



Pacific Coast Commons Specific Plan Draft Environmental Impact Report

State Clearinghouse No. 2020050508

Prepared for:

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
µg/m ³	micrograms per cubic meter
AB	Assembly Bill
ACC	air-cooled condensing
ACM	asbestos-containing material
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AF	acre-feet
AFY	acre-feet per year
AIA	American Institute of Architects
ALUP	Airport Land Use Plan
AMI	Area Median Income
AQMP	Air Quality Management Plan
ASCE	American Society of Civil Engineers
AST	aboveground storage tank
ASTM	American Standard for Testing and Materials
Basin Plan	Water Quality Control Plan, Los Angeles Region
BGS	below ground surface
BMP	best management practice
BUG	backlight, up light, and glare
C&D	construction and demolition
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CalOSHA	the California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane
CHRIS	California Historical Resources Information System

Acronym/Abbreviation	Definition
City	City of El Segundo
CIWMB	California Integrated Waste Management Board
CNEL	Community Noise Equivalent Level
CNMP	Construction Noise Mitigation Plan
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
DWR	California Department of Water Resources
EIA	U.S. Energy Information Administration
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act of 2007
EMS	Emergency Medical Services
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
ESFD	El Segundo County Fire Department
ESMC	El Segundo Municipal Code
ESPD	El Segundo Police Department
ESPL	El Segundo Public Library
ESUSD	El Segundo Unified School District
EV	electric vehicle
EVSE	electric vehicle supply equipment
EWMP	Enhanced Watershed Management Program
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
FHWA	Federal Highway Administration
GHG	greenhouse gas
GPCD	gallons per-capita demand
GPD	gallons per day

Acronym/Abbreviation	Definition
GSA	Groundwater Sustainability Agency
GWB	gypsum wallboard
GWP	global warming potential
HAP	hazardous air pollutant
HARP2	Hotspots Analysis and Reporting Program Version 2
HCD	Housing and Community Development
HCFC	hydrochlorofluorocarbon
HERO	Human and Ecological Risk Office
HFC	hydrofluorocarbon
HMCP	Hazardous Materials Contingency Plan
HRA	Health Risk Assessment
HSC	Health and Safety Code
HTP	Hyperion Treatment Plant
HVAC	heating, ventilating, and air-conditioning systems
Hz	Hertz
I	Interstate
IFC	International Fire Code
ips	inches per second
IRP	Integrated Water Resources Plan
ISTEA	Intermodal Surface Transportation Efficiency Act
kBTU	thousand British thermal units
kHz	kilohertz
kWh	kilowatt-hours
LACM	Natural History Museum of Los Angeles County
LACoHWMP	Los Angeles County Hazardous Waste Management Plan
LADOT	Los Angeles Department of Transportation
LAX	Los Angeles International Airport
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night level
$L_{eq}[h]$	1-hour A-weighted equivalent sound level
LID	low-impact development
L_{max}	Maximum sound level
LOS	level of service
LST	localized significance threshold
LUST	leaking underground storage tank
L_{xx}	percentile-exceeded sound level
MCL	Maximum Contaminant Level
MGD	million gallons per day
MM	Mitigation Measure

Acronym/Abbreviation	Definition
MMT	million metric tons
mPa	Micro-Pascals
MPG	miles per gallon
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MSL	mean sea level
MT	metric ton
Mw	moment magnitude
MWD	Metropolitan Water District of Southern California
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NESHAP	National Emission Standards for Hazardous Air Pollutants
NF ₃	nitrogen trifluoride
NHTSA	National Highway Traffic Safety Administration
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
Nox	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
PCB	polychlorinated biphenyls
PCC	Pacific Coast Commons
PCCSP	Pacific Coast Commons Specific Plan
PCE	tetrachloroethylene
PCH	Pacific Coast Highway
PEIR	Program Environmental Impact Report
PFC	perfluorocarbon
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Program
Project	Pacific Coast Commons Specific Plan Project
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act

Acronym/Abbreviation	Definition
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Assessment
RPS	Renewables Portfolio Standard
RSL	regional screening level
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SCAB	South Coast Air Basin
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 Communities Strategy
SF ₆	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SLCP	short-lived climate pollutant
SLF	Sacred Lands File
SMB	Santa Monica Bay
SMCL	Secondary Maximum Contaminant Level
SO ₂	sulfur dioxide
SoCal Gas	Southern California Gas Company
SO _x	sulfur oxides
Specific Plan	Pacific Coast Commons Specific Plan Project
SPCC	Spill Prevention, Control, and Countermeasure
SPL	Sound pressure level
SRA	source-receptor area
STC	sound transmission class
SVP	Society of Vertebrate Paleontology
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TAZ	transportation analysis zone
TCE	trichloroethylene
TCR	tribal cultural resource
TDS	total dissolved solids
TIA	Transportation Impact Analysis
TMDL	total maximum daily load
TNM	Traffic Noise Model

Acronym/Abbreviation	Definition
TRPH	total recoverable petroleum hydrocarbons
USC	U.S. Code
USEPA	U.S. Environmental Protection Agency
UST	underground storage tank
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound
VTTM	Vesting Tentative Tract Map
VUA	Vehicle Use Area
WBMWD	West Basin Municipal Water District
WDR	waste discharge requirement
WEAP	Worker Environmental Awareness Program
West Basin	Los Angeles Coastal Plain groundwater basin
WRD	Water Replenishment District
WSCP	Water Shortage Contingency Plan
WWECP	Wet Weather Erosion Control Plan

Executive Summary

The purpose of the Executive Summary for this Draft Environmental Impact Report (EIR) is to provide a brief summary of the proposed Pacific Coast Commons Specific Plan Project (Specific Plan or 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)
- (3) Issues to be resolved including the choice among alternatives and whether or how to mitigate significant effects (see Section ES.6)

ES.1 Introduction

This Draft EIR has been prepared by the City of El Segundo (City) to evaluate potential environmental effects that would result from implementation of the proposed Project. This Draft EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (California Public Resources Code Section 2100 et seq., as amended) and its implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et seq.). The proposed Project constitutes a “project” as defined in the CEQA Guidelines Section 15378. Pursuant to Section 15367 of the State CEQA Guidelines, the City of El Segundo is the lead agency for the Project.

The Specific Plan area includes eight parcels that total 6.385 gross acres (6.23 net acres post street dedications) of land located in the City of El Segundo adjacent to Pacific Coast Highway (PCH). The Project site is currently occupied by surface parking lots, the Fairfield Inn and Suites Hotel, and the Aloft Hotel. The Project would allow for the redevelopment of the existing surface parking lots and a portion of the Fairfield Inn and Suites Hotel property within the Project site through the adoption of a Specific Plan. The Specific Plan would create five new land use districts that would allow for up to 263 new housing units, 11,252 gross square feet of new commercial/retail uses, new parking garages, as well as the continued use and operation of the existing Fairfield Inn and Suites Hotel and Aloft Hotel uses. The proposed Project is composed of three development areas: (1) Pacific Coast Commons – South (PCC-South), (2) Pacific Coast Commons – Fairfield Parking (PCC-Fairfield Parking), and (3) Pacific Coast Commons – North (PCC-North).

CEQA requires the preparation of an EIR for any project that a lead agency determines may have a significant impact on the environment. CEQA also establishes mechanisms whereby the public and decision makers can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment, if they were to be implemented.

The basic purposes of CEQA are as follows (14 CCR 15002):

1. Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities;
2. Identify the ways that impacts to the environment can be avoided or significantly reduced;
3. Prevent significant, avoidable impacts to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and

4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

In compliance with CEQA, this Draft EIR has been prepared to analyze the potential environmental impacts that may result from implementation of the proposed 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 Pacific Coast Commons Specific Plan (SP No. 19-01).
- Environmental Assessment (No. EA-1248)
- Approval of a General Plan Amendment (No. GPA 19-01)
- Zone Text Amendment (No. ZTA 19-08)
- Zone Change (No. ZC 19-01)
- Approval of a Vesting Tentative Tract Map (VTTM 82806)
- Approval of a Site Plan Review (No. 19-01)
- Approval of a Development Agreement (No. DA 19-02)
- Modification of Resolution Nos. 2759 and 2760
- Parking Demand Study and Shared Parking Analysis
- Shared Parking Agreement
- Reciprocal Access Agreements
- Street dedication waiver requests

The following is a list of other responsible agencies and their discretionary authority over the proposed Project:

- California Department of Transportation
 - Encroachment Permit to accommodate Project's street improvement at the intersection of Mariposa Avenue and PCH, and for potential subterranean utility connections beneath PCH
 - Approval of Traffic Control Plan compliant with the California Manual Uniform Traffic-Control Devices
 - Transportation Permit for oversized/overweight loads

Other required ministerial permits and approvals, and their respective agency administrators, include but may not be limited to the following:

- City of El Segundo
 - Sewer Connection Permit
 - Right of Way Encroachment Permit
 - Building Permit

- Tree Removal Permit
- California Water Resources Control Board
 - Coverage under National Pollutant Discharge Elimination System Permit No. CAS000002, General Construction Activity Storm Water Permit and Stormwater Pollution Prevention Plan

ES.2 EIR Document Organization

This Draft EIR is organized as follows:

Executive Summary - Outlines the conclusions of the environmental analysis and provides a summary of the proposed Project and the Project alternatives analyzed in the Draft EIR. This section also includes a table summarizing all environmental impacts identified in the Draft EIR along with the associated mitigation measures proposed to reduce or avoid each impact.

Chapter 1: Introduction - Serves as a forward to the Draft EIR, introducing the Project, the purpose of a Specific Plan, the organization of the Draft EIR, lead agencies and responsible agencies, the public review process, effects not found to be significant, documents incorporated by reference, and mitigation monitoring procedures.

Chapter 2: Environmental Setting – Introduces the existing environmental conditions for the proposed Project, including a detailed description of the Project location, existing conditions, public services and utilities, and cumulative projects.

Chapter 3: Project Description - Provides a detailed description of the Specific Plan including the land use plan, conceptual site plan, utilities and infrastructure, design guidelines and development standards, and off-site improvements. The Project Description also discusses Project construction activities, intended uses of the Draft EIR, and required discretionary approvals.

Chapter 4: Introduction to Environmental Analysis - Describes the potential environmental impacts of the proposed Project, as well as proposed mitigation measures to reduce or avoid any potentially significant impacts. The discussion in Chapter 4 is organized by 15 environmental issue areas as follows:

Section 4.1	Aesthetics	Section 4.9	Land Use and Planning
Section 4.2	Air Quality	Section 4.10	Noise
Section 4.3	Cultural Resources	Section 4.11	Population and Housing
Section 4.4	Energy	Section 4.12	Public Services and Recreation
Section 4.5	Geology and Soils	Section 4.13	Transportation
Section 4.6	Greenhouse Gas Emissions	Section 4.14	Tribal Cultural Resources
Section 4.7	Hazards and Hazardous Materials	Section 4.15	Utilities and Service Systems
Section 4.8	Hydrology and Water Quality		

For each environmental issue area, the analysis and discussion are organized into eight subsections as described below:

- **Existing Conditions** – This subsection describes the physical environmental conditions in the vicinity of the proposed Project at the time of publication of the Notice of Preparation (NOP). The environmental setting

establishes the baseline conditions by which the City will determine whether specific Project-related impacts are significant.

- **Relevant Plans, Policies, and Ordinances** - This subsection describes the laws, regulations, ordinances, plans, and policies applicable to the environmental issue area and the proposed Project.
- **Thresholds of Significance** - This subsection identifies a set of thresholds by which the level of impact is determined.
- **Impacts Analysis** - This subsection provides a detailed analysis regarding the environmental effects of the proposed Project, and whether the impacts of the proposed Project would meet or exceed the thresholds of significance.
- **Cumulative Impact Analysis** - Provides an evaluation of the potential cumulative impacts of the proposed Project in combination with identified related projects.
- **Mitigation Measures** - This subsection identifies potentially feasible mitigation measures that would avoid or substantially reduce significant adverse Project impacts.
- **Level of Significance After Mitigation** - This subsection discusses whether Project-related impacts would be reduced to below a level of significance with implementation of the mitigation measures identified in the Draft EIR. If applicable, this subsection also identifies any residual significant and unavoidable adverse impacts of the proposed Project that would result even with implementation of any feasible mitigation measures.
- **References** - In addition to the seven subsections listed above, full citations for all documents referred to in each environmental issue area discussion are included at the end of each section or chapter.

Chapter 5: Alternatives - Discusses alternatives to the proposed Project, including a No Project Alternative. This chapter describes the rationale for selecting the range of alternatives discussed in the Draft EIR and identifies the alternatives considered by the City that were rejected from further discussion as infeasible during the scoping process. Lastly, Chapter 5 includes a discussion of the environmental impacts of the alternatives that were carried forward for analysis and identifies the environmentally superior alternative.

Chapter 6: Other CEQA Considerations - Provides a discussion of potential environmental impacts as a result of the proposed Project, including those that can be reduced to a less-than-significant level and those significant environmental effects that cannot be avoided if the Project is implemented. These include impacts that can be mitigated, but cannot be reduced to a less than significant level.

Chapter 7: List of Preparers - Gives names of those responsible for writing this Draft EIR.

Appendices include various technical studies prepared for the proposed Project, as listed in the Table of Contents.

ES.3 Project Description

ES.3.1 Project Overview

The Project site, which totals approximately 6.23 net acres of land (post-dedications), is located in the City of El Segundo within the County of Los Angeles, approximately 20 miles southwest from downtown Los Angeles. The Los Angeles International Airport is located to the north of the City; 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 Water Reclamation Plant, Dockweiler Beach, and the Pacific Ocean are located to the west of the City. Specifically,

the Project site is bound by Palm Avenue on the north, PCH on the east, Holly Avenue on the south, and Indiana Street on the west. Mariposa Avenue bisects the Project site. Regional access is via Interstate (I) 105 (Imperial Highway) to PCH or via I-405 (San Diego Freeway) via El Segundo Boulevard to PCH. Access to the Project site is currently provided by PCH on the east and Indiana Street to the west.

The Project site is currently occupied by surface parking lots, the Fairfield Inn and Suites Hotel, and the Aloft Hotel. The Project would allow for the redevelopment of the existing surface parking lots and a portion of the Fairfield Inn and Suites Hotel property within the Project site through the adoption of a Specific Plan. The adoption of a Specific Plan would allow for the following: (1) the continued operation of the Fairfield Inn and Suites Hotel and Aloft Hotel, which contain 596 rooms within 288,767 square feet of hotel development; (2) 327,021 square feet of residential development for 263 new housing units, including 257 multi-family apartments and six condominium/townhomes; (3) 11,252 square feet of new commercial/retail uses; and (4) three new parking structures that would contain approximately 792 parking stalls.

The Fairfield Inn and Suites Hotel and the Aloft Hotel would not be redeveloped or expanded, but the zoning for the existing properties would be changed to reflect the current land uses, buildings, and site improvements. While hotel uses are allowed in the existing General Commercial (C-3) Zone, and the Fairfield Inn and Suites and the Aloft Hotels both have existing Conditional Use Permits, the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. Through the implementation of the Specific Plan, these two hotels would be brought into full conformity with the land use designation and zoning for the Project site. The Specific Plan's three development areas are Pacific Coast Commons – South (PCC-South), Pacific Coast Commons – Fairfield Parking (PCC-Fairfield Parking), and Pacific Coast Commons – North (PCC-North).

In summary, the proposed Specific Plan would allow for the redevelopment of the PCC-South, PCC-Fairfield Parking, and PCC-North and would allow for the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties within the Specific Plan boundaries, which are currently existing legal, non-conforming uses, to be in compliance with the Specific Plan. The redevelopment of the PCC-South, PCC-Fairfield Parking, and PCC-North would result in physical changes to the environment. However, the proposed development standards of the Specific Plan would not result in physical changes to the currently existing legal, non-conforming hotel uses.

ES.3.2 Project Objectives

CEQA Guidelines Section 15124 requires an EIR to include a statement of objectives sought by 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. Provide for comprehensive site planning that maintains the existing hotel uses while providing for a mixed-use multiple-family and commercial neighborhood that is compatible with the surrounding land uses.
2. Provide for additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City's General Plan.
3. Improve the jobs/housing balance in the City of El Segundo, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees.

4. Enhance bicycle and vehicular circulation through roadway intersection improvements that facilitate a safe and walkable community along Pacific Coast Highway.
5. Increase the efficient use of land by eliminating surface parking lots and providing parking garages that allow for sharing among hotel, commercial, and residential land uses.
6. Reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City's downtown.

ES.4 Summary of Environmental Impacts and Mitigation Measures

Table ES-1, Summary of Environmental Impacts and Mitigation Measures, provides a summary of the impact analysis related to the Project. Table ES-1 identifies a summary of the significant environmental impacts resulting from the Project pursuant to State CEQA Guidelines Section 15123(b)(1). For more detailed discussion, please see Chapter 4 of this Draft EIR. Table ES-1 lists the applicable mitigation measures related to potentially significant impacts, as well as the level of significance after mitigation.

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Aesthetics			
Would the project have a substantial adverse effect on a scenic vista?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
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?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project have a cumulative effect on aesthetic resources?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Air Quality			
Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact	No feasible mitigation measures for population growth.	Significant and Unavoidable
Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact	MM-AQ-1: To reduce the potential for criteria air pollutants, specifically particulate matter (PM), as a result of construction of the Project, the Construction Contractor's contract specifications shall require compliance with the following: Prior to the start of construction activities, the Construction Contractor shall ensure that all 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines. An exemption from this requirement may be granted if equipment with Tier 4 Interim engines are not reasonably available and the required corresponding reductions in criteria air pollutant emissions can be achieved from other combinations of construction equipment, such as using equipment with Tier 4 Final engines. Before an exemption may be granted, the City's Construction Contractor shall: (1) demonstrate that at least	Less Than Significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		two construction fleet owners/operators in Los Angeles County were contacted and that those owners/operators confirmed Tier 4 Interim equipment could not be located within Los Angeles County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using CalEEMod and documentation provided to the City to confirm that Project-generated emissions do not exceed applicable localized significance thresholds (LST) for nitrogen dioxide (NO ₂), carbon monoxide (CO), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM ₁₀), and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM _{2.5}), and the SCAQMD carcinogenic (cancer) risk threshold. If these requirements cannot be met, construction activities at the Project site shall be postponed until CARB-certified Tier 4 Interim engines are available for use.	
Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on air quality resources?	Potentially Significant Impact	MM-AQ-1	Less Than Significant
Cultural Resources			
Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
<p>Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</p>	<p>Potentially Significant Impact</p>	<p>MM-CUL-1: Prior to commencement of construction activities for all phases of Project implementation, the Project applicant 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 the WEAP training prior to the start of construction activities. The WEAP shall be prepared to inform all personnel working on the proposed 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.</p> <p>MM-CUL-2: If potential archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities for the proposed 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</p>	<p>Less Than Significant</p>

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		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 of the first building on the site. Once approved, the final report shall be filed with the South Central Coastal Information Center (SCCIC).	
Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on cultural resources?	Potentially Significant Impact	MM-CUL-1 MM-CUL-2	Less Than Significant
Energy			
Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on energy resources?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Geology and Soils			
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 or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	No Impact	No mitigation measures are required.	Not applicable.
ii. Strong seismic ground shaking?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
iii. Seismic related ground failure including liquefaction?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
iv. Landslides?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project result in substantial soil erosion or the loss of topsoil?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
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?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
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?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
sewers are not available for the disposal of wastewater?			
Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impact	<p>MM-GEO-1: Prior to commencement of any grading activity on-site, the Project Applicant/Developer shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines. 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, Pleistocene Sand Dune 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.</p>	Less Than Significant
Would the project have a cumulative effect on geology and soils resources?	Potentially Significant Impact	MM-GEO-1	Less Than Significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Greenhouse Gas Emissions			
Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on greenhouse gas emissions?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Hazards and Hazardous Materials			
Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact	MM-HAZ-1: The Project Applicant/Developer shall ensure that the demolition contractor's contract specifications incorporate abatement procedures for the removal of materials containing asbestos, lead, polychlorinated biphenyls, hazardous material, hazardous wastes, and universal waste items. Confirmation of adequate removal of such materials shall be provided to the City prior to the issuance of a building permit for PCC-Fairfield Parking. All abatement work shall be done in accordance with federal, state, and local regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), and the South Coast Air Quality Management District.	Less Than Significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
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?	Potentially Significant Impact	<p>MM-HAZ-1 MM-HAZ-2: Prior to commencement of any earthwork or construction activities at PCC-North, a Hazardous Materials Contingency Plan (HMCP) shall be developed that addresses potential impacts in soil and soil vapor associated with the 76 Station adjacent to PCC-North. The HMCP shall include training procedures for identification of contamination, and shall describe procedures for assessment, characterization, management, and disposal of hazardous constituents, materials, and wastes, and notification in accordance with all applicable state and local regulations. Contaminated soils shall be managed and disposed of in accordance with local and state regulations. The HMCP shall include health and safety measures, which may include but are not limited to periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities. The applicant or its designee shall implement the HMCP during construction activities for the proposed Project.</p>	Less Than Significant
Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result,	Potentially Significant Impact	MM-HAZ-2	Less Than Significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
would it create a significant hazard to the public or the environment?			
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?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impact	MM-TRA-1 (See Transportation Section of this Table)	Less Than Significant
Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on hazards or hazardous materials?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Hydrology and Water Quality			
Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	--	--	--
i. result in substantial erosion or siltation on or off site;	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
ii. substantially increase the rate or amount of surface runoff in a manner which	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
would result in flooding on or off site;			
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
iv. impede or redirect flood flows?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on hydrology or water quality resources?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Land Use and Planning			
Would the project physically divide an established community?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on land use resources?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Noise			
Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant Impact	<p>MM-NOI-1: Prior to issuance of a demolition or grading permit, whichever occurs first, the Project Applicant/Developer or its approved construction contractor shall develop and submit to the City of El Segundo a Construction Noise Mitigation Plan (CNMP) for review and approval. The CNMP shall include, at a minimum, the following noise reduction means and related measures:</p> <p>a. To protect the existing occupied residences on the west side of Indiana Street (and west of the PCC North (Phase 2) portion of the Project, between E. Mariposa Avenue and E. Palm Avenue) from excessive Project construction-related noise attributed to demolition, site preparation, grading, building construction, and paving activities during PCC-Fairfield Parking (Phase 1) and PCC-South (Phase 3), and those same five activities plus architectural coating</p>	Less Than Significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>activities during Phase 2, temporary noise barriers of sufficient height and extent along the Project’s western site boundary shall be installed and shall be confirmed to achieve (depending on construction phase activity and involved equipment) at least 5 dBA and as much as 20 dBA of barrier noise insertion loss. The temporary barrier elements should resemble an outdoor-use vinyl-covered acoustical blanket comprising one or more materials that demonstrate a sound transmission class (STC) of 30 or better. The Project Applicant/Developer shall retain the services of a qualified acoustical consultant or noise control engineer to advise on or review the design, installation, and expected performance of such temporary barriers when used during Project construction. Anticipated locations, horizontal extents, heights, and durations of installation of the temporary sound barriers over the course of Project phased buildout shall be part of the CNMP submitted to the City for review.</p> <p>b. Operation of a concrete saw during the demolition phase shall include some form of proximate and portable solid-walled partial enclosure, acoustical-blanket tent, or comparably-performing shroud that can reliably deliver 10 dBA of noise reduction—separate from the temporary barrier insertion loss need described in MM-NOI-1(a) above. Alternately, slotted low-noise saw blades may be used to yield some or all of this noise reduction, so that operation of the concrete saw at a distance of 50 feet does not exceed 80 dBA. If this limit cannot be wholly achieved due to saw operation noise control or localized sound abatement (i.e., partial enclosure), then the balance of needed attenuation shall be provided by either the temporary noise barrier per MM-NOI-1(a) or by limiting duration of saw operation within an hour: each halving of duration should yield a 3 dB reduction to the hourly noise level produced by the saw.</p>	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>c. Residents within 200 feet of the Project shall be informed at least two (2) weeks in advance when construction phase activities will occur. An information telephone hotline and/or website shall be established and managed to receive resident complaints, and the Applicant and its contractors shall respond to received complaints and document their investigations and any complaint resolutions in regular reports to the City Building Safety division.</p>	
Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on noise resources?	Potentially Significant Impact	MM-NOI-1	Less Than Significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Population and Housing			
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)?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on housing and/or population resources?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Public Services and Recreation			
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 any of the public services:			
Fire protection?	Less than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Police protection?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Schools?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Parks?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Other public facilities?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
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?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	Less than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project have a cumulative effect on public services and recreation resources?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Transportation			
Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project result in inadequate emergency access?	Potentially Significant Impact	MM-TRA-1: Prior to the issuance of demolition or grading permits, the Project Applicant/Developer shall develop and implement a City-approved Construction Traffic Control Plan. The Plan shall be prepared in accordance with applicable City and Manual on Uniform Traffic Control Devices guidelines and shall address the potential for construction-related vehicular traffic, as well as pedestrian and bicycle circulation disruption in the public right-of-way. The Plan shall describe safe detours and shall include protocols for implementing the following, if determined necessary and	Less Than Significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		feasible: temporary traffic controls (e.g., a flag person) during construction to maintain smooth traffic flow; dedicated turn lanes for movement of construction trucks and equipment on and off site; scheduling of construction activities that affect traffic flow on the arterial system to off-peak hours; consolidation of truck deliveries; and/or rerouting of construction trucks away from congested streets or sensitive receptors.	
Would the project have a cumulative effect on transportation resources?	Less than Significant Impact	No mitigation measures are required.	Not Applicable
<i>Tribal Cultural Resources</i>			
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	Potentially Significant Impact	MM-CUL-1 (See Cultural Resources Section of this Table) MM-CUL-2 (See Cultural Resources Section of this Table) MM-TCR-1:	Less Than Significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
resources as defined in Public Resources Code section 5020.1(k)?		Should a potential tribal cultural resource (TCR) (as defined by PRC Section 21074) be inadvertently encountered during construction activities, consistent with the process required by MM-CUL-2, all construction work occurring within 100 feet of the find shall immediately stop and the City shall be notified of the discovery. The City shall notify Native American tribes that have been identified by the Native American Heritage Commission to be traditionally and culturally affiliated with the geographic area of the Project. Any affected tribe shall be provided a reasonable period of time to conduct a site visit and make recommendations regarding future ground disturbance activities as well as the treatment and disposition of any discovered TCRs. Depending on the nature of the potential resource and Tribal recommendations, review by a qualified archaeologist may be required. Implementation of proposed recommendations shall be made based on the determination of the City that the approach is reasonable and feasible.	
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	Potentially Significant Impact	MM-CUL-1 (See Cultural Resources Section of this Table) MM-CUL-2 (See Cultural Resources Section of this Table) MM-TCR-1	Less Than Significant

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
significance of the resource to a California Native American tribe?			
Would the project have a cumulative effect on tribal cultural resources?	Potentially Significant Impact	MM-CUL-1 (See Cultural Resources Section of this Table) MM-CUL-2 (See Cultural Resources Section of this Table) MM-TCR-1	Less Than Significant
Utilities and Service Systems			
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?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
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	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
project's projected demand in addition to the provider's existing commitments?			
Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable
Would the project have a cumulative effect on utilities and/or service systems resources?	Less Than Significant Impact	No mitigation measures are required.	Not Applicable

ES.5 Summary of Project Alternatives

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 CEQA Guidelines direct that the selection of alternatives be governed by “a rule of reason” (14 CCR 15126.6[a] and [f]).

As presented in this Draft EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures, with the exception of conflicts related to exceedance of population growth projections in the applicable Air Quality Management Plan (AQMP). As described in Section 4.2, Air Quality of this Draft EIR, although the Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]) is the most recent RTP/SCS, the South Coast Air Quality Management District (SCAQMD) is still in the early stages of updating its Air Quality Management Plan (AQMP) (anticipated to be released in 2022). Therefore, the SCAG 2016 RTP/SCS and associated Regional Growth Forecast would be applicable in this analysis of the potential to conflict with the SCAQMD 2016 AQMP, as required in Section. In the 2016 RTP/SCS, SCAG estimated 16,700 residents in the City in 2012 and 17,300 residents by 2040. The proposed Project’s residential units would accommodate 618 individuals upon its occupancy in 2025. Considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, the proposed Project would result in a population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP. The proposed Project would therefore conflict with the applicable AQMP, which would result in a significant and unavoidable impact, as there is no feasible mitigation for population growth.

This Draft EIR includes the analysis of three alternatives to the proposed Project:

- Alternative A – No Project/Existing Development
- Alternative B – Reduced Development Alternative: Exclusion of PCC–North
- Alternative C – Reduced Development: Reduce 1 Level from PCC-South and PCC-North

E.S.5.1 Alternative A - No Project/Existing Development

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate the specific alternative of “no project” along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving a proposed project. As specified in Section 15126.6(e)(3)(A), when a project is the revision of an existing land use or regulatory plan or policy or an ongoing operation, the no project alternative will be the continuation of the plan, policy, or operation into the future. Therefore, the no project alternative, as required by the State CEQA Guidelines, would analyze the effects of development consistent with implementation of the City of El Segundo General Plan.

As shown in Figure 2-3, Project Site General Plan Designation, in Chapter 2, Environmental Setting, of this EIR, the City’s General Plan identifies the portion of the site that is south of Mariposa Avenue as General Commercial and the portion to the north of Mariposa Avenue as Parking. As shown in Figure 2-4, Project Site Zoning, in Chapter 2, the zoning for the Project site corresponds to the designations of General Commercial (C-3) and Automobile Parking

(P). According to the City's General Plan, the General Commercial designation permits all retail uses, including hotel uses, and major medical facilities, at a maximum floor area ratio (FAR) of 1.0. Office uses are not permitted except for those providing personal services not exceeding 5,000 square feet such as travel and insurance agents (City of El Segundo 1992). The City's General Plan parking designation permits areas for parking automobiles, motorcycles, and bicycles in surface or structured parking (City of El Segundo 1992). While hotel uses are allowed in the existing General Commercial (C-3) Zone, and the Fairfield Inn and Suites and the Aloft Hotels both have existing Conditional Use Permits, the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. The Aloft Hotel is 98,741 net square feet in size with an existing 0.992 FAR based upon its current lot size and configuration where a maximum of 1.0 FAR is allowed. The three buildings that comprise the Fairfield Inn and Suites Hotel total 190,026 net square feet in size with an existing 1.94 FAR where 1.0 FAR is allowed (existing legal, non-conforming condition). Both properties are non-conforming in regard to many development standards as they were built prior to the current development standards of the General Commercial (C-3) Zone. Further, no further intensification of the land uses could occur with the current FAR standards. Therefore, the continuation of the City's General Plan would not allow for additional development to occur.

Section 15126.6(e)(3)(B) further states that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, Alternative A assumes the proposed Project would not proceed, no new permanent development or land uses would be introduced within the Project site, and the existing environment would be maintained. The existing uses would continue to operate as they do currently. The existing hotel uses would remain in place and operational, the existing surface parking lots would be retained, no new buildings or parking garages would be constructed, no on-site landscaping improvements would occur, and no intersection improvements would occur.

E.S.5.2 Alternative B - Reduced Development Alternative: Exclusion of PCC-North

CEQA requires that 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[a]). As presented in prior sections of this EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures, with the exception of conflicts related to exceedance of population growth projections in the applicable Air Quality Management Plan (AQMP). As such, Alternative B proposes a reduction in the Project to eliminate the significant impacts related to population growth projections and the AQMP, as well as lessen the proposed development intensity by eliminating PCC-North from the Specific Plan boundaries.

As previously discussed in Section 4.11, Population and Housing, the Southern California Association of Government's (SCAG) forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. Assuming 2.35 persons per household, the proposed Project's 263 residential units would accommodate 618 individuals at full occupancy of all units. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG's estimated projections through 2045 by 118 persons. Alternative B would not exceed SCAG's estimated projection through 2045.

As previously described in Section 4.2, Air Quality, considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, the proposed Project would result in a

population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP. Thus, Alternative B would eliminate an adequate amount of residential units to eliminate this significant and unavoidable impact.

All mitigation measures required under the proposed Project would be implemented prior to or during Project construction for all sites, with the exception of MM-HAZ-1, which is specifically related to PCC-North. Therefore, Alternative B is proposed as a reduced development alternative to exclude PCC-North.

Under Alternative B, there would be no development north of Mariposa Avenue, which is included in the proposed Specific Plan as PCC-North. The Specific Plan would be prepared under Alternative B, excluding PCC-Mixed Use 2 (PCC-North) from the land use district. The PCC-North property would remain surface parking lot and no changes to the general plan land use designation or zoning would occur for that area.

Under Alternative B, there would be two phases of Project construction, similar to the proposed Project; however, Phase 2 would only involve construction of PCC-South, rather than PCC-South and PCC-North overlapping. Alternative B would include development of one multi-level parking garage, 120 residential units, and 5,756 square feet of commercial at PCC-South, and one multi-level parking garage and 3,273 square feet of commercial at PCC-Fairfield Parking, for a total of 120 units and 9,029 square feet of commercial, in addition to the continuation of the existing two hotels, as under the proposed Project.

Phase 1 for PCC-Fairfield Parking would include a five-level parking garage (65feet in height) with commercial/retail on a portion of the ground floor fronting PCH, as set forth in the proposed Project. During Phase 1, all hotel guests would continue to park at surface parking lots north of Mariposa Avenue (PCC-North), which includes 232 parking spaces, as well as the parking lot north of Holly Avenue, which includes 165 parking spaces, for a total of 397 spaces. This would accommodate the peak parking demand at full occupancy for both hotels of 352 parking spaces (see Appendix J-2). Once Phase 1 is completed, parking for the Fairfield Inn and Suites Hotel would move from PCC-North to the newly constructed garage at PCC-Fairfield Parking, which would include 215 replacement parking spaces for the Fairfield Inn and Suites Hotel and would be shared between the hotel and the commercial/retail uses. The 215 spaces from PCC-Fairfield Parking plus the 165 parking spaces at the surface parking lot for the Aloft Hotel, totaling 380 parking spaces, would provide adequate parking for the 352 hotel spaces and 28 spaces for the proposed 3,273square feet of commercial at PCC-Fairfield Parking.

Phase 2 of development would include the construction of eight levels of parking garage (i.e., two levels of subterranean and six levels above ground) located behind the commercial/retail uses and adjacent to the existing Aloft Hotel and fronting PCH, as set forth in the proposed Project. During Phase 2, the Aloft Hotel would remain in operation and hotel patrons would park at the PCC-North lot (232 parking spaces), which can accommodate the demand of 145 vehicles at full hotel occupancy (Appendix J-2). Once Phase 2 is completed, parking for the Aloft Hotel would move from PCC-North to the eight-level parking garage, which would provide a total of 336 parking spaces, including 165 spaces for the residential units, and 171 shared spaces. Based on the Shared Parking Analysis (Appendix J-2), the parking provided between the five-level parking garage at PCC-Fairfield Parking and the eight-level garage at PCC-South would be sufficient for the long-term operation of the proposed uses at both sites, in addition to the hotel parking.

Under Alternative B, the eastbound lane of Mariposa Avenue at PCH would be reconfigured in the same manner as the proposed Project, from one left lane and one through-right lane to one left, one through, and one right-turn lane.

Once operational, Alternative B would represent a reduction in proposed square footage, as well as a reduction in the overall footprint of Specific Plan area. As shown in Table ES-2, Alternative B would reduce the Specific Plan total development square footage from 622,398 square feet to 437,398 square feet, to be located only within PCC-South and PCC-Fairfield Parking.

Table ES-2. Alternative B – Specific Plan Land Use Summary

Proposed Land Use District	Location	Existing (Square Feet)		Proposed (Square Feet)				
		Hotel Rooms-	Hotel	Residential Units	Residential	Commercial	Lobby	Total
PCC Mixed-Use (PCC MU-1)	PCC-South	–	–	120	144,244	5,756	–	150,000
PCC Commercial (PCC COM-1)	Aloft Hotel	246	106,747	–	–	–	–	106,747
PCC Commercial (PCC COM-2)	Fairfield Inn and Suites Hotel	350	175,651	–	–	–	–	175,651
PCC Commercial (PCC COM-3)	PCC-Fairfield Parking	–	–	–	–	3,273	1,727	5,000
PCC Mixed-Use (PCC MU-2)	PCC-North	–	–	143	182,777	2,223	–	185,000
Proposed Project Totals		596	282,398	263	327,021	11,252	1,727	622,398
Alternative B (Minus PCC-North) Totals		596	282,398	120	144,244	9,029	1,727	437,398

The exclusion of the PCC-North property from the Specific Plan under Alternative B, and the fact that PCC-South and PCC-Fairfield Parking would provide for all parking requirements for the proposed Specific Plan land uses, would make the surface parking lot at PCC-North available for other potential future uses. Potential future uses, if any, would be based on market conditions would likely require a future General Plan Amendment and zone change; however, any future uses at PCC-North would be too speculative for evaluation in this Draft EIR (State CEQA Guidelines Section 15145). Therefore, for the purposes of this analysis under Alternative B, it is assumed no changes to the PCC-North site would occur.

E.S.5.3 Alternative C - Reduced Development: Reduce 1 Level from PCC-South and PCC-North

CEQA requires that 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[(a)]). As such, Alternative C proposes to implement a reduced unit count on PCC-South and PCC-North to lessen population growth impacts and aesthetic impacts, and to eliminate the significant and unavoidable impact associated with conflicts with the AQMP. As previously discussed in Section 4.11, Population and Housing, the Southern California Association of Government’s forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. Assuming 2.35 persons per household, the proposed Project’s 263 residential

units would accommodate 618 individuals.¹ If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG's estimated projections through 2045 by 118 persons. Alternative C would not exceed SCAG's estimated projection through 2045.

As previously described in Section 4.2, Air Quality, considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, which was used in the development of the AQMP, the proposed Project would result in a population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP by 18 individuals. Alternative C would eliminate an adequate amount of residential units to eliminate this significant and unavoidable impact.

Alternative C would not include Level L-5 from PCC-South and PCC-North, which contain 25 units and 29 units, respectively (see Figure 3-4E, PCC-South Levels L-2 to L-5 and Figure 3-6D, PCC-North Levels L-2 to L-5). Therefore, Alternative C would accommodate 491 individuals.² Level L-5 contains 34 spaces on PCC-South and 39 parking spaces on PCC-North. Thus, parking would be reduced from 336 to 302. Additionally, Alternative C would reduce of PCC-South from 84 feet to 74 feet in height from finished grade to the highest point of measurement and would reduce PCC-North from 78 feet to 68 feet in height from finished grade to the highest point of measurement.

Once operational, Alternative C would represent a reduction in proposed square footage; however, the footprint of the building area would remain the same. As shown in Table ES-3, Alternative C would reduce the Specific Plan total development square footage from 622,398 square feet to 584,686 square feet, excluding parking.

Table ES-3. Alternative C – Specific Plan Land Use Summary

Proposed Land Use District	Location	Existing (Square Feet)		Proposed (Square Feet)				
		Hotel Rooms-	Hotel	Residential Units	Residential	Commercial	Lobby	Total
PCC Mixed-Use (PCC MU-1)	PCC-South	—	—	120	144,244	5,756	—	150,000
PCC Commercial (PCC COM-1)	Aloft Hotel	246	106,747	—	—	—	—	106,747
PCC Commercial (PCC COM-2)	Fairfield Inn and Suites Hotel	350	175,651	—	—	—	—	175,651
PCC Commercial (PCC COM-3)	PCC-Fairfield Parking	—	—	—	—	3,273	1,727	5,000
PCC Mixed-Use (PCC MU-2)	PCC-North	—	—	143	182,777	2,223	—	185,000
Proposed Project Totals		596	282,398	263	327,021	11,252	1,727	622,398
Minus Level L-5 from PCC-South		—	—	25	17,631 ¹	—	—	17,631 ¹

¹ 263 new housing units x 2.35 persons per household = 618 residents accommodated by the proposed Project

² 263 -25-29 = 209 new housing units x 2.35 persons per household = 491 residents accommodated by the proposed Project.

Table ES-3. Alternative C – Specific Plan Land Use Summary

Proposed Land Use District	Location	Existing (Square Feet)		Proposed (Square Feet)				
		Hotel Rooms-	Hotel	Residential Units	Residential	Commercial	Lobby	Total
Minus Level L-5 from PCC-North		—	—	29	20,081 ¹	—	—	20,081 ¹
Alternative C Totals		596	282,398	209	289,309	11,252	1,727	584,686

¹ The residential square footage for Alternative C was calculated by adding up the square footage of room types and number of room types on Level L-5 for both PCC-North and PCC-South minus the previously proposed residential square footage.

ES.6 Areas of Known Controversy/Issues to be Resolved

A Notice of Preparation for this EIR was released on May 26, 2020, beginning the 30-day public scoping period for the EIR (Appendix A-1). During the public scoping period, input is obtained from public agencies and the general public regarding the environmental issues and concerns that may potentially result from the proposed Project. Comments on the NOP were received from five agencies, seven letters/emails from individuals or groups, which are provided in Appendix A-2. The City hosted one online Scoping Meeting that was held on Wednesday, June 10, 2020, from 6:30 p.m. to 7:30 p.m. At the conclusion of the presentation, attendees of the online meeting were able to provide comments and questions about the proposed Project to the City, the applicant, and the CEQA Consultant during the questions and answers portion of the meeting. The City received five comments/questions with environmental concerns during the Scoping Meeting, which are provided in Table A of Appendix A-2.

The primary areas of controversy identified by the public and agencies included the following potential issues (the Draft EIR section that addresses the issue raised is provided in parentheses):

- Potential for air pollution (Section 4.2, Air Quality)
- Potential impacts from construction noise (Section 4.10, Noise)
- Potential noise impacts from increase in traffic (Section 4.10, Noise)
- Potential impacts to existing open spaces in the City (Chapter 3, Project Description, and Section 4.12, Public Services and Recreation)
- Potential for increased traffic (Section 4.13, Transportation)
- Potential parking impacts (Section 4.13, Transportation)
- Potential for scattered vegetation on site and existing crevices to provide roosting ground for nesting birds (Chapter 5, Other CEQA Considerations and Appendix L, Biological Resources)

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1 Introduction

The purpose of this section is to introduce the proposed Pacific Coast Commons Specific Plan (Specific Plan or Project), the applicable environmental review procedures, and the organization of the Draft Environmental Impact Report (EIR).

1.1 CEQA Overview and Purpose of an EIR

This Draft Environmental Impact Report (EIR) has been prepared by the City of El Segundo (City) to evaluate potential environmental effects that would result from implementation of the proposed Project. This Draft EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (California Public Resources Code Section 2100 et seq., as amended) and its implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et seq.). The proposed Project constitutes a “project” as defined in the CEQA Guidelines Section 15378. Pursuant to Section 15367 of the State CEQA Guidelines, the City of El Segundo is the lead agency for the Project.

The Specific Plan area includes eight parcels that total 6.385 gross acres (6.23 net acres post street dedications) of land located in the City of El Segundo adjacent to Pacific Coast Highway. The Project site is currently occupied by surface parking lots, the Fairfield Inn and Suites Hotel, and the Aloft Hotel. The Project would allow for the redevelopment the existing surface parking lots and a portion of the Fairfield Inn and Suites Hotel property within the Project site through the adoption of a Specific Plan. The Specific Plan would create five new land use districts that would allow for up to 263 new housing units, approximately 11,252 square feet of new commercial/retail uses, new parking garages, as well as the continued use and operation of the existing Fairfield Inn and Suites Hotel and Aloft Hotel uses. The proposed Project is composed of three development areas: (1) Pacific Coast Commons – South (PCC-South), (2) Pacific Coast Commons – Fairfield Parking (PCC-Fairfield Parking), and (3) Pacific Coast Commons – North (PCC-North).

CEQA requires the preparation of an EIR for any project that a lead agency determines may have a significant impact on the environment. According to Section 21002.1(a) of CEQA:

The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

CEQA also establishes mechanisms whereby the public and decision makers can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment, if they were to be implemented.

The basic purposes of CEQA are as follows (14 CCR 15002):

1. Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities;
2. Identify the ways that impacts to the environment can be avoided or significantly reduced;

3. Prevent significant, avoidable impacts to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

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.

A detailed description of the proposed Project is provided in Chapter 3, Project Description, of this Draft EIR, which includes a listing of the discretionary actions that must be considered by the City and other responsible agencies. This Draft EIR is intended to serve as a Project EIR under CEQA. Section 15161 of the CEQA Guidelines states that a Project EIR should focus primarily on changes in the environment that would result from development of the project or, in the case of a land use regulation such as a Specific Plan, the full buildout of allowable development and implementation of associated actions identified in the Specific Plan. A Project EIR must examine all phases of a project, including planning, construction and operation. This Project EIR is intended to provide the environmental information necessary for the City to make a final decision on the requested discretionary actions to be considered as part of the proposed Project and to cover the future development on the Project site that is consistent with the Specific Plan. This Draft EIR is also intended to support discretionary reviews and decisions by other agencies.

1.2 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 Pacific Coast Commons 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 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 Specific Plan 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 Specific Plan would continue to be applicable to future development.

1.3 Organization of this EIR

This Draft EIR is organized into seven chapters, including the Executive Summary. A list of the Draft EIR chapters and a brief description of their contents is provided below to assist the reader in locating information.

Executive Summary: This chapter provides a summary of the Project description, Alternatives to the proposed Project, environmental impacts, mitigation measures, and determination of significance.

Chapter 1, Introduction: This chapter briefly discusses the purpose of the Draft EIR, provides an overview of the purposes of a Specific Plan, and provides a summary of the relevant CEQA Guidelines that govern the preparation of this EIR. This chapter summarizes the scoping period and the comments received by the City on the Notice of Preparation (NOP) during the scoping process.

Chapter 2, Environmental Setting: In accordance with Section 15125 of the State CEQA Guidelines, this chapter includes a description of the physical environmental conditions of the Project site and vicinity, which will constitute as the baseline physical conditions. This chapter provides an overview of the regulatory setting and a discussion of related projects considered in the cumulative impact analysis.

Chapter 3, Project Description: In accordance with Section 15124 of the State CEQA Guidelines, this chapter outlines the City's underlying purpose and objectives for the Project; includes a summary of the components of the Specific Plan; and discusses a potential Maximum Buildout Scenario for the City's portion of the Inglewood Oil Field allowed within the parameters of the Specific Plan. A discussion of discretionary actions needed to approve the Project and a list of other public agencies expected to use the EIR in their decision making are also included.

Chapter 4, Introduction to Environmental Analysis: This chapter contains Section 4.1, Aesthetics, through Section 4.15, Utilities and Service Systems. Each section includes the following: existing conditions of the Project site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures (if any), level of significance after mitigation, and references. Chapter 4 includes the following sections:

- Section 4.1, Aesthetics
- Section 4.2, Air Quality
- Section 4.3, Cultural Resources
- Section 4.4, Energy
- Section 4.5, Geology and Soils
- Section 4.6, Greenhouse Gas Emissions
- Section 4.7, Hazards and Hazardous Materials
- Section 4.8, Hydrology and Water Quality
- Section 4.9, Land Use and Planning
- Section 4.10, Noise
- Section 4.11, Population and Housing
- Section 4.12, Public Services and Recreation
- Section 4.13, Transportation

- Section 4.14, Tribal Cultural Resources
- Section 4.15, Utilities and Service Systems

Chapter 5, Other CEQA Considerations: This chapter contains a summary discussion of any significant unavoidable impacts, potential growth-inducing impacts, energy impacts, and any significant irreversible environmental changes that would be caused by the Project. Additionally, this chapter includes an overview of Agriculture and Forestry Resources, Biological Resources, Mineral Resources, and Wildfire, which were determined by the City to not have the potential to result in any significant effects on the environment.

Chapter 6, Alternatives: Pursuant to Section 15126.6 of the State CEQA Guidelines, this chapter includes an analysis of a reasonable range of feasible alternatives to the Project. Alternatives are analyzed that would feasibly attain most of the basic objectives of the Project, but would avoid or reduce any of the significant effects of the Project. The comparative merits of each alternative are evaluated when compared to the proposed Project, and an environmentally superior alternative is identified in compliance with Section 15126.6(e)(2).

Chapter 7, List of Preparers: This chapter lists the persons who directly contributed to preparation of the Draft EIR.

1.4 Lead Agency and Responsible Agencies

1.4.1 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. BRE El Segundo Property Owner A LLC, BRE El Segundo Property Owner B LLC, and BRE EL Segundo Parking LLC (collectively, “BRE El Segundo”) applied for the Specific Plan, along with other applications, to allow for the proposed mixed-use residential, hotel, and commercial development. As such, 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 Specific Plan.

The City, as the lead agency, has determined that an EIR is required for the proposed Specific Plan 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 Specific Plan, as well as actions that it may need to achieve consistency between the Specific Plan and the City’s General Plan, including a change in the Land Use Plan designation of the Specific Plan area to Pacific Coast Commons Specific Plan. If adopted, the Pacific Coast Commons Specific Plan will also require a Zone Change to allow the proposed Specific Plan to regulate future development within the Plan area, among other discretionary actions described in Chapter 3, Project Description.

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 Pacific Coast Commons Specific Plan (SP No. 19-01).
- Environmental Assessment (No. EA-1248) for the proposed mixed-use development that will add 263 housing units, approximately 11,252 square feet of commercial uses (composed of retail, restaurant, and hotel support based office uses), and 1,727 square feet of lobby area, and three parking structures to provide parking for the uses in the Specific Plan area.

- Approval of a General Plan Amendment (No. GPA 19-01) to change the Land Use Designation from “General Commercial” and “Parking” to “Pacific Coast Commons Specific Plan (PCCSP)” with an accompanying Land Use Map change.
- Zone Text Amendment (No. ZTA 19-08) to add a new El Segundo Municipal Code (ESMC) Section 15-3-2(A)(11) “Pacific Coast Commons Specific Plan (PCCSP).”
- Zone Change (No. ZC 19-01) to rezone the property from “General Commercial (C-3)” and “Parking (P)” to “Pacific Coast Commons Specific Plan (PCCSP)” and an accompanying Zoning map change.
- Approval of a Vesting Tentative Tract Map (VTTM 82806) SUB 19-03 for merger, subdivision and residential/commercial condominium purposes reconfiguring three parcels (composed of 12 existing lots) on the block bounded by Pacific Coast Highway, Mariposa Avenue, Indiana Street and Holly Avenue and three parcels (composed of portions of four existing lots) on the block north of Mariposa Avenue and south of Palm Avenue in the Specific Plan Area into six new individual lots. Additionally, VTTM 82806 will allow (a) one residential ground and airspace parcel for 120 apartments and a maximum of 10 airspace parcels for commercial condominiums on Lot 1; (b) a ground and airspace parcel for the parking structure and up to a maximum of 10 airspace parcels for commercial condominiums on Lot 4; and (c) one residential ground and airspace parcel for 137 apartments and up to a maximum of 20 airspace parcels for commercial condominiums on Lot 5; and (d) six residential condominiums (townhomes) on Lot 6.
- Approval of a Site Plan Review (No. 19-01) to allow the site plan and architectural design to construct the mixed-use commercial and residential development for the 263 residential units, 11,252 square feet of new commercial development, 1,727 square feet of lobby area, and three parking structures.
- Approval of a Development Agreement (No. DA 19-02) between the City of El Segundo and BRE El Segundo Property Owner A LLC, BRE El Segundo Property Owner B LLC, and BRE El Segundo Parking LLC.
- Modification of Resolution Nos. 2759 and 2760 to rescind the previous approvals SUB No. 14-05, Lot-Tie Covenant No. 14-03, Off-site Parking Covenant Nos. MISC 14-03 and 14-06, leaving in place CUP No. 14-01 for the Fairfield Inn and Suites Hotel and CUP No. 14-02 for the Aloft Hotel, along with alcohol service at both hotels with modifications to the conditions of approval accordingly.
- Parking Demand Study and Shared Parking Analysis to establish the parking requirements for the proposed commercial and residential development combined with the existing hotel development.
- Shared Parking Agreement in conjunction with the Parking Demand Study and Shared Parking Analysis, to replace the previous approval of Off-Site Parking Covenant Nos. MISC 14-03 and MISC 14-06.
- Reciprocal Access Agreements for driveways and drive aisles accessing multiple parcels.
- Street dedication waiver requests for a portion of the dedication requirements for Mariposa Avenue and Indiana Street. Future street dedication for Holly Avenue and Palm Avenue would be provided through irrevocable offers to dedicate land.

1.4.2 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. Future discretionary actions that would be needed for the City's adoption of the Specific Plan, as well as the discretionary actions of responsible and trustee agencies, are described below. The following is the responsible agency and their discretionary/ministerial authority over the proposed Project:

- California Department of Transportation (Caltrans)
 - Encroachment Permit to accommodate Project's street improvement at the intersection of Mariposa Avenue and PCH, and for potential subterranean utility connections beneath PCH
 - Approval of Traffic Control Plan compliant with the California Manual Uniform Traffic-Control Devices
 - Transportation Permit for oversized/overweight load

1.5 Public Review Process

1.5.1 Notice of Preparation

The City has complied with the State CEQA Guidelines by providing opportunities for early responsible and trustee agency participation in the environmental review process, as well as opportunity for early public consultation with bordering municipalities and interested organizations and individuals. Specifically, in accordance with Section 15082(a) of the State CEQA Guidelines, the City circulated an NOP for a 30-day public review. The NOP was sent to the State Clearinghouse, public agencies, special districts, responsible and trustee agencies, and other interested parties for a public review period that began on May 26, 2020, and ended on June 25, 2020 (CEQA Public Review and Scoping Period). The purpose of the NOP is to formally convey that the City, as the lead agency, solicited input regarding the scope and proposed content of the Draft EIR.

A notice announcing the availability of the NOP was also published in the El Segundo Herald on May 21, 2020. Copies of the NOP were made available for electronic download on the City's website at <https://www.elsegundo.org/government/departments/development-services/planning-division/active-projects>.

The NOP included a description of the Project; identification of potential environmental effects associated with Project approval and implementation; and an invitation to agencies and the public to review and comment on the NOP, which are provided in Appendix A-1 of this Draft EIR. Comments on the NOP were received from five agencies, seven letters/emails from individuals or groups, which are provided in Appendix A-2. The NOP comment letters, which contain environmental concerns, are listed in Table 1-1, along with a summary of the environmental issues raised and the Draft EIR section where the environmental topics are addressed. Only comment letters with environmental concerns are listed in Table 1-1.

Table 1-1. Notice of Preparation and Comment Letters Summary

Sender of Comments	Date Received	General Summary of Comments	Addressed In Section(s)
State Agency			
Native American Heritage Commission (NAHC)	May 27, 2020	The NAHC provides recommendations for cultural assessment by contacting the appropriate regional California Historical Research Information System Center; contacting NAHC for Sacred Lands File search and Native American Tribal Consultation List; and consulting legal counsel about compliance with Assembly Bill 52, Senate Bill 18, and other applicable laws.	Section 4.3, Cultural Resources and Section 4.14, Tribal Cultural Resources
California Department of Transportation (Caltrans)	June 24, 2020	Caltrans notes the amount of parking for the Project is designed in a way that induces vehicle trips, and that demand should be addressed with appropriate design principles. Caltrans also recommends implementation of Transportation Demand Management strategies as an alternative to building parking. Additionally, Caltrans proposes considerations related to bus stop improvements, accommodations for bicycle facilities, bicycle parking, accessibility by bicyclists and pedestrians, vehicle miles traveled, and intersection control evaluation. The Project would also be required to follow applicable procedures for the Caltrans Encroachment Permit.	Section 4.13, Transportation
California Department of Fish and Wildlife (CDFW)	June 25, 2020	Based on a review of satellite imagery, CDFW states there is scattered vegetation on the site that may provide potential habitat to nesting birds. Additionally, cracks and crevices in large concrete structures, such as parking garages or large buildings, provide roosting habitat for numerous bat species. With regards to proposed landscaping for the Project, CDFW recommends using native, local appropriate plant species for the Project site. Further, CDFW recommends providing a biological baseline assessment of the flora and fauna within and adjacent to the Project site, to determine any direct, indirect, or cumulative impacts to biological resources.	Chapter 5, Other CEQA Considerations
Regional/Local Agency			
South Coast Air Quality Management District (SCAQMD)	June 3, 2020	The SCAQMD discusses air quality analysis, including recommendations for methodologies and identification of impacts. Additionally, SCAQMD discusses mitigation measures in the event the Project generates significant adverse air quality impacts and provides resources available with identifying potential mitigation measures. The letter also considers alternatives, permits, and data sources.	Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions
City of Inglewood	July 6, 2020	No comments on the NOP. The City would like to be informed of future developments in the CEQA process.	N/A
Organizations/Individuals			
Lozeau Drury LLP	June 3, 2020	Formal request to receive notices of CEQA actions and notices of any public hearings to be held under any	N/A

Table 1-1. Notice of Preparation and Comment Letters Summary

Sender of Comments	Date Received	General Summary of Comments	Addressed In Section(s)
		provision of Title 7 of the California Government Code governing California Planning and Zoning Law.	
Reagan Maechling	June 8, 2020	The commenter is supportive of the redevelopment; however, comments on the affordability of the housing proposed, impacts to El Segundo Unified School District, and cost of parking for residential and retail.	Chapter 3, Project Description, and Section 4.12, Public Services and Recreation
Kevin Maggay	June 19, 2020	The commenter proposes a traffic study and evaluation of visual aesthetic, which both involve public engagement. The commenter is concerned over the lack of open space or public recreation facilities.	Section 4.1, Aesthetics; Section 4.12, Public Services and Recreation; and Section 4.11, Transportation
Zach Levine	June 24, 2020	The comment addresses population and housing, as it relates to the affordability of the housing units; construction noise; and increased traffic.	Section 4.10, Noise, and Section 4.13, Transportation
Maria Barden	June 25, 2020	The resident addresses concerns with the amount of traffic and additional residents the Project would bring to the area.	Section 4.13, Transportation
Tony Manzo	June 25, 2020	Proposes that potential for crime to be addressed in the EIR.	Section 4.12, Public Services and Recreation
Byron Washom	June 25, 2020	The concerns over the Project are surrounding air and noise pollution, traffic, parking, and amenities. The commenters also recommend a holistic neighborhood approach to the EIR that view cumulative impacts that last more than 50 years. Issues recommended for inclusion in the EIR include parking, egress, and ingress off Mariposa Avenue, noise pertaining to trash pick-up, air pollution, and park area.	Section 4.2, Air Quality; Section 4.6 Greenhouse Gas Emissions; Section 4.10, Noise; Section 4.12, Public Services and Recreation; and Section 4.13, Transportation

1.5.2 Scoping Meeting

Pursuant to Section 21083.9 of the CEQA Statutes and Section 15082(c) of the State CEQA Guidelines, the lead agency is required to conduct at least one scoping meeting for all projects of state-wide, regional, or area-wide significance as outlined in Section 15206 of the State CEQA Guidelines. The scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, mitigation measures, and environmental effects to be analyzed. Rather than conducting an in-person meeting, the Governor's Executive Order N-25-20 allows local governments to hold meetings via teleconferencing while still meeting state transparency requirements. Therefore, the Project's Scoping Meeting was held online, through a webinar type format. The City hosted one Scoping Meeting that was held on Wednesday, June 10, 2020, from 6:30 p.m. to 7:30 p.m. that was

made available through the City’s website at <https://www.elsegundo.org/government/departments/development-services/planning-division/active-projects> or <https://bit.ly/COESACTIVEPROJECTS>.

At the conclusion of the presentation, attendees of the webinar were able to provide comments and questions about the proposed Project to the City, the applicant, and the CEQA Consultant during the questions and answers portion of the meeting. The City received five comments/questions with environmental concerns during the Scoping Meeting, which are provided in Table A of Appendix A-2.

1.5.3 Public Review of the Draft EIR

Upon completion, the Draft EIR was distributed to responsible and trustee agencies, other affected agencies, bordering municipalities, interested parties, and all parties who requested a copy of the Draft EIR in writing in accordance with CEQA. A notice announcing the availability (Notice of Availability) of the Draft EIR was published in the El Segundo Herald. The 45-day public review period of the Draft EIR begins on Thursday, February 25, 2021 and ends on Monday, April 12, 2021. Comments on the Draft EIR from public agencies (including responsible and trustee agencies), bordering municipalities, interested parties, and the general public will be accepted during the 45-day public review period.

Written comments would need to be received by the City on or before Monday, April 12, 2021 at 5:00 p.m. Written comments could be provided via email to psamaras@elsegundo.org, or by mail to:

City of El Segundo
350 Main Street
El Segundo, California 90245
Attention: Paul Samaras, Principal Planner
Subject: Pacific Coast Commons Specific Plan Project

The Draft EIR can be viewed or downloaded at the City’s website at <https://www.elsegundo.org/government/departments/development-services/planning-division/active-projects>. A hardcopy of the Draft EIR is available at the El Segundo Development Services Department located at 350 Main Street, El Segundo, CA 90245.

1.6 Effects Found Not To Be Significant

As discussed in the NOP, the proposed Project is not anticipated to result in significant impacts to the following topical areas: Agriculture and Forestry Resources, Biological Resources, Mineral Resources, or Wildfire. Nevertheless, these topics are briefly assessed in Chapter 5, Other CEQA Considerations of this Draft EIR. Further, as detailed in Sections 4.1, Aesthetics through 4.15, Utilities and Service Systems, this Draft EIR has concluded that all potential environmental impacts would be either less than significant or be able to be reduced through mitigation measures, with the exception of the significant impact related to conflict with the applicable Air Quality Management Plan (AQMP), as discussed in Section 4.2, Air Quality.

1.7 Incorporated by Reference

In accordance with Section 15150 of the 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/planning-and-building-safety-department/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 2019 California Building Code. On November 19, 2019, the El Segundo City Council adopted ordinances that adopted the following codes and regulations, which are applicable to development under the proposed Specific Plan:

- 2019 California Building Code (Volume I and II) with amendments
- 2019 Residential Code (with amendments)
- 2019 California Electrical Code
- 2019 Mechanical Code (with amendments)
- 2019 Plumbing Code (with amendments)
- 2019 Energy Code (TITLE 24)
- 2018 International Property Maintenance Code (with amendments)
- 2018 International Swimming Pool and Spa Code (with amendments)
- 2019 California Fire Code (with amendments)
- 2019 California Existing Building Code (with amendments)
- 2019 California Green Building Standards Code (with amendments)
- Earthquake Hazard Reduction Ordinance (with amendments)
- 2018 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://www.elsegundo.org/government/departments/planning-and-building-safety-department/building-safety-division/building-codes-and-regulations>.

1.8 Mitigation Monitoring Procedures

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 Specific Plan 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.

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2 Environmental Setting

2.1 Introduction

This chapter describes the environmental setting of the Pacific Coast Commons Specific Plan Project (Specific Plan or Project) and provides an overview of the environmental setting and planning context. As stated in California Environmental Quality Act (CEQA) Guidelines Section 15125(a):

An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.

CEQA requires that the lead agency describe the physical environmental conditions as they exist at the time the Notice of Preparation is published, which was May 2020. Conditions at this time were not representative of typical environmental conditions due to the restrictions in place due to the Governor's various Executive Orders related to the COVID-19 pandemic (California, Executive Department State of California [Gavin Newsom]). As stated in CEQA Guidelines Section 15125(a)(1):

Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence. In addition, a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record.

Therefore, if the environmental baseline conditions set forth in this Draft Environmental Impact Report (EIR) are different from the conditions at the time of the issuance of the Notice of Preparation, then the applicable EIR section discusses the conditions used in the impact analysis.

2.2 Project Location

2.2.1 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) (City of El Segundo 1992). 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 is located directly 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 central portion of the City and contains approximately 0.25 miles of street frontage along PCH.

Figure 2-1, Regional Location and Vicinity Map, provides a regional location map and the Project boundaries on an aerial photograph to depict the context of the immediately surrounding community. Regional access to the Project site is provided by the eastbound/westbound Century Freeway (Interstate 105) to the north, with the Sepulveda Boulevard freeway access ramps located approximately 0.4 miles from the northern portion of the Project site. The Century Freeway connects to the northbound-southbound San Diego Freeway (Interstate 405), which is located approximately 1.5 miles east of the Project site. The Project site is located approximately 0.5 miles from the Metropolitan Transportation Authority (Metro) C-Line (formerly Green Line) Mariposa Station located near the intersection of Nash Street and Mariposa Avenue. Direct access to the Project site is currently provided by PCH on the east and Indiana Street on the west.

2.2.2 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. Figure 2-2, Surrounding and Nearby Land Uses, provides an overview of nearby land uses. The Chevron Refinery occupies approximately one-third of the City and is adjacent to the beach, along with other industrial land uses. Figure 2-3, Project Site General Plan Designation, and Figure 2-4, Project Site Zoning, show the Project site's and surrounding land uses' existing zoning and general plan designations, respectively. The Project site is surrounded by a variety of land uses, including residential, recreational, and commercial retail uses, as follows:

- **Land Uses to the North:** North of the Project site across Palm Avenue are commercial uses along the east and west sides of PCH; Washington Park, and multi-family residential uses located between commercial and recreational uses. Farther north is Interstate 105 and LAX in the City of Los Angeles. Current zoning north of the Project site include Multi-Family Residential (R-3) and the General Commercial (C-3).
- **Land Uses to the East:** The Project site is bordered by PCH to the east. Retail, restaurant, grocery, banking, and office land uses, accompanied by surface parking lots within strip-mall shopping centers, are located across PCH to the east. Farther east are numerous corporate offices and associated surface parking lots. An existing fast food restaurant and gas station are located adjacent to the Project site at the southwest corner of Palm Avenue and PCH and the northwest corner of Mariposa Avenue and PCH, respectively. Current zoning east of the Project site include General Commercial (C-3) and Corporate Office (CO).
- **Land Uses to the South:** Retail and restaurant uses are located immediately south of the Project site across Holly Avenue. Farther to the south and southeast are the Raytheon Space Systems campus, the Lakes at El Segundo golf course, and the West Basin Municipal Water District campus. The Smoky Hollow

Specific Plan industrial area, which is zoned SH, is located southwest of the Project site. Land immediately south of the Project site is zoned General Commercial (C-3), with a General Commercial (CO) zone southeast across PCH.

- **Land Uses to the West:** Multi-family residential uses, which are zoned Multi-Family Residential (R-3), border the Project site west of Indiana Avenue. The linear Washington Park (including the Southern California Edison transmission line easement) is located farther west of these residential uses, followed by a large single-family residential community with various schools, community parks, and churches. The Chevron Refinery is approximately 0.4 miles southwest of the Project site. The Hyperion Water Reclamation Plant and Scattergood Generating Station, and the Pacific Ocean, are approximately 2 miles to the west of the Project site.

2.3 Existing Conditions

2.3.1 General Plan and Zoning

Figure 2-3 and Figure 2-4 show the Project site's existing zoning and general plan designations, respectively. As shown in Figure 2-3, the City's General Plan identifies the portion of the site that is south of Mariposa Avenue as General Commercial and the portion to the north of Mariposa Avenue as Parking. According to the City's General Plan, the General Commercial designation permits all retail uses, including hotel uses, and major medical facilities, at a maximum floor area ratio (FAR) of 1.0. Office uses are not permitted except for those providing personal services not exceeding 5,000 square feet such as travel and insurance agents. The City's General Plan Parking designation permits areas for parking automobiles, motorcycles, and bicycles in surface or structured parking. As shown in Figure 2-4, the zoning for the Project site corresponds to the designations of General Commercial (C-3) and Parking (P) (City of El Segundo 1992).

2.3.2 Project Site

The approximately 6.35-acre Project site consists of eight parcels located in the central portion of the City of El Segundo with the following Assessor Parcel Numbers [APN]:

- 4139-025-075 (Surface Parking)
- 4139-025-073, 074, 076, 081 (Surface Parking and Aloft Hotel)
- 4139-025-091 (Fairfield Inn and Suites Hotel Food Beverage Building [formerly the Hacienda Restaurant])
- 4139-024-057 (Surface Parking)
- 4139-024-058 (Surface Parking)

The eight parcels listed above include surface parking and two hotel uses. Specifically, the Project site is bound by Palm Avenue on the north, PCH on the east, Holly Avenue on the south, and Indiana Street on the west. Mariposa Avenue bisects Project site.

Table 2-1 identifies the current development on the Project site within the two hotel buildings and identifies the portion of the Fairfield Inn and Suites Hotel Food Beverage Building that would be demolished as a part of the proposed Project.

Table 2-1. Existing Hotel Developments

Land Use	Hotel Rooms	Net Square Feet Building Area	Gross Square Feet Building Area
Aloft Hotel	246	98,741	106,747
Fairfield Inn and Suites Hotel	350	190,026	217,311
Subtotal	596	288,767	324,058
Fairfield Inn and Suites: Food and Beverage Building	N/A	-36,605	-41,660
Net Existing to Remain	596	252,162	282,398

Source: Appendix B

The Aloft Hotel is 98,741 net square feet in size with an existing 0.992 FAR based on its current lot size and configuration, where a maximum of 1.0 FAR is allowed. This hotel includes 246 rooms, lobby, lounge/bar, retail (food self-serve), multi-purpose meeting room, fitness room, and outdoor pool. The Fairfield Inn and Suites Hotel consists of three buildings that total 190,026 net square feet in size with an existing 1.94 FAR, where 1.0 FAR is allowed. This hotel includes 350 guest rooms, lobby, restaurant/bar, meeting room/event space (banquet rooms), office, storage, and an outdoor pool and patio.

As described in Chapter 3, Project Description, one of the three existing buildings associated with the Fairfield Inn and Suites Hotel would be demolished to allow for development of the proposed Project. The total square footage of both buildings that would remain includes 252,162 net square feet, which includes 596 hotel rooms. While hotel uses are allowed in the existing General Commercial (C-3) Zone, and the Fairfield Inn and Suites and the Aloft Hotels both have existing Conditional Use Permits, the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. Under the existing General Commercial (C-3) development standards no additional development could occur as the existing hotels use the maximum FAR allowed.

The remainder of the Project site includes surface parking lots. The parking lot in the northern portion of the site is currently zoned Automobile Parking (P), which only allows surface parking lots and parking structures. Commercial development is not permitted in the Automobile Parking (P) Zone.

2.3.3 Public Transit and Bicycle Routes

Public transit that operates in the vicinity of the Project site includes the Metro C Line (formerly Green Line) and multiple bus lines. The Metro C Line is a light rail line running between the cities of Redondo Beach and Norwalk. The line runs north/south east of the Project site along Nash Street with the closest station at Nash Street and Mariposa Avenue approximately 0.51-mile east of PCC-Fairfield Parking, measured from the corner of PCH and Mariposa Avenue. There are two Metro bus lines, one Beach Cities bus line, and two Los Angeles Department of Transportation (LADOT) Commuter Express lines that run in the vicinity of the Project site. Metro Line 232 provides local service between the City of El Segundo and downtown Long Beach and runs along PCH. Metro Line 625 provides local service between the City of El Segundo and LAX and it runs along Imperial Highway north of the Project site. Beach Cities Line 109 provides local service between the City of Redondo Beach and LAX and runs along PCH. LADOT Commuter Express 438 provides express service on weekdays from El Segundo to downtown Los Angeles along Imperial Highway north of the Project site. LADOT Commuter Express 574 provides express service on weekdays from Encino to the City of Hawthorne along PCH and then heads east along El Segundo Boulevard south of the Project site.

The City adopted the South Bay Bicycle Master Plan, and it has implemented some of the bicycle improvements in the plan network, including 4.9 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 Grand Avenue from Loma Vista Street to Duley Road and on Nash Street from Imperial Highway to El Segundo Boulevard. The Bicycle Master Plan includes Class I Bike Paths, Class II Bike Lanes, Class III Bike Routes, and Bike-Friendly streets. The nearest proposed facilities are a Class II Bike Lane running east/west on Mariposa Avenue and a Class I Bike Path on Washington Street one block west of the Specific Plan boundary (Los Angeles County Bicycle Coalition and South Bay Bicycle Coalition 2011). Existing transit routes and bicycle lanes are depicted in Figures 4.13-2 and 4.13-3, respectively, in Section 4.13, Transportation of this Draft EIR.

2.4 Public Services and Utilities

2.4.1 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 1.1 miles from the Specific Plan area. Fire Station 2 is located at 2261 East Mariposa Avenue (at Mariposa Avenue and Douglas Street), which is 0.8-mile from the Project site. The provision of water for fire suppression is provided by on-site building sprinklers in the hotels and from several off-site fire hydrants.

Police services are provided by the El Segundo Police Department which is located at 348 Main Street.

The El Segundo Unified School District provides public educational services to the City, which includes the Project site. The Project site is within the service area of Center Street Elementary and 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 Street. 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 proposed Project’s public service providers and the potential for the Project to generate environmental impacts associated with these public services, is discussed in Section 4.12, Public Services and Recreation, of this Draft EIR.

2.4.2 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. Potable water pipelines are located in Indiana Street, Palm Avenue, Holly Street, Mariposa Avenue, and PCH.

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 site are owned by the City. Sewer laterals are currently

available within the developed portions of the site and sewer lines are in streets surrounding the Project site, including Indiana Street, Palm Avenue, Mariposa Avenue, and PCH.

Natural gas is provided by Southern California Gas Company and is currently available within the developed portions of the site and in streets surrounding the Project site, including PCH, Palm Avenue, Mariposa Avenue, Indiana Street, and Holly Avenue.

Electric power is provided by Southern California Edison to the Specific Plan area through an underground utility conduit system in the streets adjacent to the Project site including PCH and Mariposa Avenue.

Cable and telecommunication services are provided by Sonify, Velocity, Verizon, CenturyLink, and Charter Communications in the vicinity of the Project site. Verizon and CenturyLink currently have underground facilities in PCH. Charter Communications has a combination of aerial and underground facilities in Indian Street, Mariposa Avenue, Palm Avenue and Holly Avenue. Velocity provides phone and internet service to the Aloft Hotel and the Fairfield Inn and Suites Hotel. Currently, Sonify provides television service to the Aloft Hotel and Fairfield Inn and Suites Hotel.

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

The proposed Project's utility providers and the potential for the Project to generate environmental impacts associated with the utility infrastructure is discussed in Section 4.15, Utilities and Service Systems, of this Draft EIR.

2.5 Cumulative Projects

The CEQA Guidelines Section 15130 requires that a project's cumulative impacts be discussed when the incremental effect is cumulatively considerable. According to CEQA Guidelines Section 15065(a)(3), the term cumulatively considerable means "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." Specifically, CEQA Guidelines Section 15355 defines cumulative impacts as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. When addressing cumulative impacts, CEQA Guidelines Section 15130(b) notes that the elements necessary to provide an adequate discussion of significant cumulative impacts encompass either:

- a) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- b) 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. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative impact analyses under each environmental issue in Chapter 4, Impact Analysis, of this Draft EIR uses both methods.

Section 15130(b)(3) of the State CEQA Guidelines states that “lead agencies shall define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.” Unless otherwise indicated in the analysis in Chapter 4 of this Draft EIR, the geographic scope used in the cumulative analysis includes the City of El Segundo. However, there are environmental issues whose relevant geographic scope for purposes of cumulative impact analysis may be larger or smaller than this area, and may be defined by local, regional, or state agency jurisdiction or by other environmental factors. One example is the geographic scope of cumulative air quality impacts, defined by the South Coast Air Quality Management District to encompass the South Coast Air Basin. The basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Conversely, the geographic scope of cumulative aesthetic impacts is limited to anticipated growth and development in immediately adjacent areas that share a viewshed or line-of-sight with the Project site. Therefore, consideration of proposed developments near the Project site would provide a more relevant discussion of the cumulative aesthetic impacts of the proposed Project.

Table 2-2 describes the geographic scope of cumulative impact analysis for each environmental resource category, as well as the method of evaluation for each category.

Table 2-2. Geographic Scope and Method of Evaluation for Cumulative Impacts

Environmental Resource		Geographic Area	Method of Evaluation
Aesthetics		Immediate Vicinity	List
Air Quality	Toxic Air Contaminants; Odors	Immediate Vicinity	List and Projections
	Construction/Mobile Sources	South Coast Air Basin	
Cultural Resources		Regional and Local	List and Projections
Energy		State	Projections
Geology and Soils		Regional	List and Projections
Greenhouse Gas Emissions		South Coast Air Basin	Projections
Hazards and Hazardous Materials		Immediate vicinity	List
Hydrology and Water Quality		Sub-Watershed	List and Projections
		Groundwater Basin	
Land Use and Planning		Regional and Local	Projections
Noise	On-Site Construction Noise	Immediate Vicinity	List and Projections
	Off-Site Truck Noise	Immediate Vicinity	
Population and Housing		Regional	Projections
Public Services and Recreation		Local	Projections
Transportation		Regional	List and Projections
Tribal Cultural Resources		Regional	List and Projections
Utilities and Service Systems		Local	Projections

The analysis in Sections 4.1 through 4.15 of this Draft EIR addresses whether, after adoption of Project-specific mitigation, the residual impacts of the proposed Project would (1) contribute considerably to an existing/anticipated (without the Project) cumulatively significant effect or (2) cause a new cumulatively significant impact. A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation. The Draft EIR examines “reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project” (14 CCR 15130[a][3] and 15130[b][5]).

Figure 2-5, Cumulative Project Location Map, provides the locations of the list of cumulative projects considered in this Draft EIR, and listed in Table 2-3.

Table 2-3. List of Cumulative Projects

Location ID	Cumulative Project Location	Within City Limits	Land Use/Project Type	Unit	Size
1	2101 Pacific Coast Highway	No	Office	10.12	KSF
2	2205 N. Sepulveda Boulevard	No	General Office	4.70	KSF
		Yes	Existing Hair Salon	1.04	KSF
3	2100 E El Segundo Boulevard	Yes	Office	1751.92	KSF
			Warehouse	73.58	KSF
			Industrial	168.00	KSF
			Retail	148.96	KSF
4	305 S. Sepulveda Boulevard, 330 S. Sepulveda Boulevard, Hermosa Beach Sites	No	Design Center	100.30	KSF
			Executive Offices	19.21	KSF
			General Office	57.50	KSF
			Existing Office	8.42	KSF
5	750 South Douglas Street	Yes	Industrial	4.99	KSF
6	1000 N Sepulveda Boulevard	No	Supermarket	27.50	KSF
			Restaurant	52	Seats
			Bank	7.00	KSF
			Existing Auto Center	32.72	KSF
7	3200–3600 N. Sepulveda Boulevard	No	Shopping Center	110.00	KSF
8	3920 Highland Avenue	No	Condominium	2	DU
			Studio	3.00	KSF
9	540 E Imperial Avenue	Yes	Residential	58	DU
10	400 Duley Road	Yes	Medical Office	63.54	KSF
11	123 Nevada Street	Yes	Office	15.00	KSF
12	2125 Campus Drive	Yes	Office	153.53	KSF
13	140 Sheldon Street	Yes	Office/warehouse	7.12	KSF
			Existing Industrial	1.76	KSF
14	740 Pacific Coast Highway	No	Drive-thru Restaurant	5.00	KSF
			Existing Bank	8.10	KSF
15	500 S Douglas & 2330 Utah Avenue	Yes	General Office	78.00	KSF
16	1700 East Imperial Avenue	Yes	Office	86.52	KSF
17	445 N. Douglas Street	Yes	Office	155.66	KSF
18	455 Continental Boulevard & 1995 E Grand Avenue	Yes	Office	300.00	KSF
19	700–860 PCH; 2001–2015 E. Park Place; 700–740 Allied Way	Yes	Shopping Center	18.85	KSF
20	1301 El Segundo Boulevard	Yes	Office	6.274	KSF
			Warehouse	5.88	KSF
21	400 Pacific Coast Highway	Yes	Driving Range	65.00	KSF
			Existing Golf Course	2.50	KSF
22	2021 E Rosecrans Avenue	Yes	Office	240.00	KSF
			Studio and Production	66.00	KSF
			Retail	7.00	KSF
23	140 Oregon Street	Yes	Office	70.00	KSF
24	401–615 Pacific Coast Highway (Project	Yes	Residential	263	DU

Table 2-3. List of Cumulative Projects

Location ID	Cumulative Project Location	Within City Limits	Land Use/Project Type	Unit	Size
	Site)	Yes	Retail	11.00	KSF
25	212 Eucalyptus Drive	Yes	Office	13.49	KSF
			Restaurant	0.63	KSF
			Existing Waterhouse	5.35	KSF
26	2221 Park Place	Yes	Office	27.48	KSF
27	1225 Mariposa Avenue	Yes	Condominium	15	DU
			Existing Residential	5	DU
28	14500 Aviation Boulevard	No	Credit Union	3.60	KSF
29	11416 Inglewood Avenue	No	Condominium	13	DU
30	5151 El Segundo Boulevard	No	Hotel	129	Rooms

Source: Appendix J-1

DU = dwelling unit; KSF = thousand square feet

2.6 References

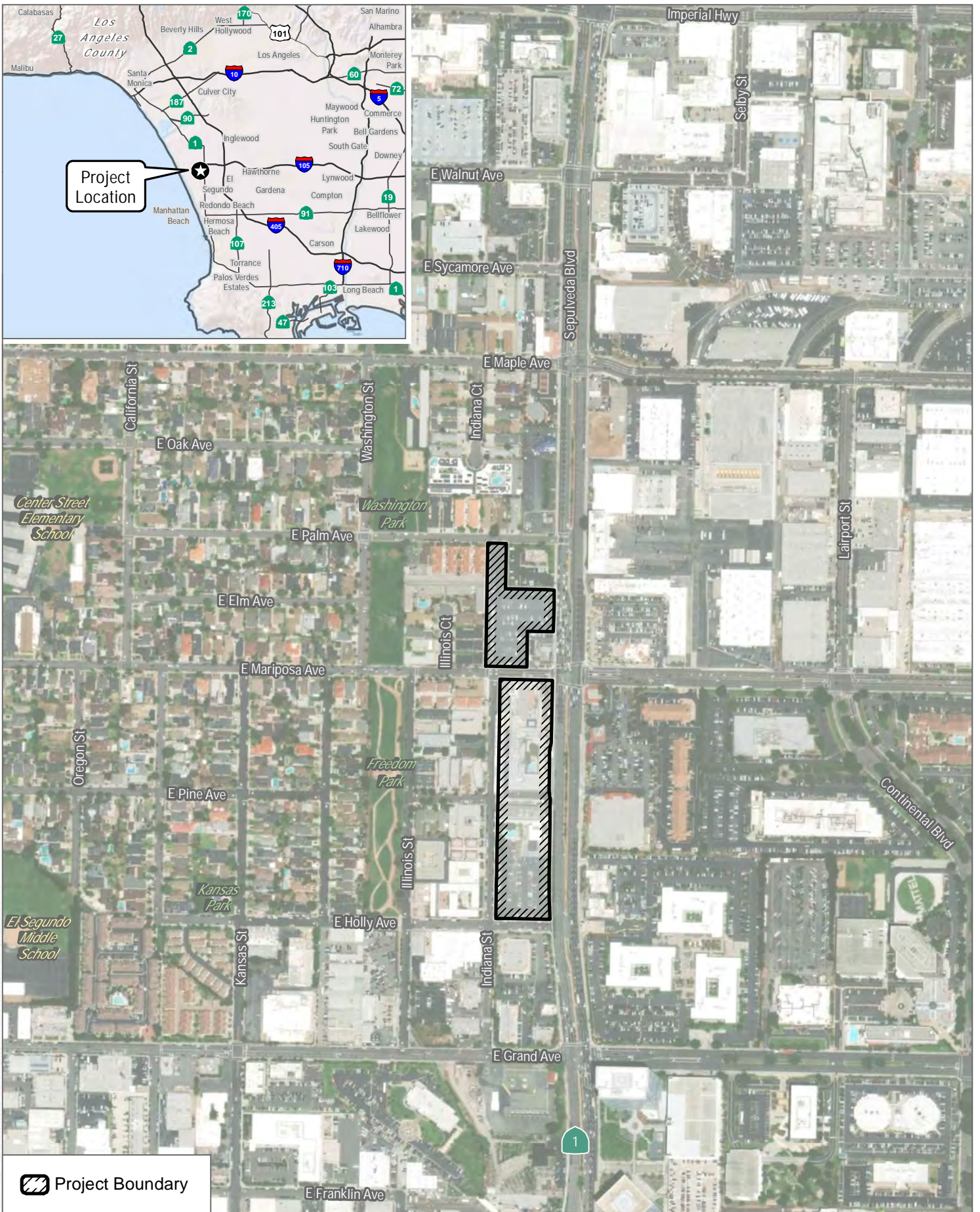
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SOURCE: Esri and Digital Globe 2019; Open Street Map 2019

FIGURE 2-1

Regional Location and Vicinity Map

Pacific Coast Commons Specific Plan EIR Project



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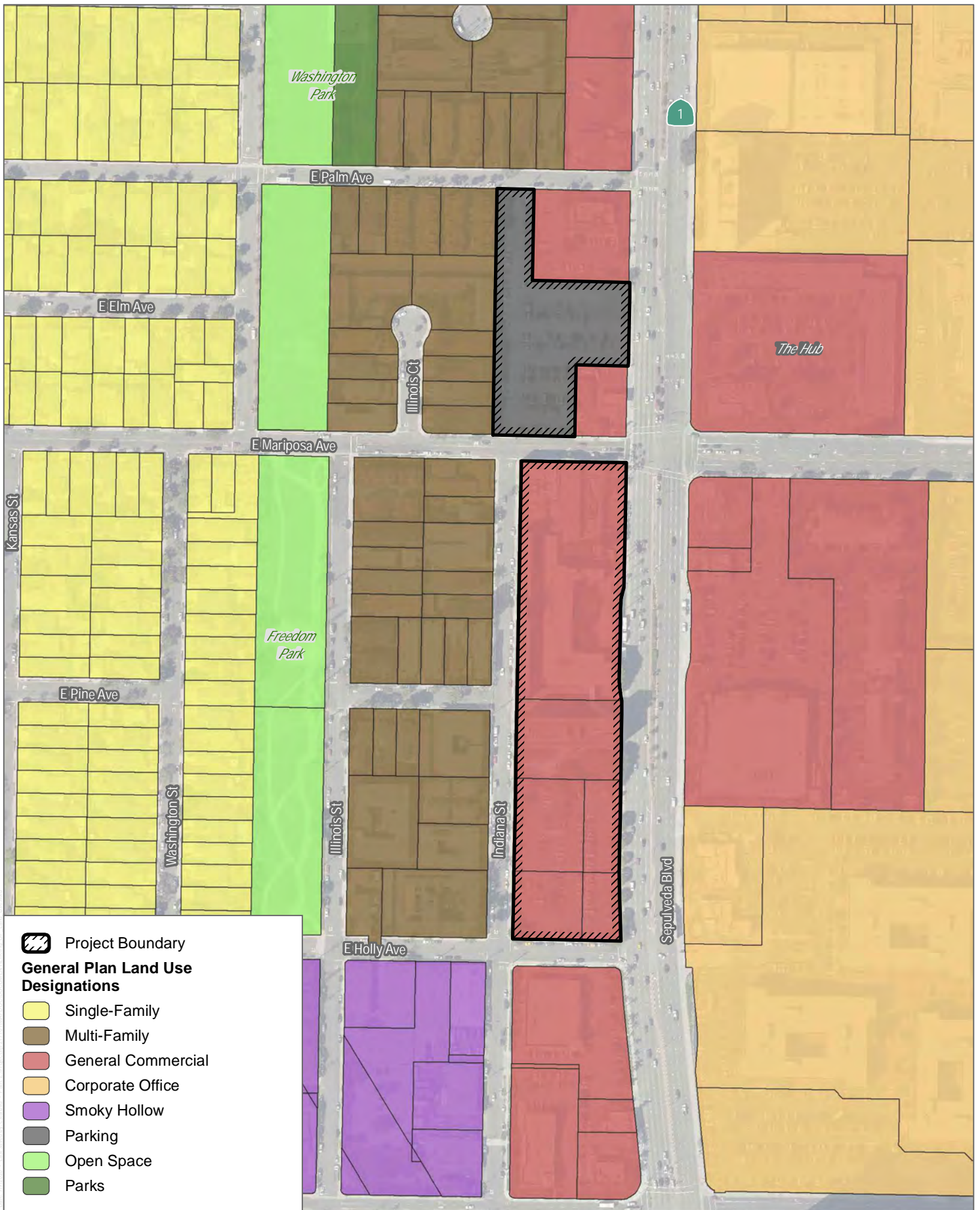
SOURCE: Esri and Digital Globe 2019; Open Street Map 2019

FIGURE 2-2

Surrounding and Nearby Land Uses

Pacific Coast Commons Specific Plan EIR Project

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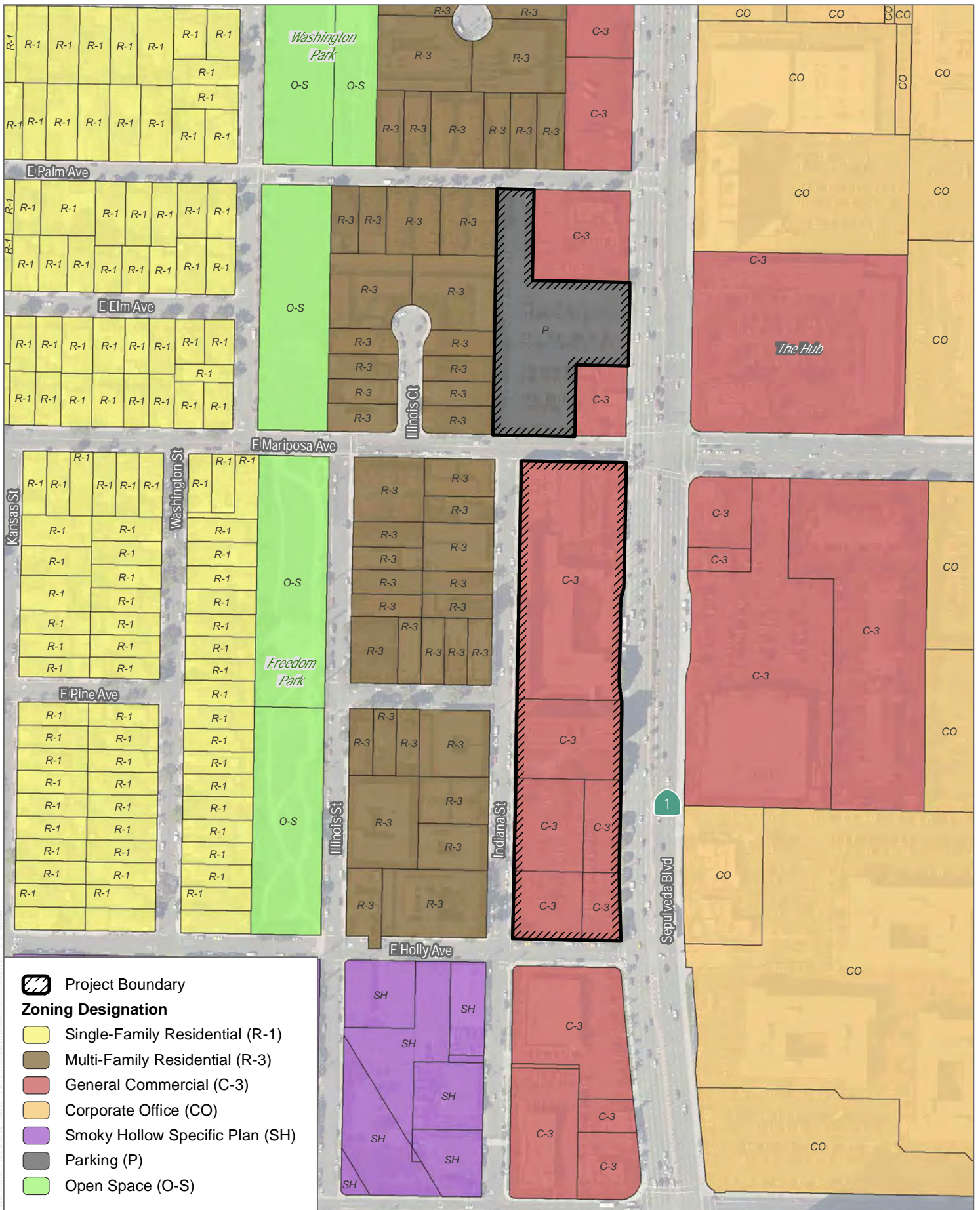
SOURCE: Esri and Digital Globe 2019; Open Street Map 2019; SCAG 2016

FIGURE 2-3

Project Site General Plan Designation

Pacific Coast Commons Specific Plan EIR Project

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SOURCE: Esri and Digital Globe 2019; Open Street Map 2019; SCAG 2016

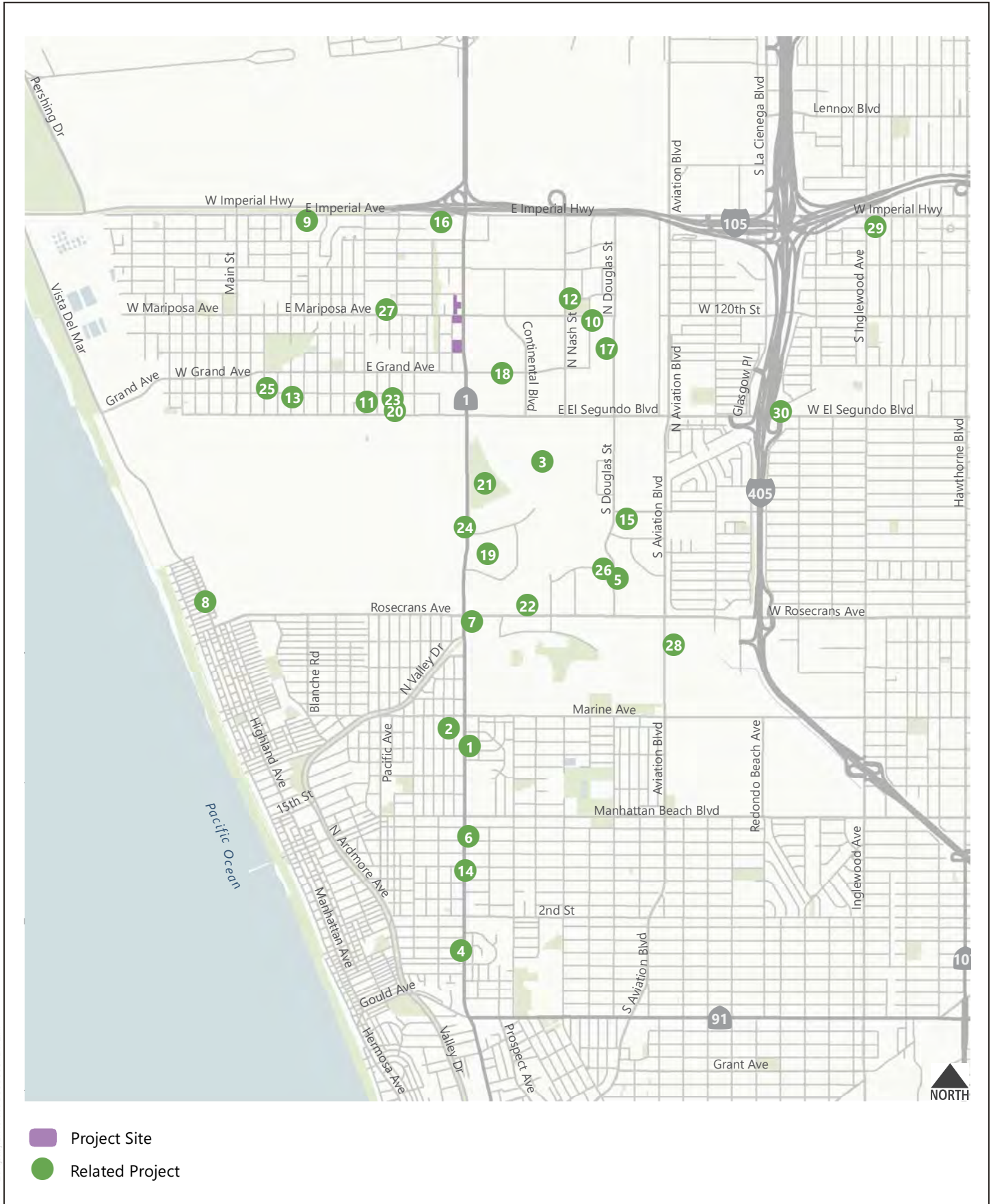


FIGURE 2-4

Project Site Zoning

Pacific Coast Commons Specific Plan EIR Project

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SOURCE: Fehr and Peers, 2020

FIGURE 2-5

Cumulative Project Location Map
Pacific Coast Commons Specific Plan EIR Project

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3 Project Description

Chapter 3 of this Draft Environmental Impact Report (EIR) provides a description of the Pacific Coast Commons Specific Plan Project (Project). The purpose of this chapter is to describe the proposed 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 proposed project, shown on a detailed map, along with a regional map of the project's location (see Section 3.2);
- (b) a statement of the objectives sought by the proposed project, which should include the underlying purpose of the project (see Section 3.3);
- (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 3.4); 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 3.5).

In accordance with Section 15124, the description of a project “should not supply extensive detail beyond that needed for evaluation and review of environmental impacts.” This chapter 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 Pacific Coast Commons Specific Plan (Specific Plan) would allow for physical changes in the environment, which are analyzed in this Draft EIR.

3.1 Project Summary

The Project site, which totals approximately 6.385 gross acres (6.23 acres post street dedications), is located in the City of El Segundo (City) within the County of Los Angeles, approximately 20 miles southwest from downtown Los Angeles. The Los Angeles International Airport is located to the north of the City; 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 Water Reclamation Plant, Dockweiler Beach, and the Pacific Ocean are located to the west of the City. Specifically, the Project site is bound by Palm Avenue on the north, Pacific Coast Highway (PCH) on the east, Holly Avenue on the south, and Indiana Street on the west. Mariposa Avenue bisects the Project site. Regional access is via Interstate (I) 105 (Imperial Highway) to PCH or via I-405 (San Diego Freeway) via El Segundo Boulevard to PCH. Access to the Project site is currently provided by PCH on the east and Indiana Street to the west.

Figure 2-1, Regional Location and Vicinity Map, included in Chapter 2, Environmental Setting, of this Draft EIR, provides the Project boundaries in the context of the surrounding community and jurisdictions.

Figure 3-1, Conceptual Site Plan, identifies the three development areas of the Project site, as well as the two existing hotel properties. As shown, the existing Aloft Hotel and two of the three buildings that comprise the existing Fairfield Inn and Suites Hotel would remain in their current condition. The Project would redevelop the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the Fairfield Inn and Suites “Food and Beverage” building (formerly the Hacienda Restaurant). The adoption of a Specific Plan would allow for the following: (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 that would contain 792 parking stalls.

The Fairfield Inn and Suites Hotel and the Aloft Hotel would not be redeveloped or expanded, but the zoning for the existing properties would be changed to reflect the current land uses, buildings, and site improvements. While hotel uses are allowed in the existing General Commercial (C-3) Zone, and the Fairfield Inn and Suites and the Aloft Hotels both have existing Conditional Use Permits, the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. Through the implementation of the Specific Plan, these two hotels would be brought into full conformity with the land use designation and zoning for the Project site. The Specific Plan’s three development areas are Pacific Coast Commons – South (PCC-South), Pacific Coast Commons – Fairfield Parking (PCC-Fairfield Parking), and Pacific Coast Commons – North (PCC-North).

In summary, the proposed Specific Plan would allow for the redevelopment of the PCC-South, PCC-Fairfield Parking, and PCC-North and would allow for the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties within the Specific Plan boundaries, which are currently existing legal, non-conforming uses, to be in compliance with the Specific Plan. The redevelopment of the PCC-South, PCC-Fairfield Parking, and PCC-North would result in physical changes to the environment. However, the proposed development standards of the Specific Plan would not result in physical changes to the currently existing legal, non-conforming hotel uses. As such, the environmental impact assessments contained in Section 4.1 through Section 4.15 of this Draft EIR are focused on the environmental impacts associated with redevelopment of the PCC-South, PCC-Fairfield Parking, and PCC-North and off-site components required to implement the Project.

3.2 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 Pacific Coast Commons 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. The proposed Specific Plan would set regulations that govern the allowable land uses, development density, and development standards for future development projects, 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.

Under the existing General Commercial (C-3) development standards, no additional development could occur on the Project site, as the existing hotels exceed the maximum floor area ratio (FAR) allowed. Additionally, the existing parking lot in PCC-North is currently zoned Parking (P), which only would allow surface parking lots and parking structures; however, no additional FAR is permitted. Therefore, BRE El Segundo Property Owner A LLC, BRE El Segundo Property Owner B LLC, and BRE EL Segundo Parking LLC (collectively, "BRE El Segundo") filed for the Specific Plan along with other applications to allow for the proposed mixed-use residential and commercial development on the Project site.

The purpose of the proposed Specific Plan is to provide a foundation for the proposed land uses on the Project site through the application of regulations, standards and design guidelines. The Specific Plan provides text and exhibits that describe the proposed land uses and associated guidelines. The Specific Plan is provided as Appendix B, Pacific Coast Commons Specific Plan, 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, 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.

As described in Section 4.9, Land Use and Planning, of this Draft EIR, a review of the El Segundo General Plan shows that the proposed Pacific Coast Commons Specific Plan is compatible and consistent with the goals and policies outlined in the General Plan. The proposed Specific Plan was prepared to provide the essential relationship between the policies of the El Segundo General Plan and actual development of the Project site. By functioning as a regulatory document, the Specific Plan would provide a means of implementing the City of El Segundo'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 (Appendix B).

3.3 Pacific Coast Commons Specific Plan (SP No. 19-01)

The Specific Plan includes the following chapters: Introduction; Overview of the Specific Plan; Land Use Plan; Utilities and Infrastructure; Design Guidelines; Development Standards; and Administration. The complete text of the Draft Pacific Coast Commons Specific Plan is included in Appendix B of this Draft EIR.

3.3.1 Land Use Plan

This Specific Plan's Land Use Plan presents the development concept, proposed land uses, construction phasing, circulation plan, and grading concept of the Specific Plan area. The Specific Plan establishes the general type, parameters, and character of the development to develop an integrated Project site that is also compatible with and complements the surrounding area. The Specific Plan proposes five new land use districts within the Project site. These land use districts and their respective proposed development capacities are listed in Table 3-1, Specific Plan Land Use Summary. Figure 3-2, Proposed Land Use Districts, identifies the locations of the proposed districts on the Project site.

Table 3-1. Specific Plan Land Use Summary

Proposed Land Use District	Location	Existing (Gross Square Feet)		Proposed (Gross Square Feet)				
		Hotel Rooms	Hotel	Dwelling Units	Residential	Commercial	Lobby	Total
PCC Mixed-Use (PCC MU-1)	PCC-South	–	–	120	144,244	5,756	–	150,000
PCC Commercial (PCC COM-1)	Aloft Hotel	246	106,747	–	–	–	–	106,747
PCC Commercial (PCC COM-2)	Fairfield Inn and Suites Hotel	350	175,651 ^a	–	–	–	–	175,651
PCC Commercial (PCC COM-3)	PCC-Fairfield Parking	–	–	–	–	3,273	1,727	5,000
PCC Mixed-Use (PCC MU-2)	PCC-North	–	–	143	182,777	2,223	–	185,000
Totals		596	282,398	263	327,021	11,252	1,727	622,398

Source: Appendix B

^a Reflects sf after demolition of 41,660 sf of "Food and Beverage" building.

The maximum development potential within the 6.385 gross-acre Specific Plan is based on an average FAR of 2.15:1. A 2.15 FAR results in a maximum development intensity of 622,398 gross square feet for the Specific Plan. The 622,398 gross square feet includes 282,398 gross square feet of existing development that would remain (i.e., the Aloft Hotel and the Fairfield Inn and Suites Hotel) and 340,000 gross square feet of new residential and commercial uses combined. The FAR varies in each of the proposed five land use districts as follows: PCC MU-1 FAR of 2.63; PCC COM-1 FAR of 2.51; PCC COM-2 FAR of 2.28; PCC COM-3 FAR of 0.14; and PCC MU-2 FAR of 2.24, for an overall Project FAR, including existing hotels, of 2.15.

The proposed Project would allow for the development of 263 new residential units and 11,252 square feet of commercial space. PCC-North would be developed with 143 residential units and 2,223 gross square feet of commercial space. PCC-Fairfield Parking would be developed with approximately 3,273 gross square feet of ground-floor commercial, and a parking structure for the Fairfield Inn and Suites Hotel. PCC-South would be redeveloped

with 120 residential units and 5,756 gross square feet of commercial space. The proposed land uses districts and a summary of the development standards required for each district are discussed below.

PCC Mixed-Use-1 (PCC MU-1)

The PCC MU-1 district would be located on the southernmost parcel (PCC-South) with frontage on PCH, Holly Avenue and Indiana Street, totaling 1.242 net acres (54,072 square feet), which is the developable portion of the proposed parcel after the proposed dedications of new right-of-way. It would be both a corner parcel and a through lot. The PCC MU-1 area would allow for multiple-family residential uses (apartments) and commercial uses. The specific residential and commercial uses would be limited in this land use category as specified in the Specific Plan's development regulations. The proposed district currently contains the parking lot for the Aloft Hotel that is located on the adjacent parcel.

Buildings and structures within the PCC MU-1 land use district cannot exceed 90 feet in height, including elevator/stairwell roof projections, measured from lowest finished grade to the highest point of measurement. Light standards on roof level parking areas and roof level recreational facilities/open space areas would be permitted and cannot exceed 14 feet in height. Exceptions to building height are permitted in accordance with the City of El Segundo Municipal Code (ESMC) Section 15-2-3.

PCC Commercial-1 (PCC COM-1)

The PCC COM-1 land use district would be located on the parcel to the north of the PCC MU-1 district with frontage on both PCH and Indiana Street. The PCC COM-1 district totals 0.905 net acres (39,425 square feet), which is the developable portion of the proposed parcel after the proposed dedications of new right-of-way. This district would allow hotels and several other commercial uses that are either accessory to hotel uses or complementary uses. The specific commercial uses in this land use category are specified in the Specific Plan's development regulations. The proposed district currently contains the existing Aloft Hotel, which would remain with Project implementation. Buildings and structures within the PCC COM-1 land use district cannot exceed 105 feet in height, as measured from lowest finished grade to the highest point of measurement. Exceptions to building height are permitted in accordance with the City of El Segundo Municipal Code (ESMC) Section 15-2-3.

PCC Commercial-2 (PCC COM-2)

The PCC COM-2 land use district would be located on the parcel to the north of the PCC COM-1 district with frontage on both PCH and Indiana Street. The PCC COM-2 district totals 1.549 net acres (67,487 square feet), which is the developable portion of the proposed parcel after the proposed dedications of new right-of-way. This district would allow for hotels and several other commercial uses that are either accessory to hotel uses or complementary uses. The permitted commercial uses in this land use category are specified in the Specific Plan's development regulations. The proposed district currently contains the existing Fairfield Inn and Suites Hotel (comprised of three buildings), which would remain with Project implementation. One of the three existing buildings (the "Food and Beverage" building to be demolished) is primarily located in the PCC COM-3 land use district with a small portion in the PCC COM-2 land use district. Buildings and structures within the PCC COM-2 land use district cannot exceed 100 feet in height, as measured from finished grade to the highest point of measurement. Exceptions to building height are permitted in accordance with the City of El Segundo Municipal Code (ESMC) Section 15-2-3.

PCC Commercial-3 (PCC COM-3)

The PCC COM-3 district would be located on the parcel to the north of the PCC COM-2 district with frontage on Mariposa Avenue, PCH and Indiana Street. The PCC COM-3 parcel also has frontage of Mariposa Avenue. The PCC COM-3 land use category totals 0.728 net acres (31,693 square feet), which is the developable portion of the proposed parcel after the proposed dedications of new right-of-way. This district would allow for hotels and several other commercial uses that are either accessory to hotel uses or complementary uses. The specific commercial uses in this land use category are specified in the Specific Plan's development regulations. The parcel currently contains the existing Fairfield Inn and Suites Hotel "Food and Beverage" building that would be demolished and replaced with the proposed commercial uses and a parking structure.

Buildings and structures within the PCC COM-3 land use district cannot exceed 68 feet in height, including elevator/stairwell roof projections, as measured from finished grade to the highest point of measurement. Light standards on roof level parking areas would be permitted and cannot exceed 14 feet in height. Exceptions to building height are permitted in accordance with ESMC Section 15-2-3.

PCC Mixed-Use-2 (PCC MU-2)

The PCC MU-2 district is located on the northernmost parcel with frontage on PCH, Mariposa Avenue and Palm Avenue. This district would include two separate lots: one parcel totaling 1.513 net acres (65,915 square feet), which would contain 137 multiple family residential units (apartments) and commercial uses, and one parcel totaling 0.293 acres (12,771 square feet), which would contain six condominiums/townhomes. In total, PCC MU-2 would include 1.806 net acres (78,686 square feet), which is the developable portion of the proposed parcel after the proposed dedications of new right-of-way. The PCC MU-2 district would allow for multiple-family residential (apartments and condominiums) and commercial uses. The specific residential and commercial uses would be limited as specified in the Specific Plan's development regulations. The parcel currently contains a parking lot that provides parking for the Fairfield Inn and Suites Hotel. The parking lot would be demolished for Project implementation.

Buildings and structures within the PCC MU-2 land use district cannot exceed 85 feet in height, including elevator/stairwell roof projections, measured from finished grade to the highest point of measurement. Light standards on roof level parking areas and roof level recreational facilities/open space areas would be permitted and cannot exceed 14 additional feet in height. Exceptions to building height are permitted in accordance with ESMC Section 15-2-3.

The Land Use chapter of the Specific Plan also discusses the phasing for each of the land uses. All three phases of development are anticipated to be completed within 5 years of Project approval. This chapter concludes with a brief description of the grading concept for the Specific Plan site. Final grading plans would be approved by the City Engineer before the City issues grading permits.

Non-Conforming Conditions and Buildings

The Specific Plan area encompasses the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties. As previously discussed, these existing hotel properties include existing legal, non-conforming buildings because they were built prior to the current development standards of the C-3 Zone. Although the hotels do not conform to certain development standards within the C-3 Zone, hotels are an allowable use within that zone. The proposed Specific

Plan would allow for the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties to be in compliance with the Specific Plan as the hotels would be consistent with the newly established development standards in the PCC COM-1 and PCC COM-2 land use districts, respectively. As previously described, PCC COM-1 and PCC COM-2 would allow hotels and several other commercial uses that are either accessory to hotel uses or complementary uses. Additionally, there would be no additional floor area added to the hotel properties.

Further, the non-conforming uses and buildings section of the Specific Plan states that any existing buildings, structures, parking areas, landscaping and signage located in the PCC COM-1, PCC COM-2, and PCC COM-3 land use districts that become non-conforming at the time of adoption of this Specific Plan would be permitted to remain. Until such time as building permits are issued for development of the Specific Plan, the existing “Food and Beverage” building may continue to be used for commercial, restaurant, and meeting spaces.

Circulation Plan

As described above, regional access to the Project site is provided by the eastbound/westbound I-105 to the north, with the PCH access ramps located approximately 0.4-mile from PCC-North. I-105 connects to the northbound-southbound I-405, which is located approximately 1.5 miles east of the Project site. Major arterial corridors, including PCH to the east and El Segundo Boulevard to the south provide direct access to the Project site from these regional access corridors.

The development within the Specific Plan would provide infrastructure and facilitate access for various modes of travel including automobiles, bicycles, and pedestrians. Vehicular circulation is provided by PCH, Mariposa Avenue, Palm Avenue, Holly Avenue, and Indiana Street. Walkways would be provided connecting the buildings, uses (hotels, residential, and commercial uses), parking structures and surfaces areas, and the public sidewalks on the surrounding streets. Bicycle parking facilities in accordance with the ESMC, South Bay Bicycle Master Plan, and California Green Building Code requirements would be provided in multiple locations in the parking structures and sidewalk-adjacent areas in the Specific Plan.

Vehicular Circulation

The new developments would facilitate on-site circulation and parking in the Project area. Figure 3-1, Conceptual Site Plan and Figure 4.13-5, Project Site Access (see Section 4.13, Transportation), depicts the proposed ingress/egress locations for the proposed Project. The proposed parking garage at PCC-South would be accessible via L-1 entry/exit on PCH and B-2 entry/exit on Indiana Street and would include 336 parking spaces. The proposed parking garage at PCC-Fairfield Parking would be accessible via a driveway entrance from PCH adjacent to the Fairfield Inn and Suites Hotel and would include 215 spaces. The residential and commercial parking at PCC-North would be accessible via L-1 entry/exit via the fire access driveway/fire lane and includes 241 spaces within the proposed parking garage. An additional 12 parking spaces would be provided in two-car garages on the first level of the six townhomes.

Emergency access would be provided for emergency vehicles to PCC-North via two vehicle access points to the driveway/fire lane from Mariposa and Palm Avenues. The driveway/fire lane access would be gated to allow regulated entrance/exit for residents and emergency vehicles only.

Development within the Specific Plan site would also provide infrastructure and facilitate access for various modes of travel including automobiles, bicycles, and pedestrians. Pedestrian and handicap access would be provided

between buildings and to public sidewalks on the five street frontages along the site. Proposed improvements associated with the adjacent roadways are summarized below.

- **Pacific Coast Highway.** PCH is a California Department of Transportation (Caltrans) facility and an existing public major arterial street that abuts the property on its eastern edge. No other right-of-way improvements are proposed as part of the development allowed in the Specific Plan. No additional curb cuts besides the three existing curb cuts that provide access to the two existing hotels may be allowed along PCH in the Specific Plan area. The two existing driveways that access the north parking lot at 629 North PCH would be removed.
- **Mariposa Avenue.** Mariposa Avenue is an existing public two-lane collector street that abuts the property between the northern and southern blocks of the Specific Plan area. Some additional right-of-way improvements are required as a result of the development allowed in the Specific Plan. A waiver is requested for a portion of the street dedication requirements on the south side of Mariposa Avenue. No additional curb cuts besides the one existing curb cut on the north side of the street (which also serves as a fire lane) may be allowed along the north side of Mariposa Avenue in the Specific Plan area. No curb cuts may be allowed along the south side of Mariposa Avenue within the Specific Plan area.
- **Palm Avenue.** Palm Avenue is an existing public local commercial street that abuts the property on its northern edge. Palm Avenue has been classified as a local commercial street for the frontage of the Specific Plan area. Some additional right-of-way improvements are required as a result of the development allowed in the Specific Plan. No additional curb cuts besides the one existing curb cut that accesses the on-site driveway (which also serves as a fire lane) may be allowed along Palm Avenue within the Specific Plan area. Street dedication to expand the width of the public right-of-way will be provided. .
- **Holly Avenue.** Holly Avenue is an existing public local commercial/residential street that abuts the property on its southern edge. Holly Avenue is classified as a local commercial street for the block fronting the Specific Plan area. Some additional right-of-way improvements are required as a result of the development allowed in the Specific Plan. There are no existing curb cuts along this block of Holly Avenue. No curb cuts may be allowed along Holly Avenue in the Specific Plan area. Street dedication to expand the width of the public right-of-way will be provided.
- **Indiana Street.** Indiana Street is an existing local commercial/residential street that abuts the property on its western edge. Currently, the roadway and sidewalk are privately owned, and the City of El Segundo only has easement rights. Some additional right-of-way improvements are required as a result of the development allowed in the Specific Plan. The proposed Project includes dedication of 25 feet of existing roadway and sidewalk (to the centerline of the street) to the City of El Segundo. This would allow the conversion of the east half of Indiana Street from a privately owned street to a publicly owned street (and sidewalk). A waiver request has been granted for additional street dedication requirements to expand the right-of-way an additional 7 feet for the portion of the block along the frontage of the existing hotel properties because the existing hotel buildings are located at the property line. An additional dedication of 4 feet will be provided on the east side of the street along the frontage where the new development is proposed (along proposed Lots 1 and 4 only). A waiver request was granted for a 3-foot portion of the street dedication requirements to expand the right-of-way on the east side of the street for the portions of the block where new development is proposed in the PCC COM-3 and the PCC MU-1 land use districts (along the frontage of proposed Lots 1 and 4). Additionally, a waiver request was granted for a 7-foot portion of the street dedication requirements to expand the right-of-way on the east side of the street for the portion of the block where existing development is located in the PCC COM-1 and PCC COM-2 land use districts

(along the frontage of proposed Lots 2 and 3). No additional curb cuts besides the three existing curb cuts may be allowed along Indiana Street.

Public streets must be designed and constructed in accordance with the General Plan and in the overall right-of-way size identified in the Street Classification and Standards (Exhibit C-8) in the Circulation Element of the General Plan or as exempted by a waiver granted subject to the regulations in ESMC Chapter 15-24A Right of Way Dedications and Improvements. No private streets would be located within the Specific Plan area. A portion of one public street, Mariposa Avenue (a commercial collector), bisects the northern and southern portions of the Specific Plan area. Streets that adjoin the boundaries of the Specific Plan area include PCH (a major arterial street that is a Caltrans owned State Highway Facility), Holly Avenue, Indiana Street, and Palm Avenue. Holly Avenue, Indiana Street, and Palm Avenue are classified as local streets. A portion of Mariposa Avenue between Indiana Street and Pacific Coast Highway is proposed to be expanded on the south side of the street to include a dedicated right turn lane (eastbound on Mariposa Avenue to southbound PCH).

Non-Vehicular Circulation

Walkways would be provided connecting the buildings, uses (hotels, residential, and commercial uses), parking structures and surfaces areas, and the public sidewalks on the five surrounding streets (PCH, Mariposa Avenue, Palm Avenue, Holly Avenue, and Indiana Street). Marked crosswalks are provided at all major arterial intersections. Bicycle parking facilities in accordance with ESMC and California Green Building Code requirements would be provided in multiple locations in the parking structures and surface parking areas in the Specific Plan.

Landscaping

The proposed Project would result in the removal of 17 to 20 trees (approximately 8,500 square feet of vegetation). As required by the Specific Plan, for each Site Plan Review application, a landscaping plan prepared by a licensed landscape architect must be submitted. All areas of the Project site that are not covered by buildings or paving must be landscaped with drought-tolerant planting in accordance with the City's requirements. Landscaped areas must be provided, and permanent irrigation systems installed in the landscaped areas around the perimeter of the buildings, within the required setbacks along the property perimeter and in the Vehicular Use Areas as defined in ESMC Chapter 15-1-6.

Landscaping must conform to the City's Water Conservation in Landscaping requirements as set forth in ESMC Chapter 15-15A. One shade tree must be provided for every 25 feet along interior property lines where landscaping is provided in the PCC Mixed-Use 2 (PCC MU-2) land use district. In accordance with ESMC Chapter 9-3-6, all removed trees would be replaced in accordance with the requirements of a tree permit. The Specific Plan requires tree plantings to include 20% using 36-inch box size trees, 30% using 24-inch box size trees, and 50% 15-gallon size, or larger.

Common Recreational Facilities/Open Space and Private Open Space

The Specific Plan requires common recreation facilities/open space and private open space for multi-family residential uses in the PCC MU-1 and PCC MU-2 districts. Common recreation facilities/open space are not required for the townhomes. Common recreation facilities/open space are facilities that are accessible to all multi-family residential unit occupants. Common recreation facilities may include indoor and/or outdoor areas. Indoor areas may include gyms or fitness areas, indoor pools, indoor spas and saunas, multi-purpose recreation and community rooms, and similar facilities. Private open space includes decks, patios, and balconies that are accessible from the

multi-family residential unit or townhome unit and exclusively devoted to that unit. There is no requirement to provide private outdoor space for each multiple-family residential unit; however, any private outdoor space that is provided must meet minimum dimensions. In order to count towards these requirements, the minimum dimensions for any private open space shall be 5 feet in width by 5 feet in length. Multi-family residential units must provide an average of 100 square feet per unit in combined common recreation facilities/open space and private open space. Townhomes must provide a minimum of 100 square feet of total private outdoor space. To count toward these requirements, the minimum dimensions of private outdoor space for townhome units must be 5 feet in width by 5 feet in length.

3.3.2 Vesting Tentative Tract Map No. 82806

The proposed Project includes a Vesting Tentative Tract Map (VTTM) No. 82806 for the merger, subdivision and reconfiguring of the Project site into the following: (1) three parcels (composed of 12 existing lots) for residential/commercial condominium purposes on the block bounded by PCH, Mariposa Avenue, Indiana Street, and Holly Avenue; and (2) three parcels (composed of portions of four existing lots) on the block north of Mariposa Avenue and south of Palm Avenue in the Specific Plan Area. Thus, the proposed Project would result in six new individual lots. Lot 1 would correspond to PCC MU-1 (PCC South). Lot 2 would correspond to PCC COM-1 (Aloft Hotel). Lot 3 would correspond to PCC COM-2 (Fairfield Inn and Suites Hotel). Lot 4 would correspond to PCC-COM-3 (PCC Fairfield Parking). Lot 5 would correspond to the portion of PCC MU-2 (PCC North) that would contain the commercial, multi-family residential, and parking garage. Lot 6 would correspond to the portion of PCC MU-2 (PCC North) that would contain the six townhomes. Figure 3-3, Vesting Tentative Tract Map includes the proposed Tract Map.

VTTM No. 82806 would allow the following:

- One residential ground and airspace parcel for 120 apartments and a maximum of 10 airspace parcels for commercial condominiums on Lot 1, which would be PCC MU-1
- Aloft Hotel on Lot 2, which would be PCC COM-1
- Fairfield Inn and Suites Hotel on Lot 3, which would be PCC COM-2
- One ground and airspace parcel for the parking structure and up to a maximum of 10 airspace parcels for commercial condominiums on Lot 4, which would be PCC COM-3
- One residential ground and airspace parcel for 137 apartments and up to a maximum of 20 airspace parcels for commercial condominiums on Lot 5, which would be PCC MU-2
- Six residential condominiums (townhomes) on Lot 6, which would be PCC MU-2

3.3.3 Conceptual Site Plan

Each of the proposed five land use districts, as shown in Figure 3-2, are proposed for development with the Conceptual Site Plan. The Conceptual Site Plan proposes development that does not exceed the maximum allowable development capacity for each land use district as permitted by the Specific Plan. The proposed new development associated with each of the five land use districts, as well as the FAR, is provided in Table 3-2, Conceptual Site Plan and Specific Plan Buildout Summary.

Table 3-2. Conceptual Site Plan and Specific Plan Buildout Summary

Use	Units, Rooms, and/or Number of Parking Spaces	Conceptual Site Plan		Specific Plan Maximum Buildout		Parcel Square Footage	FAR ³	Dwelling Unit per Acre
		Net Building Area ¹ (square feet)	Gross Building Area ² (square feet)	Net Building Area ¹ (square feet)	Gross Building Area ² (square feet)			
New Development								
<i>PCC Mixed Use-1 (PCC - South)</i>								
Multi-Family Residential	120 units	136,571	140,794	139,917	144,244	–	–	–
Commercial	–	5,583	5,756	5,583	5,756	–	–	–
Parking structure	336 spaces	–	–	–	–	–	–	–
PCC MU-1 Total		142,154	146,550	145,500	150,000	54,072	2.63	96.67
<i>PCC Commercial-3 (PCC - Fairfield Parking)</i>								
Commercial	–	3,175	3,273	3,175	3,273	–	–	–
Parking structure	215 spaces	–	–	–	–	–	–	–
Lobby	–	1,170	1,206	1,675	1,727	–	–	–
PCC COM-3 Total		4,345	4,479	4,850	5,000	31,693	0.14	–
<i>PCC Mixed-Use-2 (PCC - North)</i>								
Multi-Family Residential	137 units	159,062	163,472	167,754	172,433	65,915	–	90.54
Commercial	–	2,156	2,223	2,156	2,223		–	–
Parking structure	241 spaces	–	–	–	–		–	–
Townhomes	6 units	9,540	10,344	9,540	10,344	12,771	–	20.47
PCC MU-2 Total		170,758	176,039	179,450	185,000	78,686	2.24	79.17
Total Development Areas		317,257	327,068	329,800	340,000		–	–
Existing Development								
<i>Commercial-1 (PCC - South)</i>								
Aloft Hotel	246 rooms	98,741	106,747	98,741	106,747	39,425	2.51	–
<i>Commercial-2 (PCC - Fairfield Parking)</i>								
Fairfield Inn and Suites Hotel Commercial	350 rooms	190,026	217,311	–	–	–	–	–
Fairfield Inn and Suites Hotel – Food and Beverage Building		-36,605	-41,660	–	–	–	–	–
PCC – Fairfield Parking Total		153,421	175,651	153,421	175,651	67,487	2.28	–
Total Existing Areas (Minus Demolition)		252,162	282,398	252,162	282,398		–	–
Total Development		569,419	609,466	581,962	622,398	271,363	2.15	–

Source: Withee Malcom Architects 2020; Appendix B

– = not applicable

¹ Net area consists of the area of all floors, stories or levels, as measured to the interior of a building's perimeter walls.

² Gross area consists of the area included within the surrounding exterior walls of a building or portion thereof, exclusive of garages, vent shafts, and courts.

³ Floor area ratio (FAR) is calculated by dividing the net maximum Specific Plan buildout development capacity by the developable parcel square footage.

As summarized above and outlined in Table 3-2, implementation of the Specific Plan would allow for new construction within three development areas: (1) PCC – South, (2) PCC – Fairfield Parking, and (3) PCC – North. The following sections describe the proposed Conceptual Site Plan areas, which include a proposed development scenario that would fit within the maximum development envelope allowed by the Specific Plan. The Conceptual Site Plan constitutes a proposal for new land uses within the three development areas of the Specific Plan, in conformance with requirements set forth in the Specific Plan.

Pacific Coast Commons – South

PCC-South would be developed under the PCC MU-1 district. This district would include the construction of a six-story, 120-unit mixed-use residential and commercial building with 5,756 gross square feet of commercial/retail on the ground floor fronting PCH. The proposed 120 residential units include 44 studio apartments ranging from 479 to 588 square feet, 52 one-bedroom units ranging from 668 to 809 square feet, and 24 two-bedroom units ranging from 920 to 1,058 square feet. Figure 3-4A, Conceptual PCC-South Elevations (South and East), depicts the proposed residential and commercial uses fronting PCH on the east elevation view, and the view from Holly Avenue on the south elevation view. Figure 3-4B, Conceptual PCC-South Elevations (North and West), depicts the proposed Project from Indiana Street.

Figure 3-4C, Conceptual PCC-South Section, show a cross-section depiction of the site through the parking garage. The residential building would be 85 feet in height from lowest finished grade to the highest point of measurement. The proposed eight levels of parking garage (i.e., approximately two levels of subterranean and six levels above ground from PCH, depending on elevation grade) would be located behind the commercial/retail uses and adjacent to the existing Aloft Hotel. Due to the existing grade on the Project site, the parking garage would have only one subterranean parking level from Indiana Street. Ingress/egress into the parking structure would be via driveways on PCH and Indiana Street. The parking garage would provide 165 parking spaces exclusively for residential tenant use, and 171 spaces would be shared between residential guest parking, commercial use, and for overflow if needed from other sites, resulting in a total of 336 parking spaces within the multi-level parking structure.

Level (L) 1 (ground floor) includes 5,756 square feet of commercial/retail uses, a leasing office, residential units, and parking stalls. Additional parking spaces would be provided in subterranean Basement, Parking P-2 and Parking P-1. Figure 3-4D, Conceptual PCC-South Level L-1, shows the proposed layout of the various land uses on the ground floor. As shown on Figure 3-4D, the parking garage would be accessible via L-1 driveway on PCH and P-2 entry/exit on Indiana Street. Figure 3-4E, Conceptual PCC-South Levels L-2 to L-4, shows the proposed layout of the various land uses on the Levels L-2 to L-4, which includes residential units and parking spaces. Figure 3-4F, Conceptual PCC-South Level L-5, shows the proposed layout of the various land uses on Level L-5, which includes residential units and parking spaces. Figure 3-4G, Conceptual PCC-South Level L-6, shows the proposed layout of the swimming pool and roof-deck area. Figure 3-4H, Conceptual PCC-South Roof Plan, shows the proposed solar panel area.

The PCC-South includes a total of 17,512 square feet of open space. This includes 11,852 square feet of common open space area, including courtyards, community amenities on the 6th floor, and the roof-deck swimming pool amenity, and a total of 5,660 square feet of private open space (balconies) in the residential units.

Pacific Coast Commons – Fairfield Parking

PCC-Fairfield Parking would be developed under the PCC COM-3 district. This district would include a five-level parking garage (65 feet in height from lowest finished grade to the highest point of measurement) with 3,273 gross square feet of commercial/retail on a portion of the ground floor fronting PCH. The proposed parking garage would provide 215 replacement parking spaces for the Fairfield Inn and Suites Hotel, which would be shared between the hotel and the commercial/retail uses. Figure 3-5A, Conceptual PCC-Fairfield Parking Elevations (East), depicts the commercial uses fronting PCH. Figure 3-5B, Conceptual PCC-Fairfield Parking Elevations (North and West), depicts the proposed commercial uses fronting Mariposa Avenue on the north elevation view, and the view from Indiana Avenue on the west elevation view. Figure 3-5C, Conceptual PCC-Fairfield Parking Section, shows a cross-section depiction of the site through the parking garage. The parking garage would be 60 feet in height from finished grade to the highest point of measurement. The proposed five-story parking garage would be located behind and above the proposed commercial/retail uses fronting PCH. Ingress/egress to the parking structure would be provided via a driveway on PCH adjacent to the Fairfield Inn and Suites Hotel. Figure 3-5D, Conceptual PCC-Fairfield Level L-1, shows the proposed layout of the commercial/retail and parking garage structure on the ground floor. Figure 3-5E, Conceptual PCC-Fairfield Level L-2, shows the layout for the parking garage Level L-2. Figure 3-5F, Conceptual PCC-Fairfield, shows the layout for the parking garage Levels L-3 to L-5, which provides a representative layout for parking garage levels above the ground-floor, including pedestrian paths of travel..

Pacific Coast Commons – North

PCC-North would be developed under the PCC MU-2 district. The PCC-North area is situated between an existing restaurant with surface parking and an existing gas station, both fronting PCH. The PCC-North also extends along the western property line from Palm Avenue to Mariposa Avenue. This district would include construction of a six-story residential building with 2,223 gross square feet of commercial on the ground floor that faces PCH, a six-story parking garage in the central portion of property, a new fire/access road, and apartment/townhome units facing the existing single-family residential to the west of the property. Figure 3-6A, Conceptual PCC-North Elevations (South and East), depicts the proposed residential and commercial uses fronting PCH on the east elevation view, and the development from Mariposa Avenue on the south elevation view. Figure 3-6B Conceptual PCC-North Elevations (North and West) depicts the proposed residential and commercial uses fronting the fire access lane on the west elevation view, and the development from the property to the north of PCC-North along Palm Avenue.

The proposed building would be 83 feet in height from finished grade to the highest point of measurement. The proposed 143 residential units would include 47 studio apartments ranging from 499 to 582 square feet, 67 one-bedroom units ranging from 668 to 809 square feet, and 23 two-bedroom units ranging from 982 to 1,058 square feet. Additionally, a row of six townhomes would be constructed along the fire lane/access road which would be approximately 1,724 square feet per unit.

Figure 3-6C, Conceptual PCC-North Section, shows a cross-section depiction of the site through the parking garage. The proposed six levels of parking garage would be 78 feet in height from finished grade to the highest point of measurement and located in between the residential uses. Ingress/egress into the parking structure would be via one driveway that fronts the 26-foot-wide driveway/fire lane that would be constructed along the western boundary of the property and would connect with Palm Avenue to the north and Mariposa Avenue to the south. An open courtyard area would be included in the central portion of the site, located between the commercial/retail to the east and the parking structure to the west.

The parking garage would provide 189 spaces for the residential units, and 52 spaces would be shared between residential guest parking, commercial use, and for overflow if needed from other sites, resulting in a total of 241 spaces within the multi-level parking structure. The 194 designated residential spaces would share parking with the proposed commercial uses. The residential units would be developed within five levels above the ground-floor commercial/retail fronting PCH, and with five stories of residential fronting the fire lane/access road. The six townhomes would be located between the driveway/fire lane and the existing commercial business at the corner of Palm Avenue and PCH and each townhome has a private two-car parking garage.

Figure 3-6D, Conceptual PCC-North Level L-1, shows the proposed layout of the various land uses on the ground floor. Level L-1 (ground floor) would consist of 2,223 gross square feet of commercial/retail, a leasing office, a community room, residential units, townhomes, and parking stalls. No subterranean parking would be included. Figure 3-6E, Conceptual PCC-North Levels L-2 to L-5, shows the proposed layout of the various land uses on the Levels L-2 to L-5, which includes residential units, townhomes on L-2, and parking spaces. Figure 3-6F, Conceptual PCC-North Level L-6, shows the proposed layout of the swimming pool and roof-deck area as well as parking spaces on L-6. Figure 3-6G, Conceptual PCC-North Roof Plan, shows the proposed solar panel area.

The PCC-North includes a total of 17,932 square feet of open space. This includes 11,357 square feet of common open space area, including courtyards, community amenities on the 6th floor, and the roof-deck swimming pool amenity, and a total of 6,575 square feet of private open space (balconies) in the multiple-family residential (apartment) units.

Landscaping and Pedestrian Improvements

In accordance with the Specific Plan requirements, one shade tree must be provided for every 25 feet along interior property lines where landscaping is provided in the PCC MU-2 land use district.

3.3.4 Utilities and Infrastructure

The proposed Project would require upgrades to utility infrastructure. All infrastructure would be constructed in accordance with the standards of the applicable governing agency.

Water Service

Water utility service is provided by the City and is currently available within the Project site. The water service connection for domestic water and fire protection would be made to one or more of the existing City water lines. The specific location of these connections and pipe sizing would be based upon the City's approval. The system would provide adequate water supply for operation of the building's domestic requirements, automatic sprinkler systems and on-site fire hydrants (if required by the state or City Fire Marshal). Fire flows for the proposed development would be based on the requirements listed in that version of the California Fire Code that is in effect at the time of plan submission, as amended by the City. Based on the requirements outlined by the El Segundo Fire Department in Regulation H-2-a for Fire Hydrant and Private Fire Main System Installation, two additional fire hydrants may need to be installed in order to provide coverage for portions of the proposed buildings that are in excess of 150-feet from a public fire hydrant. Coordination with the El Segundo Fire Department Fire Prevention Division is required to determine whether the additional fire hydrants would be located in the public street and/or within the development.

Future reclaimed water service is anticipated to be provided through the existing point of connection on Washington Avenue. Should the West Basin Municipal Water District extend the reclaimed water lines adjacent to the Specific Plan area in the future, the points of connection would be based on West Basin Municipal Water District and the City of El Segundo's input. Reclaimed water service may not be available at the time of Project completion.

Sanitary Sewer

All existing sanitary sewer lines in the streets surrounding the Project site are owned by the City. Sewer utility service is provided by the City and the Los Angeles County Sanitation District and is currently available within the site. New sewer laterals are proposed for all the new buildings. It is anticipated that the new sewer laterals would connect to several of the existing gravity lines surrounding the Project. The proposed Project would not impact the existing pressure lines. Points of connection would be based on the City's input and would require a Sewer Connection Permit from the City.

Storm Drainage

There are two existing storm drains near the Project site that are owned by Caltrans and the City. Proposed drainage would include stormwater treatment features on multiple sites within the Specific Plan area, in accordance with the City of El Segundo low-impact development requirements. The stormwater quality design volume required by low-impact development standards would be stored in the system and infiltrate into the soil beneath the underground system within 48 hours. The Project includes one drywell at each of the three new development sites within the Specific Plan area to capture the required volume. The drywells would include overflow piping that would be sized based on the 25-year storm event and would convey water to Indiana Street or Mariposa Avenue and into the City of El Segundo catch basin on Indiana Street. Thus, stormwater in the proposed condition would flow only to the City of El Segundo storm drain.

Natural Gas

Natural gas is provided to the Project area by the Southern California Gas Company (SoCal Gas). The existing gas service would be maintained, and future gas service would be provided through private gas service line connections to the SoCal Gas utilities (public main line(s) in the surrounding streets include PCH, Palm Avenue, Mariposa Avenue, Indiana Street, and Holly Avenue). The private gas service lines would be secured by easements with SoCal Gas.

Electricity

Electrical power is provided to the Project area by Southern California Edison. New underground utility conduit systems would be needed to intercept the existing underground electric system and provide electrical power to the proposed improvements. An easement would be granted to Southern California Edison for access and maintenance. Final locations and points of connection for the electrical system would be based on a final approved Southern California Edison design.

Telecommunications

Telecommunication utilities are owned by Frontier Communications and AT&T. It is anticipated that Velocity and Sonify would continue to provide service to the Aloft Hotel and the Fairfield Inn and Suites Hotel. New underground

utility conduit systems would intercept the existing underground telecommunications system and provide services to the proposed buildings. An easement would be granted to the telecommunication companies for access and maintenance. Final locations and points of connection for the telecommunications system would be based on a final approved design by the telecommunications providers.

3.3.5 Design Guidelines and Development Standards

The Specific Plan's Design Guidelines chapter is intended as guidelines instead of development regulations, and strict adherence is not required. The Guidelines only apply to new construction within the Specific Plan area, and do not apply to the existing hotels. The design guidelines are provided in the Specific Plan to promote the quality of design planned for the Project. The design guidelines described in the Specific Plan establish criteria that enhance the coordination, organization, function and identity of the Project site, while maintaining a compatible relationship with the surrounding development. The objectives of the guidelines are as follows:

- Provide for high-quality residential and commercial development within the Specific Plan area.
- Promote orderly and predictable development.
- Encourage individual creativity and innovative solutions by allowing flexibility in how a particular guideline is met as long as the intent of the guideline is achieved.
- Ensure functional pedestrian, bicycle, and motor vehicle circulation within the Project site, and convenient pedestrian and bicycle linkages to and from adjacent residential and commercial areas and schools.

The Specific Plan establishes guidelines related to site planning, access and parking, architecture orientation and massing, color and materials, screening and mechanical equipment, parking structures, landscaping, walls and fences, lighting design, and signage. The full text for the Specific Plan is provided in Appendix B, of this Draft EIR.

The Specific Plan Development Standards chapter is intended to supplement the existing General Plan and ESMC. Where this Specific Plan is inconsistent with the ESMC, the Specific Plan would prevail. Where this Specific Plan does not specifically regulate, development must comply with the standards and requirements set forth in the ESMC. Uses allowed within the Specific Plan are described in Table VI-1, Allowable Uses (see Appendix B). The Specific Plan lists specific uses and whether they require an administrative use permit, or are permitted accessory use, conditional uses, permitted uses, or not permitted uses by land use district. Pursuant to the ESMC, uses of a similar nature which are not listed in the Specific Plan may be considered by the Director of Development Services, subject to appeal to the Planning Commission. This chapter describes the development standards for lot area, height, setbacks, lot frontage, building area, floor area, walls and fences, and accessory structures. This chapter also describes the circulation for the Specific Plan area, parking and loading, landscaping, public safety, signage, sustainability, enclosed uses, and non-conforming uses and buildings.

3.3.6 Off-Site Improvements

The proposed Project would require the following off-site construction activities:

- Dedication of right-of-way to the City and construction of a right turn-lane on eastbound Mariposa Avenue to southbound PCH
- Curb/gutter, landscaping, and sidewalk/pedestrian improvements along Holly Avenue, Indiana Street, Mariposa Avenue, Palm Avenue, and PCH

- Utility connections to existing utilities, which may include but may not be limited to: new fire hydrants, potable water line connections, sewer line connections, storm drain system connections, natural gas, electric, and telecommunication connections

3.3.7 Conditions of Approval

If the proposed Project is approved, the City would implement the following requirements as conditions of Project approval. As such, the following actions would be considered a part of the proposed Project, and are not considered to be mitigation for any specific environmental impact pursuant to CEQA.

- If the timing of the proposed construction of PCC-South and PCC-North (i.e. Phase 2 and Phase 3) would overlap and the total parking demand would exceed the total parking supply, the Project applicant/developer would be required to accommodate the excess parking demand at an off-site location and provide shuttle service to and from the Project site accordingly to ensure that that parking is adequately provided during short-term construction activities.
- Up to 3,700 square feet of the commercial space across all three sites could be fast casual restaurant space, with the remainder would be general commercial/retail.

3.3.8 Development Agreement

As part of the proposed Project, the City and Applicant propose to enter into a Development Agreement, which would ensure that the Project can be developed as proposed for a set number of years. In return, the Project would provide benefits to the City including some provision for affordable housing. The full benefits will be negotiated between the parties but will not create any environmental impacts.

3.4 Project Construction

Development of the Specific Plan would require demolition and grading at PCC-South, PCC-Fairfield Parking, and PCC-North to remove structures and surface parking. No grading would be required for the areas where the existing hotel buildings would remain.

Site grading would require a combination of “cut and fill” earthwork to create a building/parking structure pad and to accommodate one level of subterranean parking (note: only one level is subterranean from Indiana Street) and retaining walls on PCC-South as a result of the existing sloped topography. The property slopes down from PCH toward Indiana Street and toward Holly Avenue, with the lowest point at the intersection of Indiana Street and Holly Avenue. PCC-South is estimated to require 27,700 cubic yards of cut and fill that would result in 17,700 cubic yards of export. Grading for the PCC Fairfield Parking site is estimated to result in approximately 6,000 cubic yards of cut and fill for site rebalancing resulting in no cubic yards of soil export. PCC-North site is estimated to require 15,000 cubic yards of cut and fill for site rebalancing that will result in 0 cubic yards for export. Final grading plans would be approved by the City Engineer before the City issues grading permits.

It is currently anticipated that these phases will occur sequentially and if so, are anticipated to be completed within 4 1/2 years of EIR certification and Project approval. However, this Draft EIR assumes an overlap of construction phases, which is possible depending on market conditions and would provide a more conservative analysis of short-term air quality, greenhouse gas, noise, and transportation impacts.

The first phase of development would occur at the PCC-Fairfield Parking. The second and third phases would consist of overlapping construction schedules and would include PPC-South and PCC-North. Construction of the proposed Project is anticipated to begin as early as October 2021 (Q4) and would end in July 2024 (Q3), for construction activities spanning over approximately 34 months. Construction activities would include demolition, site preparation, grading/earthwork and trenching, building construction, paving, and architectural coating (see Table 3-3).

Table 3-3. Estimated Construction Schedule

Construction Phases	2021				2022				2023				2024			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<i>PCC-Fairfield Parking (Phase 1)</i>																
Site Prep and Demolition				◆												
Grading and Excavations				◆	◆											
Building Construction					◆	◆	◆	◆								
Paving/Architectural Coating								◆								
<i>PCC-South and PCC-North (Overlapping Phases 2 and 3)</i>																
Site Prep and Demolition									◆							
Grading and Excavations										◆						
Building Construction										◆	◆	◆	◆	◆		
Paving/Architectural Coating															◆	

3.5 Project Objectives

CEQA Guidelines Section 15124 requires an EIR to include a statement of objectives sought by 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. Provide for comprehensive site planning that maintains the existing hotel uses while providing for a mixed-use multiple-family and commercial neighborhood that is compatible with the surrounding land uses.
2. Provide for additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City’s General Plan.
3. Improve the jobs/housing balance in the City of El Segundo, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees.
4. Enhance bicycle and vehicular circulation through roadway intersection improvements that facilitate a safe and walkable community along Pacific Coast Highway.
5. Increase the efficient use of land by eliminating surface parking lots and providing parking garages that allow for sharing among hotel, commercial, and residential land uses.

6. Reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City’s downtown.

3.6 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 proposed 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.

3.7 Discretionary Actions

3.7.1 City of El Segundo

The City of El Segundo, as lead agency for the Project, has the responsibility for reviewing, processing, and approving the proposed Project. This Draft EIR is intended to allow for all future discretionary actions related to activities within the Pacific Coast Commons Specific Plan area. If development is proposed that results in environmental impacts not assumed within this Draft EIR or covered under the impact analyses and mitigation measures set forth in this Draft EIR, or if substantial changes to the circumstances under which the Project is undertaken and/or new information of substantial importance becomes available after the certification of this Draft EIR, the City will evaluate the need for supplemental environmental documentation per Sections 15162 to 15164 of the State CEQA Guidelines.

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

- Adoption of the Pacific Coast Commons Specific Plan (SP No. 19-01).
- Environmental Assessment (No. EA-1248) for the proposed mixed-use development that will add 263 housing units, approximately 11,252 square feet of commercial uses (composed of retail, restaurant, and hotel support based office uses), and 1,727 square feet of lobby area, and three parking structures to provide parking for the uses in the Specific Plan area.
- Approval of a General Plan Amendment (No. GPA 19-01) to change the Land Use Designation from “General Commercial” and “Parking” to “Pacific Coast Commons Specific Plan (PCCSP)” with an accompanying Land Use Map change.

- Zone Text Amendment (No. ZTA 19-08) to add a new El Segundo Municipal Code (ESMC) Section 15-3-2(A)(11) “Pacific Coast Commons Specific Plan (PCCSP).”
- Zone Change (No. ZC 19-01) to rezone the property from “General Commercial (C-3)” and “Parking (P)” to “Pacific Coast Commons Specific Plan (PCCSP)” and an accompanying Zoning map change.
- Approval of a Vesting Tentative Tract Map (VTTM 82806) SUB 19-03 for merger, subdivision and residential/commercial condominium purposes reconfiguring three parcels (composed of 12 existing lots) on the block bounded by Pacific Coast Highway, Mariposa Avenue, Indiana Street and Holly Avenue and three parcels (composed of portions of four existing lots) on the block north of Mariposa Avenue and south of Palm Avenue in the Specific Plan Area into six new individual lots. Additionally, VTTM 82806 will allow (a) one residential ground and airspace parcel for 120 apartments and a maximum of 10 airspace parcels for commercial condominiums on Lot 1; (b) a ground and airspace parcel for the parking structure and up to a maximum of 10 airspace parcels for commercial condominiums on Lot 4; and (c) one residential ground and airspace parcel for 137 apartments and up to a maximum of 20 airspace parcels for commercial condominiums on Lot 5; and (d) six residential condominiums (townhomes) on Lot 6.
- Approval of a Site Plan Review (No. 19-01) to allow the site plan and architectural design to construct the mixed-use commercial and residential development for the 263 residential units, 11,252 square feet of new commercial development, 1,727 square feet of lobby area, and three parking structures.
- Approval of a Development Agreement (No. DA 19-02) between the City of El Segundo and BRE El Segundo Property Owner A LLC, BRE El Segundo Property Owner B LLC, and BRE El Segundo Parking LLC.
- Modification of Resolution Nos. 2759 and 2760 to rescind the previous approvals SUB No. 14-05, Lot-Tie Covenant No. 14-03, Off-site Parking Covenant Nos. MISC 14-03 and 14-06, leaving in place CUP No. 14-01 for the Fairfield Inn and Suites Hotel and CUP No. 14-02 for the Aloft Hotel, along with alcohol service at both hotels with modifications to the conditions of approval accordingly.
- Parking Demand Study and Shared Parking Analysis to establish the parking requirements for the proposed commercial and residential development combined with the existing hotel development.
- Shared Parking Agreement in conjunction with the Parking Demand Study and Shared Parking Analysis, to replace the previous approval of Off-Site Parking Covenant Nos. MISC 14-03 and MISC 14-06.
- Reciprocal Access Agreements for driveways and drive aisles accessing multiple parcels.
- Street dedication waiver requests for a portion of the dedication requirements for the south side of Mariposa Avenue and the east side of Indiana Street.

3.7.2 Responsible Agencies

A public agency, other than the lead agency, that has discretionary approval over a project is known as a “responsible agency,” as defined by State CEQA Guidelines (14 CCR 15000 et seq.). The following is a list of other responsible agencies and their discretionary/ministerial authority over the proposed Project:

- **California Department of Transportation**
 - Encroachment Permit to accommodate Project’s street improvement at the intersection of Mariposa Avenue and PCH, and for potential subterranean utility connections beneath PCH
 - Approval of Traffic Control Plan compliant with the California Manual Uniform Traffic-Control Devices
 - Transportation Permit for oversized/overweight loads

3.7.3 Other Permits and Approvals

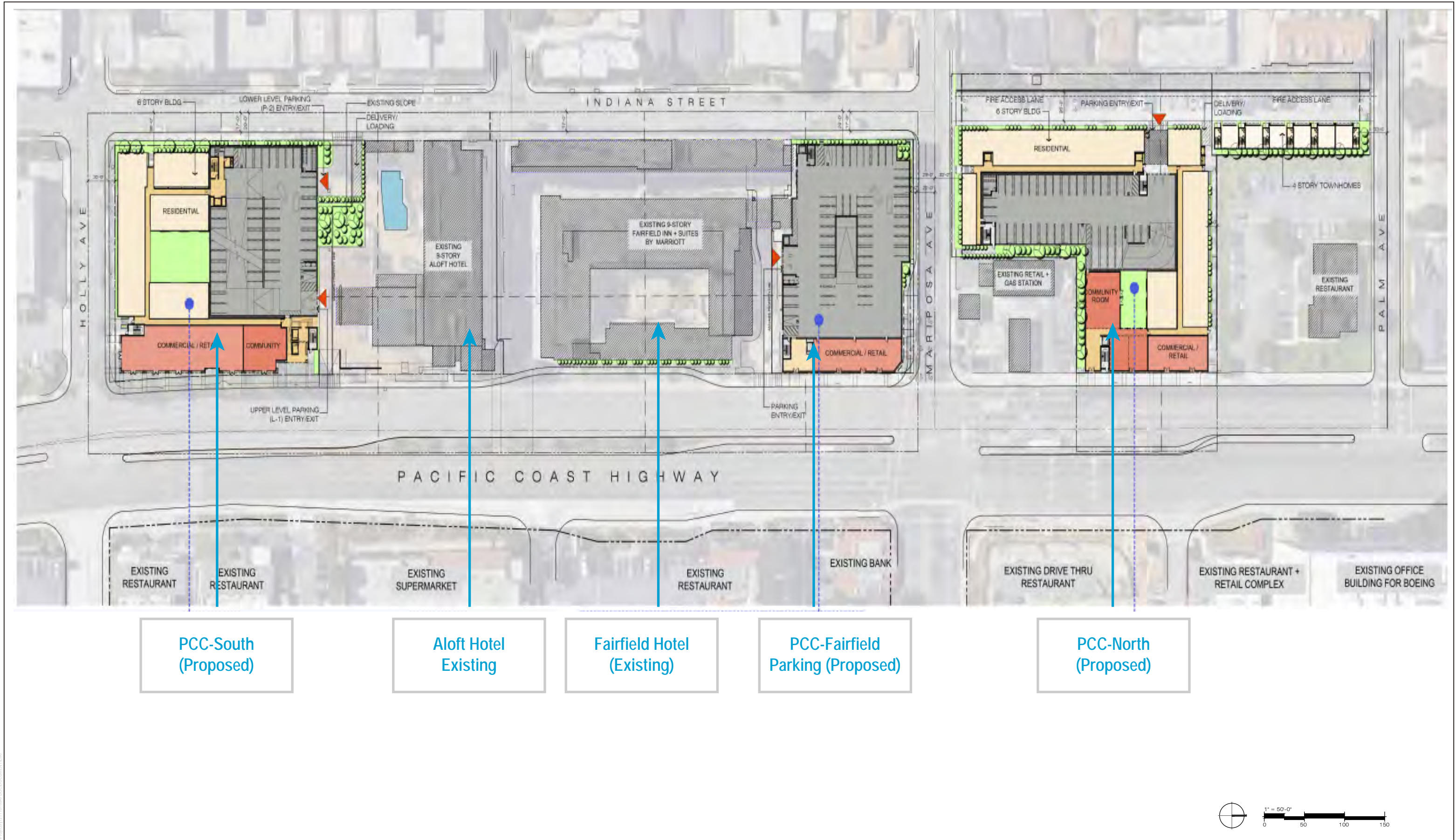
Other permits and approvals are required for Project implementation that are not subject to discretionary review, but nevertheless require actions by the applicant and/or the City to obtain the necessary approvals to implement the proposed Project. Other permits and approvals required, and their respective agency administrators, are listed below:

- **City of El Segundo**
 - Sewer Connection Permit
 - Right of Way Encroachment Permit
 - Building Permit
 - Tree Removal Permit
- **California Water Resources Control Board**
 - Coverage under National Pollutant Discharge Elimination System Permit No. CAS000002, General Construction Activity Storm Water Permit and Stormwater Pollution Prevention Plan

3.8 Reference

Wither Malcom Architects. 2021. "Pacific Coast Commons Design Package." January 2021.

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PCC-South
(Proposed)

Aloft Hotel
Existing

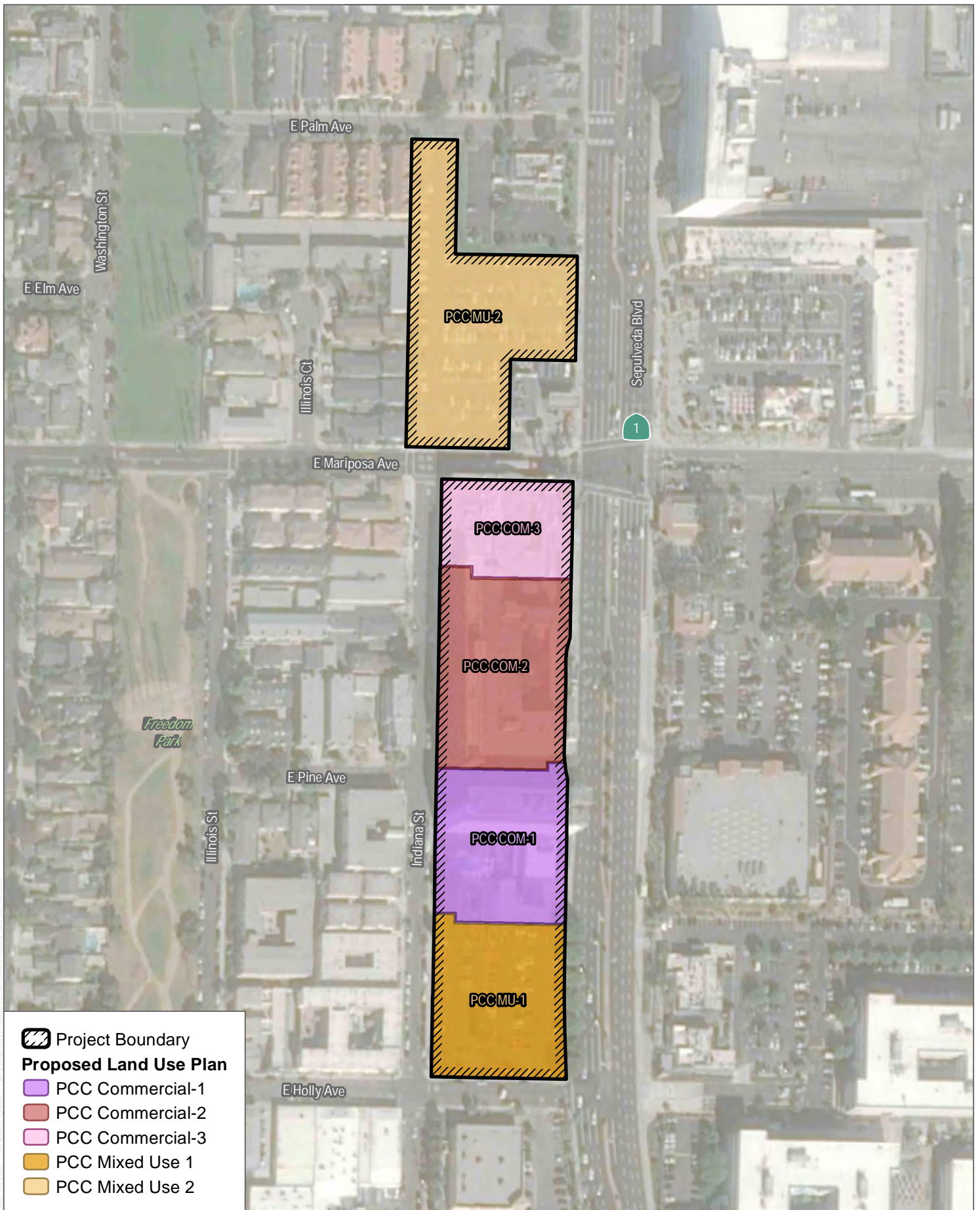
Fairfield Hotel
(Existing)

PCC-Fairfield
Parking (Proposed)

PCC-North
(Proposed)

SOURCE: Withee Malcolm Architects 2020

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SOURCE: Esri and Digital Globe 2019; Open Street Map 2019

FIGURE 3-2

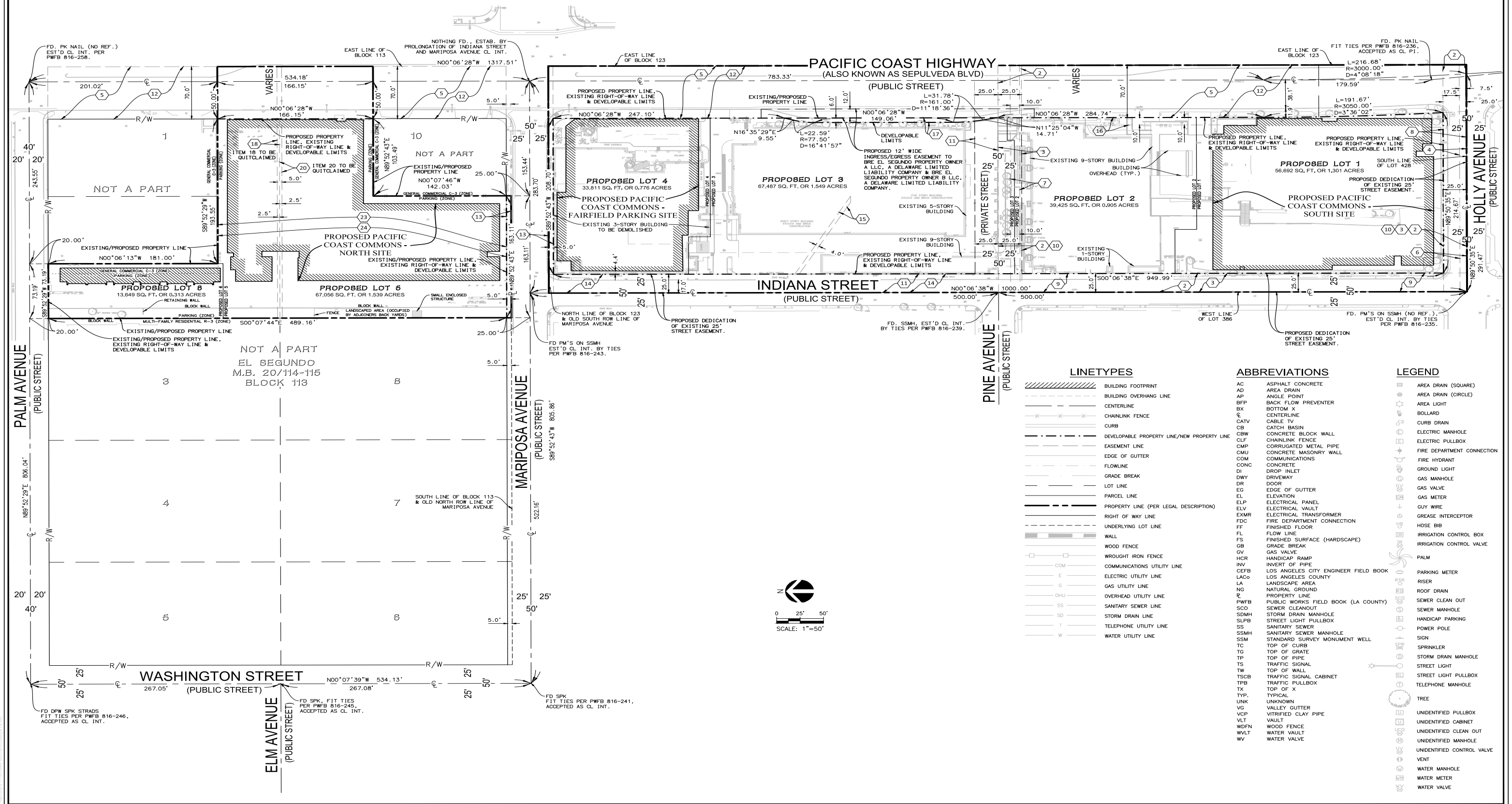
Proposed Land Use Districts

Pacific Coast Commons Specific Plan EIR Project

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VESTING TENTATIVE TRACT MAP No. 82806

PROPOSED CONDITIONS



SOURCE: KPFF 2020

FIGURE 3-3

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EAST ELEVATION



SOUTH ELEVATION

SOURCE: Withee Malcolm Architects

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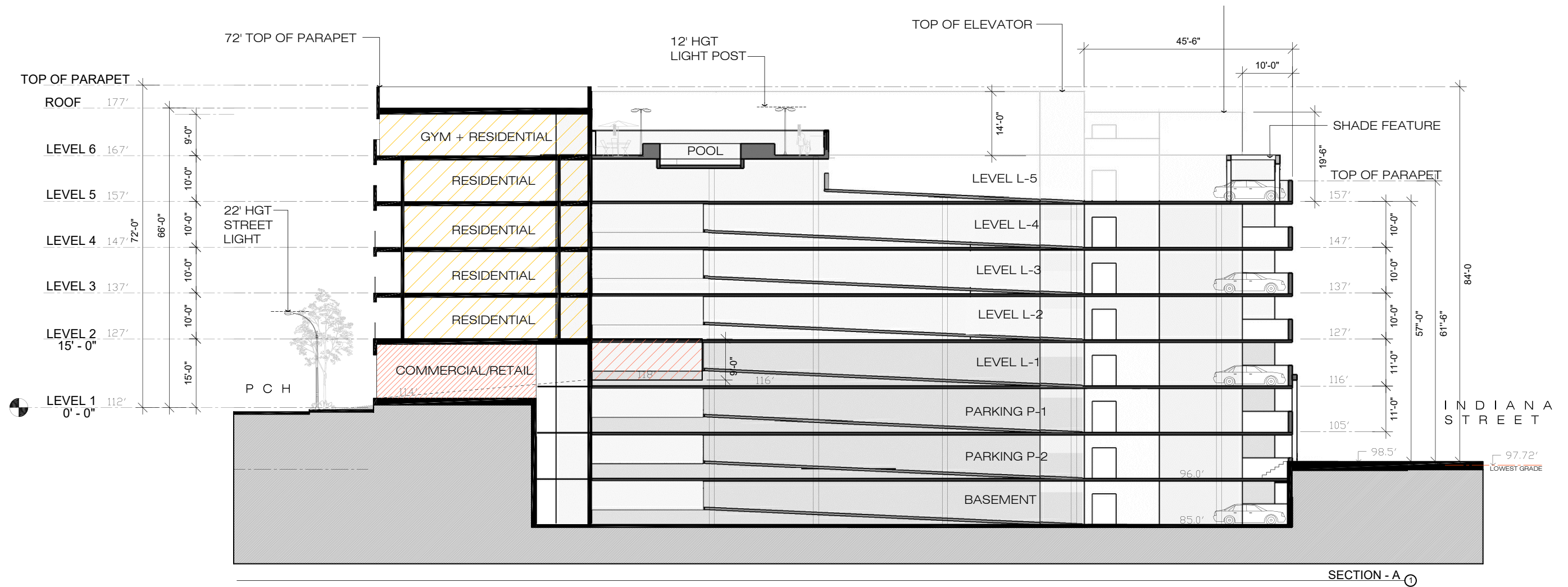
WEST ELEVATION



NORTH ELEVATION

SOURCE: Withee Malcolm Architects 2020

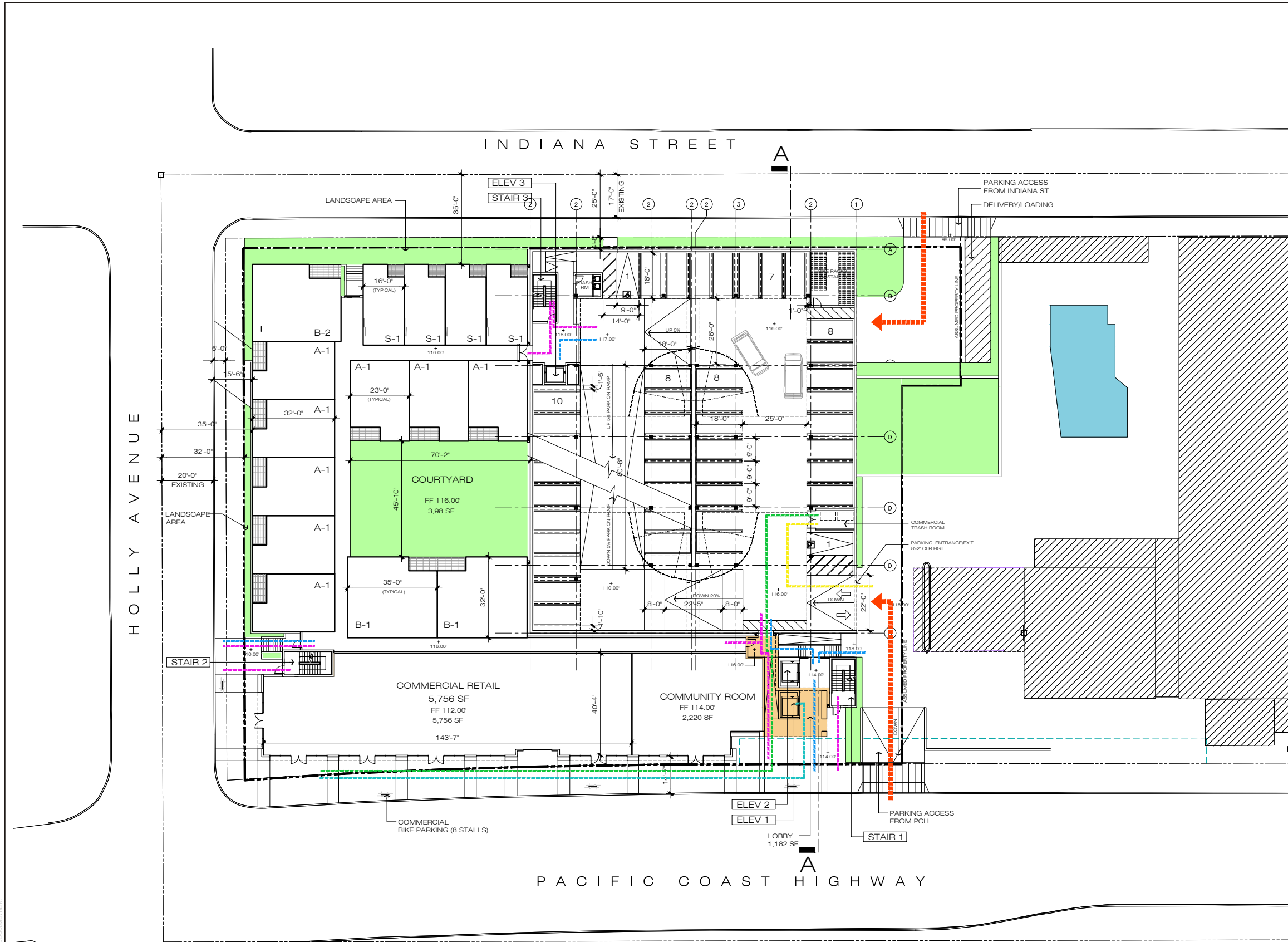
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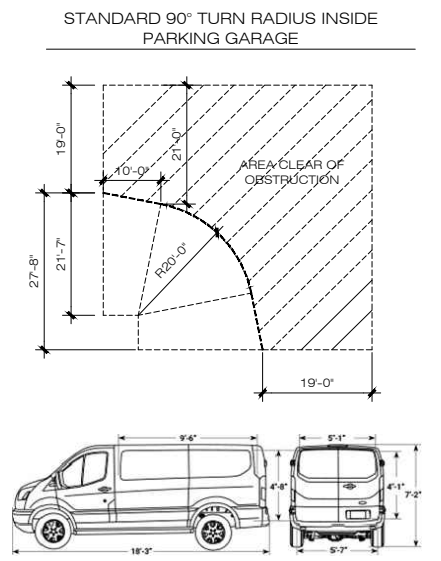
SOURCE: Withee Malcolm Architects 2020

FIGURE 3-4C

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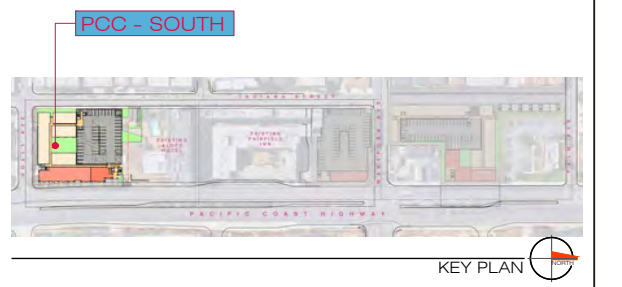


- LEGEND**
- PEDESTRIAN PATH OF TRAVEL
 - PARKING ACCESS FROM PUBLIC STREETS
 - EXIT ROUTE
 - COMMERCIAL DELIVERY ROUTE
 - COMMERCIAL TRASH ACCESS
 - TRASH PICK UP ROUTE
- ELEV 1** COMMERCIAL / HOTEL PARKING (LEVEL B-1 TO L-1)
ELEV 2 RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-6)
ELEV 3 RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-6)
STAIR 1 LEVEL B-1 TO LEVEL L-6
STAIR 2 LEVEL L-1 TO LEVEL L-6
STAIR 3 LEVEL B-1 TO LEVEL L-6



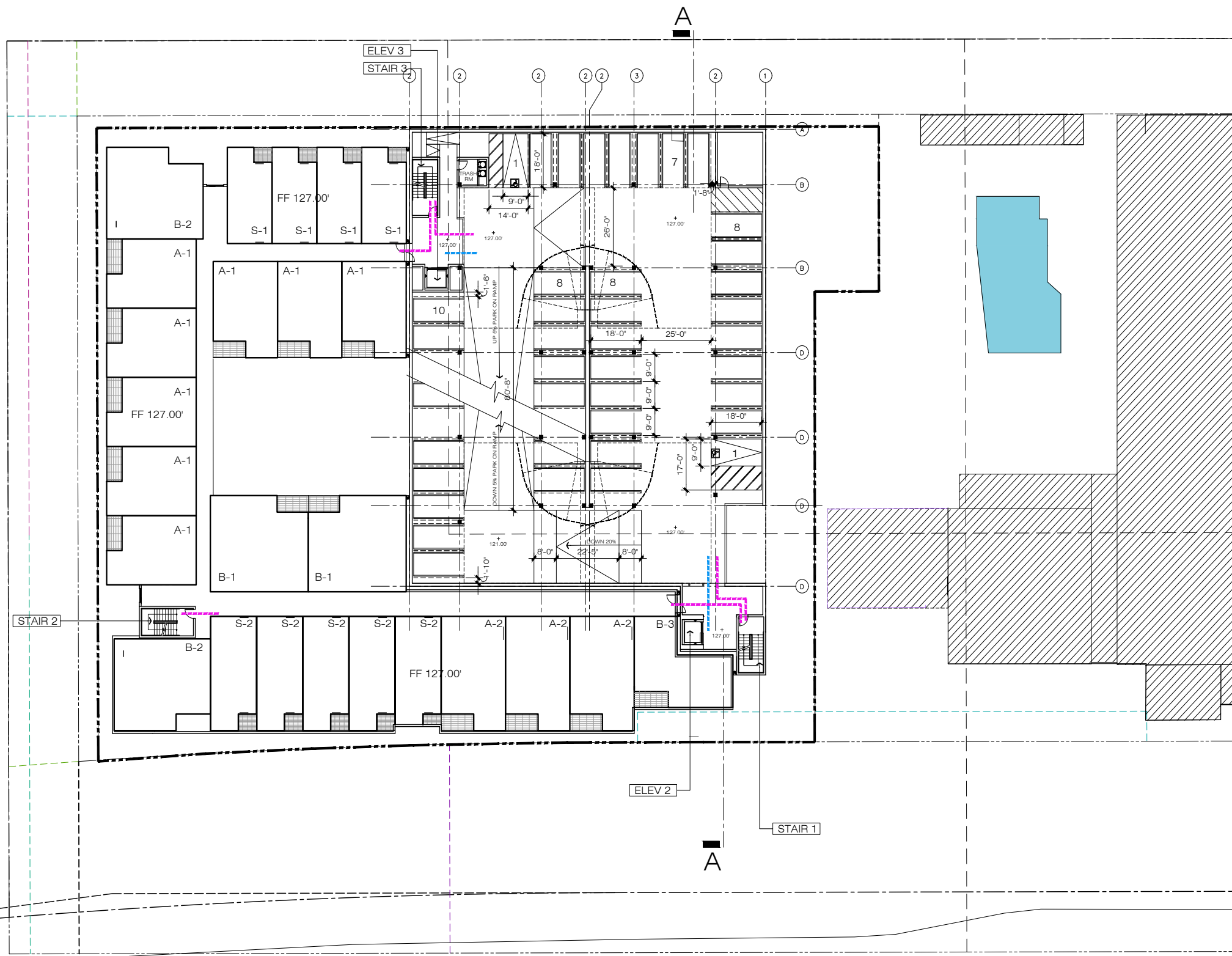
LEVEL L-1

STANDARD	39 SPACES
ACCESSIBLE	3 SPACES
TOTAL	42 SPACES



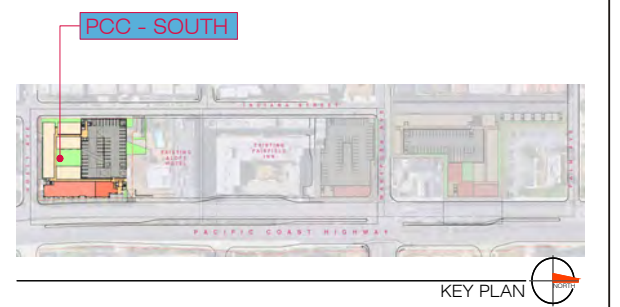
LEVEL L-1
116.00'

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- LEGEND**
- PEDESTRIAN PATH OF TRAVEL
 - EXIT ROUTE
- | | |
|----------------|---|
| ELEV 1 | COMMERCIAL / HOTEL PARKING (LEVEL B-1 TO L-1) |
| ELEV 2 | RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-1) |
| ELEV 3 | RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-1) |
| STAIR 1 | LEVEL B-1 TO LEVEL L-6 |
| STAIR 2 | LEVEL L-1 TO LEVEL L-6 |
| STAIR 3 | LEVEL B-1 TO LEVEL L-6 |

LEVEL L-4	
STANDARD	41 SPACES
ACCESSIBLE	2 SPACES
	43 SPACES
LEVEL L-3	
STANDARD	41 SPACES
ACCESSIBLE	2 SPACES
	43 SPACES
LEVEL L-2	
STANDARD	41 SPACES
ACCESSIBLE	2 SPACES
	43 SPACES



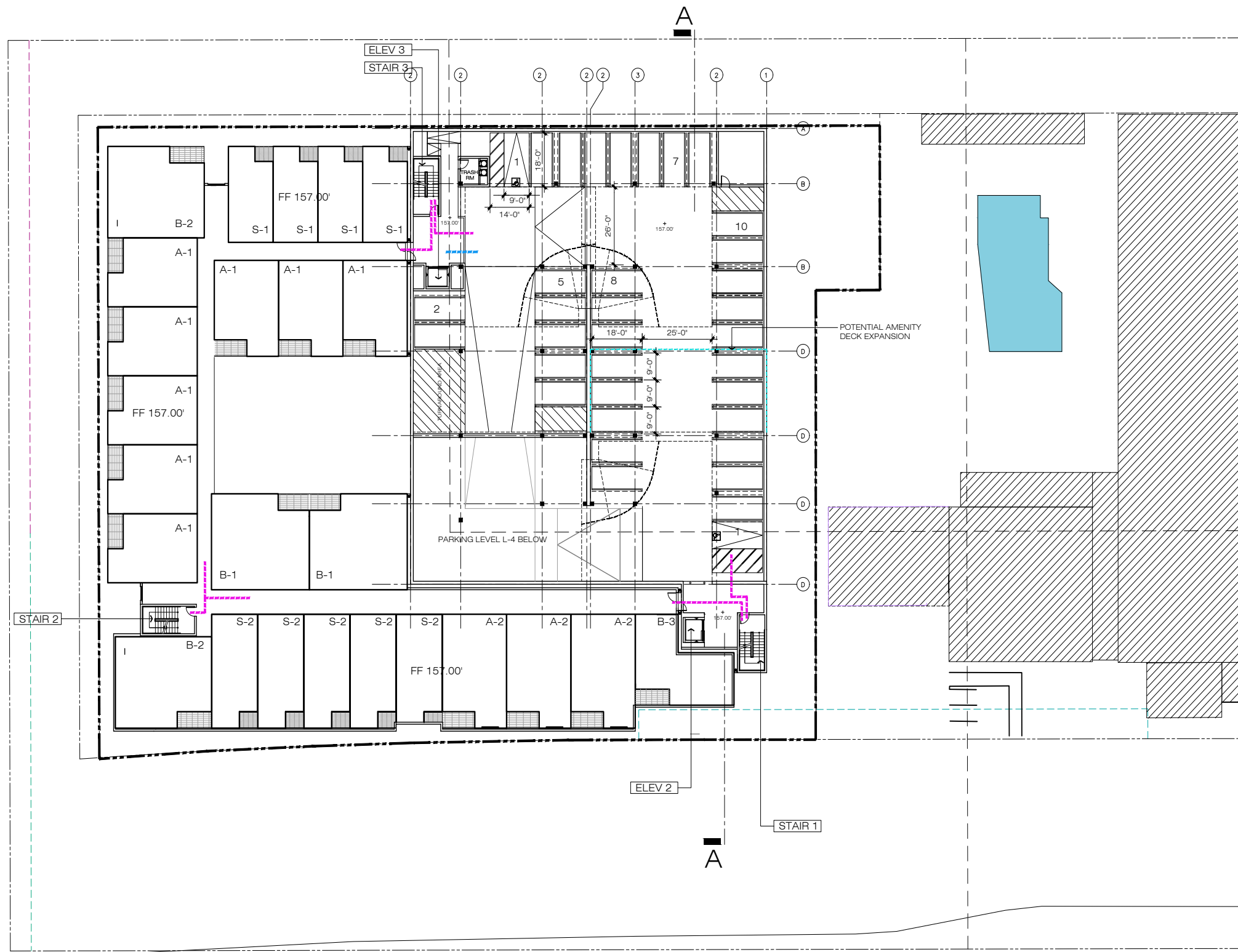
LEVEL L-2 TO LEVEL L-4
127.00', 137.00', 147.00'

SOURCE: Withee Malcolm Architects 2020



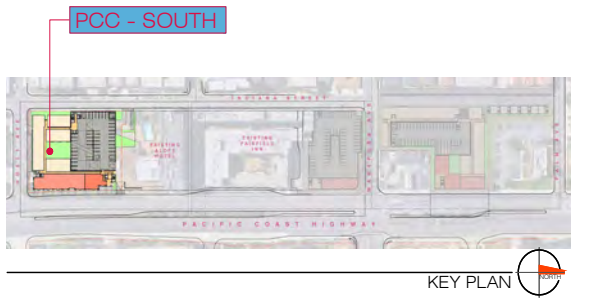
FIGURE 3-4E
Conceptual PCC-South Level L-2 to L-4
Pacific Coast Commons Specific Plan EIR Project

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- LEGEND**
- PEDESTRIAN PATH OF TRAVEL
 - EXIT ROUTE
- | | |
|----------------|---|
| ELEV 1 | COMMERCIAL / HOTEL PARKING (LEVEL B-1 TO L-1) |
| ELEV 2 | RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-6) |
| ELEV 3 | RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-6) |
| STAIR 1 | LEVEL B-1 TO LEVEL L-6 |
| STAIR 2 | LEVEL L-1 TO LEVEL L-6 |
| STAIR 3 | LEVEL B-1 TO LEVEL L-6 |

LEVEL L-5	
STANDARD ACCESSIBLE	31 SPACES
	3 SPACES
	34 SPACES



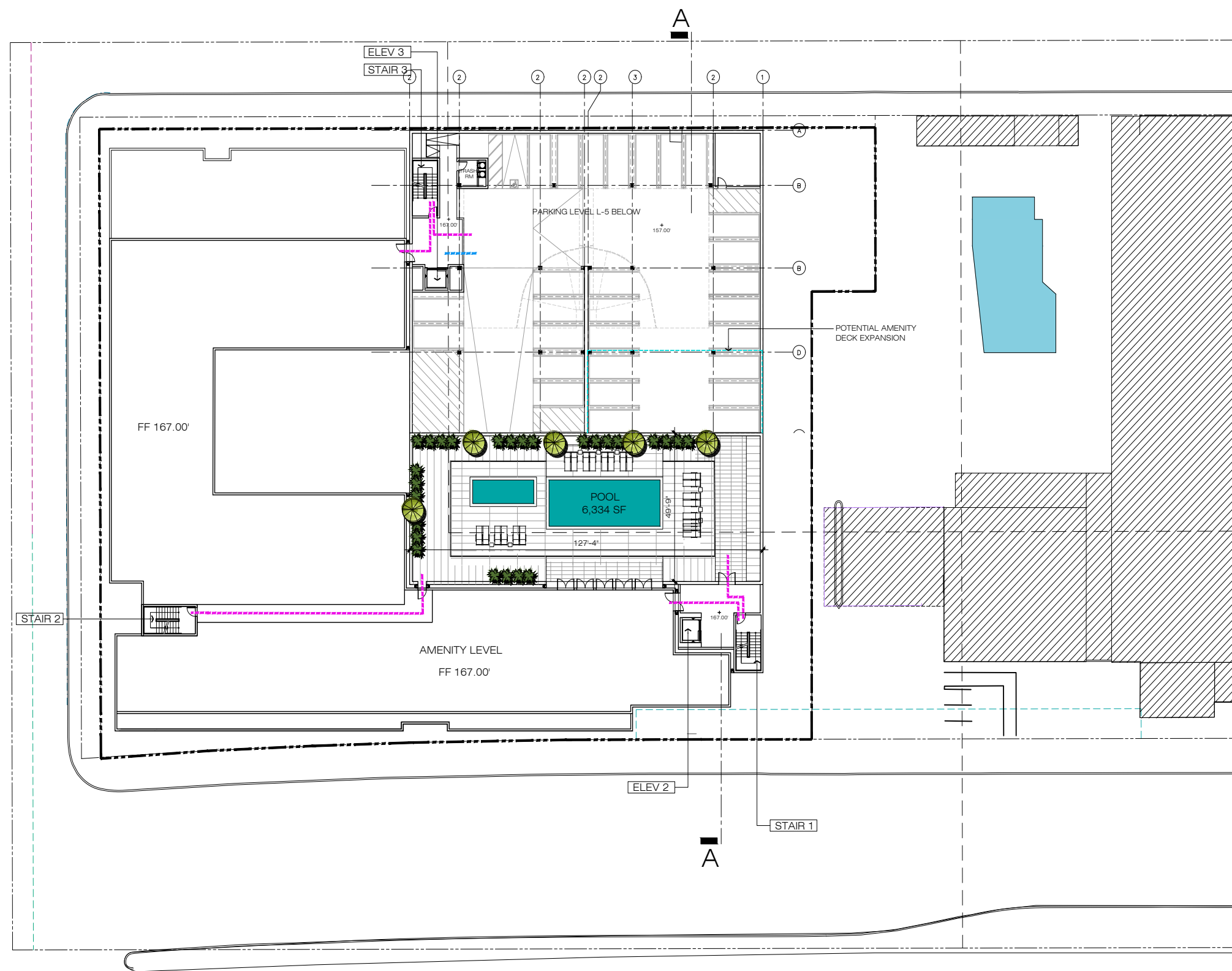
LEVEL L-5
157.00'

SOURCE: Withee Malcolm Architects 2020

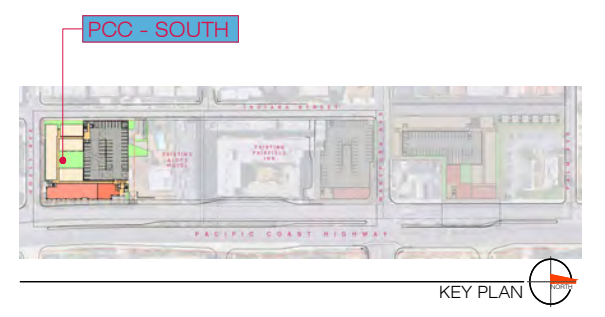


FIGURE 3-4F
Conceptual PCC-South Level L-5
Pacific Coast Commons Specific Plan EIR Project

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- LEGEND**
- PEDESTRIAN PATH OF TRAVEL
 - PARKING ACCESS FROM PUBLIC STREETS
 - EXIT ROUTE
-
- ELEV 1 COMMERCIAL / HOTEL PARKING (LEVEL B-1 TO L-1)
 - ELEV 2 RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-6)
 - ELEV 3 RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-6)
 - STAIR 1 LEVEL B-1 TO LEVEL L-6
 - STAIR 2 LEVEL L-1 TO LEVEL L-6
 - STAIR 3 LEVEL B-1 TO LEVEL L-6



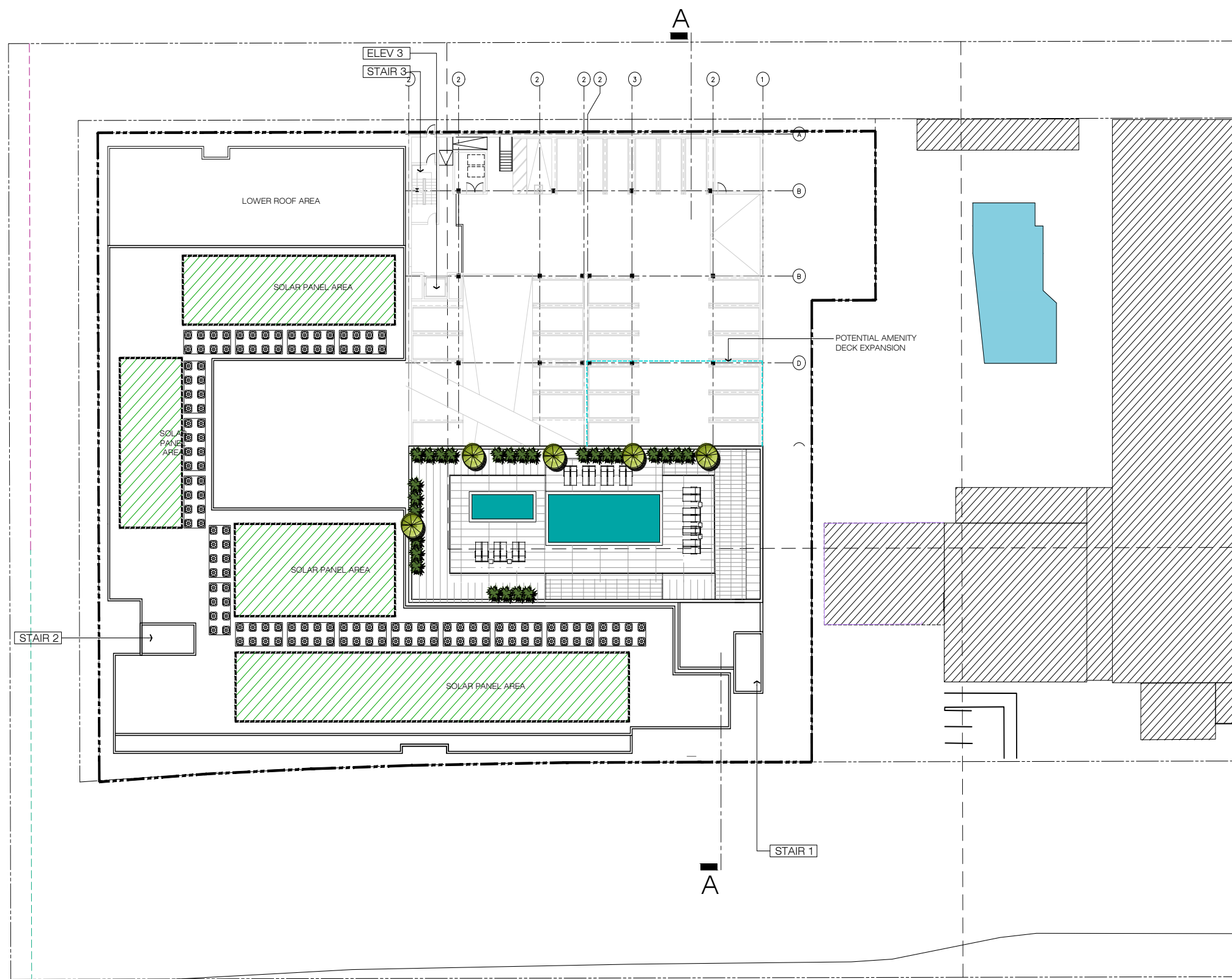
LEVEL L-6
167.00'

SOURCE: Withee Malcolm Architects 2020



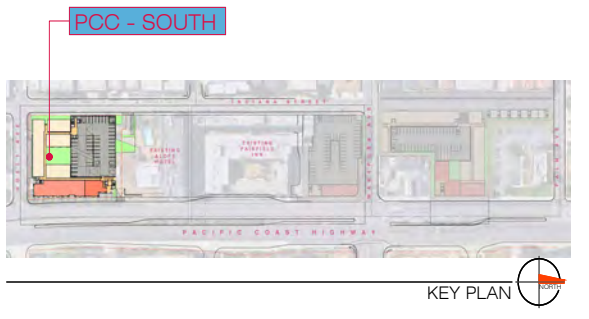
FIGURE 3-4G
 Conceptual PCC-South Level L-6
 Pacific Coast Commons Specific Plan EIR Project

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LEGEND

	PEDESTRIAN PATH OF TRAVEL
	PARKING ACCESS FROM PUBLIC STREETS
	EXIT ROUTE
ELEV 1	COMMERCIAL / HOTEL PARKING (LEVEL B-1 TO L-1)
ELEV 2	RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-6)
ELEV 3	RESIDENT ONLY ELEVATOR (LEVEL B-1 TO LEVEL L-6)
STAIR 1	LEVEL B-1 TO LEVEL L-6
STAIR 2	LEVEL L-1 TO LEVEL L-6
STAIR 3	LEVEL B-1 TO LEVEL L-6



ROOF PLAN

SOURCE: Withee Malcolm Architects 2020

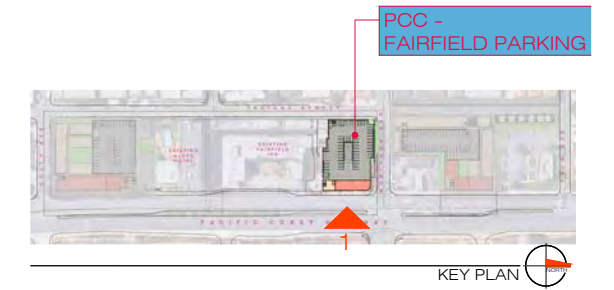


FIGURE 3-4H
 Conceptual PCC-South Roof Plan
 Pacific Coast Commons Specific Plan EIR Project

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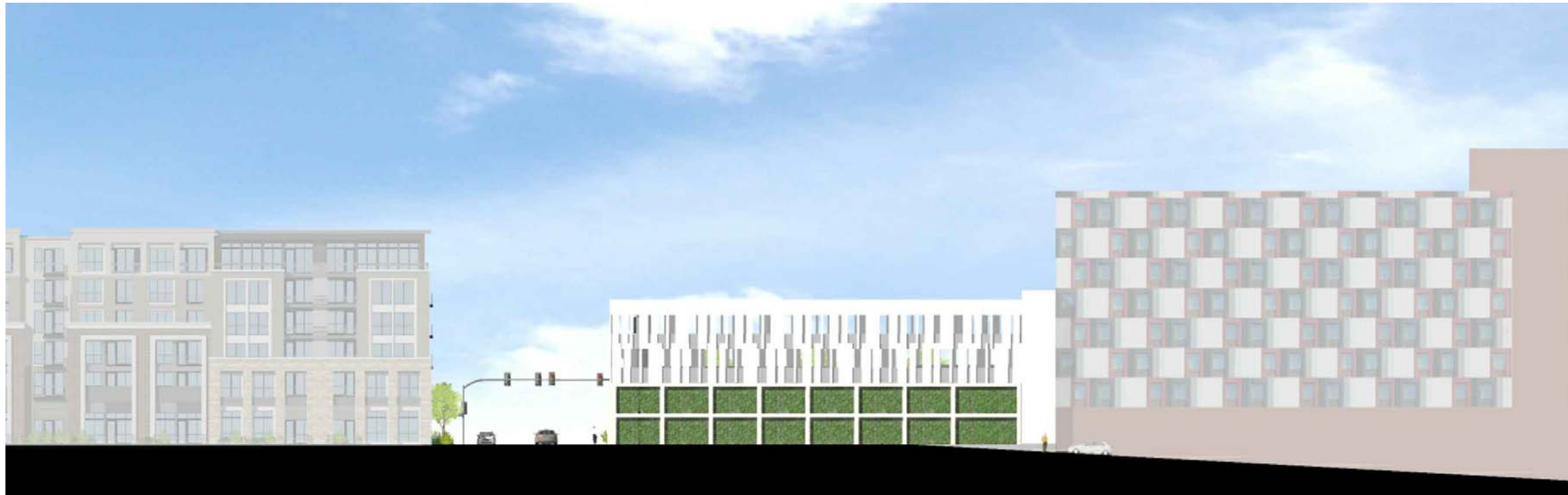


EAST ELEVATION ①



KEY PLAN

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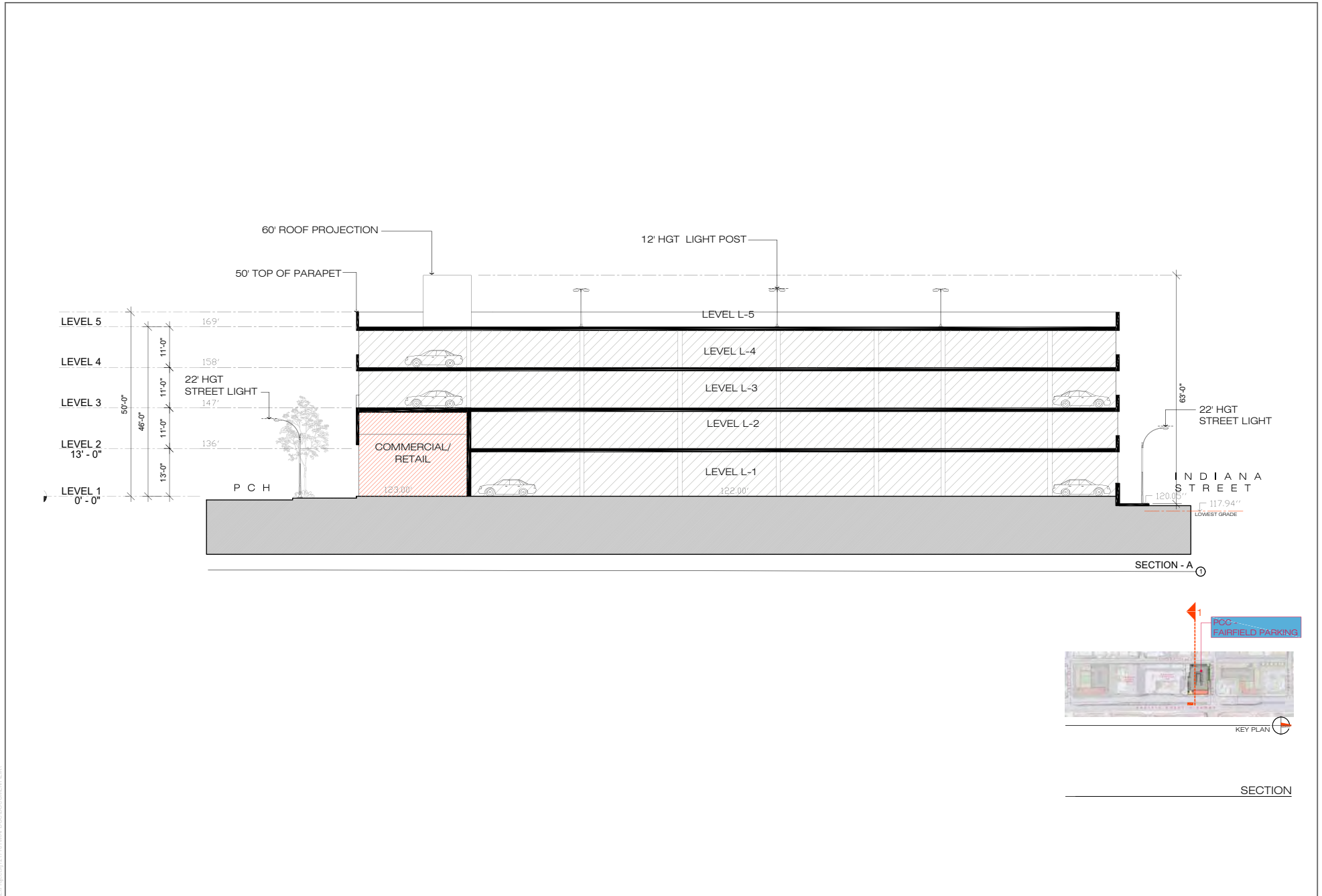
WEST ELEVATION



NORTH ELEVATION

SOURCE: Withee Malcolm Architects 2020

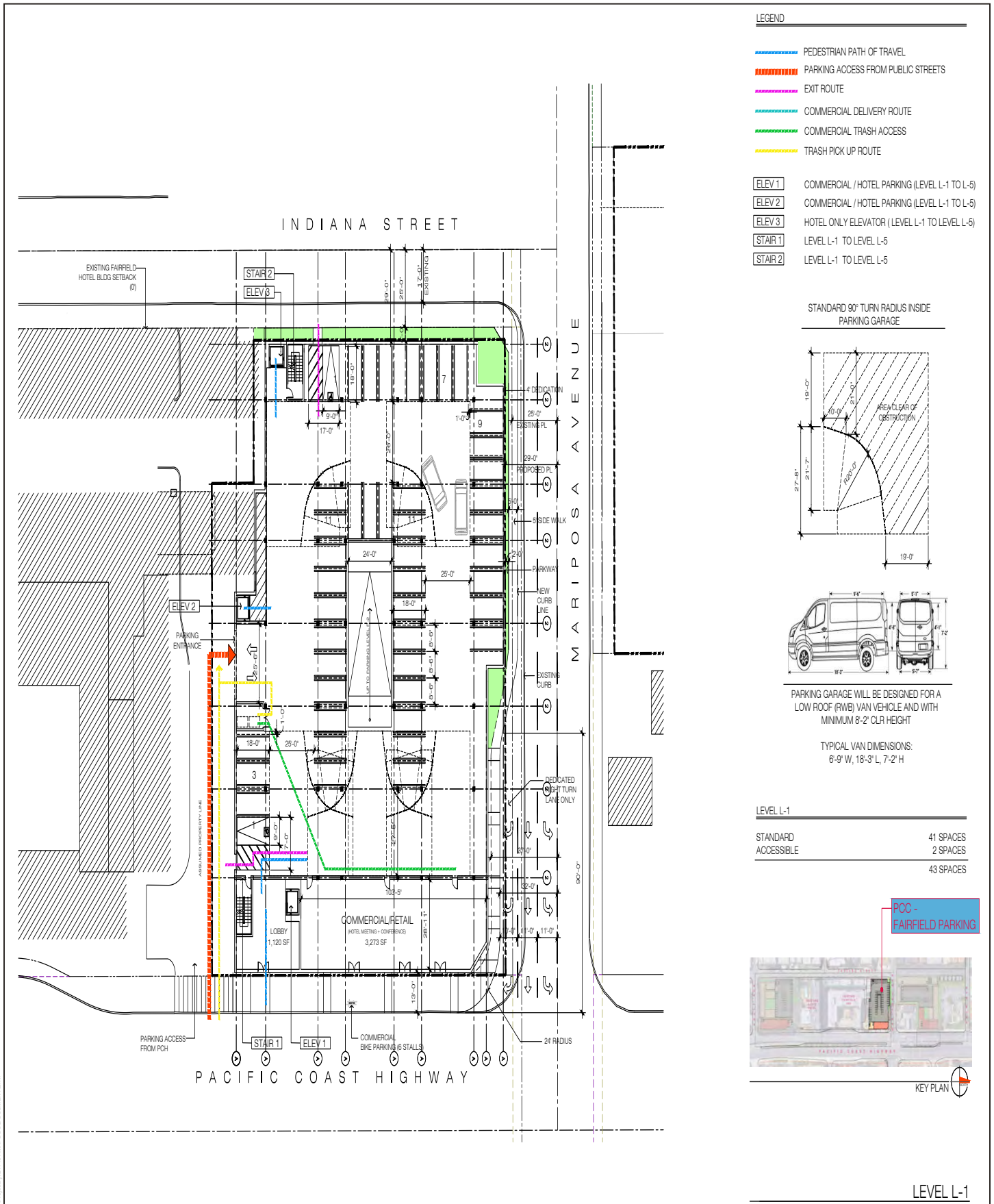
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SOURCE: Withee Malcolm Architects 2020

FIGURE 3-5C
Conceptual PCC-Fairfield Parking Section
 Pacific Coast Commons Specific Plan EIR Project

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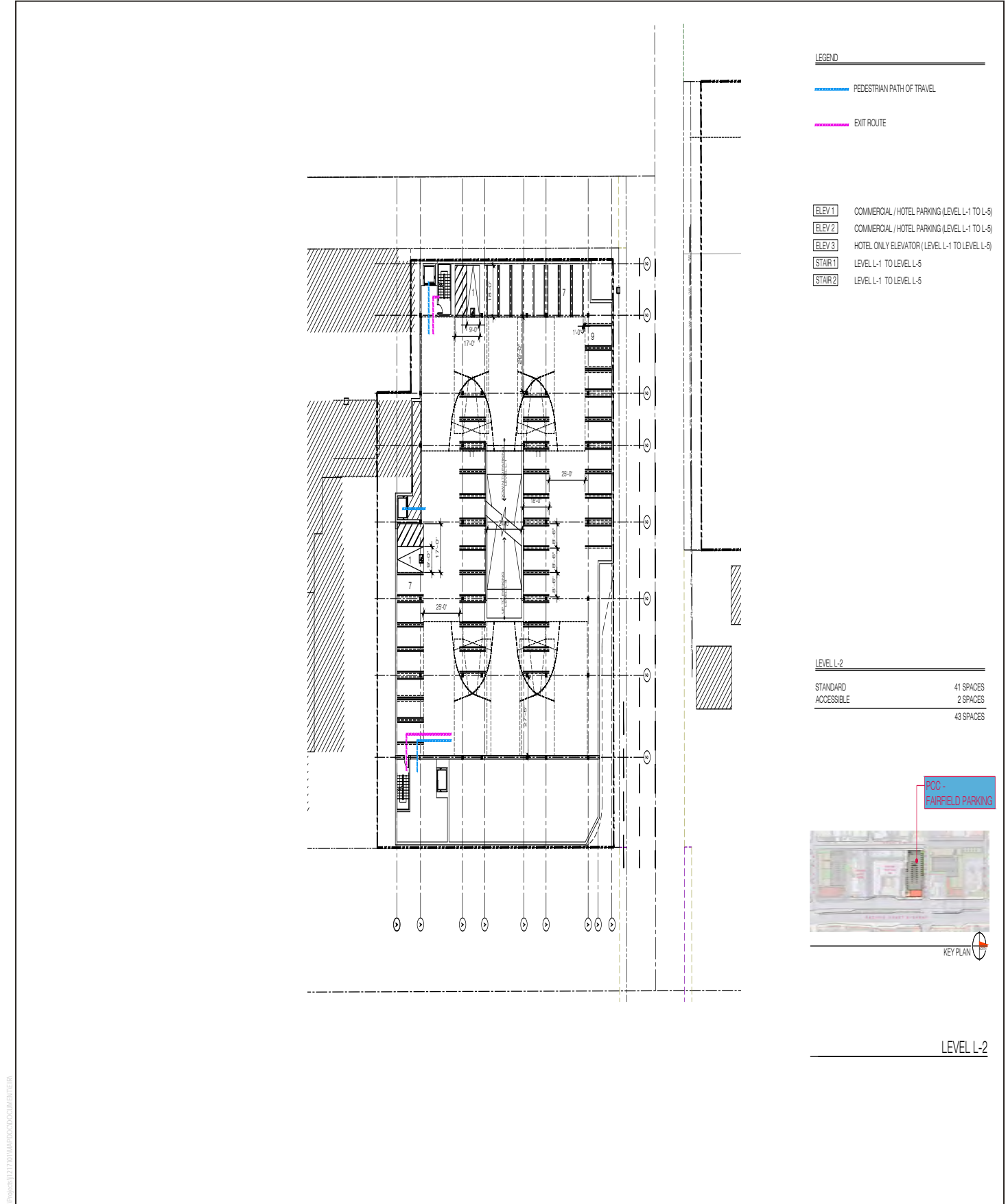


SOURCE: Withee Malcolm Architects 2020

FIGURE 3-5D

Conceptual PCC-Fairfield Parking Level L-1
Pacific Coast Commons Specific Plan EIR Project

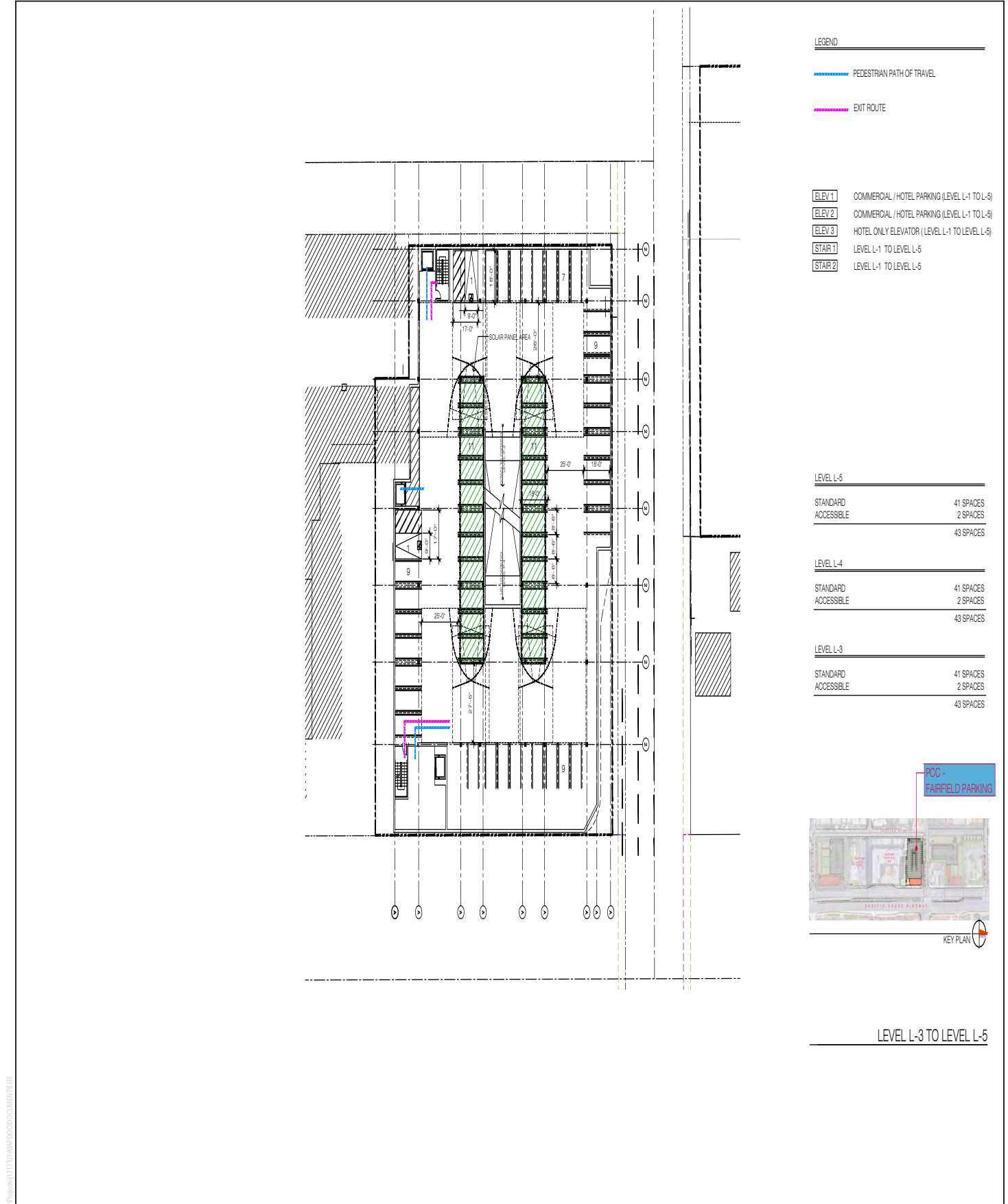
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SOURCE: Withee Malcolm Architects 2020

FIGURE 3-5E
Conceptual PCC-Fairfield Level L-2
 Pacific Coast Commons Specific Plan EIR Project

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SOURCE: Withee Malcolm Architects 2020

FIGURE 3-5F

Conceptual PCC-Fairfield Levels L-3 to L-5
 Pacific Coast Commons Specific Plan EIR Project

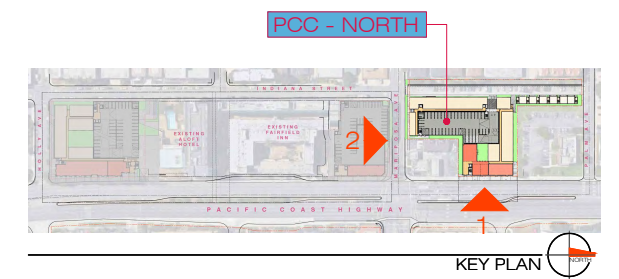
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EAST ELEVATION ①



SOUTH ELEVATION ②



KEY PLAN

ELEVATIONS

SOURCE: Withee Malcolm Architects 2020

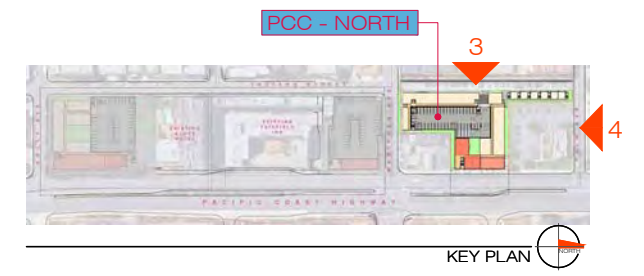
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WEST ELEVATION ③



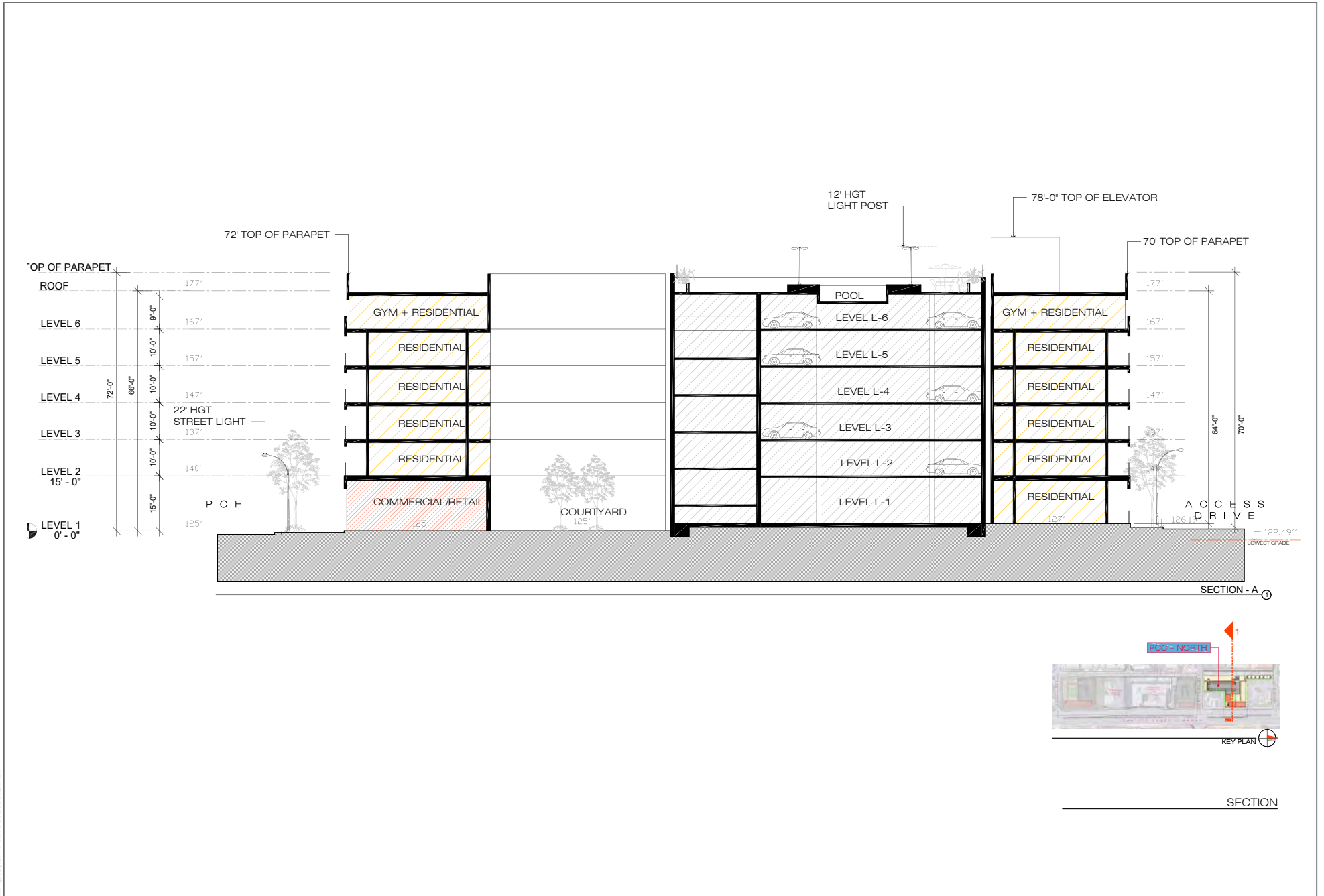
NORTH ELEVATION ④



KEY PLAN

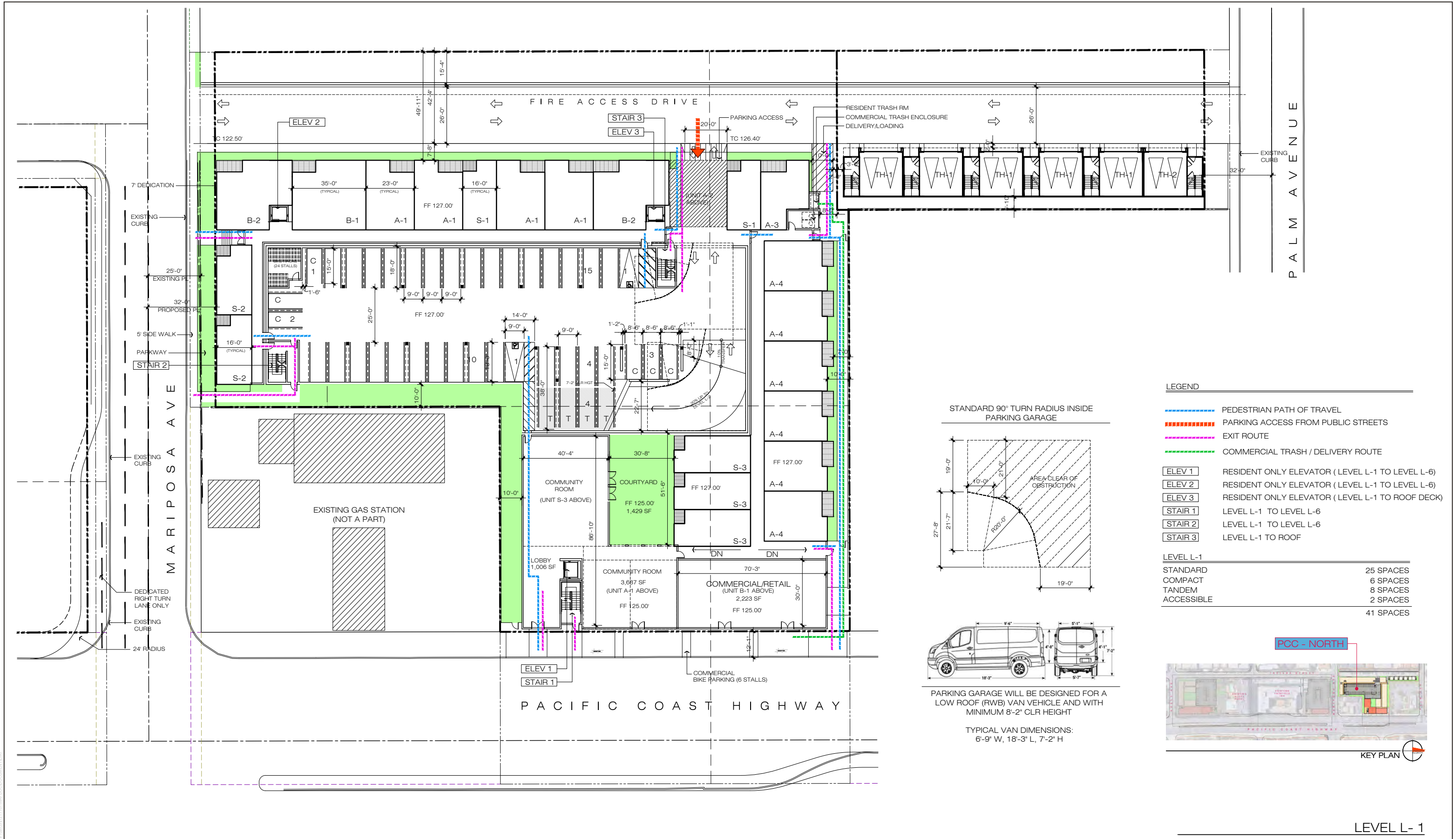
SOURCE: Withee Malcolm Architects 2020

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SOURCE: Withee Malcolm Architects 2020

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LEGEND

- PEDESTRIAN PATH OF TRAVEL
- PARKING ACCESS FROM PUBLIC STREETS
- EXIT ROUTE
- COMMERCIAL TRASH / DELIVERY ROUTE

ELEV 1 RESIDENT ONLY ELEVATOR (LEVEL L-1 TO LEVEL L-6)

ELEV 2 RESIDENT ONLY ELEVATOR (LEVEL L-1 TO LEVEL L-6)

ELEV 3 RESIDENT ONLY ELEVATOR (LEVEL L-1 TO ROOF DECK)

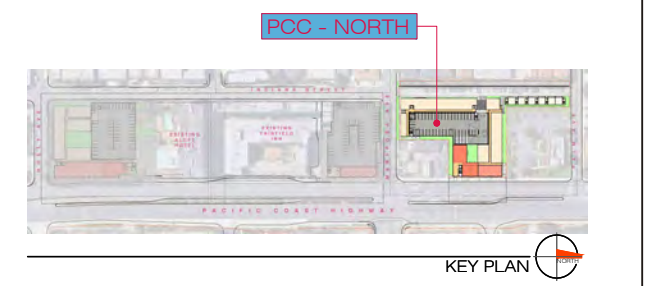
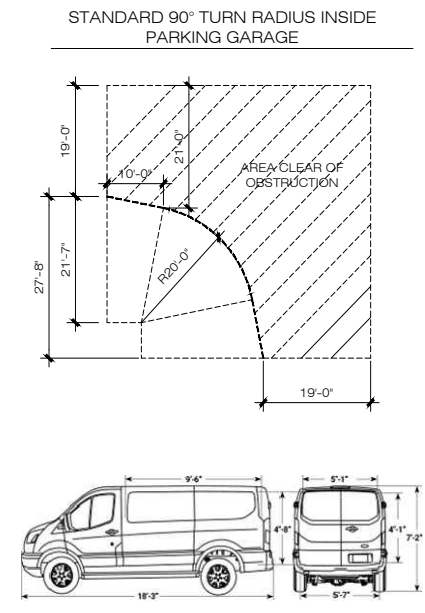
STAIR 1 LEVEL L-1 TO LEVEL L-6

STAIR 2 LEVEL L-1 TO LEVEL L-6

STAIR 3 LEVEL L-1 TO ROOF

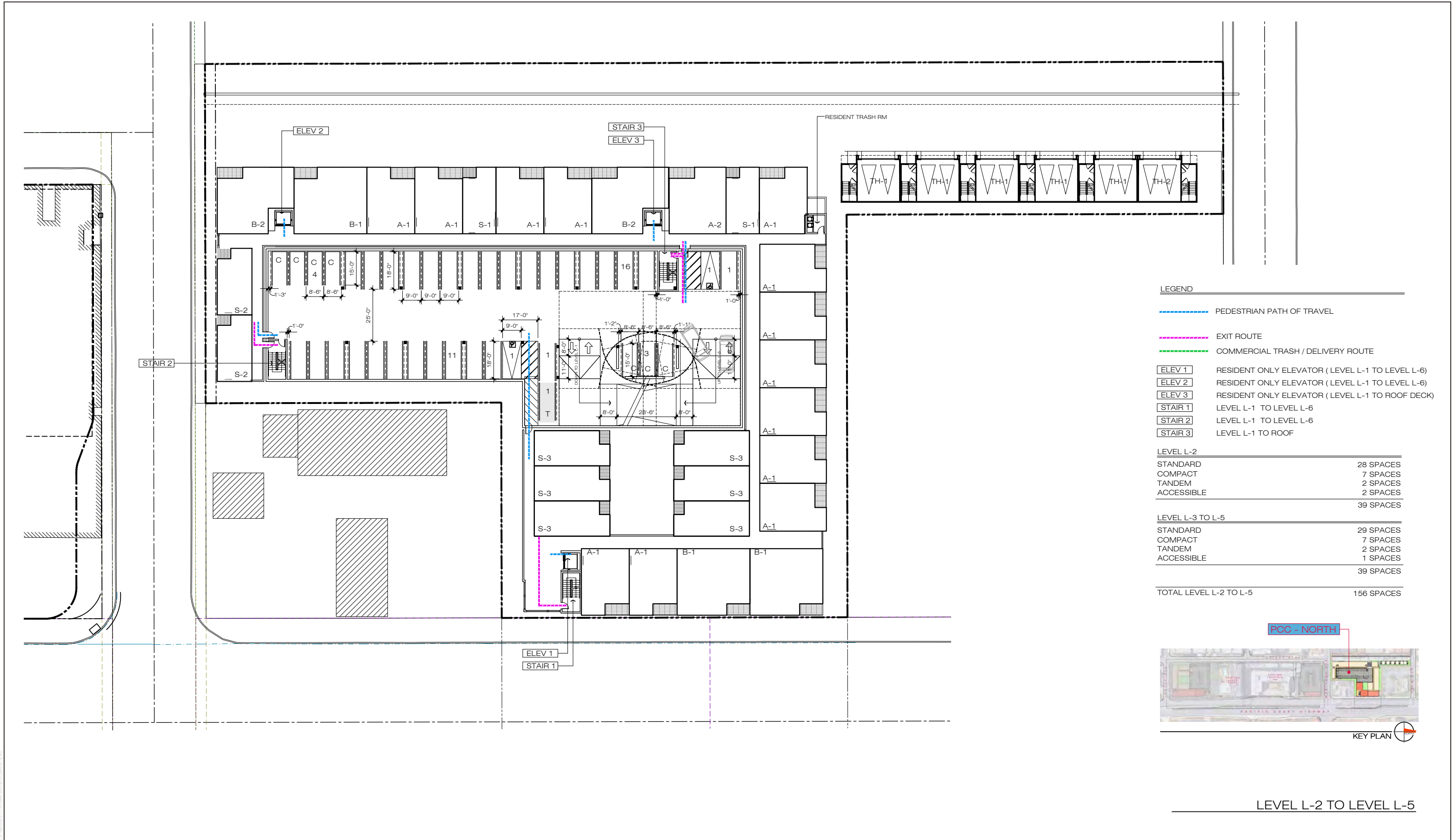
LEVEL L-1

STANDARD	25 SPACES
COMPACT	6 SPACES
TANDEM	8 SPACES
ACCESSIBLE	2 SPACES
TOTAL	41 SPACES



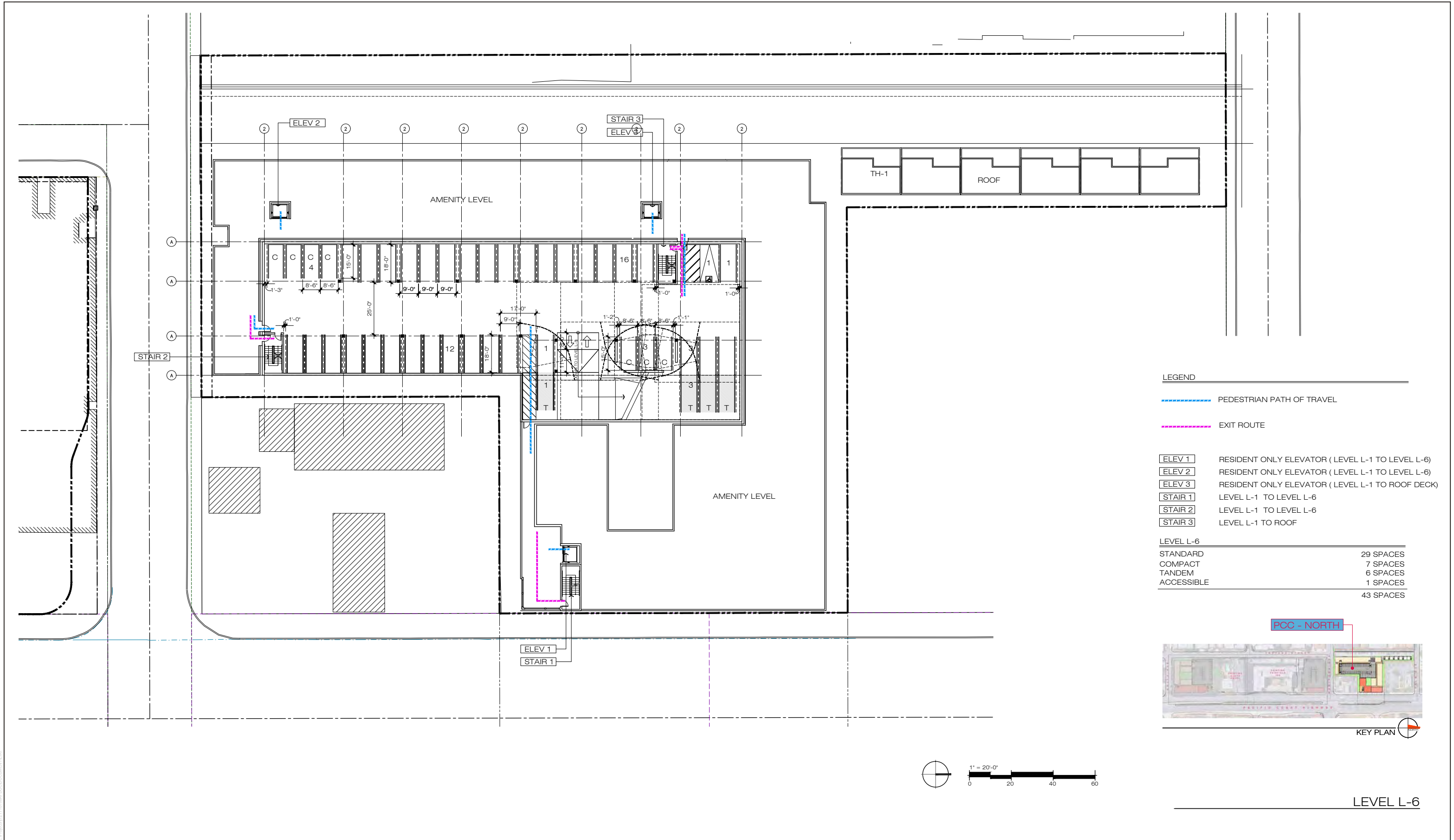
SOURCE: Withee Malcolm Architects 2020

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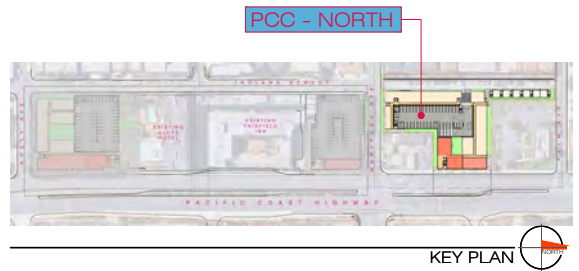
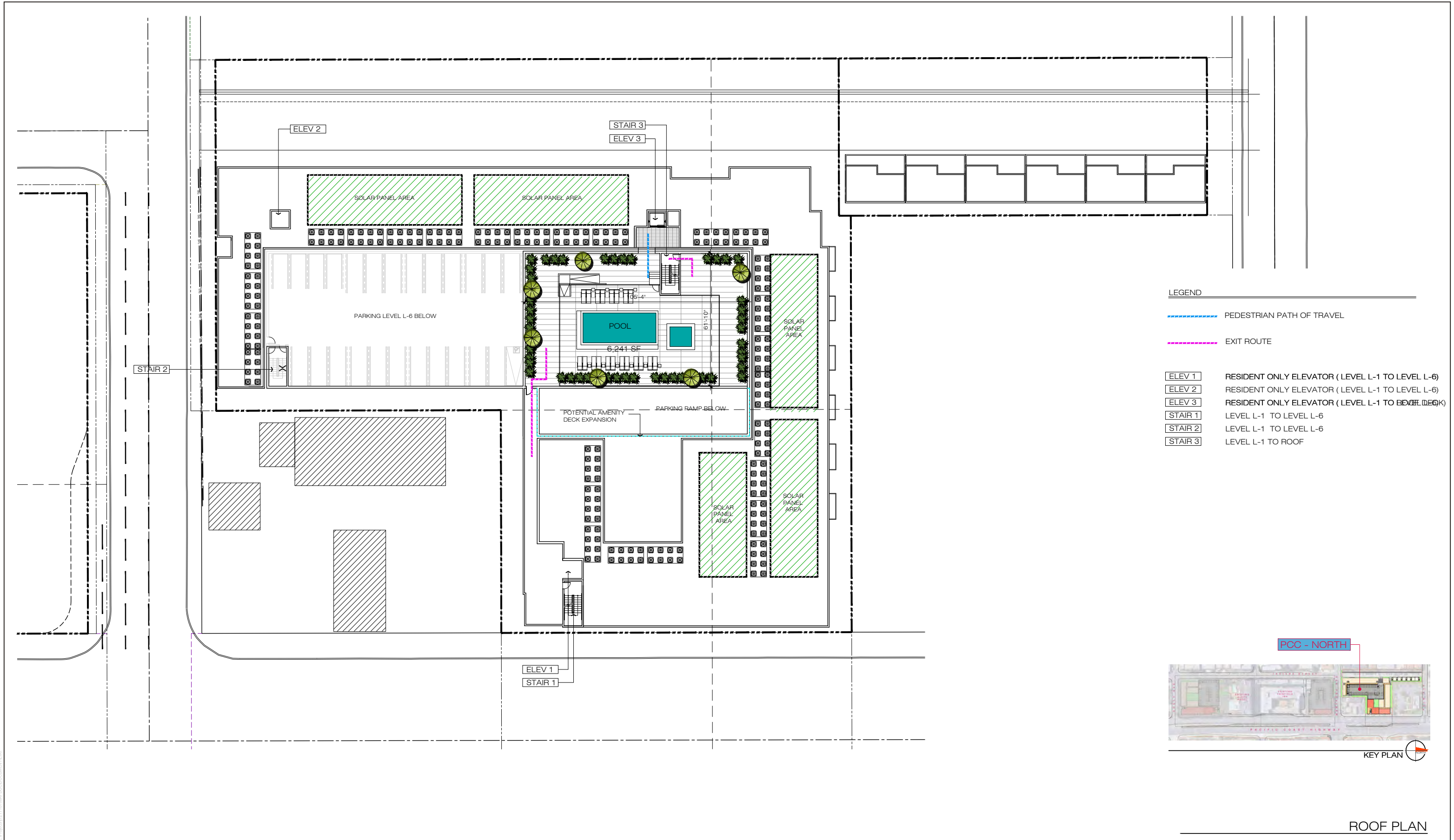
SOURCE: Withee Malcolm Architects 2020

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SOURCE: Withee Malcolm Architects 2020

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4.0 Introduction to Environmental Analysis

The following sections contain an analysis, by issue area, of the potentially significant environmental effects of the proposed Pacific Coast Commons Specific Plan (Specific Plan or Project). The environmental issue areas analyzed in this section are as follows:

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Cultural Resources (Section 4.3)
- Energy (Section 4.4)
- Geology and Soils (Section 4.5)
- Greenhouse Gas Emissions (Section 4.6)
- Hazards and Hazardous Materials (Section 4.7)
- Hydrology and Water Quality (Section 4.8)
- Land Use and Planning (Section 4.9)
- Noise (Section 4.10)
- Population and Housing (Section 4.11)
- Public Services and Recreation (Section 4.12)
- Transportation (Section 4.13)
- Tribal Cultural Resources (Section 4.14)
- Utilities and Service Systems (Section 4.15)

The discussions of each environmental issue area include the following subsections:

- Existing Conditions
- Relevant Plans, Policies, and Ordinances
- Thresholds of Significance
- Impacts Analysis
- Cumulative Impact Analysis
- Mitigation Measures
- Level of Significance after Mitigation
- References

As stated in the Notice of Preparation (see Appendix A-1), it was found that the proposed Project would have either no new impacts/no impacts or a less than significant impact without new mitigation relative to the following environmental issue areas. As such, these issue areas are not included as stand-alone sections in this Draft EIR, but are discussed in Section 5.5, Effects Found Not to be Significant.

- Agriculture and Forestry Resources
- Biological Resources
- Mineral Resources
- Wildfire

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4.1 Aesthetics

This section describes the existing visual and aesthetic conditions of the Pacific Coast Commons Specific Plan (Specific Plan or 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 site 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 conceptual site plans prepared by the Project applicant. Other sources consulted are listed in Section 4.1.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

4.1.1 Existing Conditions

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

Regional Conditions and Land Uses

Figure 2-2, Surrounding and Nearby Land Uses, in Chapter 2, Environmental Setting, of this Draft EIR, provides an overview of nearby 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 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 the El Segundo 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 (City of El Segundo 1992a).

The City is almost entirely built out and contains vegetation that is ornamental. 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 from the Project site include the elevated terrain of the Santa Monica Mountains to the north, San Gabriel Mountains to the north/northeast, the Lakes at El Segundo Golf Course to the southeast, 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 City of Manhattan Beach or north of the Project site in the City of Los Angeles.

Surrounding Land Uses

The Project site is surrounded by a variety of land uses, including residential, recreational, and commercial retail uses.

- Land Uses to the North: North of the Project site across Palm Avenue are commercial uses to the east and west sides of PCH. West of PCH, multi-family residential uses are located between commercial uses lining PCH and recreational uses (Washington Park). Farther north is Interstate 105 and Los Angeles International Airport in the City of Los Angeles. Multi-Family Residential (R-3) Zone and the General Commercial (C-3) Zone are located adjacent to the Project site. Open Space (O-S) Zone is designated to the northwest Project site and Corporate Office (CO) Zone is designated to the northeast.
- Land Uses to the East: The Project site is bordered by PCH to the east. Retail, restaurant, grocery, banking, and office land uses, accompanied by surface parking lots within strip-mall shopping centers, are located across PCH to the east. Farther east are numerous corporate offices and associated surface parking lots. The northernmost parcels within the Project site are adjacent to two developed parcels that include a gas station and a fast food restaurant. Properties to the east of the Project site are zoned C-3 and CO.
- Land Uses to the South: Retail and restaurant uses are located immediately south of the Project site across Holly Avenue. Farther south and southeast is the Raytheon Space Systems campus, the Lakes at El Segundo golf course, and the West Basin Municipal Water District campus. The Smoky Hollow Specific Plan industrial area is located southwest of the Project site. Land uses within the C-3 Zone are located adjacent to the Project site to the south. Properties located to the southeast and southwest of the Project site are zoned CO and Smoky Hollow Specific Plan (SH), respectively.
- Land Uses to the West: Multi-family residential uses border the Project site across Indiana Avenue. The linear Washington Park (including the Southern California Edison transmission line easement) is located farther west of these residential uses, followed by a large single-family residential community with various schools, community parks, and churches. The Chevron Refinery is approximately 0.4-mile southwest of the Project site. The Hyperion Water Reclamation Plant and Scattergood Generating Station, and the Pacific Ocean, are approximately 2 miles west of the Project site. Properties located adjacent to the Project site to the west are zoned R-3.

Project Site

The Project site consists of two existing hotel properties, which would not be altered or redeveloped with the proposed Project, and three development areas: (1) Pacific Coast Commons – South (PCC-South), (2) Pacific Coast Commons – Fairfield Parking (PCC-Fairfield Parking), and (3) Pacific Coast Commons – North (PCC-North). The existing conditions within the three proposed development areas of the Project site, as well as the two existing hotel properties, are described as follows:

Pacific Coast Commons – South

Figure 4.1-1, PCC-South Existing Photos, provides pedestrian-level view of this portion of the Project site. The PCC-South portion of the Project site currently contains parking for the Aloft Hotel and the W XYZ lounge. The parking lot is screened from PCH by trees and shrubs, along with a chain-link fence. The W XYZ lounge fronts PCH and is red-brown

in color with small native plants in front of the signage. Seven mature trees are located adjacent to the sidewalk along PCH, four mature trees are located along the frontage of Indiana Avenue, and three mature trees are located within the parking lot area. It is anticipated that all trees would be removed for development of PCC-South.

Aloft Hotel

Figure 4.1-2, Aloft Hotel Existing Photos, provides pedestrian-level view of this portion of the Project site. The Aloft Hotel was originally the nine-story “South Tower” of the Hacienda Hotel (currently Fairfield Inn and Suites Hotel) and was built in 1979. This tower was sold and became an independent hotel, and eventually became the Aloft Hotel. In 1987, the entire exterior of the hotel was remodeled, which resulted in the loss of the original decorative colored curtain wall paneling and pierced, Mid-century Modern-style screens on the building side that faces PCH. For more information on the history and architecture of the hotel, see Section 4.3, Cultural Resources.

The Aloft Hotel portion of the Project site fronts both PCH and Indiana Street. The 9-story tower is white on the south-facing side and red-brown on the east-facing side with palm trees, native plants, and trees lining the building along PCH. The Aloft Hotel is approximately 85 feet in height and has 246 rooms. The Aloft Hotel operates 24 hours a day. The lounge, which serves the hotel, is open daily from 4 p.m. to midnight.

Fairfield Inn and Suites Hotel

Figure 4.1-3, Fairfield Inn and Suites Hotel Existing Photos, provides pedestrian-level view of this portion of the Project site. The Fairfield Inn and Suites Hotel began construction in 1958 and included adjacent retail shops. Subsequent to a zone change within six months of the hotel’s opening, a new seven-story 180-room hotel wing on the west side of the property was completed in 1961 and was called the Thunderbird Hotel. Minor changes to the property occurred in the 1960s. In 1965, the hotel was sold, and the hotel was renamed to Hacienda Hotel. For more information on the history and architecture of the hotel, see Section 4.3, Cultural Resources.

The Fairfield Inn and Suites Hotel building consists of three connected buildings, but comprises one hotel with multiple wings and additions. The Fairfield Inn and Suites Hotel (525 Sepulveda Boulevard) presents as three wings: (1) a main four-story hotel (approximately 39 feet high) that contains the hotel lobby and hotel rooms around an open-air courtyard and pool area; (2) a nine-story wing (approximately 100 feet high) along Indiana Street, added circa 1960–1962; and (3) one- to two-story conference room and restaurant wing extending the property to Mariposa Avenue, north of the main hotel. The buildings are connected by hallways, and suspended pedestrian walkways, and open-wall building connections.

The south-facing portion of the main tower is visible from PCH and has small outdoor balconies. The north-facing portion of the main hotel is white. Moving from the four-story, white-colored portion of the main building north, the main building becomes two stories in height along PCH. The landscaping along PCH consists of small shrubs and palm trees. The entrance of the Fairfield Inn and Suites Hotel is north-facing and contains similar white and red-brown coloring. The west tower may be visible to vehicles or pedestrians on the northbound side of PCH and is similarly white and red-brown.

Pacific Coast Commons – Fairfield Parking

Figure 4.1-4, PCC-Fairfield Parking Existing Photos, provides pedestrian-level view of this portion of the Project site. The PCC-Fairfield Parking portion of the Project site is currently developed with the one- to two-story conference room and restaurant wing extending the property to Mariposa Avenue, just north of the main hotel.

The Food and Beverage Building (formerly the Hacienda Restaurant), which is no longer in operation, and ballroom, meeting, and other space for the Fairfield Inn and Suites Hotel, which is periodically used, are the spaces that would be demolished and redeveloped with the implementation of the proposed Project. The existing building is two stories and 36 feet tall and is 41,660 square feet in size. It is attached to the nine-story west tower building (to remain as-is). This portion faces east toward PCH and is beige. The landscaping is limited to shrubs adjacent to the sidewalk on PCH and eight tall palm trees within the Project site at the intersection of PCH and Mariposa Avenue. Views from Mariposa Avenue are limited to the two-story beige wall from the Food and Beverage Building with limited architectural elements.

Pacific Coast Commons – North

Figure 4.1-5, PCC-North Existing Photos, provides pedestrian-level view of this portion of the Project site. The PCC-North portion of the Project site is the surface parking area for the Fairfield Inn and Suites Hotel north of Mariposa Avenue. There are currently 232 parking spaces on this site, which are accessed from Mariposa Avenue, and there are exit-only driveways on PCH and Palm Avenue. There are no landscaping features or trees within the surface parking area, and there is an existing iron fence along Mariposa Avenue.

Scenic Vistas

Landforms and varied topography such as mountain ranges, coastlines, and hills within Los Angeles County allow for a variety of long-range views that define the aesthetically diverse communities in Los Angeles County. These landforms not only create scenic backdrops against developed communities, but also provide environmental and public benefits to residents. While existing scenic resources in Los Angeles County are recognized for their importance as they contrast against developed urban areas, the County of Los Angeles General Plan does not identify any officially designated scenic vistas (County of Los Angeles 2014). Likewise, the City's General Plan does not identify any officially designated scenic vistas within City boundaries (City of El Segundo 1992a). The western boundary of the City includes 0.8-mile of Pacific Ocean shoreline; however, this area is not visible from the Project site. The view from the Project site are limited to surrounding urban development.

Scenic Highways

According to Caltrans, the County of Los Angeles has two officially designated state scenic highways and 11 eligible scenic highways (Caltrans 2019). Route 2 and Route 27, the County of Los Angeles's two designated scenic highways, are located 22.9 miles northeast and 13.3 miles northwest of the Project site, respectively. Route 1, an eligible scenic highway, is the closest to the Project site, located approximately 6 miles northwest and 20.4 miles southeast of the Project site as the road extends north and south along the coast. None of Los Angeles County's officially designated or eligible scenic highways are visible from the Project site, nor is the Project site visible from the highways. Further, there are no state designated scenic highways within City boundaries (Caltrans 2019).

Light and Glare

The Project site is located in a highly developed area along PCH and contains commercial businesses that produce light sources from interior lighting and glare from signage and glass windows. The City is urbanized, with many existing 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. Buildings and structures with glass, metal, and polished exterior or roofing materials contribute to localized sources of glare. For example, surrounding buildings in the Project area, including the commercial uses to the south; retail, restaurant, and office

uses along PCH; and residential uses to the north and east, contribute to sources of light and glare in the form of interior and exterior lighting signage. Exterior lighting sources such as lighted walkways and outdoor areas (e.g., pools and terraces), and landscape accent lighting are typically common on hotel and higher volume commercial properties in the area. Furthermore, there are light posts illuminating PCH in the existing median.

Shade or Shadow

The Project site is currently developed with the Aloft Hotel and the Fairfield Inn and Suites Hotel, both of which are nine stories in height. These uses regularly cast shadows on the adjacent residential land uses. Single-story commercial buildings line the eastern portion of PCH. Due to their relatively low vertical profile, these buildings do not create substantial shadows on PCH or adjacent land uses.

4.1.2 Relevant Plans, Policies, and Ordinances

Federal

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

State

California Scenic Highway System

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

California Code of Regulations

Title 24 – California Building Standards Code

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 / 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. All outdoor luminaires rated above 150 watts shall comply with the backlight, up light, and glare (BUG) ratings in accordance with IES TM-15-11, Addendum A, and shall be provided with a minimum of 40% dimming capability activated to full on by motion sensor or other automatic control. 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% dimming at night. Section 140.8 of the California Energy Code sets forth lighting power density restrictions for signs.

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.

Article 3, Offenses Relating to Traffic Devices (21450–21468) (Article 3 enacted by Stats. 1959, Ch. 3.), Section 21466.5. 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.

Regional and Local

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 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 existing 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 (City of El Segundo 1992a, 1992b, 1992c).

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.

City of 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).

Chapter 18, Signs

Section 15-18-5 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.

Chapter 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).

Chapter 30, 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 15-30-2, 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.

Proposed PCC Specific Plan

Requirements set forth in the Specific Plan's Development Standards that are relevant for the topic of aesthetics include the following:

B.2 Height:

- a. Buildings and structures within the PCC Mixed-Use 1 (PCC MU-1) land use district in the Specific Plan cannot exceed 90 feet in height including elevator/stairwell roof projections, measured from the lowest finished grade to the highest point of measurement. Light standards on roof level parking areas and roof level recreational facilities/open space areas are permitted and they cannot exceed 14 feet in height. Exceptions to building height are permitted in accordance with ESMC §15-2-3.
- b. Buildings and structures within the PCC Commercial-1 (PCC COM-1) land use district in the Specific Plan cannot exceed 105 feet in height, measured from lowest finished grade to the highest point of measurement. Exceptions to building height are permitted in accordance with ESMC §15-2-3.
- c. Buildings and structures within the PCC Commercial-2 (PCC COM-2) land use district in the Specific Plan cannot exceed 100 feet in height, measured from lowest finished grade to the highest point of measurement. Exceptions to building height are permitted in accordance with ESMC §15-2-3.
- d. Buildings and structures within the PCC Commercial-3 (PCC COM-3) land use district in the Specific Plan cannot exceed 68 feet in height including elevator/stairwell roof projections, measured from lowest finished grade to the highest point of measurement. Light standards on roof level parking areas are permitted and they cannot exceed 14 feet in height. Exceptions to building height are permitted in accordance with ESMC §15-2-3.
- e. Buildings and structures within the PCC Mixed-Use 2 (PCC MU-2) land use district in the Specific Plan cannot exceed 85 feet in height including elevator/stairwell roof projections, measured from lowest finished grade to the highest point of measurement. Light standards on roof level parking areas and roof level recreational facilities/open space areas are permitted and they cannot exceed 14 additional feet in height. Exceptions to building height are permitted in accordance with ESMC §15-2-3.

E. Landscaping: 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 (VUAs) as defined in ESMC §15-1-6. A Landscape Master Plan must be prepared for each sub-district of the Specific Plan area to ensure a unified appearance implementing the intent of the Design Guidelines and objectives of this Specific Plan. The Landscape Master Plan must be prepared by a licensed landscape architect and it must be submitted to the City prior to approval of the first site plan review within the Specific Plan area.

E.1 Landscaping must be provided in all property perimeter areas except where buildings, driveways, pedestrian walkways, driveway visibility and corner clearance areas are located. One shade tree must be provided for every 25 feet of street frontage where landscaping is provided. One shade tree must be provided for every 25 feet along interior property lines where landscaping is provided in the PCC Mixed-Use 2 (PCC MU-2) land use district. Trees are not required to be evenly spaced.

G.1 Lighting must be adequate throughout the Specific Plan area and shielded to minimize off-site illumination. Submittal of photometric studies is required as part of any site plan review submittal which includes parking lots and parking structures in the Specific Plan area.

G.3. Street lighting must be provided in accordance with ESMC requirements.

H.1. Signage within the Specific Plan area must conform to the signage regulations of ESMC Chapter 15-18 except as established and approved in a Master Sign Program for each land use district in the Specific Plan. The existing Master Sign Program for the existing buildings in the Specific Plan area (for the Aloft and the Fairfield Inn and Suites hotels) remains in effect and is excluded from the Master Sign Program requirements for the new development.

H.3. An Electronic Message Center sign as defined in ESMC Chapter 15-18 that is a wall sign is permitted up to 150 square feet in size. Such sign must be located within 100 feet of Pacific Coast Highway.

H.4. Neon signage is not permitted on any building façades facing west in the PCC Mixed-Use 1 land use district or any building facades facing west in the PCC Commercial-3 land use district. Neon signage is not permitted on the Palm Avenue street frontage or on any building facades facing west in the PCC Mixed-Use 2 land use district between Mariposa and Palm Avenues or along the Palm Avenue.

H.6. A Master Sign Program for each land use district in the Specific Plan area must be developed and submitted for review and approval by the Director of Development Services concurrent with the first site plan review in that land use district within the Specific Plan. The Master Sign Program must include the following elements: Master signage (entryways, common sign design throughout the Specific Plan area); Sign standards developed for the mixed-use multiple-family residential and commercial development; Provisions for wayfinding and decorative elements such as banners; General features that all signs are required to comply with; and Regulations for temporary signs (including construction signs).

I.4. Exterior lighting must be energy efficient and designed to minimize light pollution.

4.1.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to aesthetics 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 aesthetics would occur if the Project would:

- a) Have a substantial adverse effect on a scenic vista.
- b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible

vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.

- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.1.4 Impacts Analysis

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

The Project site is currently developed and located within a highly urbanized, relatively flat portion of the City. As such, views from the Project site and in the vicinity of the Project site are not particularly scenic. The City's General Plan does not identify any officially designated scenic vistas within City boundaries (City of El Segundo 1992). Further, the County of Los Angeles's General Plan does not identify any officially designated scenic vistas for conservation purposes (County of Los Angeles 2014). The western boundary of the City includes 0.8 miles of Pacific Ocean shoreline; however, this area is not visible from the Project site. The views from the Project site are limited to existing urban development. Scenic resources visible from the regional Project area include the elevated terrain of the Santa Monica Mountains to the north, San Gabriel Mountains to the north/northeast, the Lakes at El Segundo Golf Course to the southeast, and the coastline and beaches to the west. However, these scenic resources are not visible from the Project site due to the distance and intervening development. Although open space at Washington Park and Freedom Park provide some valued viewshed within the proximity of the Project, the intervening residential uses prevent extensive views of the Project site from these parks. As such, although the Project would result in visual changes on the Project site due to increased intensity of use, these changes would not adversely affect a scenic vista. In summary, due to the urban, developed character of the existing viewshed, the presence and proximity of existing nine- to 20-story developments along PCH, as well as existing topography in the area, the proposed Project would not have a substantial adverse effect to existing scenic views of the Santa Monica Mountains, San Gabriel Mountains, the coastline, or beaches, and no mitigation is required.

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

There are currently no designated state scenic highways or eligible state scenic highways in the City of El Segundo. The nearest eligible scenic highway, Route 1, runs from Route 187 near the City of Santa Monica (approximately 6 miles northwest of the Project site), to Route 101 near El Rio in Ventura County. The nearest officially designated state scenic highway, Route 27 near the Topanga State Park, is located approximately 13.3 miles northwest of the Project site (Caltrans 2019). Due to distance, intervening terrain, and intervening development, the proposed Project would not be visible from the eligible state scenic segment of Route 1 nor the officially designated state scenic highway segment of Route 27. As such, the proposed Project would not damage scenic resources within a state scenic highway, and no mitigation is required.

Threshold 4.1c 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?

California Public Resources Code Section 21071 defines an “urbanized area” as “(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.” As further discussed in Section 4.11, Population and Housing, the Southern California Association of Governments estimated 16,033 residents in the City in 2010; the City’s General Plan estimated 17,269 residents in the City by 2010; and the Southern California Association of Governments estimated 17,200 residents in the City by 2045. However, the City is adjacent to the City of Los Angeles to the north, the City of Hawthorne to the east, and City of Manhattan Beach to the south. The combined population of the City of El Segundo and any combination of not more than two of these adjacent cities is well over 100,000 persons. Therefore, the following analysis considers whether the proposed Project would conflict with applicable zoning or other regulations governing scenic quality.

The policy documents and other regulations applicable to the Project site, as they relate to scenic quality, are listed above in Section 4.1.2, Relevant Plans, Policies and Ordinances. With regards to local plans and policies, under existing conditions, the Project site is subject to the El Segundo General Plan and the ESMC. The Project would involve adoption of the proposed Specific Plan, which would establish a new regulatory framework within the Specific Plan area. As discussed in Section 4.9, Land Use and Planning, approval of the Specific Plan and implementation of the Project would require approval of a General Plan Amendment (No. GPA 19-01) to change the Land Use Designation from “General Commercial” and “Parking” to “Pacific Coast Commons Specific Plan (PCCSP)” with an accompanying General Plan Amendment Land Use map change (No. GPA 19-01), a Zone Text Amendment (No. ZTA 19-08) to add a new ESMC §15-3-2(A)(12) “Pacific Coast Commons Specific Plan (PCCSP)”, and Zone Change (No. ZC-19-01).

As noted in Chapter 2, Environmental Setting, the Aloft Hotel is 98,741 net square feet with an existing 0.992 floor area ratio (FAR) based on its current lot size and configuration where a maximum of 1.0 FAR is allowed. The three buildings that comprise the Fairfield Inn and Suites Hotel total 190,026 net square feet in size with an existing 1.94 FAR where 1.0 FAR is allowed (existing legal, non-conforming condition). Both properties have non-conforming conditions in regard to many development standards as they were built prior to the current development standards of the General Commercial (C-3) Zone (hotels are an allowable use within that zone). The proposed Specific Plan would allow for the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties to be in compliance with the Specific Plan as the hotels would be consistent with the newly established development standards in the Commercial-1 (COM-1) and Commercial-2 (COM-2), respectively. The COM-1 and COM-2 designations would allow hotels and several other commercial uses that are either accessory to hotel uses or complementary uses. Additionally, there would be no additional floor area added to the hotel properties.

Figure 4.1-6, Conceptual Site Plan Building Heights, shows the proposed massing and height of the three proposed development areas in the context of the existing hotel buildings. The Specific Plan would allow for heights up to 105 feet and 100 feet in PCC COM-1 and PCC COM-2, respectively at the hotel properties, which are generally consistent with the current building heights of approximately 100 feet and 85 feet when viewed from PCH, respectively. The Specific Plan does not include any additional floor area to the hotel properties as a result of the proposed Project; therefore, no additional development capacity is included within PCC COM-1 or PCC COM-2.

For PCC-South (PCC-MU-1) the Conceptual Site Plan proposes a building height of 85 feet, and the Specific Plan would allow for a maximum of 90 feet measured from lowest finished grade to the highest point of measurement. For PCC-Fairfield Parking (PCC-COM-3) the Master Site Plan proposes a building height of 65 feet, and the Specific Plan would allow for a maximum of 68 feet measured from lowest finished grade to the highest point of measurement. For PCC-North (PCC-MU-2) the Master Site Plan proposes a building height of 83 feet, and the Specific Plan would allow for a maximum of 85 feet measured from lowest finished grade to the highest point of measurement. Upon Project approval, the Specific Plan would constitute the zoning for the Project site, and the land use and development standards identified in the Specific Plan document would supersede all zoning regulations to the extent that they would be in conflict with the sections of this Specific Plan.

It is anticipated that Project implementation would eliminate all landscaped areas, including all trees, within the development areas that contain landscaping (PCC-South and PCC-Fairfield Parking), and no changes to landscaping are anticipated at the two hotel properties. As required by ESMC Section 9-3-6 all tree removals located on public property 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. 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).

Additionally, the Specific Plan requires preparation of a Landscape Master Plan for each sub-district of the Specific Plan area to ensure a unified appearance implementing the intent of the Design Guidelines and objectives of this Specific Plan. The Landscape Master Plan must be prepared by a licensed landscape architect and it must be submitted to the City prior to approval of the first site plan review within the Specific Plan area. Development on the Project site must include landscaping at all property perimeter areas except where buildings, driveways, pedestrian walkways, driveway visibility and corner clearance areas are located. One shade tree must be provided for every 25 feet of street frontage where landscaping is provided. One shade tree must be provided for every 25 feet along interior property lines where landscaping is provided in the PCC Mixed-Use 2 (PCC MU-2) land use district. Therefore, the removal of any trees on the Project site would be addressed through compliance with the ESMC and the Specific Plan development standards.

As described in Section 3.7, Discretionary Actions, in Chapter 3, Project Description, of this Draft EIR, the proposed Project requires Site Plan Review to allow the proposed site plan and architectural design for the implementation of the proposed Project. Figure 4.1-7, Conceptual Architectural Rendering for PCC-South, and Figure 4.1-8, Conceptual Architectural Rendering for PCC-Fairfield Parking and PCC-North, provide conceptual artistic renderings of views of the proposed Project from PCH. These renderings depict the proposed architectural elements and materials proposed in the Master Site Plan proposal. The City's Site Plan Review requirement would ensure that the Master Site Plan conform to the requirements and preferences of City staff as it relates to all structures, landscape and hardscape areas, parking areas, walks, internal circulation, access, adjacent streets, signs, and fence or wall type and placement.

Although the Project would require a General Plan Amendment to allow for greater density on the Project site, as well as changes to the allowable land use mix and land use recommendations for the site, the Project would comply with all other applicable goals and policies related to aesthetics and scenic resources of the City's General Plan. Environmental impacts that could be caused by aspects of the Project that diverge from the existing General Plan requirements (i.e., increased density) are evaluated throughout this Draft EIR. Table 4.1-1, Aesthetics

Consistency Table, indicates that the Project would comply with all design guidelines outlined by the City, including applicable policies in the City’s General Plan.

The Project site would be brought into consistency with the ESMC upon approval of the Specific Plan and would comply with other applicable provisions of the ESMC. Additionally, the proposed Project is subject to the City’s Site Plan Review, which would evaluate the proposal for architectural design. Section 3.3.5, Design Guidelines and Development Standards, in Chapter 3, Project Description, of this Draft EIR provides further details regarding the Specific Plan’s consistency with the ESMC with regards to permitted uses, development standards, landscaping, signage and sustainability features. Therefore, the proposed Project would be consistent with applicable regulations governing scenic quality. Impacts would be less than significant, and no mitigation is required.

Table 4.1-1. Aesthetics Consistency Table

Policy Text	Consistency Analysis
Land Use Element	
<p>Goal LU1: Maintenance of El Segundo’s “Small Town” atmosphere, and provide an attractive place to live and work.</p>	<p>The Specific Plan includes design guidelines and development standards for the purpose of providing high-quality residential and commercial development within the Specific Plan area; and thus, providing an attractive place to live and work. The Specific Plan would allow increased density and intensification of use of the Project site; however, the proposed Project would increase development density in a location that is along a major corridor (Pacific Coast Highway [PCH]), in proximity to the City’s employment opportunities, and would bring the hotels (which do not conform to certain development standards within the C-3 zone) into conformance with the newly established COM-1 and COM-2 land use districts of the proposed Specific Plan. The proposed Project would not encroach into existing single-family neighborhoods, alter any residential land uses, or otherwise disrupt the existing community’s atmosphere. The proposed Project seeks to create new housing opportunities within the City through a mixed-use development with 263 new housing units and 11,252 square feet of commercial/retail uses. 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. Thus, the Project would be designed to enhance the City and provide an attractive place to work and live.</p>
<p>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.</p>	<p>As previously addressed under Goal LU1, the proposed Project would increase the height and density; however, the proposed Project does not encroach into existing residential areas and thus, would preserve and maintain the City’s low medium-density nature in residentially zoned areas. The Specific Plan describes the development standards for lot area, height, setbacks, lot frontage, building area, floor area, walls and fences, and accessory structures.</p>
<p>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.</p>	<p>The Project would redevelop the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the old Hacienda Restaurant, through the adoption of a Specific Plan that allows for the development of 263 new housing units and approximately 11,252 square feet of commercial/retail uses. As previously mentioned, 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. The proposed Project would add</p>

Table 4.1-1. Aesthetics Consistency Table

Policy Text	Consistency Analysis
	decorative pavement treatments at the apron of driveways to improve visual interest to pedestrians or those interacting with the Project site at the street level. The design guidelines are provided in the Specific Plan to promote the quality of design planned for this Project. The design guidelines described in the Specific Plan establish criteria that enhance the coordination, organization, function and identity of the Project site, while maintaining a compatible relationship with the surrounding development. Thus, aesthetics, zoning, and amenities are considered in the proposed Project.
Conservation Element	
<p>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.</p>	<p>The Project seeks to improve the jobs/housing balance in the City to improve air quality by providing housing for those who work in the City of El Segundo so that they may reduce their vehicle miles traveled to the extent possible. By redeveloping existing surface parking lots with a new mixed-use commercial and residential development, the Project would enhance the urban landscape in the City. Additionally, as stated in the Specific development standards, the Specific Plan would require landscaped areas around the perimeter of the buildings.</p>
<p>Policy CN5-1: Preserve the character and quality of existing neighborhood and civic landscapes.</p>	<p>The proposed development would not exceed the heights of the existing nine-story hotels located within the Project site. Therefore, the Project would maintain the character and quality of the land uses within the Project site and would not intrude upon existing surrounding neighborhoods. Further, the Project would develop a mix of commercial and residential uses along PCH, which would provide for an appropriate transition of uses between the commercial uses and the nine- to 20-story office buildings to the east and the single-family residential neighborhoods to the west.</p>
Open Space and Recreation Element	
<p>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.</p>	<p>The proposed Project 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. The proposed Project would also provide on-site open space areas to satisfy the demands of the future resident population. PCC-South includes a total of 17,512 square feet of open space. This includes 11,852 square feet of common open space area, including courtyards, community amenities on the 6th floor, and the roof-deck swimming pool amenity, and a total of 5,660 square feet of private open space (balconies) in the residential units. The PCC-North includes a total of 17,932 square feet of open space. This includes 11,357 square feet of common open space area, including courtyards, community amenities on the 6th floor, and the roof-deck swimming pool amenity, and a total of 6,575 square feet of private open space (balconies) in the residential units.</p>

Shade/Shadow Effects

The Conceptual Site Plan proposes development that does not exceed the maximum allowable development capacity for each land use district as required by the Specific Plan. As such, the maximum allowable height as defined by the Specific Plan is more conservative for its potential shade/shadow impacts, and thus, has been analyzed herein.

The maximum allowable height for each of the Specific Plan land use districts are listed in Section 4.1.2, Relevant Plans, Policies, and Ordinances. No development changes are proposed to PCC-COM-1 and PCC-COM-2. The development standards in the Specific Plan identify the maximum height for PCC-MU-1 (PCC-South) as 90 feet, PCC-COM-3 (PCC-Fairfield Parking) as 68 feet, and PCC-MU-2 (PCC-North) as 85 feet. For comparison, the Conceptual Site Plan proposed the development as follows: PCC-South includes a residential building that would 84 feet in height from lowest finished grade to the highest point of measurement,; PCC-Fairfield Parking proposes the construction of a 5-level parking garage (63 feet in height from lowest finished grade to the highest point of measurement); and PCC-North includes a residential building that would be 78 feet in height from lowest finished grade to the highest point of measurement.

A shade/shadow analysis was prepared for the proposed Project to consider the potential for shadow-sensitive uses to be placed in shadow by the Project. The existing residential across Indiana Street to the west, are considered shadow-sensitive uses. To approximate shade and shadow conditions in the surrounding area created by implementation of the proposed Project, shadows cast by the proposed Project were simulated for the winter solstice (December 21), spring equinox (March 20), summer solstice (June 21), and fall equinox (September 23). Shadow projections from the proposed Project during spring, summer, winter, and fall are shown in Figure 4.1-9A, Proposed Shadows – Winter Solstice; Figure 4.1-9B, Proposed Shadows – Spring Equinox; Figure 4.1-9C, Proposed Shadows – Summer Solstice; and Figure 4.1-9D, Proposed Shadows – Fall Equinox.

This City does not have existing zoning or other regulations governing the effects of shade/shadow. Nonetheless, the City has utilized the City of Los Angeles thresholds of significance to determine whether the proposed Project would result in a significant to shade/shadow impacts onto adjacent residential uses. Based on the City of Los Angeles' thresholds, the proposed Project would have a shade/shadow impact if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. (Winter Solstice and Spring Equinox), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. (Summer Solstice and Fall Equinox).

Winter Solstice

Due to the low angle of the sun, shadows cast on December 21 would be the longest in length, and therefore, represent the worst-case scenario. As shown in Figures 4.1-9A, Proposed Shadows – Winter Solstice, shadows generated by the proposed Project at 9:00 a.m. and 10:00 a.m. would be cast to the northwest onto residential uses. As the morning progresses, shadows cast to the northwest would reduce in length and would be reoriented toward the north. For example, by 12:00 p.m. the shadows cast by the proposed Project would no longer be cast on residential uses across Indiana Street. At this time, the proposed Project would not shade any other structure outside of the Project site. At 2:00 p.m. and 3:00 p.m., shadows cast by the proposed Project would extend north onto one single-family property and would continue to move and elongate to the east onto PCH. Project-generated shadows would extend across PCH to the sidewalk near the restaurant and retail uses across PCH. After 3:00 p.m., Project-generated shadows may continue to elongate as the sun sets but would not produce shadows on nearby residential uses. Further, Project shadows would function in this manner for a limited duration (i.e., during the winter season). As such, the proposed Project would not produce shadows for more than three hours between 9:00 a.m. and 3:00 p.m. affecting adjacent uses or property during the winter and impacts would be less than significant.

Spring Equinox

Shadow projections during spring equinox from the proposed Project are shown in Figure 4.1-9B, Proposed Shadows – Spring Equinox. The depictions of Project-generated shadows represent the median shade/shadow

that would result from implementation of the proposed Project. At 9:00 a.m. and 10:00 a.m. would be cast to the northwest onto residential uses. As the morning progresses, shadows cast to the northwest would reduce in length and would be reoriented toward the north. For example, by 11:00 a.m. the shadows cast by the proposed Project would no longer be cast on residential uses across Indiana Street. At 2:00 p.m. shadows would be cast onto one of the single-family driveways to the north. At 3:00 p.m. and 4:00 p.m., the shadow would no longer be cast on the same single-family property and would cast a shadow onto the driveway of another single-family resident. The Project would produce shadows that extend onto PCH beginning at 3:00 p.m. and extend west at 4:00 p.m. and slightly farther west at 5:00 p.m., no longer casting shadows on residential uses to the north and west. Due to the limited duration of these shadows, the Project would not produce shadows for more than three hours between 9:00 a.m. and 3:00 p.m. affecting adjacent uses or property during the spring and impacts would be less than significant.

Summer Solstice

Shadow lengths and projections on the summer solstice are depicted in Figure 4.1-9C, Proposed Shadows – Summer Solstice. As shown, shadows cast by the proposed Project during the summer would be shorter than those in the winter and would generally only cast slightly onto the residential uses to the west at 9:00 a.m. and 10:00 a.m. In the afternoon, shadows would be cast onto the sidewalk immediately adjacent to the Project site at 2:00 p.m. and onto PCH toward the existing median at 4:00 p.m. However, the adjacent residential uses to the west would only be shaded at 9:00 a.m. and 10:00 a.m. Due to the limited duration of these shadows, the Project would not produce shadows for more than four hours between 9:00 a.m. and 5:00 p.m. affecting adjacent uses or property during the summer and impacts would be less than significant.

Fall Equinox

Shadow projections during fall equinox from the proposed Project are shown in Figure 4.1-9D, Proposed Shadows – Fall Equinox. During the fall equinox, shadows would be projected to the west at the greatest extent at 9:00 a.m. and to the east at the greatest extent at 5:00 p.m. The Project would produce a shadow at the existing residential uses across Indiana at 9:00 a.m. and 10:00 a.m. The Project would not produce shadows onto residential uses during the rest of the day. The Project would produce shadows that extend onto PCH beginning at 2:00 p.m. However, the adjacent residential uses to the west would only be shaded at 9:00 a.m. and 10:00 a.m. Due to the limited duration of these shadows, the Project would not produce shadows for more than four hours between 9:00 a.m. and 5:00 p.m. affecting adjacent uses or property during the fall and impacts would be less than significant.

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

Nighttime Lighting

The implementation of the Specific Plan would redevelop the existing surface parking lot of the Fairfield Inn and Suites Hotel and Aloft Hotel properties and demolish the Fairfield Inn and Suites Hotel Food and Beverage Building for the construction of 263 new housing units and approximately 11,252 square feet of commercial/retail uses. The Specific Plan would allow for a maximum building height of 90 feet for PCC-South, 68 feet for PCC-Fairfield Parking, and 85 feet for PCC-North. Because the proposed Project represents an intensification of use compared to the existing uses, the Project would result in additional lighting sources and potential sources of glare on the Project site and light trespass on adjacent residential neighborhoods.

Regarding lighting, lighting sources on the Project site may include surface-mounted floodlights for landscaping, linear landscape luminaires, in-ground up-lights, and pathway lights for safety and wayfinding. Outdoor lighting would be used on the exterior of the building's street level, signage, pedestrian ways, plaza courtyards, the roof-deck swimming pool at PCC-South and PCC-North, and the parking structures. Interior lights would shine through the Project's glass windows at night, causing additional illumination.

An Electronic Message Center sign as defined in ESMC Chapter 15-18 that is a wall sign is permitted by the Specific Plan up to 150 square feet, as long as the sign is within 100 feet of PCH. The Specific Plan sets forth specific requirements for neon signage. Neon signage is not permitted on any building façades facing west in the PCC Mixed-Use 1 land use district. Neon Signage is not permitted on any building façade facing west in the PCC Commercial-3 land use district. Neon signage is not permitted on the Palm Avenue street frontage or on any building facades facing west in the PCC Mixed-Use 2 land use district between Mariposa and Palm Avenues or along the Palm Avenue.

Electronic signage for the proposed Project must be in conformance with the signage regulations of ESMC Chapter 15-18 except as established and approved in a Master Sign Program for each land use district in the Specific Plan. A Master Sign Program for each land use district in the Specific Plan area must be developed and submitted for review and approval by the Director of Development Services and must include the following elements: Master signage (entryways, common sign design throughout the Specific Plan area); Sign standards developed for the mixed-use multiple-family residential and commercial development; Provisions for wayfinding and decorative elements such as banners; General features that all signs are required to comply with; and Regulations for temporary signs (including construction signs). The existing Master Sign Program for the existing buildings in the Specific Plan area (for the Aloft Hotel and the Fairfield Inn and Suites Hotel) would remain in effect and is excluded from the Master Sign Program requirements for the new Specific Plan development.

As previously discussed in Section 4.1.2, Relevant Plans, Policies, and Regulations, the California Building Code has several development standards to control lighting. In accordance with the California Building Code, the Project would be required minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress for safety and wayfinding. 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% dimming at night. All exterior lighting would be in compliance with the California Building Code.

While the new structures on the Project site would result in greater general illumination on the Project site over the existing uses, PCH is a developed urban corridor with retail, restaurant, and office development. In addition, several multi-story hotels buildings of comparable scale and massing as the proposed Project operate nearby. These uses feature similar lighting sources and sources of potential glare as proposed for the Project. As with the existing uses in the Project vicinity, 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 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.

Further, the Specific Plan would implement design guidelines to promote and enforce the City's lighting regulations. Specifically, development standard G1 requires lighting in the Specific Plan area to be shielded to minimize off-site illumination. The Specific Plan would require that the parking structure "light sources should be shielded so that the sources of the illumination is not seen from outside the structure" to ensure the Project does not result in light trespass. The Specific Plan requires the submittal of photometric studies as part of any site plan review submittal, which includes parking lots, and parking structures in the Specific Plan area. The Project

represents an intensification of use over existing development on the Project site and would create a new source of substantial light on the Project site. Nonetheless, the Project and Project lighting elements would comply with ESMC and Specific Plan requirements, as well as the Site Plan Review. In addition, due to the presence of comparable multi-story office development along PCH, and the general urban character of the corridor and surrounding area, the proposed Project would not adversely affect existing nighttime views in the area due to new sources of nighttime lighting or glare. No mitigation is required.

Daytime Glare

The new mixed-use buildings and parking structures would be designed to be complimentary in design to the existing Aloft Hotel and Fairfield Inn and Suites Hotel. The architecture would have a modern feel, with neutral colors, natural, and composite material accents. Specifically, as it relates to potential sources of glare, portions of the proposed residential and commercial portions would contain glass windows. Consistent with the California Vehicle Code, “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” and “limits to the location of light sources that may cause glare and impair the vision of drivers.” Additionally, the Specific Plan would require that “the type and location of parking structure, parking area and building lighting must prevent direct glare on to adjacent residential properties” (Appendix B, Specific Plan). Furthermore, the Project is subject to Site Plan Review to ensure materials that could create adverse light or glare effects are not included in the design. Per the Specific Plan, lighting must be adequate throughout the Specific Plan area and shielded to minimize off-site illumination, and the submittal of photometric studies is required as part of any Site Plan Review submittal, which includes parking lots and parking structures in the Specific Plan area. Therefore, the proposed Project would not create a new source of substantial daytime glare. No mitigation is required.

4.1.5 Cumulative Impact Analysis

Scenic Vistas/Scenic Quality

The City is entirely almost entirely built out and contains vegetation that is ornamental. 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. Distant scenic resources visible from the Project area include the elevated terrain of the Santa Monica Mountains to the north, San Gabriel Mountains to the north/northeast, the Lakes at El Segundo Golf Course to the southeast, and the beaches and coastline to the west. Additionally, PCH 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 and north of the Project site in the City of Los Angeles. However, due to the urban, developed character of the City and surrounding area, cumulative projects would not have a substantial adverse effect to existing scenic views of the Santa Monica Mountains, San Gabriel Mountains, the coastline, or beaches.

The Project site, along with cumulative projects, are located in a highly developed urban environment. In general, visual resource impacts of the cumulative projects would be site-specific and would not be expected to combine with other projects in separate viewsheds to create a cumulative impact. However, other projects in close proximity to the Project site could cumulatively change the scenic character of the area in combination with the proposed Project. As shown on Figure 2-5 Cumulative Project Location Map located in Chapter 2, Environmental Setting of this Draft EIR, no identified cumulative projects are within close proximity to the Project site or within the PCH view corridor. Due to the built-out nature of the City, cumulative projects within the City would be

considered infill development. As these projects are implemented, a more dense and urban character would occur within the City. Land use intensification at these sites would not substantially degrade the scenic quality of the viewshed. Further, these projects would be required to comply with the development standards of the ESMC that include setbacks and height limits, and may similarly be subject to Site Plan Review.

As detailed in Table 4.1-1, the proposed Project would be consistent with applicable City goals and policies concerning scenic quality, and similar to the Project, future projects in the cumulative study area would be required to demonstrate compliance with applicable scenic quality regulations. If non-compliance with a particular regulation would result in a significant impact, mitigation would be required to reduce impacts to the extent feasible. Therefore, impacts would be less than significant and the Project would not result in a cumulatively considerable impact related to scenic vistas or conflicts with scenic quality regulations. No mitigation is required.

Shade/Shadow Effects

The extent to which a project could produce significant shade/shadow impacts is site-specific. Thus, the geographic area of potential shade/shadow impacts would be within the immediate vicinity of the Project site. As previously shown in Figure 2-5, there are no cumulative projects in the immediate vicinity of the Project, the closest cumulative project is the office proposed at 455 Continental Boulevard & 1995 E Grand Avenue, over 0.3-mile southwest of the Project site. Due to the distance and intervening development, this cumulative project would not combine with the proposed Project to produce shadows on nearby sensitive uses. Therefore, impacts would be less than significant and the Project would not result in a cumulatively considerable impact related to shade/shadow.

Light or 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. The Project would have the potential to result in an incremental increase in 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 on the Project site would comply with applicable guidelines included in the Specific Plan that would be comparable to ESMC regulations concerning lighting and glare. Lastly, the surrounding area is largely developed in nature and located in an urban environment. Thus, the area currently includes sources of interior and exterior lighting. Therefore, impacts would be less than significant and the Project would not result in a cumulatively considerable impact related to light and glare. No mitigation is required.

4.1.6 Mitigation Measures

No mitigation measures are required.

4.1.7 Level of Significance After Mitigation

Impacts would be less than significant.

4.1.8 References

- Caltrans (California Department of Transportation). 2019. “List of Eligible and Officially Designated State Scenic Highways (XLSX).” August 2019. Accessed April 22, 2020. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.
- 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>.
- 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>.
- 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>.
- County of Los Angeles. 2014. Los Angeles County General Plan Updated Draft Environmental Impact Report SCH No. 2011081042. June 2014.

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Photo A: Northwest facing view of the Fairfield Inn and Suites Hotel from Pacific Coast Highway



Photo B: West facing view of the Fairfield Inn and Suites Hotel from Pacific Coast Highway

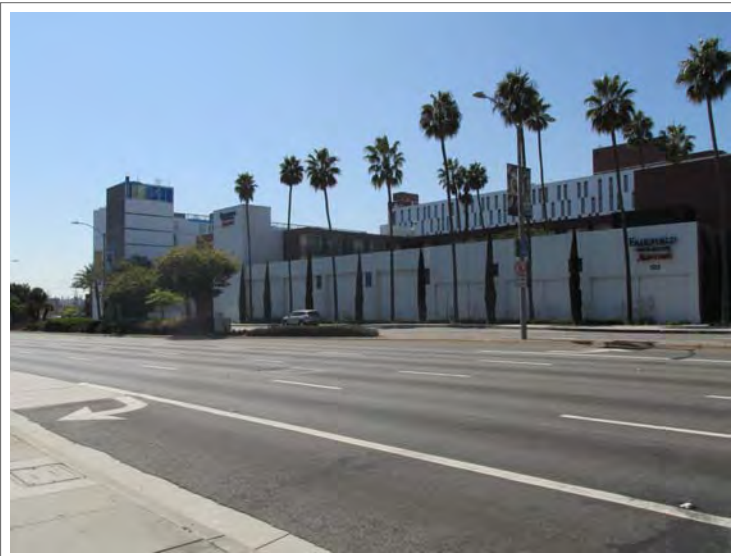


Photo C: Southwest facing view of the Fairfield Inn and Suites Hotel from Pacific Coast Highway



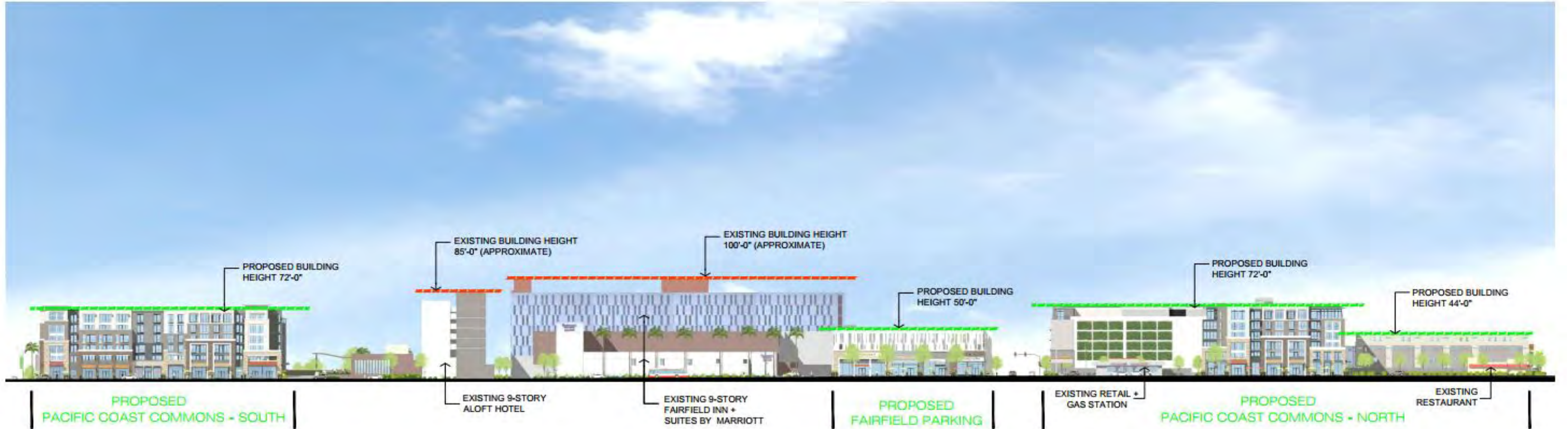
Photo D: Southeast facing view of the Fairfield Inn and Suites Hotel from Indiana Street

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SOURCE: Withee Malcolm Architects 2020

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SOURCE: Withee Malcolm Architects 2020

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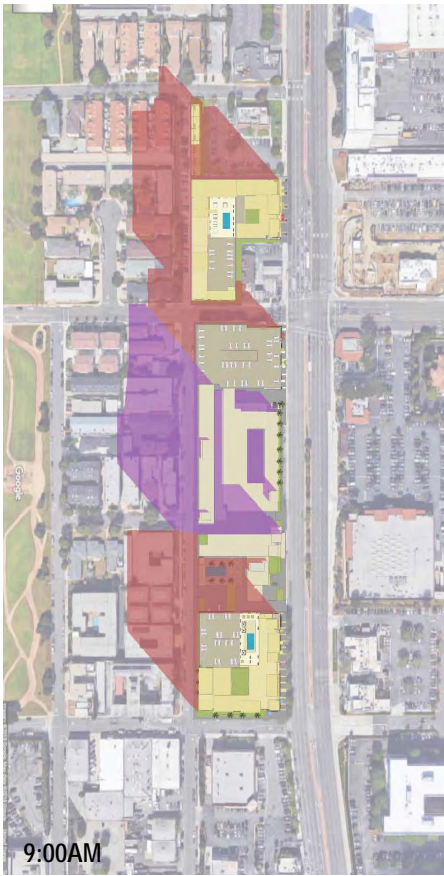
FIGURE 4.1-7
Conceptual Architectural Rendering for PCC-South
Pacific Coast Commons Specific Plan EIR Project

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SOURCE: Withee Malcolm Architects 2020

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9:00AM



10:00AM



11:00AM



12:00PM



1:00PM



2:00PM



3:00PM

Specific Plan Height Requirements:
 PCC Mixed Use-1: 90 feet
 PCC Commercial-3: 68 feet
 PCC Mixed-Use-2: 85 feet



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Specific Plan Height Requirements:
 PCC Mixed Use-1: 90 feet
 PCC Commercial-3: 68 feet
 PCC Mixed-Use-2: 85 feet



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Specific Plan Height Requirements:
 PCC Mixed Use-1: 90 feet
 PCC Commercial-3: 68 feet
 PCC Mixed-Use-2: 85 feet

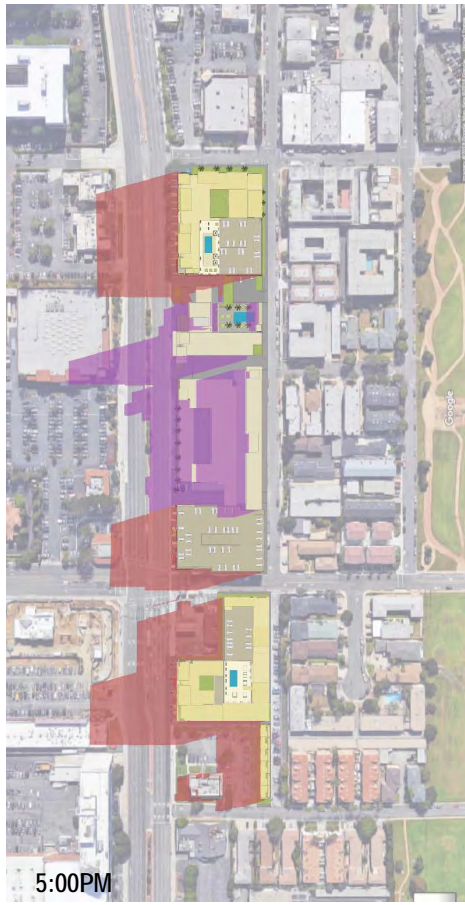
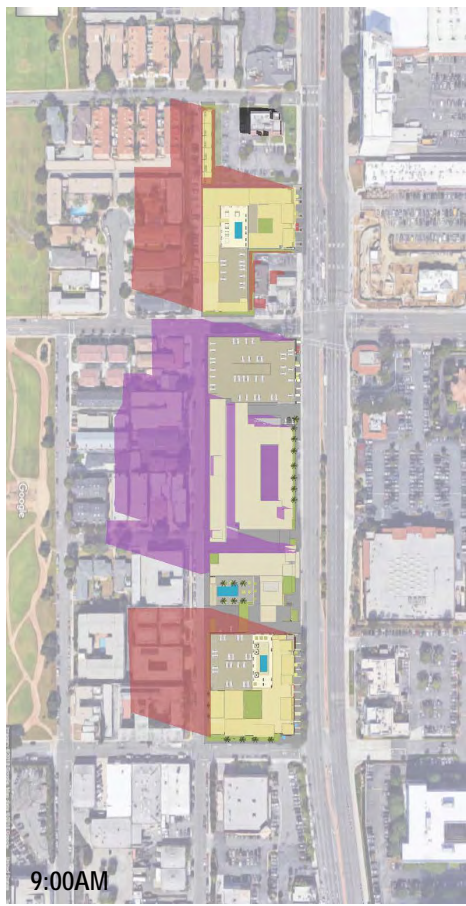


SOURCE: Withee Malcolm Architects 2020

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FIGURE 4.1-9C
 Proposed Shadows – Summer Solstice
 Pacific Coast Commons Specific Plan EIR Project

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Specific Plan Height Requirements:
 PCC Mixed Use-1: 90 feet
 PCC Commercial-3: 68 feet
 PCC Mixed-Use-2: 85 feet



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4.2 Air Quality

This section describes the existing air quality conditions of the Pacific Coast Commons Specific Plan Project (Specific Plan or 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 contained in this section is based on the latest version of California Emissions Estimator Model (CalEEMod), Version 2016.3.2, to estimate the proposed Project's criteria air pollutant emissions from both construction and operations. In addition, a Health Risk Assessment (HRA) was performed to determine the potential cancer risk and non-cancer health impacts to existing sensitive residential receptors in proximity to the proposed Project due to toxic air contaminant (TAC) emissions from construction activities using the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) Version 19191 and the Hotspots Analysis and Reporting Program Version 2 (HARP2). For the relevant data, refer to the following appendix:

Appendix C-1 CalEEMod Outputs, prepared by Dudek

Appendix C-2 Health Risk Assessment Report for the Pacific Coast Commons Project, prepared by Dudek

Other documentation used in this analysis includes the Transportation Impact Analysis, included as Appendix I, SCAQMD CEQA Handbook, the SCAQMD 2017 Final Air Quality Management Plan, and the SCAQMD Final Localized Significance Threshold Methodology. Other sources consulted are listed in Section 4.2.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

Methodology

The Project site currently is occupied by the Fairfield Inn and Suites Hotel and the Aloft Hotel and adjacent surface parking lots. These two hotel facilities contain a total of 596 hotel rooms as well as associated amenity areas, including two swimming pools, dining areas, and other hotel facilities. These existing hotels would remain in their current condition with implementation of the proposed Specific Plan. As described in Chapter 3, Project Description, of this Draft Environmental Impact Report (EIR), approximately 41,660 square feet of accessory building space associated with the Fairfield Inn and Suites Hotel would be demolished to allow for development of the proposed Project. This Draft EIR does not consider the elimination of this 41,660 square feet in the calculation of projected Project-related operational emissions (i.e. the Project's operational emissions are not reduced to account for the elimination of these occupiable buildings); therefore, this Draft EIR provides a conservative assessment of operational impacts.

4.2.1 Existing Conditions

The Project site is located within the South Coast Air Basin (SCAB). The SCAB is a 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB's air pollution problems are a consequence of the combination of emissions from the nation's second-largest urban area, meteorological conditions that hinder dispersion of those emissions, and mountainous

terrain surrounding the SCAB that traps pollutants as they are pushed inland with the sea breeze (SCAQMD 2017). Meteorological and topographical factors that affect air quality in the SCAB are described below.¹

Climate and Meteorology

The SCAB generally lies in the semi-permanent, high-pressure zone of the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the SCAB is a function of the area's natural physical characteristics (e.g., weather and topography) as well as of human influences (e.g., development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and/or dispersion of pollutants throughout the SCAB.

Moderate temperatures, comfortable humidity, and limited precipitation characterize the climate in the SCAB. The average annual temperature varies little throughout the basin, averaging 75 degrees Fahrenheit (°F). However, with a less pronounced oceanic influence, the eastern inland portions of the basin show greater variability in annual minimum and maximum temperatures. All portions of the SCAB have recorded temperatures over 100°F in recent years. Although the SCAB has a semiarid climate, the air near the surface is moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the basin by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as “high fog,” are a characteristic climate feature. Annual average relative humidity is 70% at the coast and 57% in the eastern part of the basin. Precipitation in the SCAB is typically 9 to 14 inches annually and is rarely in the form of snow or hail, due to typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the basin.

The City of El Segundo's (City) climate is characterized by relatively low rainfall, with warm summers and mild winters. Average temperatures range from a high of 76°F in August to a low of 65°F in January. Precipitation averages about 1.40 to 2.67 inches, falling mostly from November through March (WRCC 2016).²

Sunlight

The presence and intensity of sunlight are necessary prerequisites for the formation of photochemical smog. Under the influence of the ultraviolet radiation of sunlight, certain “primary” pollutants (mainly reactive hydrocarbons and oxides of nitrogen [NO_x]³) react to form “secondary” pollutants (primarily oxidants). Since this process is time dependent, secondary pollutants can be formed many miles downwind of the emission sources. Southern California also has abundant sunshine, which drives the photochemical reactions that form pollutants such as ozone (O₃) and a substantial portion of fine particulate matter (PM_{2.5}, particles less than 2.5 microns in diameter). In the SCAB, high concentrations of O₃ are normally recorded during the late spring, summer, and early autumn months, when more intense sunlight drives enhanced photochemical reactions. Because of the prevailing daytime winds and time-delayed nature of photochemical smog, oxidant concentrations are highest in the inland areas of Southern California.

¹ The discussion of meteorological and topographical conditions of the SCAB is based on information provided in the Final 2016 Air Quality Management Plan (SCAQMD 2017).

² Local climate data for the City is based on the closest and most-representative station measured by the Western Regional Climate Center, which is the Pomona Fairplex (047050) climatological station.

³ NO_x is a general term pertaining to compounds of nitric oxide (NO), nitrogen dioxide (NO₂) and other oxides of nitrogen.

Temperature Inversions

Under ideal meteorological conditions and irrespective of topography, pollutants emitted into the air mix and disperse into the upper atmosphere. However, the Southern California region frequently experiences temperature inversions in which pollutants are trapped and accumulate close to the ground. The inversion, a layer of warm, dry air overlaying cool, moist marine air, is a normal condition in coastal Southern California. The cool, damp, and hazy sea air capped by coastal clouds is heavier than the warm, clear air, which acts as a lid through which the cooler marine layer cannot rise. The height of the inversion is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above mean sea level, the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet above mean sea level, the terrain prevents the pollutants from entering the upper atmosphere, resulting in the pollutants settling in the foothill communities. Below 1,200 feet above mean sea level, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the daylight hours.

Mixing heights for inversions are lower in the summer and inversions are more persistent, being partly responsible for the high levels of O₃ observed during summer months in the SCAB. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods, allowing them to form secondary pollutants by reacting in the presence of sunlight. The basin has a limited ability to disperse these pollutants due to typically low wind speeds and the surrounding mountain ranges.

As with other cities within the SCAB, the City is susceptible to air inversions, which trap a layer of stagnant air near the ground where pollutants are further concentrated. These inversions produce haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources. Elevated concentrations of particles less than 10 microns in diameter (PM₁₀) and of PM_{2.5} can occur in the SCAB throughout the year, but they occur most frequently in fall and winter. Although there are some changes in emissions by day of the week and by season, the observed variations in pollutant concentrations are primarily the result of seasonal differences in weather conditions.

Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The national and California standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O₃, nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), PM₁₀, PM_{2.5}, and lead. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants. These pollutants, as well as TACs, are discussed in the following text.⁴

⁴ The descriptions of each of the criteria air pollutants and associated health effects are based on the U.S. Environmental Protection Agency's Criteria Air Pollutants (EPA 2018a) and the California Air Resources Board's Glossary of Air Pollutant Terms (CARB 2019a).

Ozone. O₃ is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O₃ precursors, such as hydrocarbons and NO_x. These precursors are mainly NO_x and volatile organic compounds (VOCs). The maximum effects of precursor emissions on O₃ concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O₃ formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O₃ exists in the upper atmosphere ozone layer (stratospheric O₃) as well as at the Earth's surface in the troposphere (ground-level O₃).⁵ The O₃ that the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level ozone is a harmful air pollutant that causes numerous adverse health effect and is thus, considered “bad” ozone. Stratospheric ozone, or “good” ozone, occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the earth's atmosphere. Without the protection of the beneficial stratospheric ozone layer, plant and animal life would be seriously harmed.

O₃ in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O₃ at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2013). These health problems are particularly acute in sensitive receptors such as the sick, older adults, and young children.

Inhalation of O₃ causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms. Exposure to O₃ can reduce the volume of air that the lungs breathe in and cause shortness of breath. O₃ in sufficient doses increases the permeability of lung cells, rendering them more susceptible to toxins and microorganisms. The occurrence and severity of health effects from O₃ exposure vary widely among individuals, even when the dose and the duration of exposure are the same. Research shows adults and children who spend more time outdoors participating in vigorous physical activities are at greater risk from the harmful health effects of O₃ exposure. While there are relatively few studies of O₃'s effects on children, the available studies show that children are no more or less likely to suffer harmful effects than adults. However, there are a number of reasons why children may be more susceptible to O₃ and other pollutants. Children and teens spend nearly twice as much time outdoors and engaged in vigorous activities as adults. Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults. Also, children are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults. Children, adolescents and adults who exercise or work outdoors, where O₃ concentrations are the highest, are at the greatest risk of harm from this pollutant (CARB 2019b).

Nitrogen Dioxide and Oxides of Nitrogen. NO₂ is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO₂ in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O₃. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

⁵ The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

A large body of health science literature indicates that exposure to NO₂ can induce adverse health effects. The strongest health evidence, and the health basis for the ambient air quality standards for NO₂, results from controlled human exposure studies that show that NO₂ exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO₂ exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses. Infants and children are particularly at risk because they have disproportionately higher exposure to NO₂ than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration. Several studies have shown that long-term NO₂ exposure during childhood, the period of rapid lung growth, can lead to smaller lungs at maturity in children with higher levels of exposure compared to children with lower exposure levels. In addition, children with asthma have a greater degree of airway responsiveness compared with adult asthmatics. In adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease (CARB 2019c).

Carbon Monoxide. CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the Project location, automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

CO is harmful because it binds to hemoglobin in the blood, reducing the ability of blood to carry oxygen. This interferes with oxygen delivery to the body's organs. The most common effects of CO exposure are fatigue, headaches, confusion and reduced mental alertness, light-headedness, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO (CARB 2019d).

Sulfur Dioxide. SO₂ is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO₂ are coal and oil used in power plants and industries; as such, the highest levels of SO₂ are generally found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels.

Controlled human exposure and epidemiological studies show that children and adults with asthma are more likely to experience adverse responses with SO₂ exposure, compared with the non-asthmatic population. Effects at levels near the 1-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath, and chest tightness, especially during exercise or physical activity. Also, exposure at elevated levels of SO₂ (above 1 parts per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of

mortality. The elderly and people with cardiovascular disease or chronic lung disease (such as bronchitis or emphysema) are most likely to experience these adverse effects (CARB 2019e).

SO₂ is of concern both because it is a direct respiratory irritant and because it contributes to the formation of sulfate and sulfuric acid in particulate matter (NRC 2005). People with asthma are of particular concern, both because they have increased baseline airflow resistance and because their SO₂-induced increase in airflow resistance is greater than in healthy people, and it increases with the severity of their asthma. SO₂ is thought to induce airway constriction via neural reflexes involving irritant receptors in the airways (NRC 2005).

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. PM_{2.5} and PM₁₀ represent fractions of particulate matter. Coarse particulate matter (PM₁₀) is about 1/7 the thickness of a human hair. Major sources of PM₁₀ include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter (PM_{2.5}) is roughly 1/28 the diameter of a human hair. PM_{2.5} results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, PM_{2.5} can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport absorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM₁₀ tends to collect in the upper portion of the respiratory system, PM_{2.5} is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also produce haze and reduce regional visibility and damage and discolor surfaces on which they settle.

A number of adverse health effects have been associated with exposure to both PM_{2.5} and PM₁₀. For PM_{2.5}, short-term exposures (up to 24-hour duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases. In addition, of all of the common air pollutants, PM_{2.5} is associated with the greatest proportion of adverse health effects related to air pollution, both in the United States and worldwide based on the World Health Organization's Global Burden of Disease Project. Short-term exposures to PM₁₀ have been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits (CARB 2017).

Long-term exposure (months to years) to PM_{2.5} has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children. The effects of long-term exposure to PM₁₀ are less clear, although several studies suggest a link between long-term PM₁₀ exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer (CARB 2017).

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO₂ in the atmosphere and can result in respiratory impairment, as well as reduced visibility.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for PM_{2.5} described above.

Volatile Organic Compounds. Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O₃ are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O₃ and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs. There are no separate health standards for VOCs as a group.

Non-Criteria Air Pollutants

Toxic Air Contaminants. A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In the state of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics “Hot Spots” Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter. Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and thus is a subset of PM_{2.5} (CARB 2016). DPM is typically composed of carbon particles (“soot,” also called black carbon, or BC) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. The CARB classified “particulate emissions from diesel-fueled engines” (i.e., DPM) (17 CCR 93000) as a TAC in August 1998. DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of PM_{2.5}, DPM also contributes to the same non-cancer health effects as PM_{2.5} exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to non-cancer health effects are children whose lungs are still developing and older adults who often have chronic health problems.

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. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air pollution-sensitive individuals are most likely to spend time include schools and schoolyards, parks

and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses) (CARB 2005). The South Coast Air Quality Management District (SCAQMD) identifies sensitive receptors as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

The closest off-site sensitive receptors to the proposed Project are single-family and multi-family residences, immediately adjacent to the Project site to the west. Furthermore, the closest schools to the proposed Project are Center Street Elementary School, which is located approximately 1,600 feet to the west and El Segundo Middle School, which is located approximately 1,680 feet to the west.

4.2.2 Relevant Plans, Policies, and Ordinances

Federal

Federal Clean Air Act

The federal Clean Air Act passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the Clean Air Act, including the setting of National Ambient Air Quality Standards (NAAQS; federal standards) for major air pollutants, hazardous air pollutant (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emissions standards and permits, acid rain control measures, stratospheric O₃ protection, and enforcement provisions. Federal standards are established for criteria pollutants under the Clean Air Act, which are O₃, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and lead.

The federal standards describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The federal standards (other than for O₃, NO₂, SO₂, PM₁₀, PM_{2.5}, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. Federal standards for O₃, NO₂, SO₂, PM₁₀, and PM_{2.5} are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the federal standards at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the federal standards must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the federal standards to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels.

Hazardous Air Pollutants

The 1977 federal Clean Air Act amendments required the EPA to identify national emission standards for HAPs to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 federal Clean Air Act Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

State

California Clean Air Act

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products.

CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. As stated previously, an ambient air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health. For each pollutant, concentrations must be below these relevant CAAQS before a basin can attain the corresponding CAAQS. Air quality is considered “in attainment” if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O₃, CO, SO₂ (1-hour and 24-hour), NO₂, PM₁₀, and PM_{2.5} and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded.

California air districts have based their thresholds of significance for California Environmental Quality Act (CEQA) purposes on the levels that scientific and factual data demonstrate that the air basin can accommodate without affecting the attainment date for the NAAQS or CAAQS. Since an ambient air quality standard is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the ambient air quality standard, this means that the thresholds established by air districts are also protective of human health.

The NAAQS and CAAQS are presented in Table 4.2-1, Ambient Air Quality Standards.

Table 4.2-1. Ambient Air Quality Standards

Pollutant	Average Time	California Standards ^a	Federal Standards ^b	
		Concentration ^c	Primary ^{c,d}	Secondary ^{c,e}
O ₃	1 hour	0.09 ppm (180 µg/m ³)	–	Same as primary standard
	8 hours	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³) ^f	
NO ₂ ^g	1 hour	0.18 ppm (339 µg/m ³)	0.100 ppm (188 µg/m ³)	Same as primary standard
	Annual arithmetic mean	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	
CO	1 hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	None
	8 hours	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	
SO ₂ ^h	1 hour	0.25 ppm (655 µg/m ³)	0.075 ppm (196 µg/m ³)	–
	3 hours	–	–	0.5 ppm (1,300 µg/m ³)
	24 hours	0.04 ppm (105 µg/m ³)	0.14 ppm (for certain areas) ^g	–

Table 4.2-1. Ambient Air Quality Standards

Pollutant	Average Time	California Standards ^a	Federal Standards ^b	
		Concentration ^c	Primary ^{c,d}	Secondary ^{c,e}
	Annual	–	0.030 ppm (for certain areas) ^g	–
PM ₁₀ ⁱ	24 hours	50 µg/m ³	150 µg/m ³	Same as primary standard
	Annual arithmetic mean	20 µg/m ³	–	
PM _{2.5} ⁱ	24 hours	No separate state standard	35 µg/m ³	Same as primary standard
	Annual arithmetic mean	12 µg/m ³	12.0 µg/m ³	
Pb ^{j,k}	30-day average	1.5 µg/m ³	–	Same as primary standard
	Calendar quarter	–	1.5 µg/m ³ (for certain areas) ^l	
	Rolling 3-month average	–	0.15 µg/m ³	
H ₂ S	1-hour	0.03 ppm (42 µg/m ³)	–	–
Vinyl chloride ^l	24-hour	0.01 ppm (26 µg/m ³)	–	–
SO ₄	24-hour	25 µg/m ³	–	–
Visibility-reducing particles	8-hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to particles when the relative humidity is less than 70%	–	–

Source: CARB 2016.

Notes: O₃ = ozone; ppm = parts per million by volume; µg/m³ = micrograms per cubic meter; NO₂ = nitrogen dioxide; CO = carbon monoxide; mg/m³ = milligrams per cubic meter; SO₂ = sulfur dioxide; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; Pb = lead; H₂S = hydrogen sulfide; SO₄ = sulfates; PST = Pacific standard time.

^a State standards for O₃, CO, SO₂ (1-hour and 24-hour), NO₂, and suspended particulate matter—PM₁₀, PM_{2.5}, and visibility-reducing particles—are values that are not to be exceeded. All others are not to be equaled or exceeded. The CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

^b National standards (other than O₃, NO₂, SO₂, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The O₃ standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than 1. For PM_{2.5}, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

^c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25° Celsius (C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25° C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

^d National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

^e National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

^f On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

^g To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb, whereas California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

^h In 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

ⁱ On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of

15 $\mu\text{g}/\text{m}^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu\text{g}/\text{m}^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

- j CARB has identified Pb and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- j The national standard for Pb was revised on October 15, 2008, to a rolling 3-month average. The 1978 Pb standard (1.5 $\mu\text{g}/\text{m}^3$ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- k The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 $\mu\text{g}/\text{m}^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs. The Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources; however, AB 2588 does not regulate air toxics emissions. TAC emissions from individual facilities are quantified and prioritized. “High-priority” facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, the CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines (CARB 2000). The regulation is anticipated to result in an 80% decrease in statewide diesel health risk in 2020 compared with the diesel risk in 2000. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment Program. These regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel-powered equipment. Several Airborne Toxic Control Measures that reduce diesel emissions including In-Use Off-Road Diesel-Fueled Fleets (13 CCR Sections 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR Section 2025).

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to 5 minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operations of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

California Health and Safety Code Section 41700

Section 41700 of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of

any of those persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

Regional and Local

South Coast Air Quality Management District

The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the SCAB, where the Project site is located. The SCAQMD operates monitoring stations in the SCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The SCAQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to attain state and federal ambient air quality standards in the SCAB. The SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

Air Quality Management Plan

The most-recently adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD governing board on March 3, 2017. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP addresses criteria air pollutant emissions from ocean-going vessels, which are considered federal sources, and includes emissions associated with marine vessels and engines in the baseline year and future forecasts. The 2016 AQMP's overall control strategy is an integral approach relying on fair-share emission reductions from federal, state, and local levels. The 2016 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources (SCAQMD 2017). These control strategies are to be implemented in partnership with CARB and the EPA.

The previous AQMP was the 2012 AQMP, which was adopted in February 2013 (SCAQMD 2013). The 2012 AQMP proposed policies and measures to achieve national and California standards for improved air quality in the SCAB and those portions of the Salton Sea Air Basin (formerly named the Southeast Desert Air Basin) that are under SCAQMD jurisdiction. The 2012 AQMP is designed to meet applicable federal and state requirements for O₃ and particulate matter. The 2012 AQMP documents that attainment of the federal 24-hour PM_{2.5} standard is impracticable by 2015 and the SCAB should be classified as a serious nonattainment area along with the appropriate federal requirements. The 2012 AQMP includes the planning requirements to meet the 1-hour O₃ standard. The 2012 AQMP demonstrates attainment of the federal 24-hour PM_{2.5} standard by 2014 in the SCAB through adoption of all feasible measures. Finally, the 2012 AQMP updates the EPA-approved 8-hour O₃ control plan with new measures designed to reduce reliance on the Clean Air Act Section 182(e)(5) long-term measures for NO_x and VOC reductions. The 2012 AQMP reduction and control measures, which are outlined to mitigate emissions, are based on existing and projected land use and development. The EPA, with a final ruling on April 14, 2016, approved the Clean Air Act planning requirements for the 24-hour PM_{2.5} standard portion and on September 3, 2014, approved the 1-hour O₃ Clean Air Act planning requirements.

Applicable Rules

Emissions that would result from stationary and area sources during operation under the Project may be subject to SCAQMD rules and regulations. The SCAQMD rules applicable to the Project may include the following:

Regulation II – Permits

- **Rule 201 – Permit to Construct:** This rule establishes an orderly procedure for the review of new and modified sources of air pollution through the issuance of permits. Rule 201 specifies that any facility installing nonexempt equipment that causes or controls the emissions of air pollutants must first obtain a permit to construct from the SCAQMD.

Regulation IV – Prohibitions

- **Rule 401 – Visible Emissions:** This rule establishes the limit for visible emissions from stationary sources for a period or periods aggregating more than three minutes in any hour. This rule prohibits visible emissions dark or darker than Ringelmann No. 1 for periods greater than three minutes in any hour or such opacity which could obscure an observer's view to a degree equal or greater than does smoke.
- **Rule 402 – Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM₁₀ emissions to less than 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule), which may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities.
- **Rule 431.2 – Sulfur Content of Liquid Fuels:** The purpose of this rule is to limit the sulfur content in diesel and other liquid fuels for the purpose of reducing the formation of SO_x and particulates during combustion and of enabling the use of add-on control devices for diesel-fueled internal combustion engines. The rule applies to all refiners, importers, and other fuel suppliers such as distributors, marketers, and retailers, as well as to users of diesel, low-sulfur diesel, and other liquid fuels for stationary-source applications in the SCAQMD. The rule also affects diesel fuel supplied for mobile sources.

Regulation XI – Source Specific Standards

- **Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines:** This rule applies to stationary and portable engines rated at greater than 50 horsepower (hp). The purpose of Rule 1110.2 is to reduce NO_x, VOCs, and CO emissions from engines. Emergency engines, including those powering standby generators, are generally exempt from the emissions and monitoring requirements of this rule because they have permit conditions that limit operation to 200 hours or less per year as determined by an elapsed operating time meter.

- **Rule 1113 – Architectural Coatings:** This rule 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.
- **Rule 1138 – Control of Emissions from Restaurant Operations:** This rule specifies PM and VOC emissions and odor control requirements for commercial cooking operations that use chain-driven charbroilers to cook meat.
- **Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_x emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

Regulation XIV – Toxics and Other Non-Criteria Pollutants:

- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities:** This rule states that an owner or operator of any demolition or renovation activity is required to have an asbestos study performed prior to demolition and to provide notification to SCAQMD prior to commencing demolition activities.

SCAB Attainment Designation

Pursuant to the 1990 federal Clean Air Act amendments, the EPA classifies air basins (or portions thereof) as “attainment” or “nonattainment” for each criteria air pollutant, based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as “attainment” for that pollutant. If an area exceeds the standard, the area is classified as “nonattainment” for that pollutant. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as “unclassified” or “unclassifiable.” The designation of “unclassifiable/attainment” means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are re-designated as maintenance areas and must have approved Maintenance Plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as “attainment” or “nonattainment,” but based on CAAQS rather than the NAAQS. Table 4.2-2 depicts the current attainment status of the Project site with respect to the NAAQS and CAAQS.

Table 4.2-2. South Coast Air Basin Attainment Classification

Pollutant	Designation/Classification	
	Federal Standards	California Standards
Ozone (O ₃), 1-Hour	No National Standard	Nonattainment
Ozone (O ₃), 8-Hour	Extreme Nonattainment	Nonattainment
Nitrogen Dioxide (NO ₂)	Unclassifiable/Attainment	Attainment
Carbon Monoxide (CO)	Attainment/Maintenance	Attainment
Sulfur Dioxide (SO ₂)	Unclassifiable/Attainment	Attainment
Coarse Particulate Matter (PM ₁₀)	Attainment/Maintenance	Nonattainment
Fine Particulate Matter (PM _{2.5})	Serious Nonattainment	Nonattainment
Lead (Pb)	Nonattainment	Attainment
Hydrogen Sulfide	No National Standard	Unclassified
Sulfates	No National Standard	Attainment
Visibility-Reducing Particles	No National Standard	Unclassified
Vinyl Chloride	No National Standard	No designation

Sources: EPA 2018b (national); CARB 2018 (California).

Notes: Bold text = not in attainment; Attainment = meets the standards; Attainment/Maintenance = achieves the standards after a nonattainment designation; Nonattainment = does not meet the standards; Unclassified or Unclassifiable = insufficient data to classify; Unclassifiable/Attainment = meets the standard or is expected to be meet the standard despite a lack of monitoring data.

In summary, the SCAB is designated as a nonattainment area for federal and state O₃ standards and federal and state PM_{2.5} standards. The SCAB is designated as a nonattainment area for state PM₁₀ standards; however, it is designated as an attainment area for federal PM₁₀ standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO₂ standards, and federal and state SO₂ standards. While the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard (CARB 2018; EPA 2018b).

Despite the current nonattainment status, air quality within the SCAB has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly a result of lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend toward cleaner air has occurred in spite of continued population growth. Despite this growth, air quality has improved significantly over the years, primarily because of the impacts of the region's air quality control program. PM₁₀ levels have declined almost 50% since 1990, and PM_{2.5} levels have also declined 50% since measurements began in 1999 (SCAQMD 2013). Similar improvements are observed with O₃, although the rate of O₃ decline has slowed in recent years.

Local Ambient Air Quality

The Project area's local ambient air quality is monitored by SCAQMD and CARB. CARB, air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. Air quality monitoring stations usually measure pollutant concentrations 10 feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations.

The Westchester monitoring station, located at 7201 West Westchester Parkway, Los Angeles, California, is the nearest air quality monitoring station to the Project site, approximately 2.2 miles northwest of the Project site. Data for this site were only available for 8-hour O₃, 1-hour O₃, NO₂, CO, SO₂ and PM₁₀, concentrations. PM_{2.5} measurements were taken from the Compton monitoring station (700 North Bullis Road, approximately 11.07 miles southeast of the Project site). The data collected at these two stations are considered representative of the air quality experienced in the Project vicinity. Air quality data from 2016 through 2018 are provided in Table 4.2-3. The number of days exceeding the ambient air quality standards is also shown in Table 4.2-3.

Table 4.2-3. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2016	2017	2018	2016	2017	2018
Ozone (O₃)										
Westchester Monitoring Station	ppm	Maximum 1-hour concentration	California	0.09	0.087	0.086	0.074	0	0	0
	ppm	Maximum 8-hour concentration	California	0.070	0.080	0.070	0.065	3	0	0
			National	0.070	0.080	0.070	0.065	2	0	0
Nitrogen Dioxide (NO₂)										
Westchester Monitoring Station	ppm	Maximum 1-hour concentration	California	0.18	0.081	0.072	0.059	0	0	0
			National	0.100	0.082	0.072	0.060	0	0	0
	ppm	Annual concentration	California	0.030	0.010	ND	ND	–	–	–
			National	0.053	–	–	–	–	–	–
Carbon Monoxide (CO)										
Westchester Monitoring Station	ppm	Maximum 1-hour concentration	California	20	–	–	–	–	–	–
			National	35	1.6	2.1	1.8	0	0	0
	ppm	Maximum 8-hour concentration	California	9.0	–	–	–	–	–	–
			National	9	1.3	1.6	1.5	0	0	0
Sulfur Dioxide (SO₂)										
Westchester Monitoring Station	ppm	Maximum 1-hour concentration	National	0.075	0.097	0.095	0.012	0	0	0
	ppm	Maximum 24-hour concentration	National	0.14	0.019	0.025	0.001	0	0	0
	ppm	Annual concentration	National	0.030	0.0055	0.0067	0.0051	0	0	0
Coarse Particulate Matter (PM₁₀)^a										
Westchester Monitoring Station	µg/m ³	Maximum 24-hour concentration	California	50	43.9	46.5	45.1	0.0 (0)	0.0 (0)	ND (0)
			National	150	43.0	46.5	45.3	0.0 (0)	0.0 (0)	ND (0)
	µg/m ³	Annual concentration	California	20	21.9	20.2	ND	–	–	–

Table 4.2-3. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2016	2017	2018	2016	2017	2018
<i>Fine Particulate Matter (PM_{2.5})^a</i>										
Compton Monitoring Station	µg/m ³	Maximum 24-hour concentration	National	35	36.3	66.7	49.4	3.3 (1)	15.4 (5)	6.3 (2)
	µg/m ³	Annual concentration	California	12	ND	13.3	13.3	—	—	—
			National	12.0	11.0	13.2	13.2	—	—	—

Sources: CARB 2019f; EPA 2018c.

Notes: ppm = parts per million by volume; ND = insufficient data available to determine the value; — = not available; µg/m³ = micrograms per cubic meter.

Data taken from CARB iADAM (<http://www.arb.ca.gov/adam>) and EPA AirData (<http://www.epa.gov/airdata/>) represent the highest concentrations experienced over a given year. Exceedances of national and California standards are only shown for O₃ and particulate matter. Daily exceedances for particulate matter are estimated days because PM₁₀ and PM_{2.5} are not monitored daily. All other criteria pollutants did not exceed national or California standards during the years shown. There is no national standard for 1-hour ozone, annual PM₁₀, or 24-hour SO₂, nor is there a state 24-hour standard for PM_{2.5}.

Westchester Monitoring Station is located at 7201 West Westchester Parkway, Los Angeles, California 90045.

Compton Monitoring Station is located at 700 North Bullis Road, Compton, California 90221.

^a Measurements of PM₁₀ and PM_{2.5} are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization for the Southern California region and is the largest metropolitan planning organization in the United States.

With respect to air quality planning and other regional issues, SCAG has prepared the 2008 Regional Comprehensive Plan: Helping Communities Achieve a Sustainable Future (2008 RCP) for the region (SCAG 2008). The 2008 RCP sets the policy context in which SCAG participates in and responds to the SCAQMD air quality plans and builds off the SCAQMD AQMP processes that are designed to meet health-based criteria pollutant standards in several ways (SCAG 2008). First, it complements AQMPs by providing guidance and incentives for public agencies to consider best practices that support the technology-based control measures in AQMPs. Second, the 2008 RCP emphasizes the need for local initiatives that can reduce the region's greenhouse gas (GHG) emissions that contribute to climate change, an issue that is largely outside the focus of local attainment plans. Third, the 2008 RCP emphasizes the need for better coordination of land use and transportation planning, which heavily influences the emissions inventory from the transportation sectors of the economy. This also minimizes land use conflicts, such as residential development near freeways, industrial areas, or other sources of air pollution.

On April 7, 2016, SCAG's Regional Council adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2016 RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The 2016 RTP/SCS was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. In June 2016, SCAG received its conformity determination from the Federal Highway Administration and the Federal Transit Administration indicating that all air quality conformity requirements for the 2016 RTP/SCS and associated 2015 Federal Transportation Improvement Program Consistency Amendment through Amendment 15-12 have been met (SCAG 2016). The SCAQMD 2016 AQMP applies the updated SCAG growth forecasts assumed in the 2016 RTP/SCS.

On May 7, 2020, SCAG's Regional Council adopted the Connect SoCal (2020–2045 RTP/SCS). The Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura (SCAG 2020).

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 PM ₁₀ 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).
Policy AQ 14-1.1	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 AQ 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, NO _x , SO _x , lead, O ₃ , and CO, by taking all appropriate air pollution control measures to reduce unsafe levels of air pollutants impacting the City.

Proposed PCC Specific Plan

Requirements set forth in the Specific Plan’s Development Standards that are relevant for the topic of Air Quality include, the following:

D.2 Preferential Parking must be provided for carpools and vanpools.

D.3. Bicycle parking and EV Charging must comply with the stricter of El Segundo Municipal Code (ESMC) Chapters 15-15 and 15-16 or Cal Green Code.

E.1. Landscaping must conform to the City’s Water Conservation in Landscaping requirements as set forth in ESMC Chapter 15-15A. One shade tree must be provided for every 25 feet along interior property lines where landscaping is provided in the PCC Mixed-Use 2 (PCC MU-2) land use district.

I.3. Bicycle parking must comply with the ESMC and Cal Green Code.

4.2.3 Thresholds of Significance

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

- a) Conflict with or obstruct implementation of the applicable air quality plan.
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- c) Expose sensitive receptors to substantial pollutant concentrations.
- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Air Quality Significance Thresholds

The SCAQMD has established Air Quality Significance Thresholds, as revised in March 2015, that set forth quantitative emission significance thresholds below which a project would not have a significant impact on ambient air quality under existing and cumulative conditions. The quantitative air quality analysis provided herein applies the SCAQMD thresholds identified in Table 4.2-4 to determine the potential for the proposed Project to result in a significant impact under CEQA.

Table 4.2-4. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
<i>Pollutant</i>	<i>Construction (pounds per day)</i>	<i>Operation (pounds per day)</i>
VOCs	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM ₁₀	150	150

Table 4.2-4. SCAQMD Air Quality Significance Thresholds

PM _{2.5}	55	55
Lead ^a	3	3
TACs and Odor Thresholds		
TACs ^b	Maximum incremental cancer risk ≥ 10 in 1 million Chronic and acute hazard index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants^c		
NO ₂ 1-hour average NO ₂ annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.030 ppm (state) and 0.0534 ppm (federal)	
Ambient Air Quality Standards for Criteria Pollutants^c		
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
PM ₁₀ 24-hour average PM ₁₀ annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^d 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM _{2.5} 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^d 2.5 $\mu\text{g}/\text{m}^3$ (operation)	

Source: SCAQMD 2015.

Notes: $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter; CO = carbon monoxide; NO₂ = nitrogen dioxide; NO_x = oxides of nitrogen; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; ppm = parts per million; SCAQMD = South Coast Air Quality Management District; SO_x = sulfur oxides; TAC = toxic air contaminant; VOC = volatile organic compounds

GHG emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not included as they will be addressed within the GHG emissions analysis and not the air quality study.

^a The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

^b TACs include carcinogens and noncarcinogens.

^c Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.

^d Ambient air quality threshold are based on SCAQMD Rule 403.

The phasing out of leaded gasoline started in 1976. As gasoline no longer contains lead, the proposed Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

The evaluation of whether the proposed Project would conflict with or obstruct implementation of the applicable air quality plan is based on the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993), Chapter 12, Sections 12.2 and 12.3. The first criterion assesses if the proposed Project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP, which is addressed in detail in Section 4.2.4, Impact Analysis. The second criterion is if the proposed Project would exceed the assumptions in the AQMP or increments based on the year of proposed Project buildout and phase, as discussed further in Section 4.2.4.

In addition to the above-listed emission-based thresholds, the SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the proposed Project as a result of construction activities. Such an evaluation is referred to as a localized significance threshold (LST) analysis. For

project sites of five acres or less, SCAQMD LST Methodology (SCAQMD 2008) includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO₂, CO, PM₁₀, and PM_{2.5}) without performing Project-specific dispersion modeling.

The LST significance thresholds for NO₂ and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM₁₀ represents compliance with Rule 403 (Fugitive Dust). The LST significance threshold for PM_{2.5} is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the PM_{2.5} ambient air quality standards. The allowable emission rates depend on the following parameters:

- a. Source-receptor area (SRA) in which the project is located
- b. Size of the project site
- c. Distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals)

The Project site is located in SRA 3 (Southwest Coastal LA County). The SCAQMD provides guidance for applying CalEEMod to the LSTs. LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances. The maximum number of acres disturbed on the peak day was estimated using the Fact Sheet for Applying CalEEMod to Localized Significance Thresholds (SCAQMD 2014). During grading activities, fugitive dust can be generated from the movement of dirt on the Project site. CalEEMod estimates dust from dozers moving dirt around, dust from graders or scrapers leveling the land, and loading or unloading dirt into haul trucks. Each of those activities is calculated differently in CalEEMod, based on the number of acres traversed by the grading equipment. Only some pieces of equipment generate fugitive dust in CalEEMod. The CalEEMod manual identifies various equipment and the acreage disturbed in an 8-hour day:

- Crawler tractors, graders, and rubber-tired dozers: 0.5 acres per 8-hour day
- Scrapers: 1 acre per 8-hour day

Although the look-up tables include projects up to 5 acres, projects that could disturb greater than 5 acres require dispersion modeling to determine LSTs. The analysis conservatively applies the LSTs for a 1-acre disturbance area, which is presented in Table 4.2-5.

The closest sensitive receptors would be located immediately adjacent to the Project site to the west. Therefore, the LST value for a distance of 25 meters was used; this represents the closest distance presented in the lookup tables. The LST values from the SCAQMD lookup tables for SRA 3 (Southwest Coastal Los Angeles County) for a disturbed acreage of 1 acre and a receptor distance of 25 meters are shown in Table 4.2-5.

Table 4.2-5. Localized Significance Thresholds for Source Receptor Area 3 (Southwest Coastal Los Angeles County)

Pollutant	Threshold by Acres Disturbed Per Day (Pounds per Day)
	1-acre
NO ₂	91
CO	664

Table 4.2-5. Localized Significance Thresholds for Source Receptor Area 3 (Southwest Coastal Los Angeles County)

Pollutant	Threshold by Acres Disturbed Per Day (Pounds per Day)
	1-acre
PM ₁₀	5
PM _{2.5}	3

Source: SCAQMD 2008.

Notes: NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter. LST thresholds were determined based on the values for a distance of 25 meters (82 feet) from the nearest sensitive receptor.

The potential for the proposed Project to expose sensitive receptors to substantial pollutant concentrations includes the LST analysis, a CO hotspot analysis, a qualitative health risk discussion, and a qualitative assessment of the health effects of other criteria air pollutants.

The potential for the proposed Project to result in an odor impact is based on the proposed Project's land use types and anticipated construction activity, and the potential for the proposed Project to create an odor nuisance pursuant to SCAQMD Rule 402.

Approach and Methodology

Construction Emissions

Emissions from the construction phase of the proposed Project were estimated using CalEEMod Version 2016.3.2. Construction scenario assumptions, including phasing, equipment mix, and vehicle trips, were based on CalEEMod default values, which were adjusted to more accurately reflect long-term buildout of the proposed Project.

Development of the Specific Plan would require demolition and grading at PCC-South, PCC-Fairfield Parking, and PCC-North to remove structures and surface parking. No grading would be required for the areas where the existing hotel buildings would remain. It is currently anticipated that these development areas would be constructed in phases that would occur sequentially and if so, are anticipated to be completed within 4 1/2 years of Draft EIR certification and Project approval. However, this Draft EIR assumes an overlap of construction phases, which is possible depending on market conditions and would provide a more conservative analysis of short-term air quality, greenhouse gas, noise, and transportation impacts.

For purposes of estimating proposed Project emissions, construction was assumed to start in October 2021, in which construction would last approximately 34 months, ending in July 2024. The October 2021 start date represents the earliest possible start date. Assuming an earlier start date for Project construction represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be less due to more stringent standards for off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles. The analysis contained herein is based on the following assumptions (duration of phases is approximate):

- Phase 1 – Demolition: 1 month
- Phase 1 – Site Preparation: 1 month

- Phase 1 – Grading: 2 months
- Phase 1 – Building Construction: 9 months
- Phase 1 – Paving: 2 months
- Phase 1 – Application of Architectural Coatings: 2 months
- Phases 2 and 3 – Demolition: 2 months
- Phases 2 and 3 – Site Preparation: 1 month
- Phases 2 and 3 – Grading: 2 months
- Phases 2 and 3 – Building Construction: 12 months
- Phases 2 and 3 – Paving: 2 months
- Phases 2 and 3 – Application of Architectural Coatings: 2 months

The parking garages, parking lots, and buildings would be painted during the architectural coating phase. The paving phase and the architectural coating phase end during the same month because the paving phase duration includes finalization of the proposed Project construction and exterior improvements. For the analysis, it was generally assumed that heavy construction equipment would be operating at the site for approximately 8 hours per day, 5 days per week (22 days per month), during proposed Project construction.

Construction worker estimates and vendor truck trips by construction phase were based on information provided by the Project applicant. Haul truck trips during the demolition and grading phases were based on demolition and earthwork quantities provided. During Phase 1, it was assumed that 41,660 square feet of buildings and 6,000 square feet of pavement would require demolition. For Phases 2 and 3, it was assumed that a total of 131,000 square feet of pavement would require demolition. Grading is estimated to involve 17,700 cubic yards of soil for export, which would be required for Phase 2. CalEEMod default trip length values were used for the distances for all construction-related trips.

The construction equipment mix and vehicle trips used for estimating the Project-generated construction emissions are shown in Table 4.2-6.

Table 4.2-6. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Daily Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Phase 1						
Demolition	80	20	200	Concrete/Industrial Saws	1	8
				Excavators	3	8
				Rubber-Tired Dozers	2	8
Site Preparation	50	10	0	Rubber-Tired Dozers	3	8
				Tractors/Loaders/Backhoes	4	8
Grading	80	10	0	Excavators	1	8
				Graders	1	8

Table 4.2-6. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Daily Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Building Construction	120	30	0	Rubber-Tired Dozers	1	8
				Tractors/Loaders/Backhoes	3	8
				Cranes	1	7
				Forklifts	3	8
				Generator Sets	1	8
				Tractors/Loaders/Backhoes	3	7
Paving	40	10	0	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
Architectural Coating	80	20	0	Air Compressors	1	6
Phase 2						
Demolition	50	20	80	Concrete/Industrial Saws	1	8
				Excavators	3	8
				Rubber-Tired Dozers	2	8
Site Preparation	60	10	0	Rubber-Tired Dozers	3	8
				Tractors/Loaders/Backhoes	4	8
Grading	80	10	1,720	Excavators	1	8
				Graders	1	8
				Rubber-Tired Dozers	1	8
				Tractors/Loaders/Backhoes	3	8
Building Construction	150	30	0	Cranes	1	7
				Forklifts	3	8
				Generator Sets	1	8
				Tractors/Loaders/Backhoes	3	7
				Welders	1	8
Paving	40	10	0	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
Architectural Coating	120	20	0	Air Compressors	1	6
Phase 3						
Demolition	50	20	20	Concrete/Industrial Saws	1	8
				Excavators	3	8
				Rubber-Tired Dozers	2	8
Site Preparation	60	10	0	Rubber-Tired Dozers	3	8
				Tractors/Loaders/Backhoes	4	8
Grading	80	10	0	Excavators	1	8
				Graders	1	8
				Rubber-Tired Dozers	1	8
				Tractors/Loaders/Backhoes	3	8

Table 4.2-6. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Daily Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Building Construction	150	30	0	Cranes	1	7
				Forklifts	3	8
				Generator Sets	1	8
				Tractors/Loaders/Backhoes	3	7
				Welders	1	8
Paving	40	10	0	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
Architectural Coating	120	20	0	Air Compressors	1	6

Notes: See Appendix C-1 for details.

Operational Emissions

Emissions from the operational phase of the proposed Project were estimated using CalEEMod Version 2016.3.2. Operational year 2025 was assumed, which would be the first full year of Project occupancy, consistent with the construction schedule.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating, water heating, and stoves are calculated in the building energy use module of CalEEMod, as described in the following text. It was assumed that the proposed Project would include natural gas fireplaces.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2017). Consumer product VOC emissions are estimated in CalEEMod based on the floor area of residential and nonresidential buildings and on the default factor of pounds of VOC per building square foot per day. For parking lot land uses, CalEEMod estimates VOC emissions associated with use of parking surface degreasers based on a square footage of parking surface area and pounds of VOC per square foot per day.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of residential and nonresidential surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The proposed Project would use low VOC paint in construction and regular maintenance activities. Low VOC paint is generally considered to contain less than 50 grams of VOC per liter, which was assumed for both interior and exterior painting. Consistent with CalEEMod default values, a VOC content of 100 was assumed for the parking structures. The model default reapplication

rate of 10% of area per year is assumed. Consistent with CalEEMod defaults, it is assumed that the residential surface area for painting equals 2.7 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating. For nonresidential land uses (e.g., retail, community, and commercial areas), it is assumed that the surface area for painting equals 2.0 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating. For the parking garage, the architectural coating area is assumed to be 6% of the total square footage, consistent with the supporting CalEEMod studies provided as an appendix to the CalEEMod User's Guide (CAPCOA 2017).

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers. The emissions associated from landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per residential dwelling unit per day and grams per square foot of nonresidential building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days (CAPCOA 2017). By design, the proposed Project would limit turf, and the proposed landscaped area would be minimal and any landscape equipment used is anticipated to be powered by electricity, when needed. Nonetheless, emissions associated with potential landscape maintenance equipment were included and no emission reduction features related to electric landscape equipment was assumed to conservatively capture potential Project operational emission sources.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site.

The energy use from nonresidential land uses (natural gas usage per square foot per year) is calculated in CalEEMod based on the California Commercial End-Use Survey database. CalEEMod default values for both residential and nonresidential land uses energy consumption were revised. CalEEMod assumes compliance with the 2016 Title 24 Building Energy Efficiency Standards. The default values were updated to reflect the more stringent 2019 Title 24 Building Energy Efficiency Standards, which became effective on January 1, 2020. Per the CEC Impact Analysis for the 2019 Update to the California Energy Efficiency Standards for Residential and Non-Residential Buildings, the first-year savings for newly constructed non-residential buildings, are 197 gigawatt hours of electricity, 76.6 megawatts of demand, and 0.27 million therms of gas, representing reductions from the 2016 Title 24 standard of 10.7%, 9%, and 1%, respectively. The first-year savings for multi-family buildings are 91 gigawatt hours, 4.1 megawatts of demand, and 0.25 million therms of gas. On a percent savings basis compared to the 2016 standards, the multi-family, savings are 2% of electricity, 8% of demand and 5% of gas.

Mobile Sources

Mobile sources for the proposed Project would be motor vehicles (i.e., automobiles and light-duty trucks) traveling to and from the Project site. Motor vehicles may be fueled with gasoline, diesel, or alternative fuels. Default vehicle trip generation rates included in CalEEMod for each of the analyzed land uses were adjusted to match the proposed Project's trip generation rates presented in the Transportation Impact Analysis (Appendix J-1). CalEEMod default data, including emissions factors were conservatively used for the model inputs to estimate daily emissions from proposed vehicular sources. Emission factors representing the vehicle mix and emissions for

2025 were used to estimate emissions associated with full build-out of the proposed Project. Trip rate assumptions for the proposed Project are shown in Table 4.2-7.

Table 4.2-7. Project Trip Rate Assumptions

Land Use	CalEEMod Land Use Surrogate	Revised Trip Rate		
		Weekday	Saturday	Sunday
Residential Units	Apartments Mid-Rise	5.16	4.96	4.55
Commercial/Retail	Regional Shopping Center	35.89	42.00	21.21
Fast Casual Restaurant	High Turnover Sit Down Restaurant	239.73	298.59	248.57

Source: Appendix C-1.

Toxic Air Contaminants – Health Risk Assessment

An HRA was performed to evaluate potential health risk associated with toxic air contaminants from construction of the proposed Project. The following discussion summarizes the dispersion modeling and HRA methodology.

The dispersion modeling of DPM was performed using the AERMOD, which is the model SCAQMD requires for atmospheric dispersion of emissions. AERMOD is a steady-state Gaussian plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of surface and elevated sources, building downwash, and simple and complex terrain. For the proposed Project, AERMOD was run with all sources emitting unit emissions (1 gram per second) to obtain the “X/Q” values. X/Q is a dispersion factor that is the average effluent concentration normalized by source strength and is used as a way to simplify the representation of emissions from many sources. The X/Q values of ground-level concentrations were determined for construction emissions using AERMOD and the maximum concentrations determined for the 1-hour and period averaging periods. Principal parameters of this modeling are presented in Table 4.2-8.

Table 4.2-8. AERMOD Principle Parameters

Parameter	Details
Meteorological Data	The latest 5-year meteorological data for the Los Angeles International Airport station from SCAQMD were downloaded, and then input to AERMOD.
Urban versus Rural Option	The urban dispersion option was selected and Los Angeles County population for year 2010 (9,818,605 persons) was input into AERMOD.
Terrain Characteristics	Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate. Per SCAQMD guidance, the National Elevation Dataset dataset with resolution of 1/3 arc-second was used.
Emission Sources and Release Parameters	A volume source was used to model the construction scenario. The release parameter was obtained from similar equipment.
Source Release Characterizations	Air dispersion modeling of DPM emissions was conducted assuming the equipment would operate in accordance with the modeling scenario estimated in CalEEMod (Appendix C-1). The construction equipment and on-site truck travel DPM emissions were modeled as a line of adjacent volume sources across the Project site to represent Project construction with a release height of 5 meters, a plume height of 2.33 meters, and a plume width of 11.63 meters.
Discrete Receptors	The HRA evaluates the risk to existing residential receptor located in proximity to the Project. A uniform 2-kilometer by 2-kilometer Cartesian grid with 50-meter spacing was centered over the Project site and converted into discrete receptors to represent proximate sensitive

Table 4.2-8. AERMOD Principle Parameters

Parameter	Details
	receptors. The closest off-site sensitive receptors to the Project site include residential receptors located approximately 25 feet west of the Pacific Coast Commons – North. Residential receptors are located approximately 65 feet west of the Pacific Coast Commons – Fairfield Parking and Pacific Coast Commons – South.

Source: See Appendix C-1.

Dispersion model plotfiles from AERMOD were then imported into CARB’s HARP2 to determine health risk, which requires peak 1-hour emission rates and annual-averaged emission rates for all pollutants for each modeling source. For the residential health risk, the HRA assumes exposure would start in the third trimester of pregnancy.

4.2.4 Impacts Analysis

Threshold 4.2a Would the project conflict with or obstruct implementation of the applicable air quality plan?

The Project site is located within the SCAB under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD administers the AQMP for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all CAAQS and NAAQS. The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which the SCAQMD Governing Board adopted in March 2017 (SCAQMD 2017).

The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region’s ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Consistency Criterion No. 1

Section 4.2.4, Threshold 4.2b, evaluates the proposed Project’s potential impacts in regards to CEQA Guidelines Appendix G (the potential to 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.). As discussed under Threshold 4.2b, the proposed Project would not result in construction or operational criteria air pollutant emissions that would exceed the SCAQMD mass daily thresholds. Because it would not exceed the SCAQMD criteria air pollutant mass thresholds, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and thus, the proposed Project would not conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993).

Consistency Criterion No. 2

The second criterion regarding the proposed Project's potential to exceed the assumptions in the AQMP is primarily assessed by determining consistency between the proposed Project's land use designations and potential to generate population growth. In general, a project would be consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for its RTP/SCS (SCAG 2016). SCAG bases its growth forecasts on general plans for cities and counties in the SCAB. The SCAQMD uses these growth forecasts for the development of the AQMP emissions inventory (SCAQMD 2017).⁶ The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans. Note that although the Connect SoCal (2020–2045 RTP/SCS) is the most recent RTP/SCS, the SCAQMD is still in the early stages of updating its AQMP (anticipated to be released in 2022). Therefore, the SCAG 2016 RTP/SCS and associated Regional Growth Forecast would be applicable in this analysis of the potential to conflict with the SCAQMD 2016 AQMP.

As discussed in this Draft EIR, the Project site has a designation of General Commercial (C-3) and Parking (P). To facilitate the proposed Project, the Project applicant is requesting a General Plan Amendment to change the current land designation to Pacific Coast Commons Specific Plan (PCCSP). Although the proposed Project is currently inconsistent with the General Plan land use designation for the Project site, the proposed Project would be consistent with the adjacent residential and commercial land uses and would be in compliance with the Land Use Element goals and policies of the City's General Plan. Nonetheless, because the Project's proposed land use designation is not consistent with the current City's General Plan land use designation, the Project may result in population (residents) not anticipated in the SCAG 2016 RTP/SCS and therefore, the 2016 SCAQMD AQMP. Accordingly, an evaluation of the Project's anticipated population in comparison to the population projections for the City is warranted.

The Final SCAG 2016 RTP/SCS provides population estimates for the years 2012 and 2040. In the 2016 RTP/SCS, SCAG estimates that the County would have 10,159,000 residents in 2015 and 11,514,800 residents by 2040. Furthermore, SCAG estimated 16,700 residents in the City in 2012 and 17,300 residents by 2040. Using population and housing estimates from the California Department of Finance, the City has a household size of 2.35 persons per household (DOF 2020). Assuming a household size of 2.35 persons per household, the proposed Project's residential units would accommodate 618 individuals⁷ upon its anticipated full occupancy in 2025. Considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, the proposed Project would result in a population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP.

⁶ Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), the California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

⁷ 263 new housing units × 2.35 persons per household = 618 residents accommodate by the proposed Project

While the proposed Project would exceed the growth assumptions in the SCAG 2016 RTP/SCS and thus, the SCAQMD 2016 AQMP population assumptions, as explained in Section 4.9, Land Use and Planning, the proposed Project would implement the guiding principles, goals and policies of SCAG's 2020-2045 RTP/SCS as they relate to livability, economic prosperity, and sustainability through the development of walkable, mixed use communities along major transportation corridors. Because the proposed Project would support SCAG's goals and strategies for growth in the region as described above and further described in Section 4.9, Land Use and Planning, and because the proposed Project would assist the development of new housing and improves the City's job/housing balance (as described in Section 4.12, Population and Housing), the proposed Project is not anticipated to result in impacts related to population growth. Although the proposed Project would provide a resident population that exceeds SCAG's projections, this growth is not considered substantial and it would further attainment of local and regional goals. In addition, as discussed in Section 4.13, Transportation, the proposed Project would not result in impacts related to vehicle miles traveled (VMT).

Although the Project would exceed the population growth assumptions in the SCAG 2016 RTP/SCS, it's important to note that the Project is consistent with the City's housing strategy to direct growth in regional centers and areas near transit stations, major bus centers, and bus stops along a major bus routes. The Project site is located approximately 0.51-mile from the Metro C Line Mariposa Station and along the PCH, a major bus route. The following bus routes are within the study area: two local Metro (Route 232 and 625), one local Beach Cities Transit (109), and two Los Angeles Department of Transportation Commuter Express (Route 438, 574) routes. The Project is also a mixed-use development that would generate fewer vehicle trips than traditional single-use and subdivision development and would take advantage of existing infrastructure systems serving the area.

Additionally, the Project would implement the majority of the proposed measures by the California Air Pollution Control Officers Association (CAPCOA) to reduce GHG emissions, which also reduce criteria pollutants, related transportation-related design features as outlined in its 2010 Quantifying Greenhouse Gas Mitigation Measures guidance document. For example, CAPCOA's Land Use-Transportation measures related to the development of projects with increased density, mixed-use components, affordable housing, destination accessibility, and transit accessibility are satisfied by the proposed Project. Site Design-Transportation measures related to pedestrian network improvements, bike parking, and electric vehicle parking are satisfied by the proposed Project. Trip Reduction Transportation measures related to commute-trip reduction programs, provide for end of trip facilities (CAPCOA 2010).

The Project would provide housing in a jobs-rich area and is a mixed-use, transit-oriented development that would reduce the need for vehicle use for residents due to the Project site's proximity to local destinations and regional transportation opportunities. Residents of the Project could visit the on-site commercial uses or nearby commercial uses within walking distance, and those in the residential units could avoid commuting entirely. These Project features are consistent with the AQMP's goal of reducing both vehicle trips and vehicle trip length which would result in less regional air pollutant emissions.

Therefore, while the Project would provide needed housing within the City and would result in development that would result in low VMT and associated mobile source emissions, because the proposed Project would not be consistent with the City's current General Plan land use designation and would result in population growth that would exceed the population growth anticipated for the City in SCAG's regional growth forecast, the proposed Project would conflict with Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook.

However, it should be noted that the impact is temporary until the Project is appropriately included in the City's population estimates and eventually, the SCAQMD AQMP. Since SCAG's forecasts are based on input from

individual jurisdictions in accordance with their General Plans and local development trends and these are updated regularly as part of SCAG’s regional planning programs, adjustments to these projections will continue to be made by the different cities and counties and SCAG as part of the regional planning process. This established regular update process will capture changes in development trends and capacities that occur over time. If approved, the Project would be included in future City projections that would be provided to and used by SCAG and SCAQMD to update the RTP/SCS and AQMP, and the potential impact is reduced to less than significant in the future. Nevertheless, the proposed Project would result in population growth that would exceed the population growth anticipated for the City in SCAG’s regional growth forecast, and therefore conflict with Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook. There is no feasible mitigation measure for population growth; therefore, this impact would be significant and unavoidable.

Summary

As described previously, the proposed Project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or conflict with Consistency Criterion No. 1. However, implementation of the proposed Project would exceed the demographic growth forecasts in the SCAG 2016 RTP/SCS; therefore, the proposed Project would potentially conflict with the SCAQMD 2016 AQMP. Based on these considerations, impacts related to the proposed Project’s potential to conflict with or obstruct implementation of the applicable air quality plan would be significant and unavoidable, as no feasible mitigation can be implemented for population growth.

Threshold 4.2b 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?

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used to help determine whether a project’s individual emissions would have a cumulatively considerable contribution on air quality. If a project’s emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

Construction Emissions

Construction of the proposed Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (e.g., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Criteria air pollutant emissions associated with temporary construction activity were quantified using CalEEMod. Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions estimated during the construction period spanning 2021 through 2024 (see Table 3-3, Estimated Construction Schedule in Chapter 3, Project Description). Construction schedule assumptions, including phase type, duration, and sequencing, were based on information

provided by the applicant and CalEEMod default values, and is intended to represent a reasonable scenario based on the best information available.

Implementation of the proposed Project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM₁₀ and PM_{2.5} emissions. The proposed Project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites three times per day depending on weather conditions. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the contractor would be required to procure architectural coatings from a supplier in compliance with SCAQMD Rule 1113.

Table 4.2-9 presents the estimated maximum daily construction emissions generated during construction of the proposed Project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix C-1.

Table 4.2-9. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
2021	4.15	41.60	25.54	0.06	3.48	2.61
2022	2.32	21.97	21.22	0.05	2.36	1.31
2023	3.19	29.16	27.05	0.08	4.47	2.13
2024	49.34	18.18	27.18	0.07	4.52	1.60
Maximum daily emissions	49.34	41.60	27.18	0.08	4.52	2.61
<i>SCAQMD threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold exceeded?	No	No	No	No	No	No

Notes:

VOCs = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

See Appendix C-1 for complete results.

The values shown are the maximum summer or winter daily emissions results from CalEEMod.

These emissions reflect CalEEMod “mitigated” output, which accounts for compliance with SCAQMD Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings).

As shown in Table 4.2-9, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} during construction in all construction years. Construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions. As such, impacts would be less than significant.

Operational Emissions

Operation of the proposed Project would generate VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, natural gas hearths, and landscape maintenance equipment; and energy sources. As discussed in Section 4.2.4, pollutant emissions

associated with long-term operations were quantified using CalEEMod. Project-generated mobile source emissions were estimated in CalEEMod based on Project-specific trip rates. CalEEMod default values generated from Project-specific land use quantities were used to estimate emissions from area and energy sources.

Table 4.2-10 presents the maximum daily area, energy, and mobile source emissions associated with operation (Year 2025) of the proposed Project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix C-1.

Table 4.2-10. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
Area	8.23	4.18	23.43	0.03	0.44	0.44
Energy	0.12	1.00	0.53	<0.01 ^a	0.08	0.08
Mobile	3.12	13.94	29.83	0.12	10.00	2.73
Project Total	11.47	19.12	53.79	0.15	10.52	3.25
<i>SCAQMD Threshold</i>	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

See Appendix C-1 for complete results.

The values shown are the maximum summer or winter daily emissions results from CalEEMod.

^a <0.01 = value less than reported 0.01 pounds per day.

As shown in Table 4.2-10, the combined daily area, energy, mobile, vehicle testing, and off-road emissions would not exceed the SCAQMD operational thresholds for VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. Impacts associated with Project-generated operational criteria air pollutant emissions would be less than significant.

Air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM₁₀ and PM_{2.5} emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. The maximum daily PM₁₀ and PM_{2.5} emissions would not exceed the significance thresholds during proposed Project construction activities. Fugitive dust, as well as vehicle and equipment exhaust, generated during Project construction would contribute to the SCAB's nonattainment designation for PM₁₀ and PM_{2.5}; however, this contribution would not be considered cumulatively considerable.

With regard to operational cumulative impacts associated with nonattainment pollutants, in general, if a project is consistent with the community and/or general plans, it has been accounted for in the attainment demonstration contained within the state implementation plan and would therefore not cause a cumulatively significant impact on the ambient air quality. As addressed in the first impact criterion, the proposed Project would be consistent with the growth projections anticipated in SCAQMD's 2016 AQMP. Accordingly, the proposed Project would not result in a cumulatively considerable contribution to the nonattainment pollutants in the SCAB.

Based on the preceding considerations, the proposed Project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during construction and operation.

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

Localized Significance Threshold

As discussed in Section 4.2.1, Existing Conditions, sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

The closest off-site sensitive receptors to the proposed Project are single-family and multi-family residences, immediately adjacent to the proposed Project to the west. Furthermore, the closest schools to the proposed Project are Center Street Elementary School, which is located approximately 1,600 feet to the west and El Segundo Middle School, which is located approximately 1,680 feet to the west.

An LST analysis has been prepared to determine potential impacts to nearby sensitive receptors during construction of the Project. As indicated in the discussion of the thresholds of significance (Section 4.2.3, Thresholds of Significance), SCAQMD also recommends the evaluation of localized NO₂, CO, PM₁₀, and PM_{2.5} impacts as a result of construction activities to sensitive receptors in the immediate vicinity of the Project site. The impacts were analyzed using methods consistent with those in SCAQMD's Final LST Methodology (2008). According to the Final LST Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008). Hauling of soils and construction materials associated with Project construction are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways. Emissions from the trucks would be relatively brief in nature and would cease once the trucks pass through the main streets.

Construction activities associated with the proposed Project would result in temporary sources of on-site fugitive dust and construction equipment emissions. Off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. The most stringent SCAQMD localized significance criteria for SRA 3 (for 1-acre project sites corresponding to a distance to a sensitive receptor of 25 meters, which represents a conservative analysis) are presented in Table 4.2-11 and compared to the maximum daily on-site emissions generated during Project construction.

Table 4.2-11. Localized Significance Thresholds Analysis for Project Construction

Maximum On-Site Emissions	NO ₂	CO	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>			
Construction emissions	40.50	21.15	2.80	2.44
SCAQMD LST	91	664	5	3
LST exceeded?	No	No	No	No

Source: SCAQMD 2008.

Notes: NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.

See Appendix C-1, Construction (Summer) and Construction (Winter) output, for complete results.

Localized significance thresholds are shown for 1-acre project sites corresponding to a distance to a sensitive receptor of 25 meters. These estimates implementation of the proposed Project's fugitive dust control strategies, including watering of an active site two times per day.

As shown in Table 4.2-11, construction activities would not generate emissions in excess of site-specific LSTs; therefore, site-specific impacts during construction and operation of the proposed Project would be less than significant.

Carbon Monoxide Hotspots

Mobile source impacts occur on two scales of motion. Regionally, travel resulting from development allowed by the proposed Project would add to regional trip generation and increase the vehicle miles traveled within the local airshed and the SCAB. Locally, traffic generated as a result of development allowed by the proposed Project would be added to the area's roadway system near the Project site. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds, and is operating on roadways already crowded with non-Specific Plan area traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

At the time that the SCAQMD 1993 Handbook was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP (Appendix V, Modeling and Attainment Demonstrations, of SCAQMD 2003) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 ppm at the intersection of Wilshire Boulevard and Veteran Avenue. When added to the maximum 1-hour CO concentration from 2016 through 2018 at the Westchester monitoring station (see Table 4.2-3, Local Ambient Air Quality Data) which was 2.1 ppm in 2017, the 1-hour CO would be 6.7 ppm, while the CAAQS is 20 ppm.

The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO hotspot was 3.8 ppm at the Sunset

Boulevard and Highland Avenue intersection (3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002). Adding the 3.8 ppm to the maximum 8-hour CO concentration from 2016 through 2018 at the Westchester monitoring station, which was 1.6 ppm in 2017, the 8-hour CO would be 5.0 ppm, while the CAAQS is 9.0 ppm.

As such, potential operational impacts, from future development allowed by the proposed Project, associated with CO hotspots would be less than significant.

Toxic Air Contaminants

Health Impacts of Toxic Air Contaminants

“Incremental cancer risk” is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period would contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. TACs that would potentially be emitted during construction activities would be DPM emitted from heavy-duty construction equipment and heavy-duty trucks. Heavy-duty construction equipment and diesel trucks are subject to CARB Airborne Toxic Control Measures to reduce DPM emissions. According to the OEHHA, HRAs should be based on a 30-year exposure duration based on typical residency period; however, such assessments should be limited to the period/duration of activities associated with a project (OEHHA 2015). The results of the HRA for proposed Project’s construction is summarized in Table 4.2-12.

Table 4.2-12. Summary of Maximum Cancer and Chronic Health Risks - Unmitigated

Impact Analysis	Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
<i>Maximally Exposed Individual Resident</i>					
Construction HRA	Cancer Risk	Per Million	41.85	10	Potentially Significant
	Chronic Hazard Index	Index Value	0.023	1.0	Less than Significant

Source: See Appendix C-2 for complete results.

Notes: CEQA = California Environmental Quality Act; HRA = Health Risk Assessment

As shown in Table 4.2-12, the results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in an on-site cancer risk above the 10 in 1 million threshold for the proposed Project. The Chronic Hazard Index for the proposed Project would be less than 1. Therefore, TAC emissions from construction activities associated with the proposed Project may expose sensitive receptors to substantial pollutant concentrations of TACs and would result in a potentially significant impact; therefore, mitigation measure MM-AQ-1 is required.

The detailed emissions assumptions and model outputs using CalEEMod are provided in Appendix C-1. Table 4.2-13 shows the results of the HRA after the implementation of MM-AQ-1.

Table 4.2-13. Summary of Maximum Cancer and Chronic Health Risks - Mitigated

Impact Analysis	Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
<i>Maximally Exposed Individual Resident</i>					
Construction HRA	Cancer Risk	Per Million	4.23	10	Less than Significant
	Chronic Hazard Index	Index Value	0.002	1.0	Less than Significant

Source: See Appendix C-2 for complete results.

Notes: CEQA = California Environmental Quality Act; HRA = Health Risk Assessment

As shown in Table 4.2-13, the HRA results from the mitigated scenario show cancer risks less than the 10 in 1 million threshold and chronic hazard index less than the 1.0 threshold. Impacts would be less than significant with mitigation incorporated.

Health Impacts of Other Criteria Air Pollutants

Construction and operation of the proposed Project would result in emissions that would not exceed the SCAQMD thresholds for any criteria air pollutants, including VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. VOCs would be associated with motor vehicles, construction equipment, and architectural coatings; however, Project-generated VOC emissions would not result in the exceedances of the SCAQMD thresholds, as shown in Tables 4.2-8 and 4.2-9. Generally, the VOCs in architectural coatings are of relatively low toxicity. Additionally, compliance with SCAQMD Rule 1113 would restrict the VOC content of coatings for construction applications.

VOCs and NO_x are precursors to O₃, for which SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O₃ are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O₃ concentrations is the result of complex photochemistry. The increases in O₃ concentrations in SCAB due to O₃ precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O₃ concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O₃ ambient air quality standards tend to occur April through October when solar radiation is highest. The holistic effect of a single project's emissions of O₃ precursors is speculative due to the lack of quantitative methods to assess this impact. Nonetheless, the VOC and NO_x emissions associated with Project construction and operation could minimally contribute to regional O₃ concentrations and the associated health impacts. Because of the minimal contribution during construction and operation, health impacts would be considered less than significant.

Construction and operation of the proposed Project would also not exceed thresholds for PM₁₀ or PM_{2.5} and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or would obstruct SCAB from coming into attainment for these pollutants. The proposed Project would also not result in substantial DPM emissions during construction and operation, and therefore would not result in significant health effects related to DPM exposure. Additionally, the proposed Project would be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction and operation, health impacts would be considered less than significant.

Construction and operation of the proposed Project would not contribute to exceedances of the NAAQS and CAAQS for NO₂. Health impacts that result from NO₂ and NO_x include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, Project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the site at any one time. In addition, existing NO₂ concentrations in the area are well below the NAAQS and CAAQS standards. Construction and operation of the proposed Project would not create substantial, localized NO_x impacts. Therefore, potential health impacts associated with NO₂ and NO_x would be less than significant.

CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots was discussed previously and is determined to be a less than significant impact. Thus, the proposed Project's CO emissions would not contribute to significant health effects associated with this pollutant.

In summary, construction and operation of the proposed Project would not result in exceedances of the SCAQMD significance thresholds for criteria pollutants and potential health impacts associated with criteria air pollutants would be less than significant.

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

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Construction Impacts

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the proposed Project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the Project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be less than significant.

Operational Impacts

Land uses and industrial operations that typically are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). The proposed Project does not propose the aforementioned odor-generating land uses during the operational phase of the proposed Project. Furthermore, the proposed Project would comply with SCAQMD Rule 402, Nuisance, which prohibits the release of odors which may cause annoyance to a considerable number of persons, as well as other SCAQMD rules related to odor generation from restaurant activities. Therefore, the potential for the proposed Project to generate an odor impact is considered less than significant.

4.2.5 Cumulative Impacts Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by Section 15130 of the State CEQA Guidelines. The past, present, and reasonably foreseeable future projects (i.e., related projects) used for this analysis are presented in in Section 2.5, Cumulative Impacts, of Chapter 2, Environmental Setting, and in Table 2-3, List of Cumulative Projects, of this Draft EIR.

Construction-Related Cumulative Impacts

The potential for the Project to result in a cumulatively considerable air quality impact is evaluated in Threshold 4.2b. As discussed, construction of the Project is not expected to exceed the SCAQMD mass daily emission-based construction thresholds. In addition, construction of the Project would not exceed the SCAQMD's LST and would not result in impacts to potential nearby sensitive receptors. Further, as discussed under Threshold 4.2c, the

Project's short-term construction-related TAC emissions would not result in a significant health risk and would not substantially contribute to health risk in the Project area with implementation of MM-AQ-1, which would reduce Project-related health risk on nearby sensitive receptors by substantially reducing exhaust (DPM). It is reasonable to assume that construction emissions of the related projects listed in Table 2-4 (from Chapter 2, Environmental Setting) would be limited by applicable SCAQMD rules. Therefore, because of the minimal amount of Project-related emissions relative to significance thresholds, and because of compliance with SCAQMD rules, Project-generated construction emissions would not be cumulatively considerable.

Operation-Related Cumulative Impacts

As discussed under Threshold 4.2(b) above, the Project would result in less-than-significant long-term operational air quality impacts for all criteria pollutants.

Impacts related to the proposed Project's potential to conflict with or obstruct implementation of the SCAQMD 2016 AQMP would be significant and unavoidable due to the exceedance of population projections assumed within SCAG's RTP/SCS. No feasible mitigation can be implemented for population growth.

Because the SCAQMD air quality plans are regularly updated and consider the cumulative emissions of existing and projected development, it may be concluded that a project that does not have a direct air quality impact would not have a cumulative regional air quality impact. Therefore, the Project would have a less than significant cumulative air quality impact related to long-term regional emissions of all criteria pollutants because direct impacts would be less than significant. As such, the Project potential to result in a cumulatively considerable increase of any criteria pollutant for which the Los Angeles portion of the SCAB is in nonattainment under an applicable NAAQS or CAAQS would be less than significant, including O₃, PM₁₀, and PM_{2.5}.

The analysis for local CO hotspot impacts under Threshold 4.2(c) is based on the SCAQMD 2003 AQMP CO analysis. The qualitative assessment that demonstrated a less than significant impact is inherently a cumulative analysis, and the cumulative impact would be less than significant. Because the Project would not include non-permitted stationary sources of TACs onsite and permitted emergency generators would only be used for maintenance and testing, it would not contribute to long-term health risk impacts in the Project area.

The Project is not anticipated to generate nuisance operational odors; therefore, the Project would result in a less than cumulatively considerable operational odor impact.

4.2.6 Mitigation Measures

MM-AQ-1: To reduce the potential for criteria air pollutants, specifically particulate matter (PM), as a result of construction of the Project, the Construction Contractor's contract specifications shall require compliance with the following:

Prior to the start of construction activities, the Construction Contractor shall ensure that all 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines. An exemption from this requirement may be granted if equipment with Tier 4 Interim engines are not reasonably available and the required corresponding reductions in criteria air pollutant emissions can be achieved from other combinations of construction equipment, such as using equipment with Tier 4 Final engines. Before an exemption may be granted, the City's Construction Contractor shall: (1) demonstrate

that at least two construction fleet owners/operators in Los Angeles County were contacted and that those owners/operators confirmed Tier 4 Interim equipment could not be located within Los Angeles County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using CalEEMod and documentation provided to the City to confirm that Project-generated emissions do not exceed applicable localized significance thresholds (LST) for nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀), and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}), and the SCAQMD carcinogenic (cancer) risk threshold. If these requirements cannot be met, construction activities at the Project site shall be postponed until CARB-certified Tier 4 Interim engines are available for use.

4.2.7 Level of Significance After Mitigation

The construction of the proposed Project would result in a potentially significant pollutant concentrations of TACs prior to mitigation. With the implementation of MM-AQ-1, the emissions of DPM would be significantly reduced compared to the unmitigated scenario, impacts would be less than significant after mitigation.

Considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, the proposed Project would result in a population growth that exceeds the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP. The proposed Project would therefore conflict with the applicable AQMP, which would result in a significant and unavoidable impact, as there is no feasible mitigation for population growth.

4.2.8 References

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4.3 Cultural Resources

This section describes the existing cultural resources conditions of the Pacific Coast Commons Specific Plan Project (Specific Plan or 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 contained in this section is based on survey and evaluation of cultural resources within the Project site and surrounding area, as well as the following:

Appendix D Cultural Resources Technical Report for the Pacific Coast Commons Specific Plan Project, prepared by Dudek, dated October 2020.

The Cultural Resources Technical Report includes the results of a California Historical Resources Information System (CHRIS) records search; coordination with the Native American Heritage Commission (NAHC); a pedestrian survey of the Project site by a qualified architectural historian; building development and archival research; development of an appropriate historic context for the Project site; and recordation and evaluation of one commercial property over 45 years old for historical significance and integrity in consideration of National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and City of El Segundo designation criteria and integrity requirements. The Cultural Resources Technical 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).

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

4.3.1 Existing Conditions

This section describes the existing conditions of the Project site, including its prehistoric, ethnographic, and historical setting, and the results of the CHRIS record search. This section also identifies and evaluates the existing built environment resources within the Project site in consideration of historical significance and integrity.

Prehistoric Overview

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. To be more inclusive, this research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769) (Appendix D).

Paleoindian Period (pre-5500 BC)

Evidence for Paleoindian occupation in the region is tenuous. Our knowledge of associated cultural pattern(s) is informed by a relatively sparse body of data that has been collected from within an area extending from coastal San

Diego, through the Mojave Desert, and beyond. One of the earliest dated archaeological assemblages in the region is located in coastal Southern California (though contemporaneous sites are present in the Channel Islands) derives from SDI-4669/W-12 in La Jolla. A human burial from SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4% probability) (Appendix D). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of ground stone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of ground stone tools. Prime examples of this pattern are sites that were studied by Emma Lou Davis (Appendix D) on Naval Air Weapons Station China Lake near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and large numbers of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (MNO-679)—a multi-component fluted point site, and MNO-680—a single component Great Basined Stemmed point site (Appendix D). At MNO-679 and -680, ground stone tools were rare while finely made projectile points were common.

Warren et al. (see Appendix D) claimed that a biface manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the region that possibly dates between 10,365 and 8,200 BC (Appendix D). Termed San Dieguito, assemblages at the Harris site are qualitatively distinct from most others in region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (Appendix D).

Archaic Period (8000 BC–AD 500)

The Archaic pattern, which has also been termed the Millingstone Horizon (among others), is relatively easy to define with assemblages that consist primarily of processing tools, such as millingsstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the region with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (Appendix D). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurred until the bow and arrow was adopted around AD 500, as well as ceramics at approximately the same time (Appendix D). Even then, assemblage formality remained low. After the bow was adopted, small arrow points appear in large quantities and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingsstones and handstones decreased in proportion relative to expedient, unshaped ground stone tools (Appendix D). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complemented only by the addition of the bow and ceramics.

Late Prehistoric Period (AD 500–1769)

In general, this period is defined by the addition of arrow points and ceramics, as well as the widespread use of bedrock mortars. The fundamental Late Prehistoric assemblage is very similar to the Archaic pattern, but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Appendix D). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred before AD 1400.

A summary of the ethnohistoric period may be found within Appendix D.

Historic Period Overview

Historical Overview of El Segundo

In 1911, Standard Oil Company sent a team of five men to the Los Angeles area to scout out a location for a second oil refinery after the success of their El Primero refinery in Richmond, California. The team chose the El Segundo location for three reasons. First, it was adjacent to the seashore, which was necessary for tanker access. Second, the land was undeveloped, which kept costs down. Finally, the location was near enough a population center to provide them with the necessary workforce. The Standard Oil Company bought 840 acres in June 1911 for their refinery, named El Segundo (the second one). The refinery opened for business in November 1911. At the same time, the El Segundo Land and Improvement Company bought another 1,470 acres of town site from J.S. Vosberg, who had owned the land and dry farmed there since the 1880s. Less than six years later, the City of El Segundo incorporated in January 1917 (Appendix D).

The major town development was located along Ballona Avenue (now El Segundo Boulevard) and Richmond Street. The next street east of Richmond, Main Street, formed the western boundary of the Standard Oil Refinery site. For the first years after incorporation, the local economy of El Segundo was focused solely on the oil industry, as the refinery provided jobs for 2,000 employees. Between 1911 and 1912, the town's assessed value increased from \$328,000 to \$1,168,515. By 1915, El Segundo had modern amenities and utilities such as paved roads, streetlights, electric home service, telephones, and a Pacific Electric rail stop for commuters. Growth could not keep up with demand, and for a few years, a "tent city" sprung up to supply much-needed temporary housing and commercial storefronts. The refinery at El Segundo benefitted from the Southern California oil booms of the 1920s, including the discovery of new oil fields at Huntington Beach in 1920, Long Beach and Santa Fe Springs in 1921, Dominguez Oil field in 1923, and Inglewood in 1924. Despite the large gains at Standard Oil throughout the country, the national company was broken into smaller companies after an antitrust crackdown. Standard Oil then became Standard Oil of California in 1926. By the 1930s, Standard Oil of California began using the "Chevron" name for oil products, later transitioning to "Calso" in the 1940s and 1950s before returning to Chevron. Standard Oil would not officially change the company name until 1984 (Appendix D).

By 1925, El Segundo's population was 2,700. Mine's Field, which later became the Los Angeles Municipal Airport and then Los Angeles International Airport was founded north of the refinery in 1927. The airfield and later airport played a large role in the civil defense of Los Angeles during World War II, and as a result of its proximity, El Segundo became the living community for aviation and defense contractors. In 1927, Watt L. Moreland, of Moreland Aircraft, built the first factory on a 15-acre tract just south of Mines Field. Douglas Aircraft, which had been founded in Santa Monica, obtained this factory in 1932 and eventually negotiated with the Northrop Division of the Douglas Aircraft Company to take it over. The Northrop Division (later renamed the El Segundo Division) produced planes at the factory such as the Gamma 2B, Delta 8-passenger, Basic Trainer (BT)-1 bomber and A-17 jet. In 1937, John Northrop left Douglas Aircraft to start his own company closer to Hawthorne, which he named Northrop Aircraft Incorporated. That same year, the City of Los Angeles purchased Mines Field and renamed the site the Los Angeles Municipal Airport. This included the construction of many modern buildings at the site to attract new airline services. Despite this, the Los Angeles Municipal Airport would not become a principal hub until after World War II (Appendix D).

During World War II, the El Segundo Division of Douglas solely produced military aircraft, including the DC-5 transport, SBD Dauntless dive-bomber and the A-20 Havoc medium bomber. In the 1930s and 1940s, other

aviation industrial giants such as Hughes Aircraft and North American Aviation (Rockwell), continued to grow their manufacturing plants and offices in El Segundo (Appendix D).

By the end of World War II, the Los Angeles Municipal Airport was well positioned to take advantage of the burgeoning aviation industry in El Segundo. New runways, passenger terminals, hangars, control tower, and maintenance sheds were constructed and ready for use, and four major airlines – American, Trans World, United, and Western – abandoned Lockheed Field in Burbank in favor of the expanded municipal airport in El Segundo. Pan Am joined them in January 1947. In 1949, the site was renamed the Los Angeles International Airport (LAX) (Appendix D).

In 1954, the Los Angeles Air Force Base on North Douglas Street was established. This base was the only active-duty military base in Los Angeles and supported the 61st Air Base Wing and the Space and Missile Systems Center. In 1955, Ramo-Wooldridge purchased 40 acres on the southeast corner of Aviation Boulevard and El Segundo Boulevard, forming the research and development site to be paired with the base. The air force base kept the aviation and research production in the region working, as the United States military turned toward space flight. By 1956, the aerospace industry had overtaken oil as the major industry and job provider in El Segundo. Other aerospace companies established offices in the area such as Boeing in 1957 (Appendix D).

In 1958, Pereira & Luckman, as well as other Southern California architects such as Paul R. Williams and Welton Becket, were contracted to redesign LAX for the “jet-age.” This called for a series of terminals and parking structures connected by a glass and steel dome (later reimagined as the LAX theme building) at the center. The airport expanded further in the 1980s to prepare for the 1984 summer Olympics to be held in Los Angeles, adding additional terminals and road levels for arriving and departing passengers (Appendix D).

All of these industrial-based developments in El Segundo led to the decentralization of business and housing from the traditional city core, unlike other small Southern California cities which developed outside of their traditional core in the post-war years. Instead, businesses set up offices in the commercial Smoky Hollow district, along Sepulveda Boulevard, or closer to LAX. Other businesses in El Segundo underwent nominal changes in the latter half of the 20th century, such as Standard Oil, which changed its name officially to Chevron Corporation in 1984, rebranding the El Segundo Oil refinery as well (Appendix D).

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 Highway) 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 Lincoln 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, strip malls with anchoring groceries stores filled in the remaining available space along Sepulveda Boulevard (Appendix D).

Project Site History

With the rebranding of LAX as an international airport in 1949, large hotels began to be established along Sepulveda Boulevard, the major artery leading to LAX from the south. Prior to the establishment of the hotel, there had been a modest multi-family residential complex at the subject property, surrounded by agricultural fields. In 1957, the City of El Segundo (City) approved preliminary sketches for a \$1.5 million hotel, the largest ever in the city, proposed for development by Allen E. Siegal a Hollywood-based hotelier and son, Marc Siegal. The

plans, by Southern California architect Raymond A. Stockdale, proposed a 220-room four-story hotel called the International Thunderbird Hotel and Restaurant. The new hotel was proposed for Sepulveda Boulevard 1.5 miles south of LAX terminals. The sketches detail a four-story hotel with two elevators and a swimming pool as well as space on the ground floor for retail shops, a drug store, barbershop, and dry cleaners. The plans also called for a two-story building with a dining room, coffee shop, cocktail lounge, banquet hall for 400 people, and smaller “key room” or conference room. In June 1958, construction of the hotel began (Appendix D).

In April 1959, the hotel and five retail stores opened to some fanfare. The retail shops included De Mere fashions, Flair for Beauty, Allen Rabinoff’s Shop for Men, Thunderbird Sundries, and Thunderbird Barbershop. The hotel quickly became an activity and event center for the local El Segundo Community, hosting social club dinners and fundraisers. Just six months after their opening, co-owner Marc Siegal submitted an application for zone changes and permits to erect a seven-story, 180-room hotel wing on the rear (west) portion of the property. The new wing was designed by Maxwell Starkham & Associates and contractor Tom Fellows & Associates, and completed in 1961. The construction of the new wing incorporated the “lift-slab” technique to erect the reinforced concrete and curtain wall exterior. The new wing was the first of ten new hotel projects by the father-and-son Siegal team. The Seigals proceeded to open Thunderbird Hotels in San Francisco (1961), Oakland (1962), and two in Hollywood (1963) as part of this 3-year expansion plan (Appendix D).

Minor changes to the property occurred in the 1960s. In 1964, a large surface parking lot was added north of the hotel. In 1965, the hotel was sold to the Hacienda hotel chain based in Las Vegas, Nevada and the hotel name changed to Hacienda Hotel. The hotel sign was changed in 1966. In 1968, the Thunderbird Coffee Shop was converted to the Hukilau Tiki Bar, and a large, abstract, wood boat prow-bird sculpture was added to the front of the restaurant wing (Appendix D).

In 1979, the hotel added another wing. The nine-story “South Tower” was added as part of a three-phase improvement project. Later this tower was sold and became an independent hotel. Today it is the Aloft Hotel. Probably the biggest change for the property came in 1987, when the entire exterior of the hotel was remodeled by A.C. Martin & Associates. Remodeling resulted in the loss of the original decorative colored curtain wall paneling and pierced, Mid-century Modern-style screens on the main, Sepulveda Boulevard elevations (Appendix D).

Project Site Architectural Styles

Mid-century Modern (1933–1965)

Mid-century Modern style is reflective of International and Bauhaus styles popular in Europe in the early 20th century. This style and its living designers (e.g., Mies Van der Rohe and Gropius) were disrupted by World War II (WWII) and moved to the United States. During WWII, the United States established itself as a burgeoning manufacturing and industrial leader, with incredible demand for modern buildings to reflect modern products in the mid-20th century. As a result, many industrial buildings are often “decorated boxes”—plain buildings with applied ornament to suit the era and appear more modern without detracting from the importance of the activity inside the building. Following WWII, the United States had a focus on forward thinking, which sparked architectural movements like Mid-Century Modern. Practitioners of the style were focused on the most cutting-edge materials and techniques. Architects throughout Southern California implemented the design aesthetics made famous by early Modernists like Richard Neutra and Frank Lloyd Wright, who created a variety of modern architectural forms. Like other buildings of this era, Mid-century Modern buildings had to be quickly assembled, and use modern materials that could be mass-produced. Both residences and offices designed in this style expressed its structure and materials, displayed large expanses of glass, and had an open interior plan (Appendix D).

Characteristics of the Mid-Century Modern style:

- One to two stories in height
- Low, boxy, horizontal proportions
- Simple geometric forms with a lack of exterior decoration
- Commonly asymmetrical
- Flat roofed without coping at roof line; flat roofs hidden behind parapets or cantilevered canopies
- Exposed post-and-beam construction in wood or steel
- Exterior walls are flat with smooth sheathing and typically display whites, buffs, and pale pastel colors
- Mass-produced materials
- Simple windows (metal or wood) flush-mounted and clerestory
- Industrially plain doors
- Large window groupings

Project Site Architects and Designers

Architect: Raymond A. Stockdale, AIA (1905–1998)

Stockdale was born in London in 1905 and emigrated to the United States in 1922 as a young man. His family lived in Santa Monica and his father worked managing a café. Stockdale worked first as general contractor and draftsman in the 1930s, then received his architect's license in 1943. He joined the Southern California chapter of the American Institute of Architects (AIA) in 1943. Stockdale tended to design residences, banks, and recreation centers in the greater Los Angeles Area in popular modern styles throughout his career such as Mid-Century Modernism, Art Moderne, and New Formalism. He is not associated with any specific styles or trends.

A sample of Stockdale's known work is included below:

- Gas station, 110 S Barrington Avenue, Brentwood, Los Angeles (1938)
- Stockdale House, 3256 Hillock Drive, Hollywood Hills, Los Angeles (1949)
- Pomona Grove Apartments, East End Avenue, Pomona (1958)
- Bank of America building, 22241 Pacific Coast Highway, Malibu (1962)
- Malibu Sports and Raquet Club, Malibu (1963)
- Pan American Bank, 3626 E First Street, Los Angeles (1965)

Maxwell Starkham & Associates (1953–Present)

Maxwell Starkham & Associates was a Los Angeles-based architecture firm that operated from 1953 to 1987. Mark Starkman, the founder was born in Toronto, Canada, served with the Royal Canadian Engineers during World War II, and then earned an architecture degree from University of Manitoba. Starkman moved to Los Angeles in 1950 and briefly worked for Richard Neutra's firm. The firm began Starkman designing tract homes in the post-World War II housing boom in Southern California. Starkman partnered with Fritz Reichl in the mid-1950s, starting the Maxwell Starkman & Associates firm. The firm specialized in investor-started commercial development with quick turnaround in order to return profits to investors. These were typically office buildings, luxury condominiums, hotels, and mixed-use projects. Later in the company's history they developed specialized

large-scale projects such as Melodyland Theater in Anaheim, and the Sony Pictures Plaza in Culver City. Starkman retired from the firm in 1987 and the firm continues the same work through present (Appendix D).

Notable examples of Maxwell Starkham & Associates work consists of the following:

- Glendale Federal Savings and Loan, Glendale, 1959
- Melodyland Theater, Anaheim, 1963
- First Los Angeles Bank, Century City, 1975
- Cedars-Sinai Medical Center, Office Buildings, Los Angeles, 1978–1980
- Filmland Corporate Center (now Sony Pictures Plaza), Culver City, 1986

CHRIS Records Search

On November 14, 2019, Dudek completed a CHRIS records search of the Project site and a 1-mile search radius at the South Central Coastal Information Center (SCCIC) located on the campus of California State University, Fullerton. This search included mapped prehistoric and historic archaeological resources as well as historic built-environment resources; Department of Parks and Recreation (DPR) site records; technical reports; archival resources; and ethnographic references. The confidential records search results are provided as Confidential Appendix B in Appendix D of this Draft EIR.

Previously Conducted Cultural Resources Studies

Results of the cultural resources records search indicated that 33 previous cultural resource studies have been conducted within 1 mile of the Project site between 1975 and 2013, as presented in Appendix D. Of these, one study overlaps the Project site (LA-02904) and two studies were adjacent (LA-10160, LA-11973); however, the scope of these studies does not address the Project site. A brief summary of the study within and adjacent to the Project site boundary is provided below in Table 4.3-1.

Table 4.3-1. Previously Conducted Studies Overlapping/Adjacent to the Project Site

SCCIC Report Number	Authors	Year	Title	Proximity to Project Site
LA-02904	Stickel, Gary E.	1993	Draft Report a Phase I Cultural Resources Literature Search for the West Basin Water Reclamation Project	Overlaps
LA-10160	Harper, Caprice D., and Francesca Smith	2008	Preliminary Cultural Resources Survey for the Formation of the Wiseburn Unified School District Project, Cities of El Segundo and Hawthorne, and Unincorporated Los Angeles County, CA	Adjacent
LA-11973	Unknown	2011	Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Final Environmental Impact Statement	Adjacent

Source: SCCIC Records Search November 14, 2019
 SCCIC = South Central Coastal Information Center

LA-02904

In 1993, E. Gary Stickel and colleagues of Environmental Research Archaeologists published a draft Phase I Cultural Resources Literature Search in support of the West Basin Water Reclamation Project (see Table 4.3-1). The report was prepared as part of a larger environmental impact statement for the West Basin Municipal Water District, based in Carson, California. The project area covered a pipeline route over an extensive area in the western coastal zone of the Los Angeles Basin, encompassing the cities of Inglewood, Hawthorne, Lawndale, Torrance, El Segundo, Manhattan Beach, Hermosa Beach, and portions of Redondo Beach. The pipeline system, described by the project was bound by Florence Avenue to the North, Western Avenue to the East, the coastline to the west, excluding the Los Angeles International Airport, and 190th Street to the south. As such, the LA-02904 project overlapped the entirety of the proposed Project site. Stickel et. al.'s Phase I research included a synopsis of the prehistoric context and record search results, but did not include physical survey or excavation. The result of the Phase I study was that the coastal region had a long and rich cultural chronology, and that potential for cultural sites including habitation sites and shell middens was relatively high for all settlement periods, From the Prehistoric Period up to and including the Mission (1769–1830) and Rancho (1830–1849) periods. Because of the breadth of the LA-02914 study area, individual sites were not identified within the current Project site.

Previously Recorded Cultural Resources

The CHRIS records search indicates that 12 cultural resources have been previously recorded within 1 mile of the Project site, as listed in Appendix D, none of which intersect or are adjacent to the Project site. All of the previously recorded cultural resources within the records search area consist of built environment resources.

Native American Coordination

NAHC Sacred Lands File Search

Dudek contacted the NAHC on October 17, 2019 and requested a review of its Sacred Lands File (SLF). The NAHC replied via email on October 28, 2019, stating that the results of the SLF search were negative. The NAHC also suggested contacting the following five Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project site:

- 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

Dudek initiated no informal tribal consultation to these individuals for the proposed Project at this time.

Assembly Bill 52 Consultation

The Project is subject to compliance with Assembly Bill 52 (California Public Resources Code [PRC] 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process, and that the lead agency notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed Project. The City of El Segundo

contacted the five NAHC Native American individuals and/or tribal organizations on May 18, 2020. The Gabrieleno Band of Mission Indians, Kizh Nation, responded on May 29, 2020, affirming the Project lies within their Ancestral Tribal Territory and requested consultation with the City of El Segundo. A more comprehensive accounting of the AB 52 efforts and communication relating to this proposed Project is provided in Section 4.14, Tribal Cultural Resources.

Senate Bill 18 Consultation

According to Senate Bill (SB) 18, the City has a responsibility to initiate consultation with tribes/groups listed on the California NAHC's official SB 18 contact list for amendment of a General Plan. SB 18 requires the City to send a letter to each contact on the NAHC's SB 18 list, extending an invitation for consultation. Tribes will have 90 days from receipt of the letter to request consultation. The City must also send a notice to all contacts 45 days prior to adopting the amended General Plan, as well as a third notice 10 days prior to any public hearing regarding the General Plan amendment. The Gabrieleno Band of Mission Indians, Kizh Nation, responded on May 29, 2020, affirming the Project lies within their Ancestral Tribal Territory and requested consultation with the City of El Segundo. A more comprehensive accounting of the SB 18 efforts and communication relating to this proposed Project is provided in Section 4.14, Tribal Cultural Resources.

Survey Methods and Results

Dudek Senior Architectural Historian Sarah Corder, MFA, conducted a pedestrian survey of the Fairfield Inn and Suites Hotel property for historic built environment resources on February 24, 2020. The survey entailed walking around the exteriors of the Fairfield Inn and Suites Hotel property, documenting each wing with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the property. During the course of the pedestrian survey, Dudek identified the three wings of Fairfield Inn and Suites Hotel (525 Sepulveda Boulevard) property as over 45 years old requiring recordation and evaluation for historical significance: the Main Hotel Volume (1959), the Conference Room and Restaurant Wing (1959), and the Indiana Street Wing (1961).

Figure 4.3-1, Built Structures Evaluated for Historical Significance, depicts an overview of the buildings that were evaluated for historical significance. Figure 4.3-2, Fairfield Inn and Suites Hotel Photographs, provides four photographs of the Fairfield Inn and Suites Hotel and the buildings that would be demolished to accommodate development of Pacific Coast Commons Fairfield Parking.

Fairfield Inn and Suites Hotel Property Description

To determine if the proposed Project would affect historical resources under CEQA, the Fairfield Inn and Suites Hotel property (525 Sepulveda Boulevard) was evaluated for historical significance and integrity in consideration of NRHP, CRHR, and City of El Segundo designation criteria and integrity requirements. A detailed physical description of the property is provided below. The Fairfield Inn and Suites Hotel building presents as three connected buildings, but comprises one hotel building with multiple wings and additions. Because the building lacks visual cohesion, each of component is described individually.

The Fairfield Inn and Suites Hotel (525 Sepulveda Boulevard) presents as three wings, a main hotel volume that contains the hotel lobby and hotel rooms around an open-air courtyard and pool area, an eight-story wing along Indiana Street, added circa 1960–1962, and a Conference room wing extending the property to Mariposa

Avenue, north of the main hotel volume. The buildings are connected by hallways, and suspended pedestrian walkways, and open-wall building connections.

Main Hotel Volume (1959)

The main hotel volume presents as a four-story, square plan building with an open-air courtyard and pool in the center. The east elevation presents as only two stories, providing visual access from Sepulveda Boulevard and public right of way into the hotel room area and courtyard. The building features a flat roof with parapet and railing but have variable heights due to different side heights and protruding elevator towers projecting above the roofline.

Cladding is concrete with regular scoring on the east and north (main) elevations, and painted brick on the south and west elevation. On the west elevation there is an additional, Mid-Century Modern-style, geometric sun shade over the hallway windows, adding restrained decoration to that elevation. The building also features cantilevered porches on the south elevation, separating the individual rooms with metal barriers and railings. Fenestration consists of occasional fixed metal windows on the east elevation; metal-framed, sliding sash glass doors on the south elevation; tripartite sliding windows singly and in pairs as well as metal service doors at the grounds level on the east elevation; and tall, fixed full-height windows and automatic sliding doors, at the lobby level on the main (north) elevation. The main (north) elevation has a covered porte-cochere, providing access from Sepulveda Boulevard. The porte-cochere features four round support posts and a segmental arch roof with skylight.

Conference Room and Restaurant Wing (1959)

The conference room and restaurant wing presents as multiple volumes with an irregular plan; with one story in front (east elevation) two stories in rear (west elevation). The building's roof presents as multiple roof forms with flat and flat-with parapet roofs as well as a distinctive Mid-Century Modern-style geometric "quilted" roof (variation on a folded plate roof).

This wing's main (east) elevation presents as a concrete arcade and shaded walkway on the left, and a late-twentieth century modern building on the right. It features continuous fixed ribbon windows, stucco textured concrete cladding, and neo-traditional Mediterranean details such as a faux stucco, belt course, tilework, and tower volume. The doors on this elevation present as wood and glass doors and a pair of wood double doors surrounded by decorative tilework, keeping with the Mediterranean theme. This wing's north elevation presents as a scored concrete wall on the left (east) side, broken by belt course detailing, and a single wood door surrounded by tile detailing; and a mid-century modern textured (pimpled) brick cladding on the right (west) side. The textured/pimpled brick continues onto the west elevation. Fenestration on this elevation is limited to a single door in a recessed vestibule and metal louvered vents. Texture continued partially onto the south elevation, however much of the southern elevation of the building connects to the main hotel volume and was not visible or presented as smooth walled concrete. An entrance along this elevation has a red clay tile stair and metal railing and a glass and steel double door with transom and sidelights. There is a modern mural on the south elevation of this wing, facing toward the hotel entrance and porte-cochere.

Indiana Street Wing (1961)

The Indiana Street wing is an eight-story, narrow, rectangular-plan building. The building features a flat roof with parapet and railing. The building is banked slightly into the hillside, with the uphill portion toward Mariposa Avenue, and a concrete masonry unit, clad parking level and foundation as the hillside slopes downward and south. The parking area is open area and has regular concrete piers. This building is connected to the main hotel

volume by a suspended walkway over a narrow alley and to the restaurant and conference room wing by an open wall connection and stairwell. This building has less overall cladding, and window and plan variability than its connected hotel buildings. Cladding consists of scored concrete on the north and south elevations, and vertically oriented wood cladding on the east and west elevations. Fenestration is limited to the east and west elevations and consists of single fixed steel-frame windows, over metal louvered vent (air conditioning vent) single and in pairs on the west elevation, and long, full height, fixed window singly or in pairs with metal sun shades or louvered sun shades at top-most portion on the east elevation. Also on the east elevation, there was a large, full height window and large metal louvered vent at south end of east elevation, likely the stairwell and elevator tower.

4.3.2 Relevant Plans, Policies, and Ordinances

Federal

National Register of Historic Places

While there is no federal nexus for this Project, the subject property was evaluated in consideration of NRHP designation criteria. The 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" (criteria consideration to be considered for listing).

State

California Register of Historical 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 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:

- (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.

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 (see 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.

Section 7050.5 of the California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human grave. In the unlikely event that human graves are encountered, work should halt in the vicinity and the County Coroner should be notified immediately. At the same time, an archeologist should be contacted to evaluate the situation and grave. If the human remains are determined to be of Native American origin, the Coroner must contact the NAHC within 24 hours of identification.

California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- California Public Resources Code Section 21083.2(g) defines “unique archaeological resource.”

- California Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a) define “historical resources.” In addition, 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.
- California Public Resources Code Section 21074(a) defines “tribal cultural resources.”
- California Public Resources Code Section 5097.98 and 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.
- California Public Resources Code Sections 21083.2(b)-(c) and 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 site(s).

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; CEQA Guidelines Section 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; CEQA Guidelines Section 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; CEQA Guidelines Section 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” (CEQA Guidelines Section 15064.5[b][1]; PRC Section 5020.1[q]). In turn, CEQA Guidelines section 15064.5(b)(2) states the significance of an historical resource is materially impaired when a project:

1. 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 of Historical Resources; or
2. 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 Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, 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
3. 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 of Historical Resources 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], [b], and [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:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. 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]; CEQA Guidelines Section 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as tribal cultural resource (PRC Section 21074[c], 21083.2[h]), further consideration of significant impacts is required. CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

Regional and Local

City of El Segundo Historic Preservation Ordinance (Chapter 15-14)

This study was completed in consideration of all sections of the El Segundo Historic Preservation Ordinance (Chapter 15-14). The ordinance was adopted in 1993 and provides for the identification, protection, enhancement, perpetuation and use of historic buildings and structures within the City that reflect special elements of the City's historical heritage. The Ordinance is enforced by the Planning Commission, which maintains the local register of cultural resources and historic sites. Sections most relevant to this study are provided below.

15-14-4: Criteria for Designation of Historic Resources

1. Procedures: Requests for designation of a cultural resource are voluntary and may be made by or with the written consent of the property owner, by filing an application with the Department of Community, Economic and Development Services. The designation of a cultural resource is strictly voluntary, not mandatory (Ord. 1212, 11-16-1993; amd. Ord. 1315, 1-18-2000).
 - a. The Commission shall hold a noticed public hearing on the matter within forty five (45) days of receipt of the complete application. Within seven (7) days of the hearing, the Commission shall provide a written recommendation to the City Council as to whether the building or structure should be made a designated cultural resource. If the recommendation of the Commission is to designate the building or structure as a designated cultural resource, the recommendation shall include the reasons for designating the building or structure as a designated cultural resource and shall include a determination of whether to mark it with a uniform and distinctive marker.

- b. Within thirty (30) days after receiving the recommendation of the Commission, the City Council shall hold a noticed public hearing and approve or deny the recommendation.
 - c. Any hearing may be continued for any reason by the consent of the City and the property owner. If the property owner does not consent, there may be no more than one continuance for a period not to exceed thirty one (31) days if the additional time is needed to conduct further study of the cultural resource. If an EIR or negative declaration is required, the time limits set forth in California Public Resources Code section 21151.5 shall apply.
 - d. The City Council shall declare designated cultural resources by resolution, which shall contain a statement as to why the cultural resource is so designated. Any such resolution shall include a legal description of the property involved, including lot and block number and the name of the property owner. The resolution shall be duly recorded by the City Clerk in the County Recorder's office.
2. Criteria: A cultural resource may be declared a designated cultural resource if it meets the following criteria:
 - a. Must be at least fifty (50) years old; and
 - b. It is associated with persons or events significant in local, State, or national history; or
 - c. It reflects or exemplifies a particular period of national, State, or local history; or
 - d. It embodies the distinctive characteristics of a type, style, period of architecture, or method of construction.
 3. Temporary Stay On Permits Pending Designation: No construction, alteration, demolition, relocation, or restoration shall be allowed and no other entitlement permits shall be issued with regard to any proposed designated cultural resource from the time an application for designation is made until the City Council has made a final decision to either approve or deny the request for designation.

Removal Of Designation: A cultural resource designation may be removed subject to the same procedures set forth above (Ord. 1212, 11-16-1993).

4.3.3 Thresholds of Significance

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

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

4.3.4 Impacts Analysis

Threshold 4.3a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

To determine if the proposed Project would impact historical resources under CEQA, the Fairfield Inn and Suites Hotel property (525 Sepulveda Boulevard; Assessor's Parcel Number [APN] 4139-025-091) was evaluated for historical significance and integrity in consideration of NRHP, CRHR, and City of El Segundo designation criteria and integrity requirements.

NRHP/CRHR Statement of Significance

Criterion A/1: That are associated with events that have made a significant contribution to the broad patterns of our history.

Archival research indicated that at the time of construction, the Thunderbird Hotel (now Fairfield Inn and Suites Hotel) was one of the largest hotel projects in Southern California; however, this achievement was subsequently overshadowed by a suburban hotel building boom throughout the state that persisted alongside a housing and population boom in the 1950s and 1960s. The size of the Thunderbird Hotel and its status as a popular, local banquet hall and meeting center do not appear to have made a significant contribution to the history of the City of El Segundo or State of California's development. Moreover, with subsequent additions and alterations, the building no longer adequately represents the time period in which these events took place. Therefore, the property does not appear eligible under Criterion A of the NRHP or Criterion 1 of the CRHR.

Criterion B/2: That are associated with the lives of persons significant in our past.

Archival research did not indicate that any previous property owners, employees, or long-term guests are known to be historically significant figures at the national, state, or local level. As such, this property is not known to have any historical associations with people important to the nation's or state's past. Therefore, the property does not appear eligible for the NRHP under Criterion B or CRHR under Criterion 2.

Criterion C/3: 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.

The Fairfield Inn and Suites Hotel was constructed in 1959 and received two major additions in 1961 and 1979. The original 1959 hotel volume, 1959 conference room and restaurant wing, and 1961 addition at the time of these construction were excellent examples of the highly artistic Mid-Century Modern-style buildings designed by local Southern California-practicing architects Raymond Stockdale and Maxwell Starkham & Associates. The now-lost character-defining features would have been the curtain wall construction, colored spandrel paneling, cantilevered porches, rectangular and boxy proportions, and decorative concrete and metal screens on the main elevation. Although neither architect could be considered a master architect, the buildings were good examples of their work. However, due to major exterior alterations in 1987, none of the original decorative elements or character-defining features of the Mid-Century Modern buildings remain. The property as a whole has been altered beyond recognition, diminishing its once high artistic value. Finally, due to extensive exterior alterations, the property may no longer be considered representative of a significant and distinguishable entity whose

components lack individual distinction. For these reasons, the Fairfield Inn and Suites Hotel property at 525 N. Sepulveda Boulevard does not appear eligible for listing in the NRHP under Criterion C or CRHR under Criterion 3.

Criterion D/4: That have yielded, or may be likely to yield, information important in prehistory or history.

The property is not significant under Criterion D of the NRHP or Criterion 4 of the CRHR as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic construction methods, materials, or technologies.

City of El Segundo Statement of Significance

The City of El Segundo’s cultural resource designation criteria is based on a combination of age and NRHP/CRHR designation criteria and integrity requirements. Therefore, for all of the reasons identified in the discussion of NRHP and CRHR eligibility, the subject property does not appear eligible under any local designation criteria, either individually or as part of a district.

Integrity Discussion

The Fairfield Inn and Suites Hotel property maintains integrity of location, as it remains in its original location. The Fairfield Inn and Suites Hotel property, including all three wings have had major exterior renovations since 1987. While the buildings maintain much of their original plan and structure, key-character defining features of the Mid-Century Modern style building were removed and replaced with ordinary modern materials. Therefore, the Fairfield Inn and Suites Hotel property does not maintain integrity of design. The property does not retain integrity of setting, as the setting in all directions has been altered into parking lots, high-rise office or hotels, or strip malls with anchoring grocery and retail stores, in the late 1980s and 1990s. The size, scale, and density of this modern setting would be unrecognizable to a person from the late 1950s or early 1960s. Similar to integrity of design, the Fairfield Inn and Suites Hotel property does not maintain integrity of materials and workmanship, due to the loss of the highly artistic concrete and metal screens and introduction of modern materials on the main and side elevations. Key original elements such as the cladding, signage, porte-cochere, decorative elements, windows, and doors have all been removed and replaced. The Fairfield Inn and Suites Hotel property does not retain integrity of feeling, as the property no longer retains the ability to express itself as a hotel building constructed in the 1950s, built in the early years of LAX’s “jet-age” modernistic expansion. Finally, the property no longer retains integrity of association either with original owners Allen E. and Marc Siegal, or with the original companies: Thunderbird Hotel Corporation or Hacienda Hotels. In summary, Fairfield Inn and Suites Hotel property does not retain the requisite integrity for designation, and does not rise to the level of significance required for designation at the national, state, or local levels.

Summary of Findings

No cultural resources were identified within the Project site as a result of the CHRIS records search, NAHC SLF search, extensive archival research, field survey, and property significance evaluation. The Fairfield Inn and Suites Hotel property located at 525 Sepulveda Boulevard (APN 4139-025-091) does not appear eligible for NRHP, CRHR, or City designation due to a lack of significant historical associations, architectural merit, and physical integrity. Therefore, this property is not considered an historical resource for the purposes of CEQA. Further, no potential indirect impacts to historical resources were identified. The Project would not cause a substantial adverse change in the significance of a historical resource, or otherwise result in a direct impact to a historical resource. No other adjacent resources were identified as a result of the records search or survey that could be

indirectly impacted by the proposed Project. Therefore, the Project would have a less than significant impact on historical resources. No mitigation is required.

Threshold 4.3b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Dudek conducted a CHRIS records search at the SCCIC on November 14, 2019. The records search identified 33 previously conducted cultural resources technical investigations within the 1-mile radius records search area. Of these, one study overlaps the Project site; however, individual sites were not identified within the current Project site as a result of this study. Additionally, the SCCIC records indicate that 12 previously recorded cultural resources exist within the surrounding 1-mile search radius. All of the resource identified are built environment resources. No previously recorded prehistoric or historic-era archaeological resources were identified within the Project site or 1-mile records search radius. Additionally, Dudek contacted the NAHC on October 17, 2019, to request a search of its SLF. Results of the SLF (received November 26, 2019) were negative. The NAHC also suggested contacting five Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project site.

- 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

No additional tribal outreach was conducted by Dudek; however, 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 4.14, 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 the proposed Project. If such unanticipated discoveries were encountered, impacts to encountered resources could be potentially significant. However, with implementation of Mitigation Measure (MM-) CUL-1, 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-2, 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 4.3c. 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 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 human remains are found, the Los Angeles County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the 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 the 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, and no mitigation is required.

4.3.5 Cumulative Impact Analysis

Cumulative impacts on cultural resources consider whether impacts of the proposed 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. Thirty cumulative projects have been identified in Section 2.4, Cumulative Impacts, of Chapter 2, Environmental Setting, of this Draft EIR. However, impacts to cultural resources, if any exist, tend to be site-specific.

As discussed above in this section, there are no known historical or archaeological resources on the Project site and as such, the Project site is not part of an existing or known grouping or district of historical or archaeological resources that would be impacted as part of the cumulative impacts of other projects.

The CHRIS record search identified twelve previously identified historic built environment resources within a 1-mile record search radius and no cultural resources immediately adjacent to the Project site. Only one of these, Hangar One at 5701 West Imperial Highway (P-19-174101), has been previously listed in the NRHP, and none of the Project addresses listed appear to be close enough in location to affect this historical resource. All other resources have been determined ineligible and are not considered historic resources for the purposes of CEQA. The proposed Project was determined to have less than significant direct and indirect impacts on historic resources. Therefore, the proposed Project would not result in any cumulatively considerable impacts to historic resources.

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 the proposed Project 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-2, 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 site would also be subject to the same requirements of CEQA as the proposed 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, impacts on archaeological resources would not be cumulatively considerable with mitigation incorporated (MM-CUL-2).

The proposed Project was determined to have less-than-significant direct impacts on human remains. Existing regulations are adequate to address the potential for impacts due to the inadvertent discovery of human remains on the Project site. Other individual projects occurring in the vicinity of the Project site would also be subject to the same state requirements to contact appropriate agencies and coordinate with the County Coroner. Therefore, the proposed Project would not result in any cumulatively considerable impacts related to human remains.

4.3.6 Mitigation Measures

MM-CUL-1 Prior to commencement of construction activities for all phases of Project implementation, the Project applicant 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 the WEAP training prior to the start of construction activities. The WEAP shall be prepared to inform all personnel working on the proposed 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-2 If potential archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities for the proposed 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 of the first building on the site. Once approved, the final report shall be filed with the South Central Coastal Information Center (SCCIC).

4.3.7 Level of Significance After Mitigation

With the implementation of MM-CUL-1 and MM-CUL-2, potential impacts cultural resources would be less than significant. No mitigation is required for potential impacts to historic resources or human remains.

4.3.8 Reference

NPS (National Park Service). 1997. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. UA. Department of the Interior, National Park Service, Cultural Resources.
<https://www.energy.gov/sites/prod/files/2016/02/f30/nrb15.pdf>.

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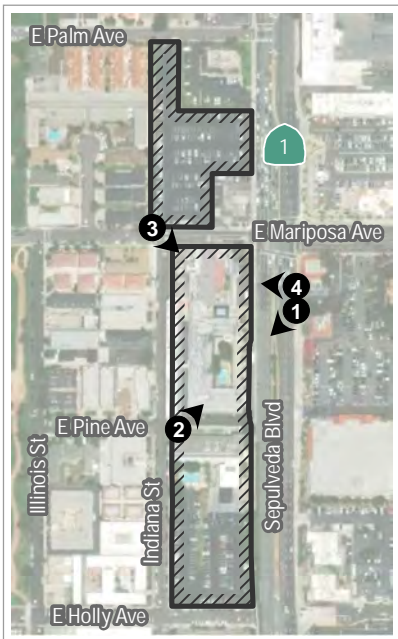
SOURCE: LARIAC Imagery 2014; Open Street Map 2019

FIGURE 4.3-1

Built Structures Evaluated for Historical Significance

Pacific Coast Commons Specific Plan EIR Project

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-  Photo Location
-  Project Boundary



Photo 1



Photo 2



Photo 3



Photo 4

Note: Photos taken October, 2019

SOURCE: Dudek 2019

DUDEK

FIGURE 4.3-2
Fairfield Inn and Suites Hotel Photographs
Pacific Coast Commons Specific Plan EIR Project

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4.4 Energy

This section describes the existing energy conditions of the Pacific Coast Commons Specific Plan (Specific Plan or Project) vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures (if any), level of significance after mitigation, and references. Information contained in this section is based on the latest version of California Emissions Estimator Model (CalEEMod), Version 2016.3.2, to estimate the proposed Project's energy consumption from both construction and operations. For the relevant data, refer to the following appendix:

Appendix C-1 Air Quality and Greenhouse Gas Emissions CalEEMod Calculations, prepared by Dudek, dated December 2020.

Appendix C-3 PCC Specific Plan Construction and Operational Energy Use, prepared by Dudek.

Other sources consulted are listed in Section 4.4.8, References.

Comments received in response to the Notice of Preparation are summarized in Table 1, Notice of Preparation (NOP) and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

Methodology

The Project site currently is occupied by the Fairfield Inn and Suites Hotel and the Aloft Hotel and adjacent surface parking lots. These two hotel facilities contain a total of 596 hotel rooms as well as associated amenity areas, including two swimming pools, dining areas, and other hotel facilities. These existing hotels would remain in their current condition with implementation of the proposed Specific Plan. As described in Chapter 3, Project Description of this Draft Environmental Impact Report (EIR), approximately 41,660 square feet of accessory building space associated with the Fairfield Inn and Suites Hotel would be demolished to allow for development of the proposed Project. This Draft EIR does not consider the elimination of this 41,660 square feet in the calculation of projected Project-related operational energy use (i.e. the Project's operational energy demand is not reduced to account for the elimination of these occupiable buildings); therefore, this Draft EIR provides a conservative assessment of operational impacts.

4.4.1 Existing Conditions

Electricity

The production of electricity requires the consumption or conversion of non-renewable energy resources, including oil, gas, coal, and nuclear resources, into electrical energy. Renewable energy resources are also used, including water, wind, solar, and geothermal sources. The delivery of electricity involves a number of system components, including power generation facilities, transmission lines, and substations and transformers that lower the voltage to a level appropriate for distribution lines to the end-user. Electrical power is generally measured in watts, while energy use is measured in watt-hours. For example, if a light bulb has a capacity rating of 100 watts, the energy required to keep the bulb on for 1 hour would be 100 watt-hours. On a utility scale, a generator's capacity is typically rated in megawatts, which is one million watts, while energy usage is measured in megawatt-hours.

According to the U.S. Energy Information Administration (EIA), California used approximately 257,268 gigawatt-hours of electricity in 2017 (EIA 2019a). By sector in 2017, commercial uses utilized 46% of the state's electricity, followed by 35% for residential uses, and 19% for industrial uses (EIA 2019a). Electricity usage in California for different land uses 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. Due to the state's energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita in the residential sector is lower than any other state except Hawaii (EIA 2020).

Southern California Edison (SCE) provides electricity to El Segundo residents and businesses, including those located on the proposed Project site. SCE, a subsidiary of Edison International, serves approximately 180 cities in 11 counties across central and Southern California. According to the California Energy Commission (CEC), approximately 83 billion kilowatt-hours (kWh) of electricity were used in SCE's service area in 2018 (CEC 2019a). Demand forecasts anticipate that approximately 75 billion kWh of electricity will be used in SCE's service area in 2020 (CPUC 2019a).

SCE receives electric power from a variety of sources. According to the California Public Utilities Commission (CPUC) 2019 California Renewables Portfolio Standard Annual Report, 36% of SCE's power came from eligible renewables, such as biomass/waste, geothermal, small hydroelectric, solar, and wind sources (CPUC 2019a). SCE maintains a lower percentage of renewable energy procurement when compared with California's two other large investor-owned utilities – Pacific Gas and Electric Company and San Diego Gas & Electric Company, both of which procured 39% and 44% of their electric power, respectively, from eligible renewables (CPUC 2019a). SCE also maintains a higher percentage of renewables relative to statewide procurement. The EIA determined that in 2018, approximately 38.6% (31,353 megawatts) of electric power was generated by a renewable source (i.e., geothermal, hydroelectric, biomass, solar thermal and photovoltaic, and wind) (EIA 2018). The California Renewables Portfolio Standard (RPS) Program establishes a goal for California to increase the amount of electricity generated from renewable energy resources to 20% by 2010 and to 33% by 2020. Recent legislation revised the current RPS target for California to obtain 50% of total retail electricity sales from renewable sources by 2030, with interim targets of 40% by 2024, and 45% by 2027 (CPUC 2016).

Within Los Angeles County, annual residential electricity use is approximately 21 billion kWh per year and annual non-residential electricity use is approximately 47 billion kWh per year, as reported by CEC for 2018 (CEC 2019b).

Natural Gas

Natural gas is a combustible mixture of hydrocarbon compounds (primarily methane) 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. 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.

According to the EIA, California used approximately 2,110,829 million cubic feet of natural gas in 2017 (EIA 2019b). Natural gas is used for cooking, space heating, generating electricity, and as an alternative transportation fuel. The majority of California's natural gas customers are residential and small commercial customers (core customers). These customers accounted for approximately 32% of the natural gas delivered by California utilities (CPUC 2019b). Large consumers, such as electric generators and industrial customers (noncore customers), accounted for approximately 70% of the natural gas delivered by California utilities in 2017 (EIA 2019b).

The Southern California Gas Company (SoCalGas) provides Los Angeles County with natural gas service. SoCalGas' service territory encompasses approximately 20,000 square miles and more than 500 communities. In the California Energy Demand mid-energy demand scenario, natural gas demand is projected to have an annual growth rate of 0.03% in SoCalGas' service territory. As of 2017, approximately 7,206 million therms¹ were used in SoCalGas' service area per year. The proposed Project is expected to begin construction in 2021. By 2020, natural gas demand is anticipated to be approximately 7,876 million therms per year in SoCalGas' service area (CEC 2017). The total capacity of natural gas available to SoCalGas in 2020 is estimated to be 3.8 billion cubic feet per day. In 2024, the total capacity available is also estimated to be 3.8 billion cubic feet per day² (California Gas and Electric Utilities 2018). This amount is approximately equivalent to 2.86 billion thousand British thermal units (kBtu) per day or 28.6 million therms per day. Within the County, annual natural gas consumption is approximately 3 billion therms (CEC 2019c).

Petroleum

Petroleum-based fuels currently account for 90% of California's transportation energy sources. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and greenhouse gases (GHGs) from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels (CEC 2016). According to the EIA, California used approximately 683 million barrels of petroleum in 2017, with the majority (585 million barrels) used for the transportation sector (EIA 2019c). This total annual consumption equates to a daily use of approximately 1.9 million barrels of petroleum. There are 42 U.S. gallons in a barrel, so California consumes approximately 78.6 million gallons of petroleum per day, adding up to an annual consumption of 28.7 billion gallons of petroleum. In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. California has implemented policies to improve vehicle efficiency and to support use of alternative transportation, which are described in Section 4.4.2, Relevant Plans, Policies, and Ordinances.

4.4.2 Relevant Plans, Policies, and Ordinances

Federal

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2010, fuel economy standards were set at 27.5 miles per gallon for new passenger cars and 23.5 miles per gallon for new light trucks. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

¹ One therm is equal to 100,000 British thermal units or 100 thousand British thermal units.

² One cubic foot of natural gas has approximately 1,020 BTUs of natural gas or 1.02 kBtus of natural gas.

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.

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.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the act includes other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and lighting efficiency standards (Sections 301–325)
- Building energy efficiency (Sections 411–441)

This federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum (EPA 2017). The U.S. Environmental Protection Agency (EPA) is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions in GHG emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of the renewable fuels sector in the United States. The updated program is referred to as RFS2 and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.

- EISA required the EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green” jobs.

U.S. Environmental Protection Agency and National Highway Traffic Safety Administration Joint Rule for Vehicle Standards

On April 1, 2010, the EPA and the National Highway Traffic Safety Administration (NHTSA) announced a joint final rule to establish a national program consisting of new standards for light-duty vehicles model years 2012 through 2016. The joint rule is intended to reduce GHG emissions and improve fuel economy. The EPA promulgated the first-ever national GHG emissions standards under the Clean Air Act, and NHTSA promulgated Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. This final rule follows the EPA and Department of Transportation’s joint proposal on September 15, 2009, and is the result of the President Obama’s May 2009 announcement of a national program to reduce GHGs and improve fuel economy. The final rule became effective on July 6, 2010 (EPA and NHTSA 2010).

The EPA GHG standards require new passenger cars, light-duty trucks, and medium-duty passenger vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide (CO₂) per mile in model year 2016, equivalent to 35.5 miles per gallon (MPG) if the automotive industry were to meet this CO₂ level through fuel economy improvements alone. The CAFE standards for passenger cars and light trucks will be phased in between 2012 and 2016, with the final standards equivalent to 37.8 MPG for passenger cars and 28.8 MPG for light trucks, resulting in an estimated combined average of 34.1 MPG. Together, these standards will cut GHG emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program. The rules will simultaneously reduce GHG emissions, improve energy security, increase fuel savings, and provide clarity and predictability for manufacturers (EPA and NHTSA 2010).

In August 2012, the EPA and NHTSA approved a second round of GHG and CAFE standards for model years 2017 and beyond (EPA and NHTSA 2012). These standards will reduce motor vehicle GHG emissions to 163 grams of CO₂ per mile, which is equivalent to 54.5 MPG if this level were achieved solely through improvements in fuel efficiency, for cars and light-duty trucks by model year 2025. A portion of these improvements, however, will likely be made through improvements in air-conditioning leakage and through use of alternative refrigerants, which would not contribute to fuel economy. The first phase of the CAFE standards (for model years 2017 to 2021) are projected to require, on an average industry fleet-wide basis, a range from 40.3 to 41.0 MPG in model year 2021. The second phase of the CAFE program (for model years 2022 to 2025) is projected to require, on an average industry fleet-wide basis, a range from 48.7 to 49.7 MPG in model year 2025. The second phase of standards has not been finalized due to the statutory requirement that NHTSA set average fuel economy standards not more than five model years at a time. The regulations also include targeted incentives to encourage early adoption and introduction into the marketplace of advanced technologies to dramatically improve vehicle performance, including the following:

- Incentives for electric vehicles, plug-in hybrid electric vehicles, and fuel cell vehicles
- Incentives for hybrid technologies for large pickups and for other technologies that achieve high fuel economy levels on large pickups
- Incentives for natural gas vehicles

- Credits for technologies with potential to achieve real-world GHG reductions and fuel economy improvements that are not captured by the standards' test procedures

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 EIA) and would impact the global climate by 3/1000th of 1 °C by 2100 (EPA and NHTSA 2018). 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.

State

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.
- 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.

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.

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.

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.

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.

California Building Energy Standards

Title 24 of the California Code of Regulations, Part 6. Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California’s building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the CEC (and revised if necessary) (California Public Resources Code, Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, with the goal of “reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy” (California Public Resources Code, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402[d]) and cost effectiveness (California Public Resources Code, Sections 25402[b][2] and [b][3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The current Title 24 standards are the 2019 Title 24 Building Energy Efficiency Standards, which became effective January 1, 2020. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards will use approximately 53% less energy than those under the 2016 standards (CEC 2018a). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018a).

As set forth in Section 110.10, Mandatory Requirements for Solar Ready Buildings, states that low-rise and high-rise multi-family buildings, hotels, and nonresidential buildings must include a “solar zone”, which is a section of the roof designated and reserved for the future installation of a solar electric or solar thermal system. The solar zone for these uses must be located on the roof or overhang of the building (or on the roof or overhang of another structure located within 250 feet of the building) or on covered parking installed with the building, and must have a total area no less than 15% of the total roof area of the building excluding any skylight area. The solar zone requirement is applicable to the entire building, including mixed-occupancy. See the 2019 standards for additional requirements regarding the azimuth, shading, interconnection pathways, and electrical service panels of solar zones.

Title 24 of the California Code of Regulations, Part 11. In addition to the CEC’s efforts, in 2008, the California Building Standards Commission adopted the nation’s first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen and 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. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals. The CALGreen 2016 standards became effective January 1, 2017.

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen’s Tier 1 standards call for a 15% improvement in energy requirements; stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen’s more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water

conservation, 80% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs.

The California Building Standards Commission approved amendments to the voluntary measures of the CALGreen standards in December 2018. The 2019 CALGreen standards became effective January 1, 2020. As with the 2019 Title 24 standards, the 2019 CALGreen standards focus on building energy efficiency. The 2019 CALGreen standards are the current applicable standards. For nonresidential projects, some of the key mandatory CALGreen 2019 standards involve requirements related to bicycle parking, designated parking for clean air vehicles, electric vehicle charging stations, shade trees, water conserving plumbing fixtures and fittings, outdoor potable water use in landscaped areas, recycled water supply systems, construction waste management, excavated soil and land clearing debris, and commissioning (24 CCR Part 11). For high-rise residential buildings (i.e., more than 4 floors), the non-residential measures generally apply.

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.

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 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.”

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.

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.

State Vehicle Standards

In response to the transportation sector accounting for more than half of California's CO₂ emissions, AB 1493 was enacted in 2002. AB 1493 required CARB to set GHG emissions standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emissions standards for motor vehicles manufactured in 2009 and all subsequent model years. The 2009–2012 standards resulted in a reduction in approximately 22% of GHG emissions compared to emissions from the 2002 fleet, and the 2013–2016 standards resulted in a reduction of approximately 30%.

In 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global-warming gases with requirements for greater numbers of zero-emissions vehicles into a single package of standards called Advanced Clean Cars. By 2025, when the rules would be fully implemented, new automobiles would emit 34% fewer global-warming gases and 75% fewer smog-forming emissions (CARB 2011).

Although the focus of the state's vehicle standards is on the reduction of air pollutants and GHG emissions, one co-benefit of implementation of these standards is a reduced demand for petroleum-based fuels.

Regional and Local

Southern California Association of Governments

SB 375 requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) in their Regional Transportation Plan (RTP). The Southern California Association of Governments (SCAG) Regional Council adopted the 2012 RTP/SCS in April 2012 (SCAG 2012), and the 2016–2040 RTP/SCS (2016 RTP/SCS) was adopted in April 2016 (SCAG 2016). Both the 2012 and 2016 RTP/SCSs establish a development pattern for the region that, when integrated with the transportation network and other policies and measures, would reduce GHG emissions from transportation (excluding goods movement). Specifically, the 2012 RTP/SCS links the goals of sustaining mobility with the goals of fostering economic development; enhancing the environment; reducing energy consumption; promoting transportation-friendly development patterns; and encouraging all residents affected by socioeconomic, geographic, and commercial limitations to be provided with fair access. The 2012 and 2016 RTP/SCSs do not require that local general plans, specific plans, or zoning be consistent with it but provide incentives for consistency for governments and developers. Because the current South Coast Air Quality Management District's Air Quality Management Plan is based

on the SCAG 2016 RTP/SCS demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for their 2016–2040 RTP/SCS, the SCAG 2016 RTP/SCS is discussed in Section 4.2.2, Impacts Analysis. See Southern California Association of Governments in Section 4.4.2 for an additional discussion on SCAG.

On May 7, 2020, SCAG’s Regional Council adopted the Connect SoCal (2020–2045 RTP/SCS). The Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region’s future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

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% decrease from 2005 levels by 2020 as recommended in the state AB 32 Scoping Plan and a 49% 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.

City of El Segundo General Plan

The City of El Segundo General Plan (City of El Segundo 1992) includes various policies related to energy conservation (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 PM ₁₀ 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. Proposed PCC Specific Plan

Requirements set forth in the Specific Plan's Development Standards that are relevant for the topic of Energy include, but may not be limited to the following:

D.2 Preferential Parking must be provided for carpools and vanpools.

D.3. Bicycle parking and EV [electric vehicle] Charging must comply with the stricter of El Segundo Municipal Code (ESMC) Chapters 15-15 and 15-16 or Cal Green Code.

I.1. All new development must have buildings designed to be energy efficient to meet or exceed Title 24 requirements.

I.3. Bicycle parking must comply with the ESMC and Cal Green Code.

I.4. Exterior lighting must be energy efficient and designed to minimize light pollution.

I.6. Roof structures of new buildings must be designed to support solar panels.

I.7. Reclaimed water must be utilized for all landscaped areas if available and feasible.

4.4.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to energy 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 energy would occur if the project would:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Approach and Methodology

CalEEMod Version 2016.3.2 (CAPCOA 2017) was used to estimate the potential proposed Project-energy consumption during construction and operation. Construction of the proposed Project would result in petroleum consumption primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details specific to construction and operation are discussed in Section 4.2, Air Quality, specifically in Approach and Methodology (Construction Emissions and Operational Emissions), are also applicable for the estimation of construction-related energy consumption. Potential energy consumption from proposed Project operations were estimated for area sources (landscape maintenance), energy sources (natural gas and electricity), mobile sources, solid waste, and water supply and wastewater treatment. Construction of the proposed Project is anticipated to commence in July 2021 and reach completion in April 2024, lasting a total of 34 months. Additional details from each category are discussed in the Air Quality section, in Section 4.2.3.

4.4.4 Impacts Analysis

Threshold 4.4a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Implementation of the proposed Project would increase the demand for electricity and natural gas in the City, as well as gasoline consumption during construction and operation of future development.

Electricity

Construction

Temporary electric power for lighting, heating/cooling, and electronic equipment, such as computers inside temporary construction trailers, as well as lighting for construction activities, would be required during short-term construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. All sources of electricity would be from existing power lines that serve the site and no new infrastructure would be required. There is nothing unusual about the proposed Project that would result in a wasteful, inefficient, and unnecessary use of electrical energy. The electricity used for construction activities would be temporary and would have a negligible contribution to the proposed Project's overall energy consumption. Impacts to electricity during construction would be less than significant, and no mitigation is required.

Operations

The operational phase would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. As discussed in Section 4.2 under Approach and Methodology (Operational Emissions), CalEEMod default values for electricity consumption for the proposed Project's land uses were revised to account for compliance with the 2019 Title 24 standards. It was assumed that multi-family residential savings are 2% of electricity from the 2016 standards. For non-residential

buildings, the savings are 10.7% of electricity. Table 4.4-1 presents the anticipated electricity demand for the proposed Project.

Table 4.4-1. Operational Electricity Demand – Proposed Project

Land Use	kWh/Year
<i>Building and Lighting Electricity Demand</i>	
Residential	1,044,560
Retail	81,249
Fast Casual Restaurant	131,535
Parking Garage	1,660,290
Building Total	2,917,634
<i>Other Electricity Demand</i>	
All Land Uses – Water/Wastewater Total	226,277
Total	3,143,911

Source: Appendix C-3.

kWh = kilowatt-hour.

As shown in Table 4.4-1, buildout of the proposed Project is estimated to have a total electrical demand of 3,143,911 kWh per year (or 20 million kWh per year) for proposed Project usage. As previously discussed, the County’s annual electricity use was approximately 68 billion kWh in 2018. Therefore, the proposed Project’s electrical consumption would be a small percentage (0.005%) of the County’s annual use. SCE forecasts that its total energy consumption in 2024 (the Project buildout year) will be approximately 120,000 gigawatt hours of electricity (CEC 2018b). Based on the Project’s estimated electrical consumption of 3,143,911 kWh/year, the Project would account for approximately 0.0026% of SCE’s total projected consumption during 2024 for the Project’s buildout year.³

In addition, the proposed Project would be built in accordance with the current Building Energy Efficiency Standards (Title 24) at the time of construction, which include robust requirements for energy efficiency. Also, the provisions of the CALGreen code apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure. In mixed occupancy buildings, such as the proposed Project, each portion of a building must comply with the specific green building measures applicable to each specific occupancy. Table 4.6-5 in Section 4.6 provides details related to the requirements for bicycle parking and electric vehicle charging that would contribute to long-term energy efficiency. Therefore, due to the inherent increase in efficiency of building code regulations, the proposed Project would not result in a wasteful, inefficient, or unnecessary use of energy. Impacts related to operational electricity use would be less than significant.

Natural Gas

Construction

Natural gas is not anticipated to be required during construction of the proposed Project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the “petroleum” subsection. Any minor amounts of natural gas that may be consumed as a result of proposed Project construction would be

³ Project’s consumption (3.143911 gigawatt hours) divided by SCE’s projected consumption (120,000 gigawatt hours).

substantially less than that required for proposed Project’s operation and would have a negligible contribution to the proposed Project’s overall energy consumption.

Operations

Natural gas consumption during proposed Project operation would be required for various purposes, including building heating and cooling. As discussed in Section 4.2 under Approach and Methodology (Operational Emissions), default natural gas generation rates in CalEEMod for the proposed Project were revised to account for compliance with the 2019 Title 24 standards. It was assumed that multi-family residential savings are 5% of natural gas from the 2016 standards. For non-residential buildings, the savings are 1% of natural gas. Table 4.4-2 presents the natural gas demand for the proposed Project.

Table 4.4-2. Operational Natural Gas Demand

Land Use	kBTU/Year
Residential	2,927,690
Retail	14,527
Fast Casual Restaurant	956,561
Total	3,898,778

Notes: kBTU = thousand British thermal units.

Source: Appendix C-3.

As shown in Table 4.4-2, buildout of the proposed Project would consume approximately 3,898,778 kBTU per year. As previously discussed, SoCalGas customers annual natural gas consumption is estimated to be 7,876 million therms per year. Therefore, the proposed Project’s estimated natural gas consumption of 3,898,778 kBTU (or 38,988 therms) per year would be a small percentage (0.0005%) of SoCalGas’ annual supply to customers. In addition, the proposed Project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains energy measures that are applicable to the proposed Project. The proposed Project would be required to meet Title 24 requirements applicable at that time, as required by state regulations through the plan review process. Therefore, due to the inherent increase in efficiency of building code regulations, the proposed Project would not result in a wasteful, inefficient, or unnecessary use of natural gas. Impacts related to operational natural gas use would be less than significant.

Petroleum

Construction

Petroleum would be consumed throughout construction of the proposed Project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities, vendor trucks, and haul trucks would rely on diesel fuel. Construction workers would travel to and from the Project site throughout the duration of construction. It was assumed that construction workers would travel in gasoline-powered vehicles.

Heavy-duty construction equipment of various types would be used during construction. CalEEMod was used to estimate construction equipment usage. Based on that analysis, diesel-fueled construction equipment would operate for an estimated 45,390 hours, as summarized in Table 4.4-3.

Table 4.4-3. Hours of Operation for Construction Equipment

Phase	Hours of Equipment Use
Phase 1 - Demolition	1,008
Phase 1 - Site Preparation	1,232
Phase 1 - Grading	2,112
Phase 1 - Building Construction	13,260
Phase 1 - Paving	2,112
Phase 1 - Application of Architectural Coatings	264
Phases 2 and 3 - Demolition	2,016
Phases 2 and 3 - Site Preparation	1,232
Phases 2 and 3 - Grading	2,016
Phases 2 and 3 - Building Construction	17,816
Phases 2 and 3 - Paving	2,064
Phases 2 and 3 - Application of Architectural Coatings	258
Total	45,390

Source: Appendix C-1.

Fuel consumption from construction equipment was estimated by converting the total CO₂ emissions from each construction phase to gallons using conversion factors for CO₂ to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO₂ per gallon (The Climate Registry 2020). The estimated diesel fuel use from construction equipment is shown in Table 4.4-4.

Table 4.4-4. Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Phase 1 - Demolition	6	35.70	10.21	3,496.65
Phase 1 - Site Preparation	7	36.78	10.21	3,602.27
Phase 1 - Grading	6	57.32	10.21	5,614.03
Phase 1 - Building Construction	9	225.93	10.21	22,128.48
Phase 1 - Paving	6	44.06	10.21	4,315.44
Phase 1 - Application of Architectural Coatings	1	5.62	10.21	550.17
Phases 2 and 3 - Demolition	6	71.38	10.21	6,991.51
Phases 2 and 3 - Site Preparation	7	36.80	10.21	3,603.89
Phases 2 and 3 - Grading	6	54.73	10.21	5,360.16
Phases 2 and 3 - Building Construction	9	303.69	10.21	29,744.20
Phases 2 and 3 - Paving	6	43.06	10.21	4,217.14
Phases 2 and 3 - Application of Architectural Coatings	1	5.49	10.21	537.66
Total				90,161.59

Source: Appendix C-3.

CO₂ = carbon dioxide; MT = metric ton; kg = kilogram.

Fuel consumption from worker and vendor truck trips was estimated by converting the total CO₂ emissions from the construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Worker vehicles are

assumed to be gasoline fueled, whereas vendor and haul trucks are assumed to be diesel fueled. The estimated fuel use for worker vehicles, vendor, and haul trucks are presented in Table 4.4-5, Table 4.4-6, and Table 4.4-7, respectively.

Table 4.4-5. Construction Worker Gasoline Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Phase 1 - Demolition	1,760	8.03	8.78	914.29
Phase 1 - Site Preparation	1,100	5.26	8.78	598.64
Phase 1 - Grading	3,440	16.53	8.78	1,882.89
Phase 1 - Building Construction	23,400	107.80	8.78	12,278.29
Phase 1 - Paving	1,800	8.11	8.78	923.50
Phase 1 - Application of Architectural Coatings	3,600	16.22	8.78	1,846.99
Phases 2 and 3 - Demolition	4,300	18.63	8.78	2,121.61
Phases 2 and 3 - Site Preparation	2,640	11.71	8.78	1,333.59
Phases 2 and 3 - Grading	6,720	29.80	8.78	3,394.58
Phases 2 and 3 - Building Construction	78,600	343.79	8.78	39,155.80
Phases 2 and 3 - Paving	3,440	14.75	8.78	1,680.51
Phases 2 and 3 - Application of Architectural Coatings	10,320	44.26	8.78	5,041.54
Total				71,172.23

Source: Appendix C-3.

CO₂ = carbon dioxide; MT = metric ton; kg = kilogram.

Table 4.4-6. Construction Vendor Diesel Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Phase 1 - Demolition	440	5.13	10.21	502.16
Phase 1 - Site Preparation	220	2.69	10.21	263.04
Phase 1 - Grading	430	5.35	10.21	523.87
Phase 1 - Building Construction	5,850	70.78	10.21	6,932.82
Phase 1 - Paving	450	5.32	10.21	521.44
Phase 1 - Application of Architectural Coatings	900	10.65	10.21	1,042.89
Phases 2 and 3 - Demolition	1,720	19.72	10.21	1,930.95
Phases 2 and 3 - Site Preparation	440	5.16	10.21	505.73
Phases 2 and 3 - Grading	840	9.86	10.21	965.48
Phases 2 and 3 - Building Construction	15,720	184.20	10.21	18,041.39
Phases 2 and 3 - Paving	860	10.06	10.21	984.98
Phases 2 and 3 - Application of Architectural Coatings	1,720	20.11	10.21	1,969.94
Total				34,184.68

Source: Appendix C-3.

CO₂ = carbon dioxide; MT = metric ton; kg = kilogram.

Table 4.4-7. Construction Haul Diesel Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Phase 1 - Demolition	200	7.47	10.21	731.34

Table 4.4-7. Construction Haul Diesel Demand

Phase	Trips	Vehicle CO ₂ (MT)	kg CO ₂ /Gallon	Gallons
Phase 1 - Site Preparation	0	0.00	10.21	0.00
Phase 1 - Grading	0	0.00	10.21	0.00
Phase 1 - Building Construction	0	0.00	10.21	0.00
Phase 1 - Paving	0	0.00	10.21	0.00
Phase 1 - Application of Architectural Coatings	0	0.00	10.21	0.00
Phases 2 and 3 - Demolition	200	7.09	10.21	694.04
Phases 2 and 3 - Site Preparation	0	0.00	10.21	0.00
Phases 2 and 3 - Grading	1,720	60.94	10.21	5,968.74
Phases 2 and 3 - Building Construction	0	0.00	10.21	0.00
Phases 2 and 3 - Paving	0	0.00	10.21	0.00
Phases 2 and 3 - Application of Architectural Coatings	0	0.00	10.21	0.00
Total				7,394.11

Source: Appendix C-3.

CO₂ = carbon dioxide; MT = metric ton; kg = kilogram.

As shown in Tables 4.4-5 through 4.4-7, the proposed Project is estimated to consume approximately 202,913 gallons of petroleum during the construction phase. For disclosure, by comparison, approximately 81 billion gallons of petroleum would be consumed in California over the course of the proposed Project's construction phase, based on the California daily petroleum consumption estimate of approximately 78.6 million gallons per day (EIA 2019c). Thus, the total expected petroleum use from the proposed Project's construction represents approximately 0.0003% of California's consumption of petroleum over the construction duration. In accordance CARB's Airborne Toxics Control Measure, the proposed Project would be required to restrict heavy-duty diesel vehicle idling time to 5 minutes, which would reduce petroleum usage. Overall, because petroleum use during construction would be temporary, and would not be wasteful or inefficient, impacts would be less than significant.

Operations

The fuel consumption resulting from the proposed Project's operational phase would be attributable to various vehicles associated with each land use. Petroleum fuel consumption associated with motor vehicles traveling within the City during operation is a function of VMT. Trip generation rates for the proposed Project were based on the Traffic Impact Analysis (Appendix J-1). The estimated fuel use from the proposed Project land uses operational mobile sources is shown in Table 4.4-8.

Table 4.4-8. Petroleum Consumption – Operation

Fuel	Vehicle MT CO ₂	kg CO ₂ /Gallon ^a	Gallons
Gasoline	1,633.12	8.78	186,004.17
Diesel	133.81	10.21	13,106.20
Total			199,110.37

Source: Appendix C-1.

MT = metric ton; CO₂ = carbon dioxide; kg = kilogram.

As depicted in Table 4.4-8, mobile sources from buildout of the proposed Project would result in approximately 199,110 gallons of petroleum fuel usage per year. For disclosure, by comparison, California as a whole consumes approximately 28.7 billion gallons of petroleum per year (EIA 2019c). Los Angeles County had 3,659 million gallons of gasoline and 301 million gallons of diesel fuel sold in 2017 (Los Angeles County 2020). Therefore, the proposed Project would consume (at buildout), approximately 0.005% of the gasoline and 0.062% of the diesel sold within the County (in 2017).

As discussed in Section 4.13, Transportation, the SCAG region has household 15.3 VMT per capita and the City of El Segundo has a household 14.2 VMT per capita. The proposed Project is estimated to generate an average daily household VMT per resident of 10.9 miles, which is more than 15% less than the City's VMT. Therefore, the Project would not result in a significant transportation impact related to VMT. Over the lifetime of the proposed Project, the fuel efficiency of vehicles is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the Project site during operation would decrease over time. As detailed in Section 4.4.2, there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles that combines the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California (CARB 2011). As such, operation of the proposed Project is expected to use decreasing amounts of petroleum over time due to advances in vehicle fuel economy standards.

In summary, the proposed Project would increase petroleum use during operation, but due to efficiency increases the amount of petroleum consumed would diminish over time. Petroleum consumption associated with the proposed Project would not be considered inefficient or wasteful and would result in a less than significant impact.

In summary, the consumption of energy resources (including electricity, natural gas, and petroleum) during the Project construction and operation would not be inefficient or wasteful and would result in a less than significant impact.

Threshold 4.4b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed Project would comply with all applicable regulatory requirements for the design of new buildings. Title 24 of the California Code of Regulations contains energy efficiency standards for residential and nonresidential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, wall/floor/ceiling assemblies, and roofs. Part 6 of Title 24 specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California in order to reduce energy demand and consumption. Part 11 of Title 24 also includes the CALGreen standards, which established mandatory minimum environmental performance standards for new construction projects. The proposed Project would comply with Title 24, Part 6 and Part 11, per state regulations.

Additionally, the proposed Project would receive electricity from SCE, which has the mandate to comply with SB 100. This policy requires that eligible renewable energy resources and zero-carbon resources supply 100% 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. Thus, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy

or energy efficiency; therefore, impacts during construction and operation of the proposed Project would be less than significant.

4.4.5 Cumulative Impacts Analysis

Buildout of 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. Although Project 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, would be reduced by measures making the Project more energy-efficient, and would be consistent with growth expectations for the service areas. Furthermore, as with the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary.

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. Since the Project is consistent with the Connect SoCal (2020 RTP/SCS), its contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of transportation fuel would not be cumulatively considerable and, thus, would be less than significant.

As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.

4.4.6 Mitigation Measures

Proposed Project impacts would be less than significant, and no mitigation is required.

4.4.7 Level of Significance After Mitigation

Impacts from energy consumption as a result of implementing the proposed Project would be less than significant. Therefore, no mitigation is required.

4.4.8 References

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4.5 Geology and Soils

This section describes the existing geological conditions of the Pacific Coast Commons Specific Plan Project (Specific Plan or Project) site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. Information contained in this section is based on survey and evaluation of paleontological resources within the Project site and surrounding area, as well as the following:

- Appendix E-1** Geotechnical Due-Diligence Evaluation, Proposed Retail & Residential Development, ALOFT Development, Sepulveda Blvd. and Mariposa Ave., City of El Segundo, California, prepared by Albus-Keefe & Associates Inc.
- Appendix E-2** CONFIDENTIAL: Vertebrate Paleontology Records Check for Paleontological Resources for the Proposed Pacific Coast Commons Specific Plan Project

Other sources consulted are listed in Section 4.5.8, References, and include the California Geological Survey's (CGS) Earthquake Zones of Required Investigation (CGS 2020) and the El Segundo General Plan Public Safety Element (City of El Segundo 1992).

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

4.5.1 Existing Conditions

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

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 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 Sepulveda Boulevard (City of El Segundo 1992).

Topography

Topography within Pacific Coast Commons (PCC)-South and PCC-Fairfield Parking grades down to the southwest. Elevations range from approximately 97 to 116 feet above mean sea level. Drainage is generally directed to the southwest toward Indiana Street and East Holly Avenue. Indiana Avenue is situated at a lower elevation than Pacific Coast Highway (PCH). East Holly Avenue is situated at a lower elevation than East Mariposa Avenue. Topography within PCC-North is relatively flat with elevations of approximately 116 to 127 feet above mean sea level. Drainage is generally directed toward the east toward PCH and south toward Mariposa Avenue (Appendix E-1).

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 4.5-1, 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 (CGS 2010). Other prominent faults in the region include the San Andreas, Newport-Inglewood, San Fernando, Sierra Madre, and Verdugo (CGS 2010). The California Geological Survey (CGS 2018) classifies faults as follows:

- **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 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 (CGS 2018).

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 (USGS 2016). 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 to for geologists to conclude that the faults are active.

Major active faults in the Project region are listed in Table 4.5-1, Summary of Nearby Faults, and are described below. Distances from the Project site to individual faults represent the distance to the nearest fault segment within the respective fault zones.

Table 4.5.1. Summary of Nearby Faults

Regional Faulting	Approximate Closest Distance to Project Site (miles)	Fault Age	Probable Magnitude (Mw)
Newport-Inglewood Fault	3.6	Holocene-active	6.0–7.4
Palos Verdes Fault	4.7	Holocene-active to pre-Holocene	6.0–7.0
Puente Hills Blind Thrust System	8.2	Holocene-active	6.5–7.1
Santa Monica Fault	8.4	Holocene-active	6.0–7.0
Verdugo Fault	16.9	Holocene-active	6.0–6.8
Raymond Fault	18.2	Holocene-active	6.0–7.0
Whittier Fault	19.7	Holocene-active	6.0–7.2
Sierra Madre Fault	22.9	Holocene-active	6.0–7.0
San Fernando Fault	23.1	Holocene-active	6.0–6.8
San Andreas Fault	57.0	Holocene-active	6.8–8.0

Sources: CGS 2010; CIT 2013

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 (CIT 2013). The closest segment of the Newport-Inglewood Fault Zone is located approximately 3.6 miles to the northeast of the Project site (Appendix E-1; CGS 2010, 2018).

Palos Verde Fault

The Holocene-active to pre-Holocene Palos Verdes Fault is located approximately 4.7 miles to the southwest of the Project site 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 (Appendix E-1; CGS 2010; CIT 2013).

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 8.2 miles northeast of the Project site, 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 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 (Appendix E-1; Shaw et al. 2002; USGS 2017).

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 site and has the capability to generate a maximum probable Mw 6.0 to 7.0 earthquake (Appendix E-1; CGS 2010; CIT 2013).

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 57 miles to the northeast of the Project site and is capable of producing an Mw 6.8 to 8.0 earthquake (CGS 2010; CIT 2013).

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 (CGS 2018). The Project site is not located within an Alquist-Priolo Earthquake Fault Zone (CGS 2020). As such, the potential for surface rupture due to fault displacement beneath the Project site is considered very low.

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 site 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 site is situated in a seismically active area that has historically been affected by generally moderate to occasionally high levels of ground motion. The Project site lies in relative close proximity to several seismically active faults; therefore, during the life of the proposed structures, the property 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. The soils underlying the Project site fall within the characteristics of Class D (i.e., "Stiff Soil" profile), as defined in Chapter 20 of the American Society of Civil Engineers (ASCE) 7-10. According to the Geotechnical Evaluation, the site has potential ground acceleration of 0.598 (Appendix E-1).

Subsurface Soils

According to the Geotechnical Evaluation, the Project area is underlain by quaternary Dune Sand deposits. Based on the review of geologic publications, maps, and historical aerial photos, and soil borings completed at properties in proximity to the Project site, the site is likely to be underlain by similar subsurface materials with a thin cap of artificial fill. Reference boring (B-1) was conducted at 1700 and 1710 Mariposa Avenue in El Segundo, which is approximately 250 feet west of the Project site, and reference boring (B-2) was located at 888 PCH, approximately 1,200 feet north of the Project site. The underlying soils are likely to be comprised of sand with varying amount of silt and clay materials that should be slightly moist to moist and loose to very dense. Density is anticipated to increase with depth. Artificial fill will most likely be present within the site due to the previous and recent developments (Appendix E-1).

Existing artificial fill and the upper 2 to 3 feet of the Dune Sands are anticipated to be unsuitable to support proposed site development in their current condition. This condition can be mitigated by removing and recompacting these materials, at depths of about 3 to 6 feet. 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. The existing near surface soils are typically below optimum moisture content.

Groundwater

According to the Geotechnical Evaluation, the historical high groundwater levels for the general area have been interpreted at 160 feet below the ground surface in the vicinity of the Project site. Groundwater was not observed to the maximum depth of 51.0 feet below the existing surface in the exploratory borings conducted in the vicinity of the site (Appendix E-1). Elevations of the subject site vary from approximately 116 to 127 feet above mean sea level (MSL). Therefore, the depth of 160 feet relates to elevations of -44 to -33 feet MSL. Assuming even the shallowest groundwater elevation of +10 feet MSL at the Project site, the depth to groundwater would be at least 106 feet below the lowest current grade of the Project site.

Liquefaction/Lateral Spreading

Liquefaction is a process in which loose, saturated granular soil loses strength as a result of cyclic loading. The strength loss is a result of a decrease in granular sand volume and positive increase in pore pressures. Generally, liquefaction can occur if all of the following conditions apply: liquefaction-susceptible soil, groundwater within a depth of 50 feet or less, and strong seismic ground shaking. Soils that are most susceptible to liquefaction are clay-free deposits of sands and silts, and unconsolidated alluvium (Appendix E-1). In addition, lateral spreading, a hazard associated with liquefaction, is the finite, lateral movement of gently to steeply sloping, saturated soil deposits caused by earthquake-induced liquefaction.

As shown in Figure 4.5-2, Earthquake Zones of Required Investigation, the Project site is not susceptible to liquefaction (CGS 2020). In addition, the City's General Plan Public Safety Element identifies liquefaction within the City as moderate risk (City of El Segundo 1992). The liquefaction evaluation for the Project site was completed under the guidance of Special Publication 117A: Guidelines for Evaluating and Mitigating Seismic Hazards in California. Historical high groundwater is anticipated at a depth of at least 50 feet below the site. Therefore, the

potential for liquefaction to occur beneath the site is considered to be very low. Furthermore, the site is not located within a mapped California Geologic Survey liquefaction hazard zone (Appendix E-1).

Slope Instability/Landslides

A landslide is the downhill movement of masses of earth material under the force of gravity. 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. As shown in Figure 4.5-2, the Project site is not located with an earthquake-induced landslide zone (CGS 2020).

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. The Geotechnical Evaluation estimates the existing artificial fills and upper collapsible Dune Sand deposits will shrink approximately 10% to 20% (Appendix E-1).

Collapsible and Expansive Soils

Previous data suggests that some soils at the Project site 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 and upper 2 to 3 feet of the Dune Deposits. Soils below the collapsible soil zone are anticipated to exhibit low compressibility characteristics in their current state (Appendix E-1).

Expansive soils are clay-based soils that increase in volume when wet and shrink when dry. Based on previous laboratory test results at nearby properties, the near-surface soils are generally anticipated to possess a Very Low to Low expansion potential. Expansive soils can undergo volume changes when they become wetted or dried. These changes can affect the overlying structures and other surface improvements.

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 (SVP 2010) guidelines. 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 site, a paleontological records search was requested from the Natural History Museum of Los Angeles County (LACM) on April 20, 2020, and desktop geological and paleontological research were conducted.

The Project site lies within the southwestern block of the Los Angeles Basin (Yerkes et al. 1965). 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 been subsiding and filling with sediments since the late Cretaceous (Yerkes et al. 1965). 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.

According to the LACM records search results received on May 4, 2020 and surficial geological mapping of Dibblee and Minch (2007) at a 1:24,000 scale, the Project site is underlain by late Pleistocene (approximately 129,000–11,700 years old) sand dune deposits (map unit Qos) (Confidential Appendix E-2). While this geological unit is mapped on the surface, the geotechnical report for the Project indicated approximately 3 feet of artificial fill within one of the nearby two borings (Confidential Appendix E-2).

The LACM did not report any previously recorded vertebrate fossil localities within the Project site; however, they did report fossil localities from Pleistocene sand dune deposits at depth near the Project site (Confidential Appendix E-2). The closest vertebrate fossil locality (LACM 3264), north/northwest of the Project near the central portion of the Los Angeles International Airport and the Tom Bradley Terminal, yielded a fossil elephant (Proboscidea) at a depth of 25 feet below the ground surface. A fossil baby mammoth (*Mammuthus*) locality (LACM 7332) was recovered near 98th Street and Bellanca Avenue from a depth of approximately 40 feet below street grade (Confidential Appendix E-2). North of LACM 7332, at Bellanca Avenue, south of Manchester Avenue, vertebrate fossil locality LACM 3789 produced fossil mammoth (*Mammuthus*), rodent (Rodentia), and speckled sanddab (*Citharichthys stigmaeus*) from 14 feet below the ground surface. Directly northwest of LACM 3789, vertebrate fossil localities LACM 1180 and LACM 4942, produced fossil specimens of horse (*Equus*), mammoth (*Mammuthus*), bison (*Bison*), and rabbit (*Lepus*), at depths of 13 to 16 feet below the surface on the northeast and southeast sides of Airport Boulevard near the intersection with Manchester Avenue, respectively (Confidential Appendix E-2). The LACM recommended paleontological monitoring of substantial excavations that extend into Pleistocene Dune Sand deposits and the collection of sediment samples to determine the presence of microvertebrate fossils.

In addition to the vertebrate fossil localities reported by the LACM, Jefferson (1991) reported numerous Pleistocene fossil vertebrate localities in this portion of the Los Angeles Basin. Specimens include amphibians, reptiles, birds, and large and small mammals. Moreover, during construction monitoring for the Scattergood Generating Station Unit 3 Repowering Project, scientifically significant fossil localities, consisting of fossil marine invertebrates, marine vertebrates (fish vertebrae), and terrestrial vertebrates (amphibian, lizard, snake, bird, rodent, insectivore, and rabbit) bones and teeth were recovered from Pleistocene sand dune deposits (ArchaeoPaleo Resource Management Inc, 2014). These localities were discovered approximately 2 miles west/southwest of the Project site in the City of El Segundo.

4.5.2 Relevant Plans, Policies, and Ordinances

Federal

Earthquake Hazards Reduction Act

In October 1977, the U.S. Congress passed the Earthquake Hazards Reduction Act 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 reduction program. To accomplish this goal, the act established the National Earthquake

Hazards Reduction Program. This program was substantially amended in November 1990 by the National Earthquake Hazards Reduction Program Act, which refined the description of agency responsibilities, program goals, and objectives.

The mission of the National Earthquake Hazards Reduction Program includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improved building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improved mitigation capacity; and accelerated application of research results. The National Earthquake Hazards Reduction Program Act designates the Federal Emergency Management Agency as the lead agency of the program and assigns several planning, coordinating, and reporting responsibilities. Other National Earthquake Hazards Reduction Program Act agencies include the National Institute of Standards and Technology, National Science Foundation, and the U.S. Geological Survey.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Act (California Public Resources Code [PRC] Sections 2621–2630) was passed in 1972 to mitigate the hazard of surface faulting to structures designed for human occupancy. The main purpose of the law is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The law addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards. The Alquist-Priolo Act requires the State Geologist to establish regulatory zones known as Earthquake Fault Zones around the surface traces of active faults and to issue appropriate maps. The maps are distributed to all affected cities, counties, and state agencies for their use in planning efforts. Before a project can be permitted in a designated Alquist-Priolo Earthquake Fault Zone, cities and counties must require a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (PRC Sections 2690–2699.6) addresses earthquake hazards from non-surface fault rupture, including liquefaction and seismically induced landslides. The act established a mapping program for areas that have the potential for liquefaction, landslide, strong ground shaking, or other earthquake and geologic hazards. The act also specifies that the lead agency for a project may withhold development permits until geologic or soils investigations are conducted for specific sites and mitigation measures are incorporated into plans to reduce hazards associated with seismicity and unstable soils.

National Pollutant Discharge Elimination System Permit

In California, the State Water Resources Control Board administers regulations promulgated by the U.S. Environmental Protection Agency (55 Code of Federal Regulations [CFR] 47990), requiring the permitting of stormwater-generated pollution under the National Pollutant Discharge Elimination System (NPDES). In turn, the State Water Resources Control Board's jurisdiction is administered through nine Regional Water Quality Control Boards. Under these federal regulations, an operator must obtain a General Construction Permit through the NPDES Stormwater Program for all construction activities with ground disturbance of 1 acre or more. The General Construction Permit requires the implementation of best management practices (BMPs) to reduce sedimentation into surface waters and to control erosion. One element of compliance with the NPDES permit is preparation of a

Stormwater Pollution Prevention Plan (SWPPP) that addresses control of water pollution, including sediment, in runoff during construction.

California Building Standards Code

The California Building Code (CBC) has been codified in the California Code of Regulations (CCR) as Title 24, Part 2. 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 purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability, by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. As indicated previously, the CBC is updated and revised every 3 years. The 2019 version of the CBC became effective January 1, 2020. It is anticipated that the proposed Project would use the most current CBC at the time of building permit issuance. The 2019 edition of the CBC is based on the 2018 International Building Code, published by the International Code Conference.

Chapters 16 and 16A of the 2019 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. Chapters 18 and 18A include the requirements for foundation and geotechnical soil investigations, and geohazard reports (Section 1803A); excavation, grading, and fill (Section 1804A); damp-proofing and water-proofing (Section 1805A); allowable load-bearing values of soils (Section 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Section 1807A); foundations (Section 1808A); and design of shallow foundations (Section 1809A) and deep foundations (Section 1810A). Chapter 33 of the 2019 CBC includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes (Section 3304).

Construction activities are subject to occupational safety standards for excavation and trenching, as specified in the California Safety and Health Administration regulations (CCR Title 8) and in Chapter 33 of the CBC. These regulations specify the measures to be used for excavation and trench work where workers could be exposed to unstable soil conditions. The proposed Project would be required to employ these safety measures during excavation and trenching.

California Environmental Quality Act

Paleontological Resources

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value and are afforded protection under state laws and regulations. Paleontological resources are explicitly afforded protection by the California Environmental Quality Act (CEQA), specifically in Section VII(f) of CEQA Guidelines Appendix G, the “Environmental Checklist Form,” which addresses the potential for adverse impacts to “unique paleontological resource[s] or site[s] or ... unique geological feature[s].” This provision covers fossils of signal importance – remains of species or genera new to science, for example, or fossils exhibiting features not previously recognized for a given animal group – as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth. Further, CEQA provides that generally, a resource shall be considered “historically significant” if it has yielded or may be likely to yield information important in prehistory (PRC Section 15064.5 [a][3][D]). Paleontological resources would fall within this category. The Public Resources Code, Chapter 1.7, Sections 5097.5 and 30244

also regulates removal of paleontological resources from state lands, defines unauthorized removal of fossil resources as a misdemeanor, and requires mitigation of disturbed sites.

Regional and Local

City of El Segundo General Plan

The City of El Segundo General Plan (City of El Segundo 1992) includes various policies related to geology and safety (both directly and indirectly). 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 PS1-1.1: 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 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

City of El Segundo Municipal Code

The California Building Code, 2016 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).

Section J104.2.3, Engineered Grading Requirements

Section J104.2.3 of the ESMC 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 ESMC.

Section J113, National Pollutant Discharge Elimination System (NPDES) Compliance

Section J113 of 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 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 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.

4.5.3 Thresholds of Significance

The significance criteria used to evaluate a project's impacts to geology and soils are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to geology and soils would occur if the Project would:

- 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.
- b. Result in substantial soil erosion or the loss of topsoil.
- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
- e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.
- f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.5.4 Impacts Analysis

Threshold 4.5a 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?**

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone (CGS 2020). According to the Geotechnical Evaluation, the closest such zone is located along the Newport-Inglewood Fault, located approximately 3.6 miles to the east/northeast of the Project site (Appendix E-1). In addition, as shown in Figure 4.5-1, no known faults traverse the Project site. Furthermore, the Project site would not directly or indirectly cause or exacerbate existing fault rupture risks from the construction of new buildings and associated infrastructure on the Project site. As a result, no impact related to surface rupture of a known earthquake fault would occur.

- ii. **Strong seismic ground shaking?**

The Project site is located in the seismically active region of Southern California. The Newport-Inglewood Fault has been mapped in the vicinity of the Project site. This fault, as well as numerous other regional faults (e.g., Palos Verde 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 could lead to damage to structures and infrastructure, personal injury and death, utility service disruption, fire, explosion, and hazardous material spills.

The soils underlying the Project site fall within the characteristics of Class D (i.e., “Stiff Soil” profile), as defined in Chapter 20 of the American Society of Civil Engineers (ASCE) 7-10. This information was used to calculate the ground motions on the Project site, using the U.S. Geological Survey U.S. Seismic Design Maps tool (Appendix E-1). According to the Geotechnical Evaluation, the site has potential ground acceleration of 0.598. The Geotechnical Evaluation (Appendix E-1) provides the seismic parameters to be used in the structural design of the Project, based on the typical site materials encountered during subsurface exploration at nearby sites and are provides for preliminary design and estimating purposes. These parameters include the mapped spectral acceleration at short periods; the mapped spectral acceleration at a one-second period; the maximum considered earthquake spectral response for short periods; the maximum considered earthquake spectral response at a one-second period; the design spectral response acceleration for short periods; and the design spectral response acceleration at a one-second period. The Geotechnical Evaluation recommends these parameters be verified by a site-specific geotechnical investigation, in accordance with the requirements set forth in Section J104.2.3, Engineered Grading Requirements, of the ESMC. Furthermore, the Project geotechnical consultant should provide final design parameters following observation and testing of site materials during grading. Depending on actual materials encountered during site grading and actual foundation loads, the design parameters presented in the Geotechnical Evaluation may require modification (Appendix E-1). Per Section J104.2.3, Engineered Grading Requirements, of the ESMC, recommendations in the geotechnical engineering report and the engineering geology report shall be incorporated into the grading plans or specifications.

Project construction would be completed in accordance with the 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 2019 edition of the CBC is based on the 2018 International Building Code, and all construction must be conducted in compliance with the CBC. Chapters 16 and 16A of the 2019 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, the Project site would not directly or indirectly cause substantial adverse effects involving strong seismic ground shaking, and impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

As previously discussed, the depth to historic high groundwater in the Project vicinity is greater than 50 feet below the ground surface; therefore, the potential for liquefaction to occur beneath the Project site is considered to be very low. Furthermore, as shown in Figure 4.5-2, the site is not located within a mapped California Geologic Survey liquefaction hazard zone (Appendix E-1; CGS 2020). As such, seismic-related ground failure due to liquefaction would not be expected to occur on the Project site. The potential for collapsible soils is discussed under Threshold 4.5c below, and impacts would be less than significant.

iv. Landslides?

As previously discussed, the Project site is not located within an earthquake-induced landslide zone. Because the Project site is not located within an area identified by the CGS as having potential for seismic slope instability, geologic hazards associated with landsliding are not anticipated at the site (Appendix E-1). 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.

Threshold 4.5b Would the project result in substantial soil erosion or the loss of topsoil?

Construction

Project construction would entail demolition and grading of portions of the Project site, followed by construction of the proposed structures. Construction activities would include site preparation, grading/earthwork, building construction, paving, and architectural coating. PCC-South includes excavations required for the subterranean parking structure. As discussed under Threshold 4.5c below, the Project site has the potential for collapsible soils and would require removal and recompaction of artificial fill soils and the upper 2 to 3 feet of the Dune Sand deposits. As recommended in the Geotechnical Evaluation, the undocumented fills underlying the Project site would be removed and replaced with compacted fill (Appendix E-1). These construction activities could result in temporary, short-term impacts related to a potential for erosion and loss of topsoil during the development of the Project site.

As previously discussed, Section J104.2.3 of 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
- Tracking controls at the site entrance, including regular street sweeping and tire washes for equipment
- 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.

Although the Project would require excavation of soils related to construction of the subterranean parking structure and related to removal and recompaction of collapsible soils, this would not result in a substantial loss of topsoil. 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.

Operations

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.

Threshold 4.5c **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?**

Landslides

As previously discussed, topographic relief across the site is from approximately 19 feet directed to the southwest toward Indiana Street and East Holly Avenue for PCC-South and PCC-Fairfield Parking, and approximately 11 feet directed toward the east toward PCH and south toward Mariposa Avenue for PCC-North (Appendix E-1). Additionally, the Project site is not within an area identified as having a potential for seismic slope instability. Because the Project site is not located within an area identified by the CGS as having potential for seismic slope instability, geologic hazards associated with landsliding are not anticipated at the site (Appendix E-1). No impacts would occur.

Liquefaction/Lateral Spreading

Potential impacts concerning liquefaction are evaluated under Threshold a(iii) above. 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.

Subsidence

According to the Geotechnical Evaluation, once existing artificial fill and the upper 2 to 3 feet of the Dune Sands are removed, they are anticipated to be suitable for reuse as compacted fill (Appendix E-1). Volumetric changes in earth quantities would occur when excavated onsite soil materials are replaced as properly compacted fill. The Geotechnical Evaluation the existing artificial fills and upper collapsible Dune Sand deposits would shrink approximately 10% to 20%. The reprocessing of removed soils are anticipated to result in negligible subsidence; however, the ultimate earthwork quantities based on actual shrinkage and subsidence that occurs during the grading process would be determined in accordance with the requirements set forth in Section J104.2.3 of the ESMC.

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 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.

Collapsible Soils

The Geotechnical Evaluation indicated that artificial fill soils in the upper 2 to 3 feet of the Dune Sand deposits exhibit collapsible potential upon wetting. If such materials are left in the current condition, excessive settlement of structures and site improvements could result due to the weight of new foundations and the introduction of water from rain or irrigation. Excessive settlement from such materials would be adequately addressed if they are removed and recompacted, as recommended by the Geotechnical Evaluation. Materials anticipated to exhibit this condition consist of the artificial fill soils and upper 2 to 3 feet of the Dune Sand deposits. Soils below the collapsible soil zone are anticipated to exhibit low compressibility characteristics in their current state (Appendix E-1).

The Geotechnical Evaluation concluded that that total settlement of foundations would be less than about 1 inch and bearing pressure is limited to about 4,500 to 5,000 pounds per square foot. Associated differential settlement should be less than 0.5 inches over 30 feet. Such settlement is anticipated to be tolerable for Project site development. The Geotechnical Evaluation recommends that the existing artificial fill be removed and recompacted at depths of about 3 to 6 feet (Appendix E-1).

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 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 Department of Planning and Building Safety. 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.

Threshold 4.5d 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 previously discussed, based on soil testing at the site, the near surface soils have a very low to low expansion potential. According to the Geotechnical Evaluation, testing for soil expansion would be required subsequent to rough grading and prior to construction of foundations and other concrete work to confirm these conditions (Appendix E-1). Expansive soils can undergo volume changes when they become wetted or dried, which could affect overlying structures. 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
- 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 ESMC and the CBC. Potential impacts associated with expansive soils would be less than significant.

Threshold 4.5e Would the project 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 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 no impact.

Threshold 4.5f Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project site is underlain late Pleistocene Sand Dune deposits as indicated by surficial geological mapping at a 1:24,000 scale and is not anticipated to be underlain by unique geological features. The LACM did not report any paleontological localities from within the Project site, but they did report localities nearby from Pleistocene Sand Dune deposits. In addition to the LACM localities, desktop research for the Project area indicated there are additional paleontological localities from Pleistocene Sand Dune deposits close to the Project site. Given the proximity of past fossil discoveries in the surrounding area and the potential for significant vertebrate fossils below any artificial fill present within the Project site, the proposed Project is highly sensitive for supporting paleontological resources and is considered to have high paleontological sensitivity. 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 parking structure, and trenching for pipelines or utilities, have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. However, upon implementation of Mitigation Measure (MM)-GEO-1, impacts would be reduced to below a level of significance. MM-GEO-1 requires a preparation of a Paleontological Resources Impact Mitigation Program 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, impacts would be less than significant.

The proposed Project site is fully developed and paved, with the exception of small areas of landscaping near the parking lots and buildings. The site does not include any unique geologic features, and there would be no impacts associated with Project implementation to geologic features.

4.5.5 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. 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. Each cumulative 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 cumulative project site.

Similarly, MM-GEO-1 would ensure that potential impacts to paleontological resources would be less than significant and other cumulative 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 cumulative projects, would not contribute to a significant cumulative impact associated with geology and soils.

4.5.6 Mitigation Measures

MM-GEO-1 Prior to commencement of any grading activity on-site, the Project applicant/developer shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines. 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, Pleistocene Sand Dune 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.

4.5.7 Level of Significance After Mitigation

Potential impacts to geology and soils would be less than significant. Incorporation of MM-GEO-1 would reduce construction-related impacts to paleontological resources to a less-than-significant level.

4.5.8 References

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SOURCE: Esri and Digital Globe, Open Street Map 2019, USGS 2020

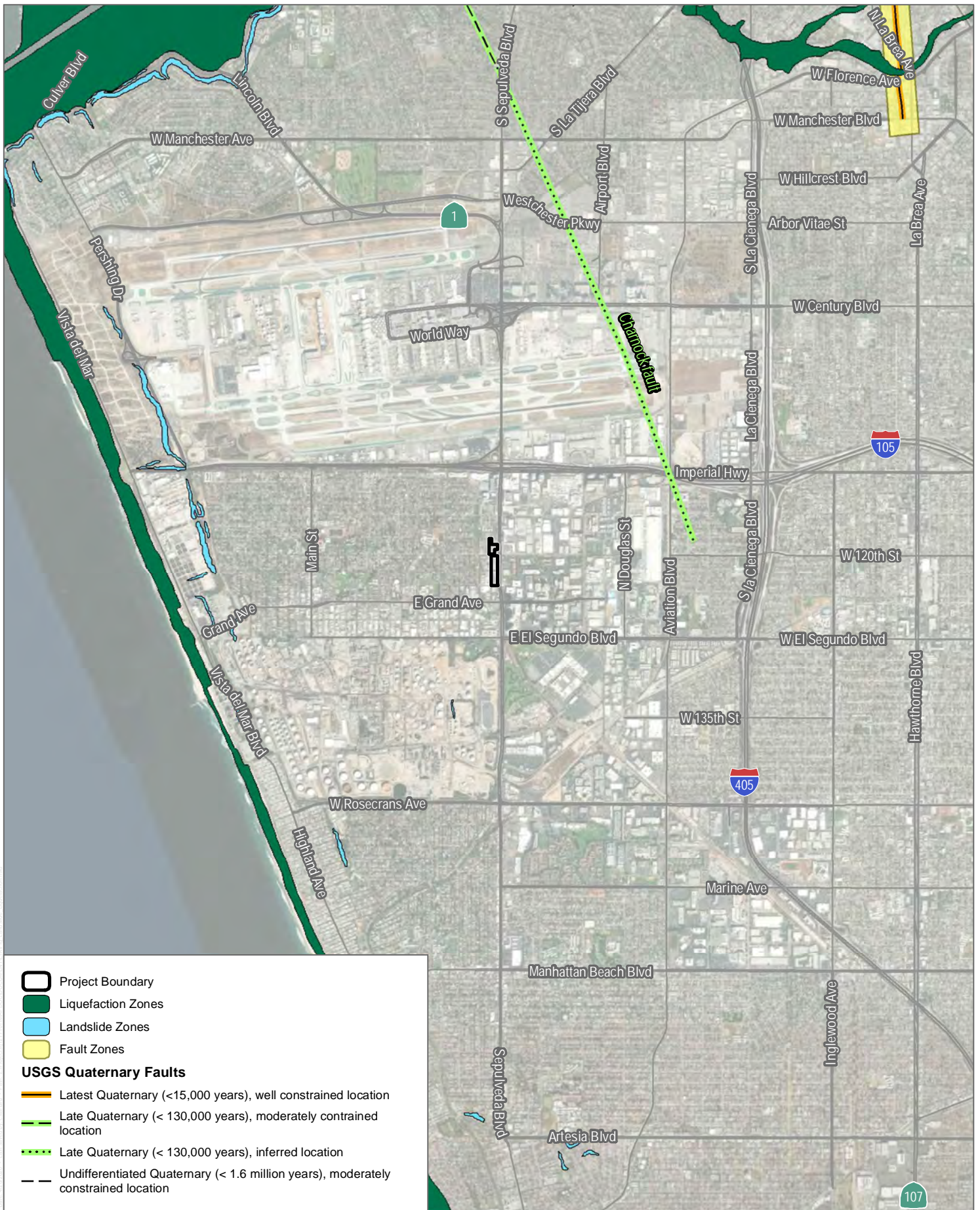
FIGURE 4.5-1

Quaternary Faults

Pacific Coast Commons Specific Plan EIR Project



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SOURCE: Esri and Digital Globe, Open Street Map 2019, USGS 2020

FIGURE 4.5-2

Earthquake Zones of Required Investigation

Pacific Coast Commons Specific Plan EIR Project



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4.6 Greenhouse Gas Emissions

This section describes the existing greenhouse gas (GHG) emissions conditions of the Pacific Coast Commons Specific Plan Project (Specific Plan or Project) site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures (if any), level of significance after mitigation, and references. Information contained in this section is based on the latest version of California Emissions Estimator Model (CalEEMod), Version 2016.3.2, to estimate the proposed Project's GHG emissions from both construction and operations. For the relevant data, refer to the following appendix:

Appendix C-1 CalEMMod Outputs, prepared by Dudek

Other documentation used in this analysis includes the Transportation Impact Analysis, included as Appendix J-1, the South Coast Air Quality Management District (SCAQMD) Draft Guidance Document – Interim CEQA GHG Significance Threshold, and the SCAQMD Greenhouse Gases CEQA Significance Thresholds Working Group Meeting No. 15. Other sources consulted are listed in Section 4.6.8, References.

Comments received in response to the Notice of Preparation are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, Introduction, of this Draft Environmental Impact Report (EIR). A copy of the Notice of Preparation is included in Appendix A-1 and the comment letters received in response to the Notice of Preparation are included in Appendix A-2 of this Draft EIR.

Methodology

The Project site currently is occupied by the Fairfield Inn and Suites Hotel and the Aloft Hotel and adjacent surface parking lots. These two hotel facilities contain a total of 596 hotel rooms as well as associated amenity areas, including two swimming pools, dining areas, and other hotel facilities. These existing hotels would remain in their current condition with implementation of the proposed Specific Plan. As described in Chapter 3, Project Description of this Draft Environmental Impact Report (EIR), approximately 36,605 square feet of accessory building space associated with the Fairfield Inn and Suites Hotel would be demolished to allow for development of the proposed Project. This Draft EIR does not consider the elimination of this 36,605 square feet in the calculation of projected Project-related operational emissions (i.e. the Project's operational emissions are not reduced to account for the elimination of these occupiable buildings); therefore, this Draft EIR provides a conservative assessment of operational impacts.

4.6.1 Existing Conditions

The Greenhouse Effect

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (EPA 2017a).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on the Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that, in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. Recent climate changes, in particular the warming observed over the past century, however, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-twentieth century and is the most significant driver of observed climate change (IPCC 2013; EPA 2017a). Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2013). The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use changes (IPCC 2013). Continued emissions of GHGs will cause further warming and changes in all components of the climate system, which is discussed further under "Potential Effects of Human Activity on Climate Change."

Greenhouse Gases

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃) (see also 14 CCR 15364.5).¹ Some GHGs, such as CO₂, CH₄, and N₂O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO₂, include fluorinated gases, such as HFCs, PFCs, and SF₆, which are associated with certain industrial products and processes. The following paragraphs provide a summary of the most common GHGs and their sources.²

Carbon Dioxide. CO₂ is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects the Earth's radiative balance. Natural sources of CO₂ include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead

¹ Climate forcing substances include GHGs and other substances such as black carbon and aerosols. This discussion focuses on the seven GHGs identified in the California Health and Safety Code Section 38505, because impacts associated with other climate forcing substances are not evaluated herein.

² The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change's Second Assessment Report and Fourth Assessment Report (IPCC 1995, 2007), CARB's Glossary of Terms Used in GHG Inventories (CARB 2018), and EPA's Glossary of Climate Change Terms (EPA 2016).

organic matter. Human activities that generate CO₂ are from the combustion of fuels such as coal, oil, natural gas, and wood and changes in land use.

Methane. CH₄ is produced through both natural and human activities. CH₄ is a flammable gas and is the main component of natural gas. Methane is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide. N₂O is produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N₂O. Sources of N₂O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and using N₂O as a propellant (such as in rockets, racecars, and aerosol sprays).

Fluorinated Gases. Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric ozone-depleting substances (e.g., CFCs, HCFCs, and halons). The most prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to ozone-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, with HFCs, to the ozone depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.
- **Sulfur Hexafluoride:** SF₆ is a colorless gas soluble in alcohol and ether and slightly soluble in water. SF₆ is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- **Nitrogen Trifluoride:** NF₃ is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.

Chlorofluorocarbons. CFCs are synthetic chemicals that have been used as cleaning solvents, refrigerants, and aerosol propellants. CFCs are chemically unreactive in the lower atmosphere (troposphere) and the production of CFCs was prohibited in 1987 due to the chemical destruction of stratospheric O₃.

Hydrochlorofluorocarbons. HCFCs are a large group of compounds, whose structure is very close to that of CFCs—containing hydrogen, fluorine, chlorine, and carbon atoms—but including one or more hydrogen atoms. Like HFCs, HCFCs are used in refrigerants and propellants. HCFCs were also used in place of CFCs for some applications; however, their use in general is being phased out.

Black Carbon. Black carbon is a component of fine particulate matter, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by

absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is a short-lived species that varies spatially, which makes it difficult to quantify the global warming potential. Diesel particulate matter emissions are a major source of black carbon and are toxic air contaminants that have been regulated and controlled in California for several decades to protect public health. In relation to declining diesel particulate matter from the California Air Resources Board's (CARB) regulations pertaining to diesel engines, diesel fuels, and burning activities, CARB estimates that annual black carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2014).

Water Vapor. The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.

Ozone. Tropospheric ozone (O_3), which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O_3 , which is created by the interaction between solar ultraviolet radiation and molecular oxygen (O_2), plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O_3 , due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.

Aerosols. Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2016). The IPCC developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2 ; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e).

The current version of CalEEMod (Version 2016.3.2) (CAPCOA 2017) assumes that the GWP for CH_4 is 25 (so emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007). The GWP values identified in CalEEMod were applied to the proposed Project.

Contributions to Greenhouse Gas Emissions

Per the U.S. Environmental Protection Agency's (EPA) Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2018 (EPA 2020), total United States GHG emissions were approximately 6,676.6 MMT (million metric tons) CO_2e in 2018. The primary GHG emitted by human activities in the United States was CO_2 , which represented approximately 81.3% of total GHG emissions (5,428.1 MMT CO_2e). The largest source of CO_2 , and of

overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 92.8% of CO₂ emissions in 2018 (5,031.8 MMT CO₂e). Relative to 1990, gross United States GHG emissions in 2018 are higher by 3.7%, down from a high of 15.2% above 1990 levels in 2007. GHG emissions decreased from 2017 to 2018 by 2.9% (188.4 MMT CO₂e) and overall, net emissions in 2018 were 10.2% below 2005 levels (EPA 2020).

According to California’s 2000–2017 GHG emissions inventory (2019 edition), California emitted 424.10 MMT CO₂e in 2017, including emissions resulting from out-of-state electrical generation (CARB 2019). The sources of GHG emissions in California include transportation, industrial uses, electric power production from both in-state and out-of-state sources, commercial and residential uses, agriculture, high global-warming potential substances, and recycling and waste. The California GHG emission source categories (as defined in CARB’s 2008 Scoping Plan) and their relative contributions in 2017 are presented in Table 4.6-1.

Table 4.6-1. Greenhouse Gas Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO ₂ e)	Percent of Total ^a
Transportation	169.86	40%
Industrial Uses	89.40	21%
Electricity (In State)	38.45	9%
Electricity (Imports)	23.94	6%
Agriculture	32.42	8%
Residential	26.00	6%
Commercial	15.14	4%
High Global-Warming Potential Substances	19.99	5%
Recycling and Waste	8.89	2%
Total	424.19	100%

Source: CARB 2019.

Notes: GHG = greenhouse gas; MMT CO₂e = million metric tons of carbon dioxide equivalent. Emissions reflect the 2017 California GHG inventory.

^a Percentage of total has been rounded, and total may not sum due to rounding.

During the 2000 to 2017 period, per-capita GHG emissions in California have continued to drop from a peak in 2001 of 14.1 MT per person to 10.7 MT per person in 2017, representing a 24% decrease. In addition, total GHG emissions in 2017 were approximately 5 MMT CO₂e less than 2016 emissions. The declining trend in GHG emissions, coupled with programs that will continue to provide additional GHG reductions going forward, demonstrates that California is just below the 2020 target of 431 MMT CO₂e (CARB 2019).

The City of El Segundo (City) has established a goal to reduce its community-wide GHG emissions to a level that is 15% below its 2005 GHG emissions level by 2020 (City of El Segundo 2015). The City’s community-wide GHG emissions inventory for baseline year 2012 is presented in Table 4.6-2.

Table 4.6-2. City of El Segundo (Year 2012) Community-Wide Greenhouse Gas Emissions Inventory

Community Sector	Total MT CO ₂ e/year	CO ₂ e (percent) ¹
Commercial Energy	417,367	60%
On-Road Transportation	245,360	35%
Residential Energy	25,392	4%
Solid Waste	12,350	2%
Off-Road Source	774	0.1%
Water	33	<0.1%

Table 4.6-2. City of El Segundo (Year 2012) Community-Wide Greenhouse Gas Emissions Inventory

Community Sector	Total MT CO ₂ e/year	CO ₂ e (percent) ¹
Wastewater	51	<0.1%
Total	701,327	100%

Source: City of El Segundo 2015.

Note: MT CO₂e = metric tons of carbon dioxide equivalent per year

¹ Total may be slightly off due to rounding.

As shown on Table 4.6-2, approximately 60% of the City’s GHG emissions in 2012 were attributed to commercial energy consumption. Transportation accounted for approximately 35%. Residential energy consumption accounted for approximately 4%, solid waste management accounted for 2%, off-road sources accounted for 0.1%, while water conveyance and wastewater treatment accounted for less than 0.1% of the City’s GHG emissions in 2012.

Potential Effects of Human Activity on Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 Intergovernmental Panel on Climate Change Synthesis Report indicated that warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, and rising sea levels (IPCC 2014).

In California, climate change impacts have the potential to affect sea level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, and electricity demand and supply (CCCC 2012). The primary effect of global climate change has been a 0.2°C rise in average global tropospheric temperature per decade, determined from meteorological measurements worldwide between 1990 and 2005. Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. A warming of about 0.2°C (0.36°F) per decade is projected, and there are identifiable signs that global warming could be taking place.

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The average temperatures in California have increased, leading to more extreme hot days and fewer cold nights; shifts in the water cycle have been observed, with less winter precipitation falling as snow, and both snowmelt and rainwater running off earlier in the year; sea levels have risen; and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later (CAT 2010).

An increase in annual average temperature is a reasonably foreseeable effect of climate change. Observed changes over the last several decades across the western United States reveal clear signals of climate change. Statewide average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada (CCCC 2012). By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1 to 8.6°F, depending on emissions levels. Springtime warming—a critical influence on snowmelt—will be particularly pronounced. Summer temperatures will rise more than winter temperatures, and the increases will be greater in inland California, compared to the coast. Heat waves will be more frequent, hotter, and longer.

There will be fewer extremely cold nights (CCCC 2012). A decline of Sierra snowpack, which accounts for approximately half of the surface water storage in California and much of the State's water supply, by 30% to as much as 90% is predicted over the next 100 years (CAT 2006).

Model projections for precipitation over California continue to show the Mediterranean pattern of wet winters and dry summers with seasonal, year-to-year, and decade-to-decade variability. For the first time, however, several of the improved climate models shift toward drier conditions by the mid-to-late 21st century in Central and, most notably, Southern California. By late-century, all projections show drying, and half of them suggest 30-year average precipitation will decline by more than 10% below the historical average (CCCC 2012).

Wildfire risk in California will increase as a result of climate change. Earlier snowmelt, higher temperatures, and longer dry periods over a longer fire season will directly increase wildfire risk. Indirectly, wildfire risk will also be influenced by potential climate-related changes in vegetation and ignition potential from lightning. However, human activities will continue to be the biggest factor in ignition risk. It is estimated that the long-term increase in fire occurrence associated with a higher emissions scenario is substantial, with increases in the number of large fires statewide ranging from 58% to 128% above historical levels by 2085. Under the same emissions scenario, estimated burned area will increase by 57% to 169%, depending on the location (CCCC 2012).

Reduction in the suitability of agricultural lands for traditional crop types may occur. While effects may occur, adaptation could allow farmers and ranchers to minimize potential negative effects on agricultural outcomes by adjusting timing of plantings or harvesting and changing crop types.

Public health-related effects of increased temperatures and prolonged temperature extremes, including heat stroke, heat exhaustion, and exacerbation of existing medical conditions, could be particular problems for the elderly, infants, and those who lack access to air conditioning or cooled spaces (CNRA 2009a).

A summary of current and future climate change impacts to resource areas in California, as discussed in the Safeguarding California: Reducing Climate Risk (CNRA 2014) is provided below.

Agriculture. The impacts of climate change on the agricultural sector are far more severe than the typical variability in weather and precipitation patterns that occur year to year. Some of the specific challenges faced by the agricultural sector and farmers include more drastic and unpredictable precipitation and weather patterns; extreme weather events that range from severe flooding to extreme drought, to destructive storm events; significant shifts in water availability and water quality; changes in pollinator lifecycles; temperature fluctuations, including extreme heat stress and decreased chill hours; increased risks from invasive species and weeds, agricultural pests and plant diseases; and disruptions to the transportation and energy infrastructure supporting agricultural production. These challenges and associated short-term and long-term impacts can have both positive and negative effects on agricultural production. Nonetheless, it is predicted that current crop and livestock production will suffer long-term negative effects resulting in a substantial decrease in the agricultural sector if not managed or mitigated (CNRA 2014).

Biodiversity and Habitat. The state's extensive biodiversity stems from its varied climate and assorted landscapes, which have resulted in numerous habitats where species have evolved and adapted over time. Specific climate change challenges to biodiversity and habitat include species migration in response to climatic changes, range shift and novel combinations of species; pathogens, parasites and disease; invasive species; extinction risks; changes in the timing of seasonal life-cycle events; food web disruptions; threshold effects (i.e., a change in the ecosystem that results in a "tipping point" beyond which irreversible damage or loss has occurred).

Habitat restoration, conservation, and resource management across California and through collaborative efforts amongst public, private and nonprofit agencies has assisted in the effort to fight climate change impacts on biodiversity and habitat. One of the key measures in these efforts is ensuring species' ability to relocate as temperature and water availability fluctuate as a result of climate change, based on geographic region.

Energy. The energy sector provides California residents with a supply of reliable and affordable energy through a complex integrated system. Specific climate change challenges for the energy sector include temperature, fluctuating precipitation patterns, increasing extreme weather events and sea level rise. Increasing temperatures and reduced snowpack negatively impact the availability of a steady flow of snowmelt to hydroelectric reservoirs. Higher temperatures also reduce the capacity of thermal power plants since power plant cooling is less efficient at higher ambient temperatures. Natural gas infrastructure in coastal California is threatened by sea level rise and extreme storm events (CNRA 2014).

Forestry. Forests occupy approximately 33% of California's 100 million acres and provide key benefits such as wildlife habitat, absorption of carbon dioxide, renewable energy and building materials. The most significant climate change related risk to forests is accelerated risk of wildfire and more frequent and severe droughts. Droughts have resulted in a greater number of large scale tree mortalities and combined with increasing temperatures have led to an overall increase in wildfire risks. Increased wildfire intensity subsequently increases public safety risks, property damage, fire suppression and emergency response costs, watershed and water quality impacts and vegetation conversions. These factors contribute to decreased forest growth, geographic shifts in tree distribution, loss of fish and wildlife habitat and decreased carbon absorption. Climate change may result in increased establishment of non-native species, particularly in rangelands where invasive species are already a problem. Invasive species may be able to exploit temperature or precipitation changes, or quickly occupy areas denuded by fire, insect mortality or other climate change effects on vegetation (CNRA 2014).

Ocean and Coastal Ecosystems and Resources. Sea level rise, changing ocean conditions and other climate change stressors are likely to exacerbate long-standing challenges related to ocean and coastal ecosystems in addition to threatening people and infrastructure located along the California coastline and in coastal communities. Sea level rise in addition to more frequent and severe coastal storms and erosion are threatening vital infrastructure such as roads, bridges, power plants, ports and airports, gasoline pipes, and emergency facilities as well as negatively impacting the coastal recreational assets such as beaches and tidal wetlands. Water quality and ocean acidification threaten the abundance of seafood and other plant and wildlife habitats throughout California and globally (CNRA 2014).

Public Health. Climate change can impact public health through various environmental changes and is the largest threat to human health in the twenty-first Century. Changes in precipitation patterns affect public health primarily through potential for altered water supplies, and extreme events such as heat, floods, droughts, and wildfires. Increased frequency, intensity and duration of extreme heat and heat waves is likely to increase the risk of mortality due to heat related illness as well as exacerbate existing chronic health conditions. Other extreme weather events are likely to negatively impact air quality and increase or intensify respiratory illness such as asthma and allergies. Additional health impacts that may be impacted by climate change include cardiovascular disease, vector-borne diseases, mental health impacts, and malnutrition injuries. Increased frequency of these ailments is likely to subsequently increase the direct risk of injury and/or mortality (CNRA 2014).

Transportation. Residents of California rely on airports, seaports, public transportation and an extensive roadway network to gain access to destinations, goods and services. While the transportation industry is a source of GHG emissions it is also vulnerable to climate change risks. Particularly, sea level rise and erosion threaten many

coastal California roadways, airports, seaports, transit systems, bridge supports and energy and fueling infrastructure. Increasing temperatures and extended periods of extreme heat threaten the integrity of the roadways and rail lines. High temperatures cause the road surfaces to expand which leads to increased pressure and pavement buckling. High temperatures can also cause rail breakages which could lead to train derailment. Other forms of extreme weather events, such as extreme storm events, can negatively impact infrastructure which can impair movement of peoples and goods, or potentially block evacuation routes and emergency access roads. Increased wildfires, flooding, erosion risks, landslides, mudslides, and rockslides can all profoundly impact the transportation system and pose a serious risk to public safety (CNRA 2014).

Water. Water resources in California support residences, plants, wildlife, farmland, landscapes, and ecosystems, and bring trillions of dollars in economic activity. Climate change could seriously impact the timing, form, amount of precipitation, runoff patterns, and frequency and severity of precipitation events. Higher temperatures reduce the amount of snowpack and lead to earlier snowmelt, which can affect water supply availability, natural ecosystems, and winter recreation. Water supply availability during the intense dry summer months is heavily dependent on the snowpack accumulated during the winter. Increased risk of flooding is associated with a variety of public health concerns including water quality, public safety, property damage, displacement, and post-disaster mental health problems. Prolonged and intensified droughts can also negatively affect groundwater reserves and result in increased overdraft and subsidence. Droughts can also negatively impact agriculture and farmland throughout the state. The higher risk of wildfires can lead to increased erosion, which can negatively impact watersheds and result in poor water quality. Water temperatures are also prone to increase, which can negatively affect wildlife that rely on a specific range of temperatures for suitable habitat.

In March 2016, the California Natural Resources Agency (CNRA) released *Safeguarding California: Implementation Action Plans*, a document that shows how California is acting to convert the recommendations contained in the 2014 *Safeguarding California* plan into action (CNRA 2016). Additionally, in May 2017, CNRA released the draft *Safeguarding California Plan: 2017 Update*, which is a survey of current programmatic responses for climate change and contains recommendations for further actions (CNRA 2017).

CNRA released *Safeguarding California Plan: 2018 Update* in January 2018, which provides a roadmap for state agencies to protect communities, infrastructure, services, and the natural environment from climate change impacts. The 2018 *Safeguarding California Plan* includes 69 recommendations across 11 sectors and more than 1,000 ongoing actions and next steps developed by scientific and policy experts across 38 state agencies (CNRA 2018). As with previous state adaptation plans, the 2018 Update addresses the following: acceleration of warming across the state; more intense and frequent heat waves; greater riverine flows; accelerating sea level rise; more intense and frequent drought; more severe and frequent wildfires; more severe storms and extreme weather events; shrinking snowpack and less overall precipitation; and ocean acidification, hypoxia, and warming.

4.6.2 Relevant Plans, Policies, and Ordinances

Federal

Massachusetts vs. EPA

On April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency*, the U.S. Supreme Court ruled that CO₂ was a pollutant and directed the EPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether

the science is too uncertain to make a reasoned decision. In making these decisions, the EPA administrator is required to follow the language of Section 202(a) of the Clean Air Act. On December 7, 2009, the administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- The elevated concentrations of GHGs—CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and SF₆—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the “endangerment finding.”
- The combined emissions of GHGs—CO₂, CH₄, N₂O, and hydrofluorocarbons—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the “cause or contribute finding.”

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Energy Independence and Security Act

On December 19, 2007, President George W. Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the Act would do the following, which would aid in the reduction of national GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
2. Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and direct NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
3. Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

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 CO₂ 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 62624–63200). On January 12, 2017, EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks (EPA 2017b).

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 CO₂ 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 (EPA and NHTSA 2016).

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 (EPA and NHTSA 2018). 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 CO₂ 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.

State

Reduction Targets

Executive Order B-30-15. EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and Assembly Bill (AB) 32. EO B-30-15 set an interim target goal of reducing GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. To facilitate achieving this goal, EO B-30-15 called for CARB to update the Scoping Plan to express the 2030 target in terms of MMT CO₂e. The EO also called for state agencies to continue to develop and implement GHG emissions reduction programs in support of the reduction targets.

Executive Order S-3-05. EO S-3-05 (June 2005) established California’s GHG emissions reduction targets and laid out responsibilities among the state agencies for implementing the EO and for reporting on progress toward the targets. This EO established the following targets:

- By 2010, reduce GHG emissions to 2000 levels
- By 2020, reduce GHG emissions to 1990 levels
- By 2050, reduce GHG emissions to 80% below 1990 levels

EO S-3-05 also directed the California Environmental Protection Agency to report biannually on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. The California Climate Action Team was formed, which subsequently issued reports from 2006 to 2010 (CAT 2016).

Assembly Bill 32. In furtherance of the goals established in EO S-3-05, the Legislature enacted AB 32 (Núñez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California’s GHG emissions at 1990 levels by 2020 and initiate the transformations required to achieve the state’s long-range climate objectives.

Senate Bill 32 and Assembly Bill 197. Senate Bill (SB) 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state’s climate policies. AB 197 also added two members of the Legislature to the Board as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and, requires CARB to identify specific information for GHG emissions reduction measures when updating the scoping plan.

Executive Order B-18-12. EO B-18-12 (April 2012) directed state agencies, departments, and other entities under the governor’s executive authority to take action to reduce entity-wide GHG emissions by at least 10% by 2015 and 20% by 2020, as measured against a 2010 baseline. EO B-18-12 also established goals for existing state buildings for reducing grid-based energy purchases and water use.

Senate Bill 605 and Senate Bill 1383. SB 605 (2014) requires CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants (SLCPs) in the state; and SB 1383 (2016) requires CARB to approve and implement that strategy by January 1, 2018. SB 1383 also establishes specific targets for the reduction of SLCPs (40% below 2013 levels by 2030 for methane and HFCs, and 50% below 2013 levels by 2030 for anthropogenic black carbon), and provides direction for reductions from dairy and livestock operations and landfills. Accordingly, and as mentioned above, CARB adopted its SLCP Reduction Strategy in March 2017. The SLCP Reduction Strategy establishes a framework for the statewide reduction of emissions of black carbon, methane, and fluorinated gases (CARB 2017a).

Executive Order B-55-18. EO B-55-18 (September 2018) establishes a statewide policy for the state to achieve carbon neutrality no later than 2045, and achieve and maintain net negative emissions thereafter. The goal is an addition to the existing statewide targets of reducing the state’s GHG emissions. CARB will work with relevant state agencies to ensure that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

California Air Resources Board Regulations

Regulations for the Mandatory Reporting of Greenhouse Gas Emissions. CARB’s Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (17 CCR 95100–95157) incorporated by reference certain requirements that EPA promulgated in its Final Rule on Mandatory Reporting of Greenhouse Gases (Title 40, CFR, Part 98). Specifically, Section 95100(c) of the Mandatory Reporting Regulation incorporated those requirements that EPA promulgated in the Federal Register on October 30, 2009; July 12, 2010; September 22, 2010; October 28,

2010; November 30, 2010; December 17, 2010; and April 25, 2011. In general, entities subject to the Mandatory Reporting Regulation that emit over 10,000 MT CO_{2e} per year are required to report annual GHGs through the California Electronic GHG Reporting Tool. Certain sectors, such as refineries and cement plants, are required to report regardless of emission levels. Entities that emit more than the 25,000 MT CO_{2e} per year threshold are required to have their GHG emission report verified by a CARB-accredited third-party verified.

2007 Statewide Limit. In 2007, in accordance with California Health and Safety Code, Section 38550, CARB approved a statewide limit on the GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO_{2e}).

Climate Change Scoping Plan. One specific requirement of AB 32 is for CARB to prepare a “scoping plan” for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code, Section 38561[a]), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan. The Climate Change Scoping Plan: A Framework for Change (Scoping Plan) included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the state’s long-range climate objectives. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs as well as building and appliance standards
2. Achieving a statewide renewable energy mix of 33%
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California’s GHG emissions
4. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
5. Adopting and implementing measures pursuant to existing state laws and policies, including California’s clean car standards, goods movement measures, and the Low Carbon Fuel Standard (LCFS 17 CCR, Section 95480 et seq.)
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California’s long-term commitment to AB 32 implementation

The Scoping Plan also identified local governments as essential partners in achieving California’s goals to reduce GHG emissions because they have broad influence and, in some cases, exclusive authority over activities that contribute to significant direct and indirect GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations. Specifically, the Scoping Plan encouraged local governments to adopt a reduction goal for municipal operations and for community emissions to reduce GHGs by approximately 15% from then levels (2008) by 2020. Many local governments developed community-scale local GHG reduction plans based on this Scoping Plan recommendation.

In 2014, CARB approved the first update to the Scoping Plan. The First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) defined the state’s GHG emission reduction priorities for the next 5 years and laid the groundwork to start the transition to the post-2020 goals set forth in EOs S-3-05 and B-16-2012. The First Update concluded that California is on track to meet the 2020 target but recommended a 2030

mid-term GHG reduction target be established to ensure a continuum of action to reduce emissions. The First Update recommended a mix of technologies in key economic sectors to reduce emissions through 2050 including energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state's 1990 emissions level, using more recent global warming potentials identified by the Intergovernmental Panel on Climate Change, from 427 MMT CO_{2e} to 431 MMT CO_{2e}.

In 2015, as directed by EO B-30-15, CARB began working on an update to the Scoping Plan to incorporate the 2030 target of 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. The Governor called on California to pursue a new and ambitious set of strategies, in line with the five climate change pillars from his inaugural address, to reduce GHG emissions and prepare for the unavoidable impacts of climate change. In the summer of 2016, the Legislature affirmed the importance of addressing climate change through passage of Senate Bill (SB) 32 (Pavley, Chapter 249, Statutes of 2016).

In January 2017, CARB released the 2017 Climate Change Scoping Plan Update (2030 Scoping Plan) for public review and comment (CARB 2017b). The 2030 Scoping Plan builds on the successful framework established in the initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target and define the state's climate change priorities to 2030 and beyond. The strategies' "known commitments" include implementing renewable energy and energy efficiency (including the mandates of SB 350), increased stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and increased stringency of SB 375 targets. To fill the gap in additional reductions needed to achieve the 2030 target, it recommends continuing the Cap-and-Trade Program and a measure to reduce GHGs from refineries by 20%.

For local governments, the 2030 Scoping Plan replaced the initial Scoping Plan's 15% reduction goal with a recommendation to aim for a community-wide goal of no more than 6 MT CO_{2e} per capita by 2030 and no more than 2 MT CO_{2e} per capita by 2050, which are consistent with the state's long-term goals. These goals are also consistent with the Under 2 MOU and the Paris Agreement, which are developed around the scientifically based levels necessary to limit global warming below 2°C. The 2030 Scoping Plan recognized the benefits of local government GHG planning (e.g., through Climate Action Plans [CAPs]) and provide more information regarding tools CARB is working on to support those efforts. It also recognizes the California Environmental Quality Act (CEQA) streamlining provisions for project level review where there is a legally adequate CAP.³ The Second Update was approved by CARB's Governing Board on December 14, 2017.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32, SB 32, and the EOs and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. A project is considered consistent with the statutes and EOs if it meets the general policies in reducing GHG emissions to facilitate the achievement of the state's goals and does not impede attainment of those goals. As discussed in several cases, a given project need not be in perfect conformity with

³ *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490; *San Francisco Tomorrow et al. v. City and County of San Francisco* (2015) 229 Cal.App.4th 498; *San Franciscans Upholding the Downtown Specific Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656; *Sequoiah Hills Homeowners Assn. V. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

each and every planning policy or goals to be consistent. A project would be consistent, if it will further the objectives and not obstruct their attainment.

California Building Energy Standards

CCR Title 24, Part 6. Title 24 of the California Code of Regulations (CCR) was established in 1978 and serves to enhance and regulate California’s building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, with the goal of “reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy” (California Public Resources Code, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402[d]) and cost effectiveness (California Public Resources Code, Sections 25402[b][2] and [b][3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The current Title 24 standards are the 2019 Title 24 Building Energy Efficiency Standards, which became effective January 1, 2020. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards will use approximately 53% less energy than those under the 2016 standards (CEC 2018). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018).

As set forth in Section 110.10, Mandatory Requirements for Solar Ready Buildings, states that low-rise and high-rise multi-family buildings, hotels, and nonresidential buildings must include a “solar zone,” which is a section of the roof designated and reserved for the future installation of a solar electric or solar thermal system. The solar zone for these uses must be located on the roof or overhang of the building (or on the roof or overhang of another structure located within 250 feet of the building) or on covered parking installed with the building, and must have a total area no less than 15% of the total roof area of the building excluding any skylight area. The solar zone requirement is applicable to the entire building, including mixed-occupancy. See the 2019 standards for additional requirements regarding the azimuth, shading, interconnection pathways, and electrical service panels of solar zones.

CCR Title 24, Part 11. In addition to the CEC’s efforts, in 2008, the California Building Standards Commission adopted the nation’s first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as California’s Green Building Standards (CALGreen), and 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. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals. The CALGreen 2016 standards became effective January 1, 2017.

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen’s Tier 1 standards call for a 15% improvement in energy requirements; stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen’s more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 80% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs.

The California Building Standards Commission approved amendments to the voluntary measures of the CALGreen standards in December 2018. The 2019 CALGreen standards became effective January 1, 2020. As with the 2019 Title 24 standards, the 2019 CALGreen standards focus on building energy efficiency. The 2019 CALGreen standards are the current applicable standards. For nonresidential projects, some of the key mandatory CALGreen 2019 standards involve requirements related to bicycle parking, designated parking for clean air vehicles, electric vehicle (EV) charging stations, shade trees, water conserving plumbing fixtures and fittings, outdoor potable water use in landscaped areas, recycled water supply systems, construction waste management, excavated soil and land clearing debris, and commissioning (24 CCR Part 11). For high-rise residential buildings (i.e. more than four floors), the non-residential measures generally apply.

CCR Title 20. Title 20 of the CCRs 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.

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 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 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.”

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.

Renewable Energy and Energy Procurement

Senate Bill 1078. SB 1078 (Sher) (September 2002) established the Renewable Portfolio Standard program, which required an annual increase in renewable generation by the utilities equivalent to at least 1% of sales, with an aggregate goal of 20% by 2017. This goal was subsequently accelerated, requiring utilities to obtain 20% of their power from renewable sources by 2010 (see SB 107, EO S-14-08, and EO S-21-09).

Senate Bill 1368. SB 1368 (September 2006), required the CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC).

Assembly Bill 1109. Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general-purpose lighting, to reduce electricity consumption 50% for indoor residential lighting and 25% for indoor commercial lighting.

Executive Order S-14-08. EO S-14-08 (November 2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. The CNRA, through collaboration with the CEC and California Department of Fish and Wildlife, was directed to lead this effort.

Executive Order S-21-09 and Senate Bill X1-2. EO S-21-09 (September 2009) directed CARB to adopt a regulation consistent with the goal of EO S-14-08 by July 31, 2010. CARB was further directed to work with the CPUC and CEC to ensure that the regulation builds upon the Renewable Portfolio Standard program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health and can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard. However, this regulation was not finalized because of subsequent legislation (SB X1-2, Simitian, statutes of 2011) signed by Governor Brown in April 2011.

SB X1 2 expanded the Renewables Portfolio Standard by establishing a renewable energy target of 20% of the total electricity sold to retail customers in California per year by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 megawatts or less), digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

SB X1-2 applies to all electricity retailers in the state including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must meet the renewable energy goals previously listed.

Senate Bill 350. SB 350 (October 2015) further expanded the Renewable Portfolio Standard by establishing a goal of 50% of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (e.g., heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of

retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal.

Senate Bill 100. SB 100 (2018) increased the standards set forth in SB 350 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 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. This bill requires that the achievement of 100% 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.

Mobile Sources

Assembly Bill 1493. AB 1493 (Pavley) (July 2002) was enacted in a response to the transportation sector accounting for more than half of California’s CO₂ emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22% in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30%.

Heavy Duty Diesel. CARB adopted the final Heavy Duty Truck and Bus Regulation, Title 13, Division 3, Chapter 1, Section 2025, on December 31, 2014, to reduce particulate matter and oxides of nitrogen emissions from heavy-duty diesel vehicles. The rule requires particulate matter filters be applied to newer heavier trucks and buses by January 1, 2012, with older vehicles required to comply by January 1, 2015. The rule will require nearly all diesel trucks and buses to be compliant with the 2010 model year engine requirement by January 1, 2023. CARB also adopted an Airborne Toxic Control Measure to limit idling of diesel-fueled commercial vehicles on December 12, 2013. This rule requires diesel-fueled vehicles with gross vehicle weights greater than 10,000 pounds to idle no more than 5 minutes at any location (13 CCR 2485).

Executive Order S-1-07. EO S-1-07 (January 2007, implementing regulation adopted in April 2009) sets a declining Low Carbon Fuel Standard for GHG emissions measured in CO₂e grams per unit of fuel energy sold in California. The target of the Low Carbon Fuel Standard is to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020 (17 CCR 95480 et seq.). The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel, including extraction/feedstock production, processing, transportation, and final consumption, per unit of energy delivered.

Senate Bill 375. SB 375 (Steinberg) (September 2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 requires CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035 and to update those targets every 8 years. SB 375 requires the state’s 18 regional metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP) that will achieve the GHG reduction targets set by CARB. If a metropolitan planning organization is unable to devise an SCS to achieve the GHG reduction target, the metropolitan planning organization must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to Government Code, Section 65080(b)(2)(K), an SCS does not (i) regulate the use of land; (ii) supersede the land use authority of cities and counties; or (iii) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

In September 2010, CARB adopted the first SB 375 targets for the regional metropolitan planning organizations. The targets for Southern California Association of Governments (SCAG) are an 8% reduction in emissions per capita by 2020 and a 13% reduction by 2035. Achieving these goals through adoption of a SCS is the responsibility of the metropolitan planning organizations. SCAG adopted its first RTP/SCS in April 2012. The plan quantified a 9% reduction by 2020 and a 16% reduction by 2035 (SCAG 2012). In June 2012, CARB accepted SCAG's quantification of GHG reductions and its determination the SCS, if implemented, would achieve SCAG targets. On April 4, 2016, the SCAG Regional Council adopted the 2016 RTP/SCS, which builds upon the progress made in the 2012 RTP/SCS. The updated RTP/SCS quantified an 8% reduction by 2020 and a 13% reduction by 2030 (SCAG 2016). In June 2016, CARB accepted SCAG's quantification of GHG reductions and its determination the SCS, if implemented, would achieve SCAG targets. In March 2018, CARB approved SCAG's updated targets of an 8% reduction by 2020 and a 19% reduction by 2030, effective October 1, 2018, which are consistent with the reduction targets from the Connect SoCal (2020–2045 RTP/SCS), adopted May 2020 (SCAG 2020).

Advanced Clean Cars Program and Zero-Emissions Vehicle Program. The Advanced Clean Cars program (January 2012) is a new emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars (CARB 2012). To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025 cars will emit 75% less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with the EPA and the NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34% in 2025. The Zero-Emissions Vehicle Program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of zero-emissions vehicles and plug-in hybrid electric vehicles in the 2018 to 2025 model years.

Executive Order B-16-12. EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of zero-emissions vehicles. It ordered CARB, CEC, CPUC, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve benchmark goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050. This directive did not apply to vehicles that have special performance requirements necessary for the protection of the public safety and welfare.

Assembly Bill 1236. AB 1236 (October 2015) (Chiu) required a city, county, or city and county to approve an application for the installation of electric vehicle charging stations, as defined, through the issuance of specified permits unless the city or county makes specified written findings based upon substantial evidence in the record that the proposed installation would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. The bill provided for appeal of that decision to the planning commission, as specified. The bill provided that the implementation of consistent statewide standards to achieve the timely and cost-effective installation of electric vehicle charging stations is a matter of statewide concern. The bill required electric vehicle charging stations to meet specified standards. The

bill required a city, county, or city and county with a population of 200,000 or more residents to adopt an ordinance, by September 30, 2016, that created an expedited and streamlined permitting process for electric vehicle charging stations, as specified. The bill also required a city, county, or city and county with a population of less than 200,000 residents to adopt this ordinance by September 30, 2017.

Water

Executive Order B-29-15. In response to the ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Solid Waste

Assembly Bill 939 and Assembly Bill 341. In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code, Sections 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by 2000.

AB 341 (Chapter 476, Statutes of 2011 (Chesbro)) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle conducted several general stakeholder workshops and several focused workshops and in August 2015 published a discussion document titled AB 341 Report to the Legislature, which identifies five priority strategies that CalRecycle believes would assist the state in reaching the 75% goal by 2020, legislative and regulatory recommendations and an evaluation of program effectiveness (CalRecycle 2015).

AB 1826 Chesbro (Chapter 727, Statutes of 2014, effective 2016) requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

Other State Actions

Senate Bill 97. SB 97 (Dutton) (August 2007) directed the Governor's Office of Planning and Research to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, the Governor's Office of Planning and Research issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA

documents. The advisory indicated that the lead agency should identify and estimate a project’s GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (OPR 2008). The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The CNRA adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4[a]). The CEQA Guidelines require a lead agency to consider 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 (14 CCR 15064.4[b]). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emission threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. The CNRA also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project’s GHG emissions (CNRA 2009a).

With respect to GHG emissions, the CEQA Guidelines state in Section 15064.4(a) that lead agencies should “make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a “model or methodology” to quantify the emissions or by relying on “qualitative analysis or other performance based standards” (14 CCR 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent 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 (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 (14 CCR 15064.4[b]).

Executive Order S-13-08. EO S-13-08 (November 2008) is intended to hasten California’s response to the impacts of global climate change, particularly sea-level rise. Therefore, the EO directs state agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009 (CNRA 2009b), and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014 (CNRA 2014). To assess the state’s vulnerability, the report summarizes key climate change impacts to the state for the following areas: Agriculture, Biodiversity and Habitat, Emergency Management, Energy, Forestry, Ocean and Coastal Ecosystems and Resources, Public Health, Transportation, and Water. Issuance of the Safeguarding California: Implementation Action Plans followed in March 2016 (CNRA 2016). In January 2018, the CNRA released the Safeguarding California Plan: 2018 Update, which communicates current and needed actions that state government should take to build climate change resiliency (CNRA 2018).

Regional and Local

South Coast Air Quality Management District

Air districts typically act in an advisory capacity to local governments in establishing the framework for environmental review of air pollution impacts under CEQA. This may include recommendations regarding significance thresholds, analytical tools to estimate emissions and assess impacts, and mitigations for potentially

significant impacts. Although air districts will also address some of these issues on a project-specific basis as responsible agencies, they may provide general guidance to local governments on these issues (SCAQMD 2008). As discussed in Section 4.6.3, Thresholds of Significance, the SCAQMD has recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects; however, these thresholds were not adopted.

Southern California Association of Governments

SB 375 requires metropolitan planning organizations to prepare an SCS in their RTP. The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012 (SCAG 2012), and the 2016–2040 RTP/SCS (2016 RTP/SCS) was adopted in April 2016 (SCAG 2016). Both the 2012 and 2016 RTP/SCSs establish a development pattern for the region that, when integrated with the transportation network and other policies and measures, would reduce GHG emissions from transportation (excluding goods movement). Specifically, the 2012 RTP/SCS links the goals of sustaining mobility with the goals of fostering economic development; enhancing the environment; reducing energy consumption; promoting transportation-friendly development patterns; and encouraging all residents affected by socioeconomic, geographic, and commercial limitations to be provided with fair access. The 2012 and 2016 RTP/SCSs do not require that local general plans, specific plans, or zoning be consistent with it but provide incentives for consistency for governments and developers. Because the current SCAQMD Air Quality Management Plan is based on the SCAG 2016 RTP/SCS demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for their 2016–2040 RTP/SCS, the SCAG 2016 RTP/SCS is discussed in Section 4.6.4, Impacts Analysis. See Local, Southern California Association of Governments, for an additional discussion on SCAG.

On May 7, 2020 SCAG’s Regional Council adopted the Connect SoCal (2020–2045 RTP/SCS). The Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region’s future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura (SCAG 2020).

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% decrease from 2005 levels by 2020 as recommended in the state AB 32 Scoping Plan and a 49% decrease from 2005 levels by 2035 (City of El Segundo 2017). The proposed Project is compared to the goals and measures of the CAP to determine consistency with the CAP.

City of El Segundo General Plan

The City of El Segundo General Plan (City of El Segundo 1992) includes various policies related to reducing GHGs (both directly and indirectly). Applicable policies include the following:

Air Quality Element

- 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.
- 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).

Proposed PCC Specific Plan

Requirements set forth in the Specific Plan’s Development Standards that are relevant for the topic of GHG emissions include the following:

- D.2 Preferential Parking must be provided for carpools and vanpools.

D.3. Bicycle parking and EV Charging must comply with the stricter of El Segundo Municipal Code (ESMC) Chapters 15-15 and 15-16 or Cal Green Code.

E.1. Landscaping must conform to the City's Water Conservation in Landscaping requirements as set forth in ESMC Chapter 15-15A. One shade tree must be provided for every 25 feet along interior property lines where landscaping is provided in the PCC Mixed-Use 2 (PCC MU-2) land use district.

I.1. All new development must have buildings designed to be energy efficient to meet or exceed Title 24 requirements.

I.2. The proposed Project parking lot areas must include storm water management practices that treat storm water runoff in compliance with the ESMC and all applicable law

I.3. Bicycle parking must comply with the ESMC and Cal Green Code.

I.4. Exterior lighting must be energy efficient and designed to minimize light pollution.

I.5. Low-emitting building materials must be utilized.

I.6. Roof structures of new buildings must be designed to support solar panels.

I.7. Reclaimed water must be utilized for all landscaped areas if available and feasible.

4.6.3 Thresholds of Significance

The significance criteria used to evaluate Project impacts to GHG/climate change are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to GHG emissions would occur if the Project would:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. There are currently no established thresholds for assessing whether the GHG emissions of a project, such as the proposed Project, would be considered a cumulatively considerable contribution to global climate change; however, all reasonable efforts should be made to minimize a project's contribution to global climate change. In addition, while GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008), GHG emissions impacts must also be evaluated at a project level under CEQA.

The State CEQA Guidelines do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the State CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009a). The State of California has not adopted emission-based thresholds for GHG emissions under CEQA. The

Governor’s Office of Planning and Research’s Technical Advisory titled “CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act Review” states that “public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact” (OPR 2008). Furthermore, the advisory document indicates that “in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a ‘significant impact,’ individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice.” Section 15064.7(c) of the State CEQA Guidelines specifies that “when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008). This guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_{2e} per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2** Consider whether or not the proposed Project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3** Consider whether the proposed Project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_{2e} per year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_{2e} per year), commercial projects (1,400 MT CO_{2e} per year), and mixed-use projects (3,000 MT CO_{2e} per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_{2e} per year would be used for all non-industrial projects. If the proposed Project generates emissions in excess of the applicable screening threshold, move to Tier 4.

- Tier 4** Consider whether the proposed Project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO₂e per service population for project level analyses and 6.6 MT CO₂e per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

- Tier 5** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Because the proposed Project involves a mix of different land use, this analysis applies the SCAQMD screening threshold of 3,000 MT CO₂e per year for mixed-use projects for Tier 3. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the proposed Project, which is assumed to be 30 years (SCAQMD 2008). This impact analysis, therefore, adds amortized construction emissions to the estimated annual operational emissions and then compares operational emissions to the proposed SCAQMD threshold of 3,000 MT CO₂e per year for the Tier 3 analysis.

Approach and Methodology

Construction Emissions

CalEEMod Version 2016.3.2 (CAPCOA 2017) was used to estimate potential Project-generated GHG emissions during construction. Construction of the proposed Project would result in GHG emissions primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants discussed in Section 4.2.3, Thresholds of Significance (Approach and Methodology, Construction Emissions, in Section 4.2, Air Quality, are also applicable for the estimation of construction-related GHG emissions. As such, see Section 4.2.3 in Section 4.2, Air Quality, for a discussion of construction emissions calculation methodology and assumptions used in the GHG emissions analysis.

Operational Emissions

Emissions from the operational phase of the proposed Project were estimated using CalEEMod Version 2016.3.2. Operational year 2025 was assumed, consistent with the construction schedule.

Area Sources. CalEEMod was used to estimate GHG emissions from the Project’s area sources, which include operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. See Section 4.2.3 in Section 4.2, Air Quality, for a discussion of landscaping equipment emissions calculations. Consumer product use and architectural coatings result in VOC emissions, which are analyzed in air quality analysis only, and little to no GHG emissions.

Energy Sources. The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the proposed Project’s land uses. The energy use (electricity or natural gas usage per square foot per year) from residential land uses is calculated in CalEEMod based on the Residential Appliance Saturation Study and the energy use from nonresidential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 British

thermal units for natural gas) for CO₂ and other GHGs. Annual natural gas and electricity emissions were estimated in CalEEMod using the emissions factors for Southern California Edison, which would be the energy provider for the proposed Project.

CalEEMod default energy intensity factors (CO₂, CH₄, and N₂O mass emissions per kilowatt-hour) for Southern California Edison is based on the value for Southern California Edison’s energy mix in 2012. The CO₂ emissions intensity factor for utility energy use in CalEEMod was adjusted consistent with Southern California Edison’s 2018 Sustainability Report, which reported that 36.5% of the power mix delivered to their customer was generated by eligible renewables (SCE 2018). As explained in Section 4.6.2, Relevant Plans, Policies, and Ordinances, state SB X1 2 established a target of 33% from renewable energy sources for all electricity providers in California by 2020 and Senate Bill 100 calls for further development of renewable energy, with a target of 60% by 2030. As such, GHG emissions associated with Project electricity demand would continue to decrease over time.

Mobile Sources. All details for criteria air pollutants discussed in Section 4.2.2 are also applicable for the estimation of operational mobile source GHG emissions. Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the NHTSA and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the proposed Project’s motor vehicles. The effectiveness of fuel economy improvements was evaluated by using the CalEEMod emission factors for motor vehicles in 2025.

Solid Waste. The proposed Project would generate solid waste, and therefore, result in CO_{2e} emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste for the proposed Project. It was assumed that the proposed Project would be consistent with the 50% diversion goal by 2020 in accordance with AB 939.

Water and Wastewater Treatment. Supply, conveyance, treatment, and distribution of water for the proposed Project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the proposed Project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use and associated electricity consumption from water use and wastewater generation were estimated using default values in CalEEMod.

4.6.4 Impacts Analysis

Threshold 4.7a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Emissions

Construction of the proposed Project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. The SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (SCAQMD 2008) recommends that “construction emissions be

amortized over a 30-year Project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.” Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 MT CO₂e per year. The quantification of emissions, therefore, is addressed in the operational emissions discussion following the estimated construction emissions.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 4.6.3, Thresholds of Significance. Construction of the proposed Project is anticipated to commence in October 2021 and reach completion in July 2024, lasting a total of 34 months. On-site sources of GHG emissions include off-road equipment and off-site sources including haul trucks, vendor trucks, and worker vehicles. Table 4.6-3 presents construction emissions for the proposed Project in 2021, 2022, 2023, and 2024 from on-site and off-site emission sources.

Table 4.6-3. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>Metric Tons per Year</i>			
2021	142.60	0.03	0.00	143.44
2022	532.13	0.09	0.00	534.30
2023	811.25	0.11	0.00	814.00
2024	483.97	0.05	0.00	485.34
Total				1,977.08

Notes: CO₂ = carbon dioxide; CH₄ = methane; GHG = greenhouse gas; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent. See Appendix C-1 for complete results.

As shown in Table 4.6-3, the estimated total GHG emissions during construction of would be approximately 1,977 MT CO₂e over the construction period.

Operational Emissions

Long-term operations of the proposed Project would result in GHG emissions through mobile sources and area sources (landscape maintenance equipment); energy use (natural gas and generation of electricity consumed by the proposed Project); water supply, treatment, and distribution and wastewater treatment; and solid waste disposal. Annual GHG emissions from these sources were estimated using CalEEMod.

The estimated operational GHG emissions from Project area sources, energy consumption, mobile sources, solid waste, and water consumption and wastewater treatment associated with the proposed Project in 2025 are shown in Table 4.6-4. Details of the emission calculations are provided in Appendix C-1.

Table 4.6-4. Estimated Operational Greenhouse Gas Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
	<i>Metric Tons per Year</i>			
Area	4.45	<0.01 ^a	0.00	4.56
Energy (natural gas and electricity)	951.51	0.03	0.01	955.38
Mobile	1,764.82	0.08	0.00	1,766.93

Table 4.6-4. Estimated Operational Greenhouse Gas Emissions

Emission Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
	Metric Tons per Year			
Solid waste	17.53	1.04	0.00	43.42
Water supply and wastewater	80.60	0.02	0.01	84.77
Construction (amortized over 30 years)	–	–	–	65.90
Total Emissions				2,920.96
<i>SCAQMD GHG Threshold</i>				3,000
Exceeds thresholds?				No

Notes: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrogen dioxide; CO₂e = carbon dioxide equivalent. See Appendix C-1 for complete results.

Proposed Project GHG emissions are based on the “mitigated” CalEEMod outputs, which includes reduction in indoor and outdoor water consumption, consistent with CALGreen and compliance with the AB 939 waste reduction goal.

^a <0.01 = value less than reported 0.01 metric tons per year.

Table 4.6-4 indicates that the net GHG emissions associated with development of the proposed Project would be below the SCAQMD GHG threshold of 3,000 MT CO₂e per year. Therefore, the proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and this would represent a cumulatively less than significant impact.

Threshold 4.6b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Consistency with the City of El Segundo CAP Measures

As discussed in Section 4.6.2, Relevant Plans, Policies, and Ordinances, the City of El Segundo CAP identifies a variety of measures, which new projects must adhere with to with respect to renewable energy, conservation of energy and water, solid waste, global warming, urban design, transportation, and human health within the City. The list of measures presented within the 2020 CAP are outlined in Table 4.6-5, along with the proposed Project’s consistency with them.

Table 4.6-5. Project Consistency with the City of El Segundo Climate Action Plan

Climate Action Plan Goals	Proposed Project Consistency
Measure LUT A1: EV Parking Policies	<i>Consistent.</i> The proposed Project would provide a combination of EV charging and alternative fuel vehicles and carpooling parking in compliance with El Segundo Municipal Code and CALGreen requirements.
Measure LUT A2: EV Charging Policies	<i>Consistent.</i> The proposed Project would provide EV charging in compliance with El Segundo Municipal Code and CALGreen requirements.
Measure LUT A3: Administrative Readiness	<i>Not Applicable: City Initiative</i>
Measure LUT A4: Public Information Programs	<i>Not Applicable: City Initiative</i>
Measure LUT A5: Multi-Modal Streets Complete Streets	<i>Consistent.</i> The new parking structures would be required to provide adequate signage to identify electric vehicle (EV) charging in the parking garage. The proposed Project would include shared parking, which would provide a more efficient use of land. Bicycle parking and storage would be provided in compliance with CALGreen and

Table 4.6-5. Project Consistency with the City of El Segundo Climate Action Plan

Climate Action Plan Goals	Proposed Project Consistency
	the City’s Municipal Code.
Measure LUT B1: Facilitate Private and Public Mobility Services (Ride-Hailing, Ride-Sharing, Car-Sharing, Bike-Sharing)	<i>Consistent.</i> The Specific Plan requires preferential parking for carpools and vanpools.
Measure LUT C1: Provide a Bus Rapid Transit (BRT) System	<i>Not Applicable: City Initiative</i>
Measure LUT C2: Expand Transit Network	<i>Not Applicable: City Initiative</i>
Measure LUT C3: Increase Transit Service Frequency and Speed	<i>Consistent.</i> The proposed Project would indirectly support this Measure by providing new living and working opportunities in close proximity to transit, thereby increasing ridership. Public transit that operates in the vicinity of the Project site includes the Metro C Line (formerly Green Line) and multiple bus lines. The Metro C Line is a light rail line running between Redondo Beach and Norwalk, with the closest station approximately 0.5 miles east of the Project site. There are two Metro bus lines, one Beach Cities bus line, and two Los Angeles Department of Transportation (LADOT) Commuter Express lines that run in the vicinity of the Specific Plan (Metro Line 232; Metro Line 625; Beach Cities Line 109; LADOT Commuter Express 438; and LADOT Commuter Express 574).
Measure LUT D1: Provide Traffic Calming Measures	<i>Consistent.</i> The proposed Project does not include pedestrian improvements within the public right-of-way; however, the proposed Project would include interconnectivity between districts within the Specific Plan area and safe access among sites. In addition, the proposed Project includes a right turn lane from eastbound Mariposa Avenue to the southbound Pacific Coast Highway, which would alleviate congestion at that intersection.
Measure LUT D2: Provide Pedestrian/Bicycle Networks Improvements	<i>Consistent.</i> The proposed Project would include bicycle storage/parking in accordance with the El Segundo Municipal Code and CALGreen requirements.
Measure LUT D3: Improve Design of Development	<i>Consistent.</i> The proposed Project would include safe access and connectivity among the districts within the Specific Plan. As presented in Table 4.6-5, the proposed Project 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. As such, the proposed Project would be consistent with the regulations set forth in CALGreen and the City’s Municipal Code, which have robust requirements for bicycle parking/storage.
Measure LUT E1: Limit Parking Supply	<i>Consistent.</i> Parking for the proposed Project would be provided in a combination of below-grade and above grade parking structures in addition to a limited amount of surface parking. Vehicle parking spaces would comply with the requirements set forth in the Pacific Coast Commons Specific Plan and preferential parking would be provided for alternative fuel vehicles in accordance with CALGreen requirements. Reciprocal access easements are required by the Specific Plan to ensure shared parking among the districts for an efficient use of space. Vehicle lifts would be permitted for a maximum of twenty percent (20%) of parking spaces for multiple-family residential and hotel uses, which would allow for flexibility and an efficient use of space requirements for parking.

Table 4.6-5. Project Consistency with the City of El Segundo Climate Action Plan

Climate Action Plan Goals	Proposed Project Consistency
Measure LUT E2: Unbundle Parking Costs from Property Costs	<i>Not Applicable:</i> All off-street parking spaces provided for residents by the proposed Project would be factored into rent.
Measure LUT E3: Implement On-Street Market Pricing	<i>Not Applicable:</i> The proposed Project does not involve creation of on-street parking pricing, but would not conflict with the City’s ability to implement this measure, if desired.
Measure LUT E4: Residential Area Parking Permits	<i>Not Applicable:</i> The proposed Project includes an adequate amount of parking, without providing excessive parking that could encourage single-use occupancy driving, per the recommendations of Caltrans. The proposed Project would not conflict with the City’s ability to implement this measure, if desired.
Measure LUT F1: Encourage Telecommuting and Alternative Work Schedules	<i>Not Applicable:</i> City Initiative
Measure LUT F2: Implement a Commute Trip Reduction Program	<i>Consistent.</i> The proposed Project would include vehicle parking spaces that would comply with the requirements set forth in the El Segundo Municipal Code and preferential parking would be provided for EV in accordance with CALGreen requirements. <i>Consistent.</i> The Specific Plan requires preferential parking for carpools and vanpools.
Measure LUT F3: Provide Car-Sharing Programs	<i>Not Applicable:</i> The proposed Project does not include a car-sharing program, but would not conflict with the City’s ability to implement this measure, if desired.
Measure LUT G1: Increase Density	<i>Consistent.</i> The proposed Project includes a mix of uses including retail/commercial and multi-family residential uses. The Specific Plan would introduce a new residential population into the area and would increase density accordingly. The new residents and employees would be in close proximity to transit, thereby increasing ridership, as well as being in close proximity to a heavy concentration of dense office developments, thereby promoting walking and other alternative forms of travel.
Measure LUT G2: Increase Diversity	<i>Consistent.</i> The proposed Project maintains the existing hotel uses while providing for a mixed-use multiple-family and commercial neighborhood that is compatible with the surrounding land uses. The Specific Plan would provide additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City’s General Plan. The proposed Project would also include affordable housing, with the ultimate amount to be determined through the Development Agreement, to the satisfaction of the City of El Segundo. The specific allocation between the types of low income housing has yet to be determined; however, the proposed affordable units would satisfy a portion of the City’s mandated 29 low income units, and the City’s requirement for 40 moderate/above income units, as set forth in the Housing Element.
Measure LUT G3: Increase Destination Accessibility	<i>Consistent.</i> The proposed Project would reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City’s downtown. The proposed Project would provide commercial/retail uses at the ground-level along Pacific Coast Highway, a major transit corridor.

Table 4.6-5. Project Consistency with the City of El Segundo Climate Action Plan

Climate Action Plan Goals	Proposed Project Consistency
Measure LUT G4: Increase Transit Accessibility	<i>Not Applicable: City Initiative</i>
Measure LUT G5: Integrate Affordable and Below-Market-Rate Housing	<i>Consistent.</i> The proposed Project includes a mix of uses including retail/commercial and multi-family residential uses. Notably, the proposed Project would include affordable housing, with the ultimate amount to be determined through the Development Agreement to the satisfaction of the City of El Segundo. The specific allocation between the types of low income housing has yet to be determined; however, the proposed affordable units would satisfy a portion of the City’s mandated 29 low income units, and the City’s requirement for 40 moderate/above income units, as set forth in the Housing Element.
Measure LUT G6: Develop a Neighborhood Oriented Development Plan	<i>Consistent.</i> The proposed Project does not develop a Neighborhood Oriented Development Plan. However, the proposed Project includes a mix of uses including retail/commercial and multi-family residential uses and is in close proximity to existing commercial, professional offices, residential, and transit infrastructure.
Measure LUT H1: Collaborate On and Implement The South Bay Digital Master Plan	<i>Not Applicable: City Initiative</i>
Measure EE (A1 through D1)	<i>Not Applicable: City Initiative</i>
Measure EE E1 Promote or Require Water Efficiency Through SB X7-7	<i>Consistent.</i> The proposed Project is an urban development with no open space turf areas that require substantial watering. The Specific Plan requires that landscaped areas 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 (VUAs) as defined in El Segundo Municipal Code (ESMC) Section 15-1-6. All landscaping must conform to the City’s Water Conservation in Landscaping requirements as set forth in ESMC Chapter 15-15A.
Measure EE E2 Promote Water Efficiency Standards Exceeding SB X7-7	<i>Consistent.</i> The Specific Plan requires that reclaimed water must be utilized for all landscaped areas if available and feasible.
Measure EE F1 Promote Tree Planting for Shading	<i>Consistent.</i> The Specific Plan requires that landscaped areas 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 (VUAs) as defined in ESMC Section 15-1-6. All landscaping must conform to the City’s Water Conservation in Landscaping requirements as set forth in ESMC Chapter 15-15A. The Specific Plan requires that one shade tree must be provided for every 25 feet along interior property lines where landscaping is provided in the PCC Mixed-Use 2 (PCC MU-2) land use district.
Measure EE F2 Incentivize or Require Light Reflecting Surfaces	<i>Consistent.</i> The proposed Project would be required to be constructed in compliance with El Segundo Municipal Code and CALGreen requirements in effect at the time of building construction for all building materials related to solar reflectance, cool pavement and cool roofs, as applicable.
Measure EE (H1 through I3)	<i>Not Applicable: City Initiative</i>
Measure SW (A1 through D1)	<i>Not Applicable: City Initiative</i>

Table 4.6-5. Project Consistency with the City of El Segundo Climate Action Plan

Climate Action Plan Goals	Proposed Project Consistency
Measure UG (A1 through B1)	<i>Not Applicable:</i> The proposed Project will not include dedicated rooftop space dedicated for community gardens. In addition, the proposed Project would not include a local farmers market.
Measure EGS (A1 through A5)	<i>Not Applicable: City Initiative</i>

Source: City of El Segundo 2017.

Consistency with the Connect SoCal (2020–2045 RTP/SCS)

SCAG’s 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. The Connect SoCal incorporates local land use projections and circulation networks in city and county general plans. Typically, a project would be consistent with the RTP/SCS if the project does not exceed the underlying growth assumptions within the RTP/SCS. As discussed in Section 4.11, Population and Housing, the proposed Project would provide a minor amount of growth, estimated at 3.7% of the 2020 estimate and 3.6% in 2040 of the City’s projected total population, the proposed 263 residential units could generate 618 persons upon its completion in 2024. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG’s estimated projections through 2045 by 118 persons. As discussed in Section 4.11, Population and Housing, the proposed Project would accommodate an expected 618 residents which from the implementation of the Specific Plan exceed the overall population growth projections included in the Connect SoCal. As stated in the Connect SoCal 2020–2045 RTP/SCS, there is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with the RTP/SCS, and lead agencies have the sole discretion in determining a local project’s consistency with the RTP/SCS (SCAG 2020a). Because there is no wholly reliable population, housing, or employment data after 2010, as the U.S. Census is conducted every ten years, all data for years prior to the upcoming 2020 Census should be viewed as projections or estimates. As demonstrated in Section 4.9, Land Use and Planning, the proposed Project would implement the guiding principles, goals and policies of SCAG’s 2020–2045 RTP/SCS as they relate to livability, economic prosperity, and sustainability through the development of walkable, mixed use communities along major transportation corridors. The development of a mix of housing and job opportunities within 0.5 miles of transit, thereby alleviating pressure on suburban and open space areas to develop, is fully supportive of SCAG’s strategies. Because the proposed Project would support SCAG’s goals and strategies for growth in the region as described below and further described in Section 4.9, Land Use and Planning, and because the proposed Project would assist the development of new housing and improves the City’s job/housing balance (as described in Section 4.11, Population and Housing), impacts related to population growth assumed in Connect SoCal would be less than significant.

The major goals of the Connect SoCal are outlined in Table 4.6-6, along with the proposed Project’s consistency with them.

Table 4.6-6. Project Consistency with the Connect SoCal (SCAG 2020–2045 RTP/SCS)

RTP/SCS Goal	Proposed Project Consistency
Goal 1: Encourage regional economic prosperity and global competitiveness	<i>Consistent.</i> The proposed Specific Plan is designed to facilitate the development of 263 new housing units and approximately 11,252 square feet of commercial/retail uses within the Project site. The addition of new housing and commercial/retail would

Table 4.6-6. Project Consistency with the Connect SoCal (SCAG 2020–2045 RTP/SCS)

RTP/SCS Goal	Proposed Project Consistency
	<p>be along a major corridor (Pacific Coast Highway [PCH]) and regional’s transportation network (i.e., Metro C Line). As such, the proposed Project would improve regional economic development through its proximity to these networks. Additionally, one of the Project objectives is to improve the jobs/housing balance in the City of El Segundo by creating more housing and increase the tax base for the City. Therefore, the Specific Plan is consistent with this goal.</p>
<p>Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods</p>	<p><i>Consistent.</i> The Project site is served by local and regional bus transit lines as well as light rail, just over 0.5-mile away. Implementation of the Specific Plan with the development of the proposed Project would increase transit accessibility of jobs and services within the Project site’s vicinity. The Project site 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 for people. Further, the Project includes objectives such as: Enhance vehicular circulation through intersection improvements and street widening; and facilitate a safe and walkable community along Pacific Coast Highway by providing a mix of land uses, including commercial at the street-level with residential uses above. The proposed Project would also improve the level of service for traffic circulation at Mariposa Avenue and PCH by reconfiguring the eastbound lane of Mariposa Avenue at PCH, from one left lane and one through-right lane to one left, one through, and one right-turn lane. Therefore, the Specific Plan is consistent with this goal.</p>
<p>Goal 3: Enhance the preservation, security, and resilience of the regional transportation system</p>	<p><i>Consistent.</i> The proposed 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 Project site includes the Metro C Line (formerly Green Line) and multiple bus lines. The Metro C Line is a light rail line running between Redondo Beach and Norwalk, with the closest station approximately 0.51-mile east of the Project site. There are two Metro bus lines, one Beach Cities bus line, and two Los Angeles Department of Transportation (LADOT) Commuter Express lines that run in the vicinity of the Specific Plan (Metro Line 232; Metro Line 625; Beach Cities Line 109; LADOT Commuter Express 438; and LADOT Commuter Express 574).</p>
<p>Goal 4: Increase person and goods movement and travel choices within the transportation system</p>	<p><i>Consistent.</i> The Project site is served by existing and proposed pedestrian, bicycle, and mass-transit infrastructure and connectivity. The City’s Circulation Element and the South Bay Bicycle Master Plan indicates that additional Class II and III facilities are planned in the Project area. The City installed signs and stencils on several streets in 2019 to implement Class III bike routes in the City. The Streets include: (1) Grand Avenue from the west City boundary to Duley Road (0.1-mile south of the Project site); (2) Main Street from El Segundo Boulevard to</p>

Table 4.6-6. Project Consistency with the Connect SoCal (SCAG 2020–2045 RTP/SCS)

RTP/SCS Goal	Proposed Project Consistency
	<p>Imperial Highway (1 mile west of the Project site); and (3) Utah Avenue from Douglas Street to Aviation Boulevard (1.3 miles southeast of the Project site). The Project would increase the mix of land uses and increase diversity of uses on the Project site to allow future residences and employees to access the existing transportation system. As such, the Project would increase the accessibility to the transportation and increase the persons using the transit infrastructure. Additionally, the County of Los Angeles’s Transportation Demand Management measures would be incorporated to maximize the utility of multi-modal investments. Therefore, the Project is consistent with this goal.</p>
<p>Goal 5: Reduce greenhouse gas emissions and improve air quality</p>	<p><i>Consistent.</i> The Project would support the use of the existing and proposed pedestrian, bicycle, and mass-transit infrastructure and connectivity. Less reliance on automobiles and support for multi-modal transportation would help reduce greenhouse gas emissions and improve air quality. Table 4.6-4 indicates that the net GHG emissions associated with development of the proposed Project would be below the SCAQMD GHG threshold of 3,000 MT CO₂e per year. Therefore, the proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Other Transportation Demand Management measures proposed further maximize multi-modal transportation. As further described in Section 4.13, Transportation, the proposed Project’s vehicle miles traveled (VMT) per service population (10.9) would be less than 15% of the City’s average VMT (12.1). Thus, the Project would not result in significant VMT impacts that further contribute to greenhouse gas emissions. In addition, the Specific Plan allows land use designations which creates a mix of land uses that are within walking distance of one another, and streets that are attractive to pedestrians. One of the goals of the proposed Project is to improve air quality by providing housing for those who work in the City so that they may reduce their vehicle miles traveled to the extent possible. Therefore, the Project is consistent with this goal.</p>
<p>Goal 6: Support healthy and equitable communities</p>	<p><i>Consistent.</i> The Specific Plan allows land use designations which creates a mix of land uses that are within walking distance of one another, and introduces retail uses along PCH to provide streets that are attractive to pedestrians. Thus, the Project would promote healthy, walkable communities. One of the objectives of the design guidelines of the Specific Plan is to facilitate a safe and walkable community along Pacific Coast Highway by providing a mix of land uses, including commercial at the street-level with residential uses above. Further, the proposed Project would seek to provide additional housing opportunities in a variety of housing sizes, types, and densities to support an equitable community. The proposed Project would include affordable housing, with the ultimate amount to be determined through the Development Agreement, to the satisfaction of the City of El Segundo. The specific allocation between the types of low</p>

Table 4.6-6. Project Consistency with the Connect SoCal (SCAG 2020–2045 RTP/SCS)

RTP/SCS Goal	Proposed Project Consistency
	<p>income housing has yet to be determined; however, the proposed affordable units would satisfy a portion of the City’s mandated 29 low income units, and the City’s requirement for 40 moderate/above income units, as set forth in the Housing Element. The Project site is not located within, but is surrounded by, areas considered to be disadvantaged communities in accordance with Senate Bill 535, which identify areas with high amounts of pollution and low-income populations. The proposed Project would contribute housing and employment opportunities to a jobs-rich community, thereby contributing to a more balanced local economy. Therefore, the Specific Plan is consistent with this goal.</p>
<p>Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network</p>	<p>The Project would comply with the proposed Specific Plan’s design standards, including those outlining sustainability-focused measures such as building design energy efficiency that meets or exceeds Title 24 requirements, parking lot areas with storm water management practices to treat runoff, energy efficient exterior lighting, low-VOC emitting building materials⁴, and roof structures to support solar panels. The installation of green infrastructure combined with high standards for energy-efficient buildings contained within the California Building Code, will ensure that Project meet the City’s requirements for sustainability and green development, both for construction and operation. In addition, the Project would increase density on a site with high access to the region’s transportation network. The Specific Plan would allow for a mix of housing types near the City’s “super block” development, which contains a mixture of office and research and development uses. Thus, the Specific Plan would support a development pattern that reduces the City’s jobs/housing imbalance and place residential uses near employment opportunities. Therefore, the Specific Plan is consistent with this goal.</p>
<p>Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel</p>	<p><i>Consistent.</i> To further facilitate transit and active transportation, the land use designations of the Specific Plan are designed to mix employment and residential uses with supporting amenities (i.e. bicycle parking) so that employees and residents do not need to use a car to access basic needs throughout the day. The Project site is located within an urbanized portion of the County of Los Angeles with access to regional transportation systems that can use new transportation technologies and data driven solutions to provide more efficient travel. Therefore, the Specific Plan is consistent with this goal.</p>
<p>Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options</p>	<p><i>Consistent.</i> The proposed Project would develop a mixed-use, pedestrian-oriented development with access to alternative modes of transportation. One of the objectives of the Specific Plan is to provide for additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of</p>

⁴ Materials that emit chemicals, which can compromise indoor air quality

Table 4.6-6. Project Consistency with the Connect SoCal (SCAG 2020–2045 RTP/SCS)

RTP/SCS Goal	Proposed Project Consistency
	the Housing Element of the City’s General Plan The proposed Project would include affordable housing, with the ultimate amount to be determined through the Development Agreement, to the satisfaction of the City of El Segundo. To further facilitate multiple transportation options, the Specific Plan is designed to mix employment and residential uses with supporting amenities so that employees and residents do not need to use a car to access basic needs throughout the day. The residential units include studios, one- and two-bedroom units, and townhomes to encourage diverse housing types within the City. Therefore, the Specific Plan is consistent with this goal.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats	<i>Consistent.</i> The Project site is located in a highly urbanized area away from existing agricultural lands and habitat. Given the proposed Project would redevelop an existing, underutilized site, the proposed Project would not encroach upon agricultural lands and natural habitat. Therefore, the Specific Plan is consistent with this goal.

Source: SCAG 2020.

As shown in Table 4.6-6, the proposed Project would not conflict with any of the goals within SCAG’s Connect SoCal. Therefore, the proposed Project would not conflict with the goal to improve air quality and GHG emissions in the region.

Consistency with the CALGreen

As discussed in Section 4.6.2, Relevant Plans, Policies, and Ordinances, 2019 CALGreen requirements are comprehensive and applicable to the proposed Project. The provisions of the CALGreen code apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure. In mixed occupancy buildings, such as the proposed Project, each portion of a building must comply with the specific green building measures applicable to each specific occupancy (CEC 2019). Table 4.6.7 below includes a listing of applicable mandatory measures that are relevant to the topic of GHG Emissions, although the listing is not exhaustive of all potentially relevant requirements.

Table 4.6-7. 2019 CALGreen Mandatory Measures Relevant to Greenhouse Gas Emissions

CALGreen Requirement
<i>Non-Residential Mandatory Measures</i>
5.106.4.1 Bicycle parking. [BSC-CG] Comply with Sections 5.106.4.1.1 and 5.106.4.1.2; or meet the applicable local ordinance, whichever is stricter. 5.106.4.1.1 Short-term bicycle parking. If the new project or an addition or alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors’ entrance, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack. Or 5.106.4.1.2 Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.

Table 4.6-7. 2019 CALGreen Mandatory Measures Relevant to Greenhouse Gas Emissions

CALGreen Requirement	
5.106.4.1.3 For additions or alterations that add 10 or more tenant-occupant vehicular parking spaces, provide secure bicycle parking for 5 percent of the tenant vehicular parking spaces being added, with a minimum of one bicycle parking facility.	
5.106.4.1.4. For new shell buildings in phased projects provide secure bicycle parking for 5 percent of the anticipated tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.	
5.106.4.1.5. Acceptable bicycle parking facility for Sections 5.106.4.1.2, 5.106.4.1.3, and 5.106.4.1.4 shall be convenient from the street and shell meet one of the following: 1. Covered, lockable enclosures with permanently anchored racks for bicycles; 2. Lockable bicycle rooms with permanently anchored racks; or 3. Lockable, permanently anchored bicycle lockers.	
5.016.5.2 Designated parking for clean air vehicles. In new projects or additions or alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel efficient and carpool/van pool vehicles as required by Table 5.106.5.2.	
Total Parking Spaces	Number of Required Spaces
0-9	0
10-25	1
25-50	3
51-75	6
49-100	8
101-150	11
151-200	16
201 and over	At least 8 Percent of Total
5.106.5.2.1 Parking stall marking. Paint, in the paint used for stall striping, the following characters such that the lower edge of the last word aligns with the end of the stall striping and is visible beneath a parked vehicle: CLEAN AIR/VANPOOL/EV	
5.016.5.3 Electric vehicle (EV) charging. [N] Construction shall comply with Section 5.106.5.3.1 or Section 5.106.5.3.2 to facilitate future installation of electric vehicle supply equipment (EVSE). When EVSE(s) is/are installed, it shall be in accordance with the California Building Code, the California Electrical Code and as follows below.	
5.106.5.3.2 Multiple charging space requirements. [N] When multiple charging spaces are required per Table 5.106.5.3.3, raceway(s) is/are required to be installed at the time of construction and shall be installed in accordance with the California Electrical Code. Construction plans and specifications shall include, but are not limited to, the following: 1. The type and location of the EVSE. 2. The raceway(s) shall originate at a service panel or a subpanel(s) serving the area, and shall terminate in close proximity to the proposed location of the charging equipment and into a listed suitable cabinet(s), box(es), enclosure(s) or equivalent. 3. Plan design shall be based upon 40-ampere minimum branch circuits. 4. Electrical calculations shall substantiate the design of the electrical system, to include the rating of equipment and any on-site distribution transformers and have sufficient capacity to simultaneously charge all required EVs at its full rated amperage. 5. The service panel or subpanel(s) shall have sufficient capacity to accommodate the required number of dedicated branch circuits(s) for the future installation of the EVSE.	
5.106.5.3.3 EV charging space and charging station calculation. [N] Table 5.106.5.3.3 shall be used to determine if single or multiple charging space requirements apply for the future installation of EVSE and EVCS. Calculations for the required number of EV charging spaces and EVCS shall be rounded up to the nearest whole number. Refer to the amended Table 5.106.5.3.3.	
5.106.5.3.4 [N] Identification. The service panel or subpanel(s) circuit directory shall identify the reserved overcurrent	

Table 4.6-7. 2019 CALGreen Mandatory Measures Relevant to Greenhouse Gas Emissions

CALGreen Requirement
protective device space(s) for future EV charging as “EV CAPABLE”. The raceway termination location shall be permanently and visibly marked as “EV CAPABLE.”
5.106.5.3.5 [N] Future charging spaces. Future charging spaces qualify as designated parking as described in Section 5.106.5.2 Designated parking for clean air vehicles.
5.201.1 Scope. Building meets or exceeds the requirements of the 2019 California Energy Code.
5.503.1 Fireplaces. Install only a direct-vent sealed-combustion gas or sealed wood-burning fireplace or a sealed woodstove or pellet stove and refer to residential requirements in the California Energy Code, Title 24, Part 6, Subchapter 7, Section 150. Woodstoves, pellet stoves and fireplaces shall comply with applicable local ordinances including South Coast Air Quality Management District regulations.
5.503.1.1 Woodstoves. Woodstoves and pellet stoves shall comply with US EPA New Source Performance Standards (NSPS) emission limits, as applicable, and shall have a permanent label indicating they are certified to meet the emission limits.
5.508.1 Ozone depletion and greenhouse gas reductions. Installations of HVAC, refrigeration and fire suppression equipment shall comply with Sections 5.508.1.1 and 5.508.1.2. 5.508.1.1 Chlorofluorocarbons (CFCs). Install HVAC, refrigeration and fire suppression equipment that do not contain CFCs. 5.508.1.2 Halons. Install HVAC, refrigeration and fire suppression equipment that do not contain Halons
5.508.2 Supermarket refrigerant leak reduction. New commercial refrigeration systems shall comply with the provisions of this section when installed in retail food stores 8,000 square feet or more conditioned area, and that utilize either refrigerated display cases, or walk-in coolers or freezers connected to remote compressor units or condensing units. The leak reduction measures apply to refrigeration systems containing high-global-warming potential (high-GWP) refrigerants with a GWP of 150 or greater. New refrigeration systems include both new facilities and the replacement of existing refrigeration systems in existing facilities.
<i>Residential Mandatory Measures</i>
4.106.4 Electric vehicle (EV) charging for new construction. New construction shall comply with Sections 4.106.4.1, 4.106.4.2, or 4.106.4.3 to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the California Electrical Code, Article 625. 4.106.4.1 New one- and two-family dwellings and townhouses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device. Or 4.106.4.2 New multifamily dwellings. If residential parking is available, ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future EVSE. Calculations for the required number of EV spaces shall be rounded up to the nearest whole number.
4.106.4.3 All newly constructed hotels and motels shall provide EV spaces capable of supporting future installation of EVSE. The construction documents shall identify the location of the EV spaces. Note: Construction documents are intended to demonstrate the project’s capability and capacity for facilitating future EV charging. There is no requirement for EV spaces to be constructed or available until EV chargers are installed for use. Table 4.106.4.3.1 Number of required EV spaces. The number of required EV spaces shall be based on the total number of parking spaces provided for all types of parking facilities in accordance with Table 4.106.4.3.1. Calculations for the required number of EV spaces shall be rounded up to the nearest whole number.

Table 4.6-7. 2019 CALGreen Mandatory Measures Relevant to Greenhouse Gas Emissions

CALGreen Requirement	
Total Parking Spaces	Number of Required Spaces
0-9	0
10-25	1
25-50	2
51-75	4
49-100	5
101-150	7
151-200	10
201 and over	6% of Total
<i>Residential Building Environmental Quality</i>	
4.503.1 Any installed gas fireplace shall be a direct-vent sealed-combustion type. Any installed woodstove or pellet stove shall comply with U.S. EPA New Source Performance Standards (NSPS) emission limits as applicable, and shall have a permanent label indicating they are certified to meet the emission limits. Woodstoves, pellet stoves, and fireplaces shall also comply with all applicable local ordinances.	

Source: 24 CCR Part 11. 2019 California Green Building Standards Code

The proposed Project 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. As such, the proposed Project would be consistent with the regulations set forth in CALGreen. The City approved Ordinance No. 1606, which adopted the 2019 edition of the CALGreen with amendments. Therefore, the proposed Project would be implemented consistent with the City’s Municipal Code requirements and CALGreen.

Consistency with CARB’s Scoping Plan

The Scoping Plan (approved by CARB in 2008 and updated in 2014 and 2017) provides a framework for actions to reduce California’s GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.⁵ Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. Table 4.6-8 highlights measures that have been, or will be, developed under the Scoping Plan and presents the proposed Project’s consistency with Scoping Plan measures (CARB 2008). The proposed Project would comply

⁵ The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that “[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan” (CNRA 2009b).

with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the proposed Project.

Table 4.6-8. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Transportation Sector		
Advanced Clean Cars	T-1	<i>Consistent.</i> The proposed Project’s residents, employees and customers would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase.
Low Carbon Fuel Standard	T-2	<i>Consistent.</i> This is a statewide measure that cannot be implemented by a project applicant or lead agency. Nonetheless, this standard would be applicable to the fuel used by vehicles that would access the Project site (i.e., motor vehicles driven by the proposed Project’s residents, employees and customers would use compliant fuels).
Regional Transportation-Related GHG Targets	T-3	<i>Not applicable.</i> The proposed Project is not related to developing GHG emission reduction targets. To meet the goals of SB 375, the Connect SoCal is applicable to the proposed Project. The proposed Project would not preclude the implementation of this strategy.
Advanced Clean Transit	N/A	<i>Not applicable.</i> The proposed Project would not prevent CARB from accelerating the use of advanced technologies in heavy-duty vehicles to meet air quality, climate, and public health goals.
Last-Mile Delivery	N/A	<i>Not applicable.</i> The proposed Project would not prevent CARB from increasing the deployment of zero-emission trucks primarily in California.
Reduction in VMT	N/A	<i>Consistent.</i> The proposed Project would be developed within proximity of existing Beach Cities Transit infrastructure, which would help reduce the proposed Project’s vehicle miles traveled (VMT). As assessed in Section 4.13, Transportation, of this Draft EIR, the proposed Project is estimated to generate 10.9 daily household VMT per capita, which is lower than 15% below the threshold. This indicates a less-than-significant transportation impact related to VMT.
Vehicle Efficiency Measures 1. Tire Pressure 2. Fuel Efficiency Tire Program 3. Low-Friction Oil 4. Solar-Reflective Automotive Paint and Window Glazing	T-4	<i>Consistent.</i> These standards would be applicable to the light-duty vehicles that would access the proposed Project site. Motor vehicles driven by the proposed Project’s residents, employees, and customers would maintain proper tire pressure when their vehicles are serviced. The proposed Project’s employees and customers would replace tires in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase. Motor vehicles driven by the proposed Project’s employees and customers would use low-friction oils when their vehicles are serviced. The proposed Project’s employees and customers would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase. In addition, the proposed

Table 4.6-8. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
		Project would not prevent CARB from implementing this measure.
Ship Electrification at Ports (Shore Power)	T-5	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Goods Movement Efficiency Measures 1. Port Drayage Trucks 2. Transport Refrigeration Units Cold Storage Prohibition 3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification 4. Goods Movement Systemwide Efficiency Improvements 5. Commercial Harbor Craft Maintenance and Design Efficiency 6. Clean Ships 7. Vessel Speed Reduction	T-6	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Heavy-Duty Vehicle GHG Emission Reduction <ul style="list-style-type: none"> • Tractor-Trailer GHG Regulation • Heavy-Duty Greenhouse Gas Standards for New Vehicle and Engines (Phase I) 	T-7	<i>Consistent.</i> Heavy-duty vehicles would be required to comply with CARB GHG reduction measures. In addition, the proposed Project would not prevent CARB from implementing this measure.
Medium- and Heavy-Duty Vehicle Hybridization Voucher Incentive Proposed Project	T-8	<i>Consistent.</i> The proposed Project medium- and heavy-duty vehicles (e.g., delivery trucks) could take advantage of the vehicle hybridization action, which would reduce GHG emissions through increased fuel efficiency. In addition, the proposed Project would not prevent CARB from implementing this measure.
Medium and Heavy-Duty GHG Phase 2	N/A	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure. However, all medium and heavy-duty vehicles which would access the proposed Project would be subject to this regulation.
High-Speed Rail	T-9	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Electricity and Natural Gas Sector		
Energy Efficiency Measures (Electricity)	E-1	<i>Consistent.</i> The proposed Project would comply with the current Title 24 Building Energy Efficiency Standards. In addition, the proposed Project would not prevent CARB from implementing this measure.
Energy Efficiency (Natural Gas)	CR-1	<i>Consistent.</i> The proposed Project would comply with the current Title 24 Building Energy Efficiency Standards. In addition, the proposed Project would not prevent CARB from implementing this measure.
Solar Water Heating (California Solar Initiative Thermal Program)	CR-2	<i>Consistent.</i> The proposed Project would include solar water heating where feasible.
Combined Heat and Power	E-2	<i>Not applicable.</i> The proposed Project would not prevent

Table 4.6-8. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
		CARB from implementing this measure.
Renewables Portfolio Standard (33% by 2020)	E-3	<i>Consistent.</i> The electricity used by the proposed Project would benefit from reduced GHG emissions resulting from increased use of renewable energy sources.
Renewables Portfolio Standard (50% by 2050)	N/A	<i>Consistent.</i> The electricity used by the proposed Project would benefit from reduced GHG emissions resulting from increased use of renewable energy sources.
SB 1 Million Solar Roofs (California Solar Initiative, New Solar Home Partnership, Public Utility Programs) and Earlier Solar Programs	E-4	<i>Consistent.</i> The proposed Project would be required to meet at minimum, the applicable current Title 24 Building Energy Efficiency Standards regarding the installation of rooftop solar systems. As set forth in 2019 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 the entire building, including mixed-occupancy.”
Water Sector		
Water Use Efficiency	W-1	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Water Recycling	W-2	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Water System Energy Efficiency	W-3	<i>Not applicable.</i> This is applicable for the transmission and treatment of water, but it is not applicable for the proposed Project. The proposed Project would not prevent CARB from implementing this measure.
Reuse Urban Runoff	W-4	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Renewable Energy Production	W-5	<i>Not applicable.</i> Applicable for wastewater treatment systems. In addition, the proposed Project would not prevent CARB from implementing this measure.
Green Buildings		
State Green Building Initiative: Leading the Way with State Buildings (Greening New and Existing State Buildings)	GB-1	<i>Consistent.</i> The proposed Project would be required to be constructed in compliance with El Segundo Municipal Code and CALGreen requirements in effect at the time of building construction.
Green Building Standards Code (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	<i>Consistent.</i> The proposed Project would be required to be constructed in compliance with El Segundo Municipal Code and CALGreen requirements in effect at the time of building construction.
Beyond Code: Voluntary Programs at the Local Level (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	<i>Consistent.</i> The proposed Project would be required to be constructed in compliance with El Segundo Municipal Code and CALGreen requirements in effect at the time of building construction.

Table 4.6-8. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Greening Existing Buildings (Greening Existing Homes and Commercial Buildings)	GB-1	<i>Consistent.</i> The proposed Project would be required to provide electric vehicle (EV) parking in accordance with the El Segundo Municipal Code and CALGreen requirements in effect at the time of building construction.
Industry Sector		
Energy Efficiency and Co-Benefits Audits for Large Industrial Sources	I-1	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure and does not include industrial uses.
Oil and Gas Extraction GHG Emission Reduction	I-2	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
Reduce GHG Emissions by 20% in Oil Refinery Sector	N/A	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
GHG Emissions Reduction from Natural Gas Transmission and Distribution	I-3	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
Refinery Flare Recovery Process Improvements	I-4	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
Work with the Local Air Districts to Evaluate Amendments to Their Existing Leak Detection and Repair Rules for Industrial Facilities to Include Methane Leaks	I-5	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure this measure and does not include industrial uses.
Recycling and Waste Management Sector		
Landfill Methane Control Measure	RW-1	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Increasing the Efficiency of Landfill Methane Capture	RW-2	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Mandatory Commercial Recycling	RW-3	<i>Consistent.</i> During both construction and operation of the proposed Project, the proposed Project would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended.
Increase Production and Markets for Compost and Other Organics	RW-3	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Anaerobic/Aerobic Digestion	RW-3	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Extended Producer Responsibility	RW-3	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Environmentally Preferable Purchasing	RW-3	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
Forests Sector		
Sustainable Forest Target	F-1	<i>Not applicable.</i> The proposed Project would not prevent

Table 4.6-8. Project Consistency with Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
		CARB from implementing this measure.
High GWP Gases Sector		
Motor Vehicle Air Conditioning Systems: Reduction of Refrigerant Emissions from Non-Professional Servicing	H-1	<i>Consistent.</i> The proposed Project’s residents and employees would be prohibited from performing air conditioning repairs and would be required to use professional servicing.
SF ₆ Limits in Non-Utility and Non-Semiconductor Applications	H-2	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure and does not include semiconductor manufacturing.
Reduction of Perfluorocarbons (PFCs) in Semiconductor Manufacturing	H-3	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure and does not include semiconductor manufacturing.
Limit High GWP Use in Consumer Products	H-4	<i>Consistent.</i> The proposed Project’s residents and employees would use consumer products that would comply with the regulations that are in effect at the time of manufacture.
Air Conditioning Refrigerant Leak Test During Vehicle Smog Check	H-5	<i>Consistent.</i> Motor vehicles driven by the proposed Project’s residents, employees, and customers would comply with the leak test requirements during smog checks.
Stationary Equipment Refrigerant Management Program – Refrigerant Tracking/Reporting/Repair Program	H-6	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure. However, commercial stationary equipment refrigerant would be subject to this regulation.
Stationary Equipment Refrigerant Management Program – Specifications for Commercial and Industrial Refrigeration	H-6	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure. However, commercial stationary equipment refrigerant would be subject to this regulation.
SF ₆ Leak Reduction Gas Insulated Switchgear	H-6	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure. In addition, the proposed Project does not include development of a switchgear.
40% Reduction in Methane and Hydrofluorocarbon (HFC) Emissions	N/A	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure.
50% Reduction in Black Carbon Emissions	N/A	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure. However, on-road vehicles accessing the proposed Project would be subject to this regulation.
Agriculture Sector		
Methane Capture at Large Dairies	A-1	<i>Not applicable.</i> The proposed Project would not prevent CARB from implementing this measure and does not include large dairies.

Source: CARB 2008.

Notes: GHG = greenhouse gas; CARB = California Air Resources Board; VMT = vehicle miles traveled; SB = Senate Bill; N/A = not applicable; SF₆ = sulfur hexafluoride.

Based on the analysis in Table 4.6-8, the proposed Project would be consistent with the applicable strategies and measures in the Scoping Plan.

Consistency with EO S-3-05 and SB 32

- **EO S-3-05.** This EO establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.
- **SB 32.** This bill establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

This section evaluates whether the GHG emissions trajectory after proposed Project completion would impede the attainment of the 2030 and 2050 GHG reduction goals identified in EOs B-30-15 and S-3-05.

To begin, CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that “California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014, p. ES2). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states the following (CARB 2014, p. 34):

This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, EO B-30-15, and EO S-3-05. This is confirmed in the Second Update, which states the following (CARB 2017a, p. 7):

The Proposed Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasibility and cost-effective strategies to ensure that California 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, including in disadvantaged communities. The Proposed Plan is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197.

Consistency with General Plan’s Air Quality Element

The City of El Segundo General Plan (City of El Segundo 1992) includes various policies related to reducing GHGs (both directly and indirectly) because strategies that reduce criteria air pollutant emissions may also reduce GHG emissions. A discussion of the proposed Project’s consistency with these policies is presented below.

Goal AQ3 Vehicle work trip reduction for private employees.

Consistent. The Project develops new mixed-use community to support surrounding land uses and 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 proposed 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 Project site includes the Metro C Line and multiple bus lines. The Metro C Line is a light rail line running between Redondo Beach and Norwalk, with the closest station approximately 0.5 miles east of the Project site. There are two Metro bus lines, one Beach Cities bus line, and two LADOT Commuter Express lines that run in the vicinity of the Specific Plan (Metro Line 232; Metro Line 625; Beach Cities Line 109; LADOT Commuter Express 438; and LADOT Commuter Express 574).

Policy AQS 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.

Not Applicable. The proposed Project would not influence the City’s support of legislation for clean vehicles.

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

Consistent. The Project would comply with the proposed Specific Plan’s design standards, including those outlining sustainability-focused measures at or above Title 24 requirements. The proposed Project would be consistent with the regulations set forth in CALGreen and the City’s Municipal Code, which adopted the 2019 edition of the CALGreen with amendments, which have robust requirements for energy conservation

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.

Consistent. As previously discussed in Section 4.2, Air Quality, the Project would implement MM-AQ-1 to ensure TAC emissions from construction activities associated with the Project are less than significant. The Project would comply with the proposed Specific Plan’s design standards, including those outlining sustainability-focused measures at or above Title 24 requirements. The Project would incorporate sustainability features in compliance with CALGreen.

Policy AQS 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 presented in Table 4.6-5, the proposed Project 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. As such, the proposed Project would be consistent with the regulations set forth in CALGreen and the City’s Municipal Code, which adopted the 2019 edition of the CALGreen with amendments, which have robust requirements for energy conservation and electric vehicle charging. Therefore, the proposed Project would be implemented consistent with the City’s Municipal Code requirements and CALGreen.

Policy AQS 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.

Consistent. The proposed Project would not influence the City’s incentives or regulations. However, the proposed Project would be consistent with the regulations set forth in CALGreen and the City’s Municipal Code.

Policy AQS 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 proposed Project would not influence the City’s enactment of comprehensive solar access. However, the Specific Plan would require that roof structures be designed to support solar panels. Additionally, as set forth in 2019 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 the entire building, including mixed-occupancy.

Policy AQS 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. The proposed Project would include solid waste facilities within the Specific Plan area that must comply with all El Segundo Municipal Code requirements pertaining to building, fire, zoning codes (e.g., adequate trash enclosures and screening). The proposed Project would comply with all applicable laws and regulations related to solid waste and recycling, as discussed in Section 4.15, Utilities and Service Systems, of this Draft EIR.

As discussed in previously, total proposed Project emissions, including operation and amortized construction, would be approximately 2,921 MT CO_{2e} per year, which is less than the SCAQMD significant threshold of 3,000 MT CO_{2e} per year. Furthermore, based on the considerations previously outlined, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and no mitigation is required. Therefore, this impact would be less than significant.

4.6.5 Cumulative Impact Analysis

As discussed in Section 4.6.1, Existing Conditions, GHG emissions inherently contribute to cumulative impacts. As shown in Table 4.6-4, the proposed Project would not result in GHG emissions in exceedance of the SCAQMD significance threshold. Therefore, cumulatively, Project GHG emissions would be less than significant.

4.6.6 Mitigation Measures

No mitigation is required.

4.6.7 Level of Significance After Mitigation

Impacts from GHGs as a result of implementing the proposed Project would be less than significant. Therefore, no mitigation is required.

4.6.8 References

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4.7 Hazards and Hazardous Materials

This section describes the existing hazards and hazardous materials conditions of the Pacific Coast Commons Specific Plan (Specific Plan or 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, as well as information from the following appendix:

Appendix F: Phase I Environmental Site Assessment of Fairfield Inn & Suites LA LAX/EI Segundo and Aloft EI Segundo – LA Airport 475, 525, 545, 629 North Sepulveda Boulevard, prepared by EMG

Other sources consulted are listed in Section 4.7.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

4.7.1 Existing Conditions

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 EI Segundo oil refinery. Figure 2-2, Surrounding and Nearby Land Uses, in Chapter 2, Environmental Setting, of this Draft EIR, provides an overview of nearby land uses. The Chevron Refinery occupies approximately one-third of the City and is adjacent to the beach, along with other industrial land uses. The Project site is surrounded by a variety of land uses, including residential, recreational, office, and commercial retail uses. Other nearby industrial or manufacturing or transportation-related land uses include the following:

- Land uses north of the Project site include the Interstate (I-) 105 and Los Angeles International Airport (LAX) in the City of Los Angeles.
- Land uses to the east of the Project site include Pacific Coast Highway (PCH) to the east, with retail, restaurant, grocery, banking, and corporate office land uses, accompanied by surface parking lots within strip-mall shopping centers located across PCH. The northernmost parcels within the Project site area are adjacent to two developed parcels that include a gas station and a fast food restaurant.
- Land uses to the south and southeast include the Raytheon Space Systems campus and the West Basin Municipal Water District campus, and the Smoky Hollow Specific Plan industrial area is southwest of the Project site.
- Land uses to the west include the linear Washington Park (including the Southern California Edison transmission line easement). The Chevron Refinery is approximately 0.4-mile southwest of the Project site. The Hyperion Water Reclamation Plant and Scattergood Generating Station are approximately 2 miles west of the Project site.

Groundwater

According to the Phase I ESA, based on nearby surface water features and local topography, groundwater depth at the site was estimated between 30 and 50 feet below ground surface (bgs), and groundwater flow direction was estimated to be southward. The Phase I ESA did not include a subsurface investigation, so depth to groundwater was not confirmed. An environmental investigation conducted on the adjacent 76 Service Station in 2004 (Inogen 2004) included exploratory borings up to 50 feet below ground surface (bgs), and groundwater was not encountered. Additionally, as described in Section 4.5, Geology and Soils, the Geotechnical Evaluation stated that the historical high groundwater levels for the general area have been interpreted at a depth of at least 50 feet below the existing surface, based on exploratory borings conducted in the vicinity of the site (Appendix E-1). It is, therefore, assumed that groundwater depth is likely 50 feet bgs or greater at the Project site. Nearby environmental investigations conducted to the southwest of the Project site, as discussed below under “Off-site Hazardous Materials”, identified groundwater flow to the west and southwest.

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 (West Basin), including municipal and domestic water supply (LARWQCB 1998). 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, Sepulveda Boulevard (Pacific Coast Highway) to the east, and Valley Boulevard and 15th Street to the south. The Project site lies within the West Basin, and therefore groundwater beneath the site cannot be used for domestic water supply. This designation is due to saltwater intrusion and regional groundwater contamination, mainly due to the Chevron Refinery. Water is supplied to the Project site by the City of El Segundo.

Methane, Oil, and Gas

The Pacific Coast Commons (PCC)-South and PCC-Fairfield Parking portions of the Project site are located within the El Segundo oil field, which is an active oil drilling field (CalGEM 2020). The northern border of the oil field transects east/west along E Mariposa Avenue. There are multiple plugged oil and gas wells located within 1 mile of the Project site. Two active oil and gas wells are located approximately 0.5 miles west/southwest of the Project site; they are owned and operated by El Segundo Oil LLC. A third active oil and gas well is located approximately 0.93 miles southeast of the Project site; it is owned and operated by Brayton-Hodges Petroleum Inc. The approximately 900-acre Chevron Oil Refinery is located approximately 0.4-mile south-southwest of the Project site. Two crude oil pipelines, one gasoline pipeline, and one natural gas pipeline run along PCH adjacent to the Project site to the east. Additionally, one jet fuel pipeline runs along Washington Street and the western edge of Freedom Park, 0.1-mile west of the Project site. High-tension transmission lines run north/south along Freedom Park, approximately 0.1-mile west of the Project site. According to the Los Angeles County Department of Public Works (LADPW 2020), the Project site is not located within 300 feet of an oil or gas well or 1,000 feet of a methane producing site.

Historical Site Uses

According to the Phase I ESA, PCC-North was first developed in the 1930s with a U-shaped motel, One-O-One Motel, at 621 N Sepulveda Boulevard. What appeared to be a residence was constructed on PCC-South in the 1930s. East Mariposa Avenue and North Sepulveda Boulevard were developed in the 1920s, expanding in size through the 1970s. The Hacienda Hotel (now the Fairfield Inn and Suites Hotel) was constructed in the late 1950s to early

1960s between PCC-South and PCC-Fairfield Parking. A large commercial structure was constructed on the PCC-South portion of the Project site in the 1960s, and was later razed in the late 1970s for construction of the Aloft Hotel and parking lot. The One-O-One Motel was razed in the late 1960s to early 1970s and turned into a paved parking lot. The surrounding properties in El Segundo were a mix of agricultural and residential from at least 1928 until development began in the 1950s and continued through the 1970s. In general, properties to the north, east, and south were residentially and commercially developed beginning in the 1950s through the 1970s, while properties to the west were residentially developed beginning in the 1930s. The adjacent gasoline service station, now a 76 station, was constructed off the southeast corner of PCC-North in the 1930s. The northwestern adjacent restaurant, now a Carl's Jr., was constructed in 2005 off the northeast corner of PCC-North (Appendix F).

On-Site Hazardous Materials

Hazardous Materials, Aboveground and Underground Storage Tanks

The Phase I ESA identified one 500-gallon diesel aboveground storage tank (AST) in the Aloft Hotel penthouse. The AST fuels the on-site emergency generator. Minor staining was observed beneath the generator on the concrete floor. Aloft Hotel is also listed in the CalEPA Regulated Site Portal (CalEPA 2021) for a 60-119 gallon diesel AST; this AST was reported through the California Environmental Reporting System (CERS) in July 2020. It is likely the reported AST size has been updated since the Phase I ESA (2017). Development of the proposed Project would not require demolition, remodel, or renovation of the Aloft Hotel, and therefore would not impact the location or use of the AST.

According to the Phase I ESA, no current or former underground storage tanks (USTs) were identified on the Project site. Review of online regulatory databases (CalEPA 2021, SWQCB 2021) did not reveal records pertaining to a current or former UST.

During the Phase I ESA, drums and small containers of hazardous materials were identified on the Project site, generally within the janitorial areas and storage areas of the Aloft Hotel and Fairfield Inn and Suites Hotel. The materials were generally associated with janitorial services and water treatment for the hotels.

Asbestos, Lead-Based Paint, and Universal Waste

An asbestos survey was conducted in 2013 on the structures on the Project site, the results of which are included in the Phase I ESA. Asbestos-containing material (ACM) was identified in multiple areas of the Project site, including the Food & Beverage Building, which is scheduled to be demolished as part of the proposed Project. A summary of ACMs is included in Appendix G of the Phase I ESA (Appendix F).

According to the Phase I ESA, based on the age of the structures (1957–1978) there is a potential for lead-based paint to be present on the Project site. A lead-based paint survey has not been conducted on the structures at the Project site. According to the Phase I ESA, painted surfaces on the Project site appeared in good condition, with no cracking or peeling.

In addition to asbestos and lead, universal wastes may be present on the Project site. These include polychlorinated biphenyl (PCB)-containing materials (such as fluorescent light ballasts), mercury thermometers, and electrical appurtenances. The proposed Project would require demolition of the Food and Beverage Building, which may contain these universal wastes. According to the Phase I ESA, two transformers, one pad mounted and one vaulted, were observed on the Project site. The transformers are owned by the utility company (Southern California Edison).

According to the Phase I ESA, it appears the transformers were installed after 1979, and therefore are unlikely to contain PCBs.

Hazardous Material Contaminated Sites

California Government Code Section 65962.5 requires the California Environmental Protection Agency to compile a list of hazardous waste and substances sites (Cortese List). While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements:

1. List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) Envirostor database (Health and Safety Codes 25220, 25242, 25356, and 116395)
2. List of Leaking Underground Storage Tank (LUST) Sites by County and Fiscal Year from the State Water Resources Control Board GeoTracker database (Health and Safety Code 25295)
3. List of solid waste disposal sites identified by the State Water Resources Control Board with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273[e] and 14 CCR Section 18051)
4. List of “active” Cease and Desist Orders and Cleanup and Abatement Orders from the State Water Resources Control Board (Water Code Sections 13301 and 13304)
5. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the DTSC

The Phase I ESA included an environmental database search in accordance with the American Standard for Testing and Materials (ASTM) Standard E 1527-13, which includes the above-listed Cortese List databases. A summary of the database search is included in the Phase I ESA (Appendix F). Per the ASTM standard, the reliance period of a Phase I ESA is 180 days from the date of issuance. As the Phase I ESA was completed by EMG in 2017, the reliance period of the report has expired. Therefore, a search for Cortese List sites was conducted in April 2020 for the purposes of this EIR. The findings of the April 2020 search were reviewed and confirmed in February 2021.

A search of the above-listed Cortese List databases was conducted, as well as other online environmental regulatory databases that provide information on hazardous material release sites in the State of California. The search included the Project site and sites within 1 mile of the Project site. The search distance for LUST sites was 0.5 miles in accordance with the ASTM E 1527-13 Standard. In addition to Cortese List sites, there are other hazardous material release sites that are not specified on the Cortese List, but have hazardous material impacts such that they could impact to the proposed Project (these are referred to herein as “non-Cortese List hazardous material sites”). For example, voluntary cleanup sites or military cleanup sites. Should construction occur in these areas exposing the contaminated media (soil, groundwater, or soil vapor), it could result in significant impacts (e.g., exposure to construction workers). Multiple LUST sites were identified within 0.5-mile of the Project site. These LUST sites have all received regulatory closure. However, as discussed below in Off-Site Hazardous Materials, one of these sites still has potential remaining contamination which could impact the Project site. No additional sites were identified on the Cortese List databases within 1 mile of the Project site. Additionally, 3 hazardous material release sites were identified that were not previously identified in the Phase I ESA; upon review these sites are at such a distance or gradient and/or have limited environmental contamination such that they do not likely impact the environmental condition of the Project site. Additional information regarding nearby contaminated sites is provided below.

Off-Site Hazardous Materials

76 Station, 603 N Pacific Coast Highway

Figure 4.7-1, Nearby Industrial Uses and Hazards, identifies land uses, contamination, and potential hazards in proximity to the Project site. The 76 gasoline service station located adjacent to PCC-North at 603 N Pacific Coast Highway (also known as Sepulveda Boulevard) has been an operating gas station since the 1930s (listed as Unocol #5866 in the GeoTracker database [SWRCB 2021]). The site has a documented LUST, which received regulatory closure in 1996. The site was sold by Conoco-Phillips to Airport Five Star, Inc. on June 30, 2004. Prior to property transfer, a Baseline Assessment Report was conducted to document existing soil conditions and potential hydrocarbon impacts (Inogen 2003). During the baseline assessment, six exploratory borings were advanced on the site to a depth of 50 feet bgs. Groundwater was not encountered. Soil samples were collected at 5-foot intervals and select samples were analyzed for total purgeable petroleum hydrocarbons (TPPH), benzene, toluene, ethylbenzene, and xylene (BTEX), oxygenates, ethanol, lead, and total recoverable petroleum hydrocarbons (TRPH) by the onsite waste oil tank. None of the contaminants of concern were detected in analyzed samples. On April 19, 2005, an informal no further action letter was issued via email from Steve Tsumura at the City of El Segundo to Chris Swartz of Conoco-Phillips (Tsumura 2005). Based on county records (County of Los Angeles 2020), the property is still owned by Airport Five Star. A recent inspection, April 10, 2020, by El Segundo City Fire Department (the local Certified Unified Program Agencies [CUPA]) identified UST violations at the gas station, including improper documentation, permitting, and monitoring of the on-site UST. The recent (April and May 2020) UST violations were resolved in May 2020 (CalEPA 2020). Ongoing operation of the gasoline service station since the 1930s and recent operational violations indicate a likely potential for releases of petroleum products to the environment at this site.

Regional PCE and TCE Contamination

A tetrachloroethylene (PCE) and trichloroethylene (TCE) plume has been identified beneath multiple parcels located approximately 0.17 miles southwest of the Project site. The plume encompasses the area approximately bound by East El Segundo Boulevard to the south, Nevada Street to the west, Illinois Avenue and Washington Avenue to the east, and East Holly Avenue to the north, as shown in Figure 4.7-1. Multiple sources of PCE and TCE have been identified in this area (ERM 2020; SCS 2019), mainly related to various former manufacturing facility operations in the area. The PCE and TCE contamination plume includes groundwater, soil, and soil vapor in concentrations that exceed regulatory cleanup levels. Multiple voluntary cleanups are ongoing in the area under DTSC oversight (Infineon Properties, Site ID 60002691; Radiant Services, Site ID 19130119; 1330 East Franklin Street, Site ID 60002376 [DTSC 2021]). Environmental data indicates groundwater flow in the area is toward the west and southwest, away from the Project site. As discussed above, groundwater in the West Basin is not used for beneficial uses, and groundwater depths are estimated to be greater than 50 feet bgs at the Project site. Shallow groundwater in the vicinity of the PCE and TCE plume is at a depth of approximately 90 to 100 feet bgs (ERM 2020; GSA 2020). As of June 8, 2020, DTSC approved a land use covenant on Block 1 and Block 2 of the former Infineon Technologies properties (DTSC 2020a), as defined in the public comment document (DTSC 2020b) and shown in Figure 4.7-1. DTSC has determined that remaining contamination would not pose a risk to future commercial/industrial workers, and the site is proposed for redevelopment (DTSC 2020b). Recent data indicates the soil vapor and groundwater contamination extends offsite, however data is not available to confirm the full extent of contamination. Based on groundwater flow direction (west/southwest, away from the Project site) and distance from the Project site, it does not appear likely this plume has impacted the Project site.

Schools

There are no current or proposed schools located within 0.25-mile of the Project site (CSCD 2020; CDE 2020). The nearest schools are El Segundo Middle, 332 Center Street (located 0.31-mile west of the Project site), and Center Street Elementary, 700 Center Street, located 0.28-mile west of the Project site.

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 (County of Los Angeles 2004), which is shown in Figure 4.10-2 in Section 4.10, Noise, of this Draft EIR. The Project site 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 Project site.

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 (CAL FIRE 2011). 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 who, among other tasks, create and maintain emergency plans for the City and coordinate 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 as published disaster routes for each city within its jurisdiction (LAPDW 2008). Sepulveda Boulevard is a designated disaster route for the City of El Segundo, which leads to the I-105 evacuation route.

4.7.2 Relevant Plans, Policies, and Ordinances

Federal

U.S. Environmental Protection Agency

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.

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 hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

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.

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 U.S. Environmental Protection Agency (USEPA) under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

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. USEPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

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.

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.

U.S. Department of Labor, Occupational Safety and Health Administration

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.

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.

U.S. Department of Transportation

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.

Federal Aviation Administration

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.

Federal Response Plan

The Federal Response Plan of 1999, as amended in 2003 (FEMA 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.

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.

State

California Unified Program for Management of Hazardous Waste and Materials

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.

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.

Hazardous Waste Management

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.

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.

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.

Aboveground and Underground Petroleum Storage Tanks

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.

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.

Environmental Cleanup Levels

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 (SFBRWQCB 2019). 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.

California Integrated Waste Management Board

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.

California Department of Transportation/California Highway Patrol

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 licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

Occupational Safety and Health

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.

Asbestos and Air Quality

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.

Contractors State License Board

The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

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:

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.

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.

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.

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.

California Civil Code Sections 1102 to 1102.16

Requires the disclosure of known lead-based paint hazards upon sale of a property.

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.

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.

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.

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.

California Building Standards Commission

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.

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.

California Forestry and Fire Protection

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.

California State Fire Marshal

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.

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.

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.

California Dig Alert

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.

Regional and Local

South Coast Air Quality Management District

Rule 1403: Work Practice Requirements for Asbestos

South Coast Air Quality Management District Rule 1403 governs work practice requirements for asbestos in all renovation and demolition activities. The rule includes requirements for asbestos surveying, notifications, ACM removal procedures, schedules, handling and clean-up procedures, and storage, disposal, and landfill requirements for waste materials. All operators are also required to maintain records and use appropriate labels, signs, and markings.

Los Angeles County General Plan Safety Element

The purpose of the Safety Element is to reduce the potential risk of death, injuries, and economic damage resulting from natural and human-caused hazards. The Safety Element works in conjunction with the Operational Area Emergency Response Plan, which is prepared by the County’s Chief Executive Office – Office of Emergency Management. The County’s Chief Executive Office – Office of Emergency Management also prepares the All-Hazard Mitigation Plan, which provides policy guidance for minimizing threats from natural and human-caused hazards, and has been approved by the Federal Emergency Management Agency and California Emergency Management Agency . The Safety Element includes policies for fire-related land use and building regulations in Los Angeles County, which specifically pertain to properties in Very High Fire Hazard Severity Zones (County of Los Angeles 2015).

The Safety Element also includes policies for emergency response within Los Angeles County. Emergency services within the County are provided by the Los Angeles County Fire Department and Los Angeles County Sheriff’s Department, in cooperation with local agencies. For the Project site, El Segundo Fire Department are first responders for fire and hazardous material emergencies; Los Angeles County Fire and Sheriff would be secondary responders (County of Los Angeles 2015).

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 proposed Project (City of El Segundo 1992a).

- Policy HM5-1.1: Adopt waste minimization as a first priority in waste management strategies in the City.

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 proposed Project (City of El Segundo 1992b).

- 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.
- 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 PS4-1: Monitor industries and activities in and around the City to prevent and reduce the contamination of water and soil.
- Policy PS6-1.1: Review projects and development proposals, and upgrade fire prevention standards and mitigation measures in areas of high urban fire hazard.

Proposed PCC Specific Plan

Requirements set forth in the Specific Plan's Development Standards that are relevant for the topic of Hazards and Hazardous Material include the following:

C.1. Public streets must be designed and constructed in accordance with the General Plan and in the overall right-of-way size identified in the Street Classification and Standards (Exhibit C-8) in the Circulation Element of the General Plan or as exempted or a waiver granted subject to the regulations in ESMC Chapter 15-24A Right of Way Dedications and Improvements. No private streets are located within the Specific Plan area. A portion of one public street, Mariposa Avenue (a commercial collector), bisects the northern and southern portions of the Specific Plan area. Streets that adjoin the boundaries of the Specific Plan area include Pacific Coast Highway (a major arterial street that is a Caltrans owned State Highway Facility), Holly Avenue, Indiana Street and Palm Avenue. Holly Avenue, Indiana Street and Palm Avenue are classified as local commercial streets. A portion of Mariposa Avenue between Indiana Street and Pacific Coast Highway is proposed to be expanded on the south side of the street to include a dedicated right turn lane (eastbound on Mariposa Avenue to southbound on Pacific Coast Highway).

D.1 Parking and loading must be provided in accordance with the requirements of ESMC Chapter 15-15, except as provided in 1.a through 1.j.

4.7.3 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 CEQA Guidelines, a significant impact related to hazards and hazardous material would occur if the Project would:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- 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.
- 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.
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

4.7.4 Impacts Analysis

Threshold 4.7a **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Short-Term Construction Impacts

As discussed in Chapter 3, Project Description, the proposed Project includes the following:

- Removal and grading of the PCC-South parking lot for construction of a 6-story mixed use residential and commercial building with in-structure parking.
- Demolition of the Fairfield Inn and Suite Hotel’s Food and Beverage building for construction of a 4-story parking structure with ground-level commercial space.
- Removal and grading of the PCC-North parking lot for construction of a six-story mixed use residential and commercial building with in-structure parking. Also, four-story townhomes will be constructed along the western edge of the PCC-North property.

Construction would require the use of heavy equipment and machinery. Hazardous materials that may be used during construction and demolition activities of the proposed Project include, but are not limited to, gasoline, diesel fuel, lubricants, grease, adhesives, welding gases, solvents, paints, and vehicle and equipment-maintenance related materials. These materials would be stored in designated construction staging areas within the boundaries of the Project site and the construction contractor must ensure that they would be transported, handled, used,

stored, and disposed of in accordance with all applicable federal, state, and local laws and regulations. Proper use, handling, and storage of materials must be conducted in accordance with the manufacturer's specifications. The use of these hazardous materials for their intended purpose would not pose a significant risk to the public or environment. 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 offsite facility. The use and handling of these substances are subject to applicable federal, state, and local health and safety laws and regulations, as summarized in Section 4.7.2, Relevant Plans, Policies, and Ordinances, which would minimize health risk to the public associated with hazardous materials.

The Food and Beverage Building is scheduled for demolition as part of the proposed Project. Based on information provided in the Phase I ESA (Appendix F) ACM is present, and LBP and universal wastes are likely present in the Food and Beverage Building. Universal wastes that may be present would require collection and off-site disposal prior to demolition. Hazardous wastes, such as spent chemicals or petroleum, may also require collection and off-site disposal prior to demolition and rehabilitation. Additionally, materials that contain PCBs would require proper management prior to demolition. Should remaining hazardous materials and hazardous wastes associated with site maintenance be present, including petroleum products and cleaning supplies, these would be disturbed during the demolition process if not removed. These materials, if not properly removed, could be transported offsite with demolition debris, and therefore the proposed Project has the potential to create a significant hazard to the public or the environment through the routine transport or disposal of hazardous materials associated with demolition activities. In accordance with mitigation measure (MM-)HAZ-1, demolition must include abatement of the Food and Beverage Building of any asbestos- and lead-containing materials, PCB-containing items, universal wastes, and/or other hazardous materials. Abatement must be conducted by licensed contractors, and materials must be transported offsite for recycling and/or disposal by licensed transporters in accordance with federal, state, and local laws. Hazardous materials are also present in the hotels, including a diesel AST and various janitorial items. As these hotels are not scheduled for demolition or renovation for the proposed Project, it is not anticipated that the presence of these materials would impact construction of the proposed Project.

With implementation of MM-HAZ-1, impacts associated with the routine transport of ACM, LBP, universal wastes, and hazardous materials for offsite disposal during construction would be less than significant with mitigation incorporated.

Long-Term Operational Impacts

The operational phase of the proposed Project would not be expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Hazardous materials would be limited to use of commercially available cleaning products, chlorine for swimming pools, landscaping chemicals and fertilizers, and various other commercially available substances. Such chemicals are currently in use on the Project site, in association with the hotels. Although the Project would introduce additional amounts of commercially available potentially hazardous materials, such as cleaning supplies and landscaping products, to the Project site, the routine transport, use, and/or disposal of these substances would be subject to applicable federal, state, and local health and safety laws and regulations, as summarized in Section 4.7.2, which would minimize health risk to the public associated with hazardous materials. Therefore, impacts would be less than significant and no mitigation is required.

Threshold 4.7b **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?**

Short-Term Construction Impacts

As discussed above, the proposed Project has the potential to expose the public and the environment to hazards associated with on-site releases of hazardous materials including ACM, LBP, PCB-containing items, universal wastes, and other hazardous materials and wastes present in the building scheduled for demolition. Management of hazardous materials and waste during pre-demolition surveys and abatement activities would be addressed by MM-HAZ-1. Hazardous materials present in the hotels, including a 500-gallon diesel AST and various janitorial items, are not expected to be impacted by construction, as the hotels are not scheduled for demolition or renovation. Construction activities would not be conducted in areas where hazardous materials are stored, therefore no impacts are anticipated.

Five hazardous material pipelines are located within close proximity to the Project site, three of which are located within the PCH right-of-way. Construction of the proposed Project would require excavation into existing rights-of-way to connect to existing utilities. In accordance with California Government Code 4216, notification to the Regional Notification Center is required prior to excavation work so that subsurface utilities can be located. Should excavations occur within 10 feet of a subsurface high-pressure natural gas or petroleum pipeline, the owner of the pipeline is required to conduct an onsite meeting with the excavator prior to excavation activities. The on-site meeting would include protection measures to avoid damage or impacts to the subsurface pipelines.

As discussed in Chapter 3 of this Draft EIR, excavation, grading, and offsite export of soils is anticipated for construction of the proposed Project. The adjacent 76 gasoline service station has been in operation since the 1930s (under various owners), and recent inspections have identified operational violations associated with the UST. While there are no documented releases, the numerous violations and long-term operation as a gasoline service station suggest that there is a potential for soil contamination associated with gas station operations in this area. The proposed Project, specifically PCC-North, is located adjacent to the gas station, and grading and trenching of PCC-North would occur adjacent to the gas station. Therefore, there is a potential for petroleum-impacted soils to be present in excavations adjacent to the gas station. Excavation of petroleum-impacted soils could cause an upset or accident condition if contaminated soils are released to the environment. Therefore, MM-HAZ-2 requires preparation of a Hazardous Materials Contingency Plan, which would include procedures to identify, handle, and dispose of potential petroleum-impacted soils related to the gas station.

With adherence to federal, state, and local laws and regulations, and implementation of MM-HAZ-1 and MM-HAZ-2, short-term construction impacts associated with potential upset and accident conditions involving the release of hazardous materials to the environment would be less than significant with mitigation incorporated.

Long-Term Operational Impacts

According to the Los Angeles County Department of Public Works (LADPW 2020), the Project site is not located within 300 feet of an oil or gas well or 1,000 feet of a methane-producing site; therefore, methane impacts are not anticipated.

As discussed above, operation of the proposed Project would only require limited use of commercially available hazardous materials, including janitorial and landscaping products. Should the amount of onsite 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), an HMBP would be required under California HSC, Division 20, Chapter 6.11, Sections 25404–25404.9. The HMBP, which would be submitted to the El Segundo Fire Department (the local CUPA) via the California Environmental Reporting System, would include emergency and spill prevention and response measures, thereby reducing the potential for an upset or accident condition. Use of extremely hazardous materials and accumulation of acutely hazardous wastes are not anticipated. Operation of the proposed Project is not anticipated to impact nearby hazardous liquid pipelines or the adjacent gasoline service station. Project operational impacts are not anticipated to create a foreseeable upset or accident condition that would release hazardous materials to the environment, and impacts are less than significant.

Threshold 4.7c 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?

There are no public or private K–12 schools located within 0.25-mile of the Project site, therefore, impacts would be less than significant and no mitigation is required.

Threshold 4.7d Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65762.5 and, as a result, would it create a significant hazard to the public or the environment?

Short-Term Construction Impacts

As discussed in Section 4.7.1, Existing Conditions, a search of the Cortese List databases was conducted, as well as other online environmental regulatory databases that provide information on hazardous material release sites in the State of California. Multiple LUST sites were identified within 0.5-mile of the Project site. These LUST sites have all received regulatory closure. However, as discussed above in Off-Site Hazardous Materials, one of these sites still has potential remaining contamination which could impact the Project site. No additional sites were identified on the Cortese List databases within 1 mile of the Project site. Additionally, 3 hazardous material release sites were identified that were not previously identified in the Phase I ESA; upon review these sites are at such a distance or gradient and/or have limited environmental contamination such that they do not likely impact the environmental condition of the Project site.

As shown in Figure 4.7-1, there are three sites within 0.5-mile of the Project site that have documented contamination: (1) 76 Station at 603 N Pacific Coast Highway (Sepulveda Boulevard), (2) the West Basin groundwater, and (3) a regional PCE and TCE groundwater contamination plume. As discussed above, excavation and grading of PCC-North would occur adjacent to the gas station. Therefore, there is a potential for petroleum-impacted soils to be present in excavations adjacent to the gas station, as described under Threshold 4.7b. A Hazardous Materials Contingency Plan would be prepared in accordance with MM-HAZ-2, which would include procedures to identify, handle, and dispose of potential petroleum-impacted soils related to the gas station. The other two listings are associated with groundwater contamination. As discussed in Section 4.7.1, groundwater at the Project site is expected to be more than 50 feet bgs. Project excavation and grading are not anticipated to extend more than 30 feet bgs at PCC-South, therefore groundwater is not expected to be encountered during construction activities. Therefore, construction of the proposed Project in areas of potentially impacted groundwater is not anticipated to create a significant hazard to the public or the environment. With implementation of MM-HAZ-2, short-term construction related impacts associated with nearby hazardous materials sites would be less than significant with mitigation incorporated.

Long-Term Operational Impacts

Once operational, the PCC-North portion of the Project would be covered with buildings and minimal landscaping. Should potentially petroleum-contaminated soils be present at the gas station, they would be beneath the surface and covered. Therefore, operation of the proposed Project would not expose the public or environment to any potentially contaminated soils. Additionally, should contaminated soils be encountered during construction, the local regulatory agency, El Segundo Fire Department would be notified in accordance with state and local regulation. Under local agency oversight, contaminated soils would be excavated and/or remediated in accordance with state and local laws and regulations to minimize potential impacts to the public or environment, including potential vapor intrusion. With adherence to applicable laws and regulations, no impacts to operation of the proposed Project would occur.

Water is supplied to the Project by the City of El Segundo; therefore, direct use of groundwater is not required during operation of the proposed Project. The groundwater contaminated by volatile organic compounds identified to the southeast of the Project site is expected to flow south-southwest, away from the Project site. Therefore, the potential for vapor intrusion associated with this contamination is low. Impacts associated with potentially contaminated groundwater are not anticipated and no mitigation is required.

Based on available information, operation of the proposed Project is not anticipated to create a significant hazards to the public or the environment due to proximity of a hazardous material-contaminated site, and impacts would be less than significant.

Threshold 4.7e 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?

Short-Term Construction Impacts

The Project site is not located within the LAX ALUP, and is therefore not subject to the ALUP requirements, including those for safety and noise. The Project site is located within 0.5-mile of LAX and is therefore regulated under 14 CFR 77.9 – Construction or Alteration Requiring Notice. In accordance with 14 CFR 77.9, the Project applicant or their contractor must file FAA Form 7460-1, Notice of Proposed Construction or Alteration at least 45 days before the start date of the proposed construction. The FAA will review the proposed construction and approve, deny, or require alterations to the construction in order to avoid impacts to navigational equipment and prevent safety hazards. With adherence to FAA regulations, the Project would not result in safety hazards for people residing or working in the Project area, and impacts would be less than significant.

Long-Term Operational Impacts

As discussed above, the Project would adhere to FAA regulations, and therefore safety hazards associated with airport navigation would be less than significant. Additionally, the Project site is not located within the LAX ALUP noise boundaries, therefore there are no anticipated impacts associated with excessive noise for people residing or working in the Project area. Therefore, impacts would be less than significant.

Threshold 4.7f **Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Short-Term Construction Impacts

PCH is a designated emergency evacuation route, and runs north/south adjacent to the Project site. Construction of the proposed Project is not anticipated to impact traffic routes on PCH or other adjacent streets. However, should construction of the proposed Project require partial right-of-way closures, such as when tying into existing utilities, a traffic control plan would be submitted in accordance with MM-TRA-1. The traffic control plan would provide alternative routes for emergency evacuation, and would be submitted to and approved by the City of El Segundo and/or California Department of Transportation. With implementation of MM-TRA-1, impacts would be less than significant with mitigation incorporated.

Long-Term Operational Impacts

As set forth in the Specific Plan (see Development Standard C.1.), the eastbound lane of Mariposa Avenue at PCH would be reconfigured as a part of the proposed Project, from one left lane and one through-right lane to one left, one through, and one right-turn lane. The proposed right-turn lane is recommended to be approximately 50 feet in length from stop bar or crosswalk with a 60-foot taper to accommodate peak hour 95th percentile queues. Therefore, the proposed Project improvement would improve the queue length on Mariposa Avenue, thereby improving Project access and circulation. Access to PCH and I-105 for emergency evacuation would not be impacted by Project implementation and no mitigation is required.

Threshold 4.7g **Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

The proposed Project is located in a highly urbanized area and is not located within an area of high wildfire hazard. Therefore, people and structures would not be subject to significant risks related to wildland fires, and impacts would be less than significant.

4.7.5 Cumulative Impact Analysis

For cumulative analysis, the hazardous materials geographic scope is generally restricted to the area immediately surrounding the 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 described above, there are a variety of 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, as detailed in Section 4.7.2, minimize potential for health and safety risks.

Cumulative projects would also be subject to federal, state, and local regulations related to hazardous materials and other public health and safety issues. In a manner similar to the proposed 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. Additionally, most hazardous material and safety-related risks are

localized, generally affecting a specific site and immediate surrounding area, thus minimizing the potential for an impact to combine with another project to create a cumulative scenario.

Because cumulative projects would be fully regulated, thus reducing potential for public safety risks, cumulative impacts associated with exposure to hazards and hazardous materials would be less than significant. Through mitigation and compliance with regulatory requirements, the construction or operation of the proposed Project itself would not create significant human or environmental health or safety risks that could combine with other project impacts to create a significant and cumulatively considerable impact. For these reasons, the proposed Project would not result in cumulatively considerable impacts related to hazards and hazardous materials.

4.7.6 Mitigation Measures

MM-HAZ-1 The Project applicant/developer shall ensure that the demolition contractor's contract specifications incorporate abatement procedures for the removal of materials containing asbestos, lead, polychlorinated biphenyls, hazardous material, hazardous wastes, and universal waste items. Confirmation of adequate removal of such materials shall be provided to the City prior to the issuance of a building permit for PCC-Fairfield Parking. All abatement work shall be done in accordance with federal, state, and local regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), and the South Coast Air Quality Management District.

MM-HAZ-2 Prior to commencement of any earthwork or construction activities at PCC-North, a Hazardous Materials Contingency Plan (HMCP) shall be developed that addresses potential impacts in soil and soil vapor associated with the 76 Station adjacent to PCC-North. The HMCP shall include training procedures for identification of contamination, and shall describe procedures for assessment, characterization, management, and disposal of hazardous constituents, materials, and wastes, and notification in accordance with all applicable state and local regulations. Contaminated soils shall be managed and disposed of in accordance with local and state regulations. The HMCP shall include health and safety measures, which may include but are not limited to periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities. The applicant or its designee shall implement the HMCP during construction activities for the proposed Project.

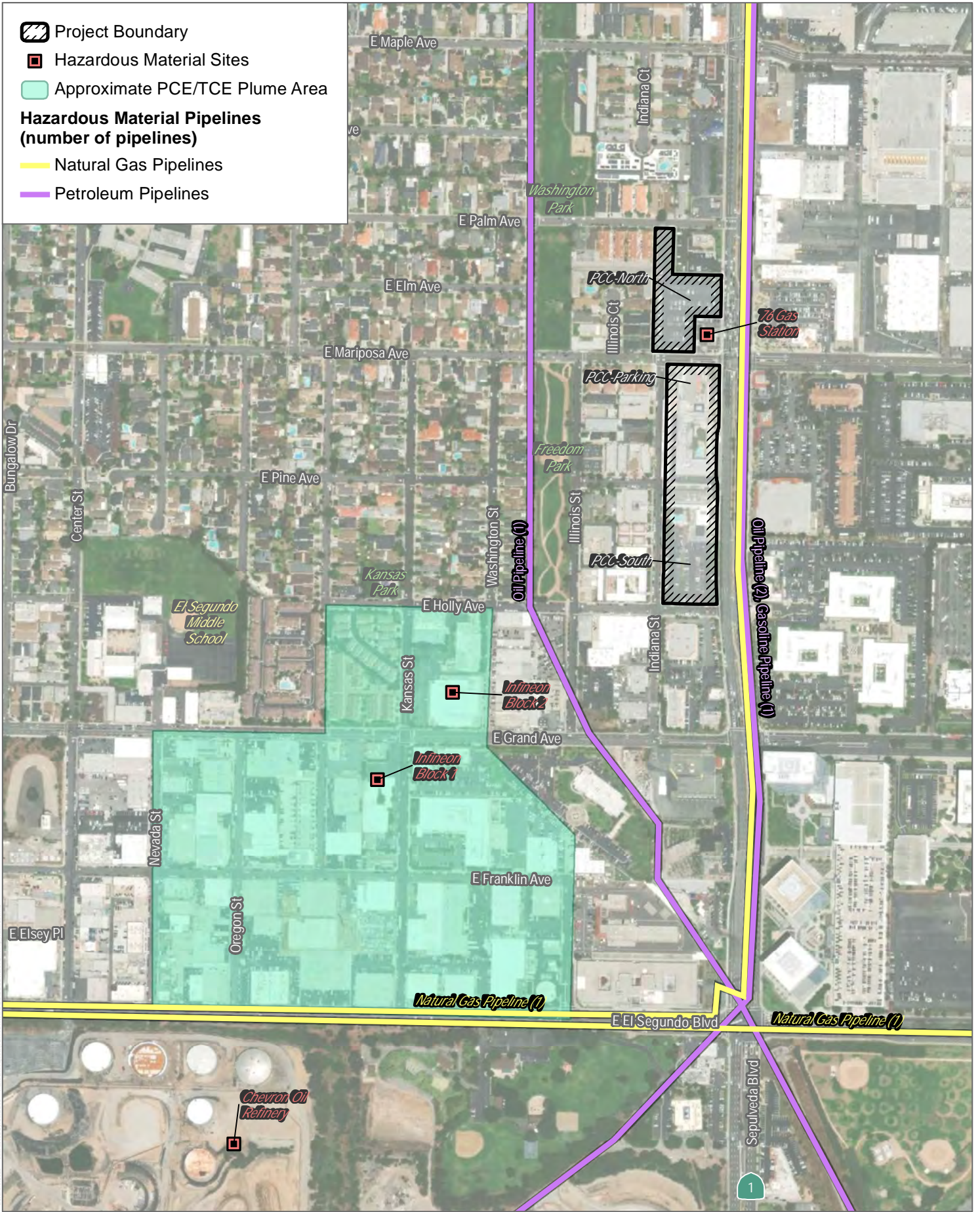
4.7.7 Level of Significance After Mitigation

The abatement of hazardous materials identified on the Project site would remove the potential for exposure of the public and the environment to accidental release of hazardous materials, as required by MM-HAZ-1. Construction and demolition activities on PCC-North adjacent to the adjacent 76 Station would be completed in accordance with the Hazardous Materials Contingency Plan, as required by MM-HAZ-2. Therefore, impacts related to foreseeable upset and accident conditions involving a release of hazardous materials to the environment would be mitigated to a less-than-significant level. All other impacts would be less than significant.

4.7.8 References

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SOURCE: Esri and Digital Globe 2019; Open Street Map 2019

FIGURE 4.7-1



Nearby Industrial Uses and Hazards

Pacific Coast Commons Specific Plan EIR Project

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4.8 Hydrology and Water Quality

This section describes the existing hydrology and water quality conditions of the Pacific Coast Commons Specific Plan Project (Specific Plan or 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 the following appendix:

Appendix G Pacific Coast Commons Existing and Proposed Utility Report, prepared by KPFF

Other sources consulted are listed in Section 4.8.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

4.8.1 Existing Conditions

Surface Water

South Santa Monica Bay Watershed

The Project site is located within the South Santa Monica Bay Watershed, which is located in the southwest portion of Los Angeles County along the Pacific Ocean. It is comprised of the coastal watersheds spanning from Castlerock Watershed on the north near Pacific Palisades, to the Palos Verdes Peninsula Watershed on the south. The Watershed is bound by the Santa Monica Mountains on the north and by the Pacific Ocean on the south/west and includes portions of the Cities of Los Angeles, Santa Monica, Culver City, El Segundo, Manhattan Beach, Redondo Beach, Torrance, Hermosa Beach, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills Estates, and Rolling Hills, and unincorporated Los Angeles County. Figure 4.8-1, South Santa Monica Bay Watershed, depicts the boundaries of the watershed and locations of surrounding cities.

The land area that drains into the Santa Monica Bay follows the crest of the Santa Monica Mountains on the north to Griffith Park, then extends south and west across the Los Angeles coastal plain to include the area east of Ballona Creek and north of the Baldwin Hills. South of Ballona Creek the natural drainage is a narrow coastal strip between Playa del Rey and Palos Verdes (LARWQCB 2014). The portion of El Segundo that includes the Project site is within the Dockweiler subwatershed, as shown in Figure 4.8-2, Dockweiler Subwatershed.

Water Quality

The Water Quality Control Plan, Los Angeles Region (Basin Plan) (LARWQCB 2014) lists the existing beneficial uses of the Dockweiler subwatershed as being WILD = Wildlife Habitat, REC-1 = Water Contact Recreation, REC-2 = Noncontact Water Recreation, IND = Industrial Service Supply, NAV = Navigation; COMM = Commercial and Sport Fishing, and MAR = Marine Habitat, with potential beneficial use for SPWN = Fish Spawning (LARWQCB 2014). Under Clean Water Act Section 303(d), the State of California is required to develop total maximum daily loads (TMDLs), which define how much of a specific pollutant/stressor a given water body can tolerate and still meet

relevant water quality standards. TMDLs have been established for impaired water bodies in California. No impaired water bodies are present in the Dockweiler subwatershed (SWRCB 2020).

Storm Drainage

A total of 27 regional best management practice (BMP) projects are located within the Santa Monica Bay Watershed. Three of the regional BMPs are joint projects between multiple agencies. Of the 27 existing regional projects, 23 are low-flow diversions, two are infiltration BMPs, one is a constructed wetland, and one is a treatment facility (LARWQCB 2014). Locations of Existing Regional BMPs are shown in Figure 4.8-3, Existing Regional Water Quality BMPs, within Santa Monica Bay Subwatersheds.

There are two existing storm drains near the Project site that are owned by the California Department of Transportation (Caltrans) and the City of El Segundo (City). The existing Caltrans storm drain is located below the Pacific Coast Highway. The storm drain is reinforced concrete pipe and varies in diameter from 18 inches to 24 inches. The existing 24-inch-diameter reinforced concrete pipe storm drain is located 66.5 feet east of the centerline in the portion that is south of Pine Avenue and the 18-inch-diameter reinforced concrete pipe storm drain is located approximately 23 feet east of centerline in the portion that is north of Pine Avenue, although this location varies. The pipe flows from north to south. The depth of the pipe invert varies from approximately from 4 feet to 6 feet below grade. The City of El Segundo storm drain is an existing 24-inch-diameter reinforced concrete pipe storm drain that runs through Indiana Street, and flows from north to south. It conveys stormwater from a catch basin on the west side of Indiana Street approximately 230 feet north of Holly Street and is located 11 feet west from the Project's property line. This storm drain runs south and ties into another storm drain on Holly Street that runs west before ultimately discharging into a basin located approximately 0.5 miles southwest of the Project, at the intersection of Center Street and Grand Avenue.

The peak flow for each area of the Project (i.e., Pacific Coast Commons [PCC]-South, PCC-Fairfield Parking, and PCC-North) in its existing condition was calculated using the County of Los Angeles approved and provided Hydrocalc software, based on the 25-year storm event. The existing drainage facilities surrounding the Project site, the portion of the site that currently flows to facilities owned either by the City or by Caltrans, and the existing peak flow rates in the 25-year storm event are shown in Figure 4.8-4A, PCC-South Existing Site Drainage, Figure 4.8-4B, PCC-Fairfield Parking Existing Site Drainage, and Figure 4.8-4C, PCC-North Existing Site Drainage.

Groundwater

The Project site is located above the West Coast Basin, which underlies approximately 160 square miles in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. The Basin extends southwesterly along the coast from the Newport-Inglewood Uplift to the Santa Monica Bay. The Basin provides groundwater to numerous cities and portions of the unincorporated areas of Los Angeles County. The West Coast Basin is an adjudicated basin that requires supplemental recharge to replenish the basin. The West Coast Basin Barrier Project consists of groundwater injection wells that were designed and constructed in the early 1950s to prevent seawater from intruding into the underlying aquifers of the West Coast Groundwater Basin in Los Angeles County. The water is supplied by the Water Replenishment District, which purchases imported water from the Metropolitan Water District, and advance-treated reclaimed water from the West Basin Municipal Water District, the City of Los Angeles, and the Water Replenishment District. This advance-treated reclaimed water has undergone microfiltration, reverse osmosis, and disinfection (WRD 2020). The series of injection wells are designed to establish groundwater elevations greater than or equal to the original elevations within the different aquifers to prevent encroachment of seawater into the aquifers. The West Coast Basin Barrier Project is one of three seawater barriers that Los Angeles

County Department of Public Works operates to prevent seawater from contaminating the groundwater by injecting freshwater to form a protective pressure ridge (LACDPW 2020). The West Coast Basin Barrier Project is near the Project site, as depicted in Figure 4.8-5, West Coast Barrier Project.

In the West Coast Basin, groundwater levels range from highs of nearly 10 feet above mean sea level to lows of more than 60 feet below mean sea level. The highest water levels are along the West Coast Basin Seawater Intrusion Barrier. Groundwater levels decrease to the east where they are at their lowest elevations in the City of Gardena between the Charnock Fault and Newport-Inglewood Uplift, both of which are geologic structural features that partially restrict groundwater flow (WRD 2020).

Groundwater quality is monitored annually and reported in the Water Replenishment District from a network of 335 monitoring wells at 60 locations. In summary, groundwater quality within the West Coast Basin, as measured in 2018–2019 was reported as follows (WRD 2020):

- Total dissolved solids (TDS) concentrations are elevated in certain portions, primarily the coastal areas from Redondo Beach to LAX and the Inglewood and Dominguez Gap areas. The elevated TDS concentrations may be caused by seawater intrusion, connate brines, or perhaps oil field brines.
- Iron is generally common at low concentrations across the WRD [Water Replenishment District] service area, however, across the West Coast Basin, iron is present at concentrations above the Secondary Maximum Contaminant Level (SMCL) at numerous locations.
- Manganese was detected above the SMCL in about 45% of nested monitoring well sites and 65% of the production well sites.
- Some coastal areas of the West Coast Basin are impacted by seawater intrusion and thus, have high chloride concentrations in groundwater.
- Trichloroethylene (TCE) is observed at a concentration above the MCL in the West Coast Basin in one individual monitoring well zone in the Hawthorne area, and perchloroethylene (PCE) is not detected in any of the West Coast Basin nested monitoring wells. Neither TCE nor PCE was detected in any of the West Coast Basin production wells.
- Arsenic at concentrations above the MCL in West Coast Basin production wells was not detected.
- Hexavalent chromium was not detected in any of the West Coast Basin production wells.
- In the West Coast Basin, 1,4-Dioxane was detected in one of the nested monitoring wells and was not detected in any of production wells tested.

Flooding

The Federal Emergency Management Agency (FEMA) provides flood hazard and risk data to help guide mitigation actions. Flood mapping is an important part of the National Flood Insurance Program, as it is the basis of National Flood Insurance Program regulations and flood insurance requirements. The Project site is not located within a FEMA-designated Special Flood Hazard Areas, or 100-year flood zone. The Project site is located in FEMA Zone X, which is an area of minimal flood hazard, and an area determined to be outside the 0.2% annual chance floodplain (i.e., 500-year floodplain) (FEMA 2020).

4.8.2 Relevant Plans, Policies, and Ordinances

Federal

National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate FEMA to evaluate flood hazards. FEMA provides flood insurance rate maps for local and regional planners to promote sound land use and floodplain development, identifying potential flood areas based on the current conditions. To delineate a flood insurance rate map, FEMA conducts engineering studies referred to as flood insurance studies. Using information gathered in these studies, FEMA engineers and cartographers delineate Special Flood Hazard Areas on flood insurance rate maps.

Clean Water Act

The Clean Water Act (CWA) (33 USC 1251 et seq.), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality. The objective of the CWA is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” Key sections of the act are as follows:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Under Section 303(d) of the CWA, the State of California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives and establish TMDLs for each pollutant/stressor. No impaired water bodies are located in the Dockweiler Subwatershed.
- Section 401 (Water Quality Certification) requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the act. As there are no federal jurisdictional waters within the Project site, no water quality certification under CWA Section 401 would be required.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs), which have several programs that implement individual and general permits related to construction activities, municipal stormwater discharges, and various kinds of non-stormwater discharges. State and regional water quality related permits and approvals, including NPDES permits, are discussed below.
- Section 404 establishes a permit program for the discharge of dredged or fill material into waters of the United States. This permit program is jointly administered by the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency. As there are no federal jurisdictional waters within the Project site, the proposed Project would not require a permit under CWA Section 404.

Numerous agencies have responsibilities for administration and enforcement of the CWA. At the federal level this includes the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers. At the state level, with the exception of tribal lands, the California Environmental Protection Agency and its sub-agencies, including the SWRCB, have been delegated primary responsibility for administering and enforcing the CWA in California.

Federal Antidegradation Policy

The Federal Antidegradation Policy (40 CFR 131.12) requires states to develop statewide antidegradation policies and identify methods for implementation. Pursuant to the Code of Federal Regulations (CFR), state antidegradation policies and implementation methods shall, at a minimum, protect and maintain (1) existing in-stream water uses; (2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

State

Porter-Cologne Water Quality Act (California Water Code)

The Porter-Cologne Act (codified in the California Water Code, Section 13000 et seq.) is the primary water quality control law for California. Whereas the CWA applies to all waters of the United States, the Porter-Cologne Act applies to waters of the state, which includes isolated wetlands and groundwater in addition to federal waters. This act is implemented by the SWRCB and the nine RWQCBs. In addition to other regulatory responsibilities, the RWQCBs have the authority to conduct, order, and oversee investigation and cleanup where discharges or threatened discharges of waste to waters of the state could cause pollution or nuisance, including impacts to public health and the environment.

The act requires a “Report of Waste Discharge” for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. California Water Code Section 13260 subdivision (a) requires that any person discharging waste or proposing to discharge waste, other than to a community sewer system that could affect the quality of the waters of the state, to file a Report of Waste Discharge with the applicable RWQCB. For discharges directly to surface water (waters of the United States), an NPDES permit is required, which is issued under both state and federal law. For other types of discharges, such as waste discharges to land (e.g., spoils disposal and storage), erosion from soil disturbance, or discharges to waters of the state (such as groundwater and isolated wetlands), waste discharge requirements (WDRs) are required and are issued exclusively under state law. WDRs typically require many of the same BMPs and pollution control technologies as required by NPDES-derived permits.

California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the state (e.g., isolated wetlands and groundwater), not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained, and discharge to that water body shall not unreasonably affect present or anticipated beneficial use of such water resources.

California Toxics Rule

The U.S. Environmental Protection Agency has established water quality criteria for certain toxic substances via the California Toxics Rule. The California Toxics Rule established acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters and enclosed bays and estuaries, that are designated by each RWQCB as having beneficial uses protective of aquatic life or human health.

NPDES and WDR Permits

NPDES and WDR programs regulate construction, municipal, and industrial stormwater and non-stormwater discharges under the requirements of the CWA and the Porter–Cologne Water Quality Control Act. The Construction Stormwater Program is administered by the SWRCB, while the Municipal Stormwater Program and other WDRs are administered by the Los Angeles RWQCB. Table 4.8-1 lists the water-quality-related permits that would apply directly or indirectly (through implementing City ordinances) to the Project, each of which is further described below.

Table 4.8-1. State and Regional Water Quality-Related Permits and Approvals

Program / Activity	Order Number / NPDES Number	Permit Name	Affected Area
Construction Stormwater Program	2009-0009-DWQ/ CAS000002, as amended	NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit)	Statewide
Municipal Stormwater Program	Los Angeles RWQCB Order No. R4-2012-0175-A01 / CAS004001	Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges (Los Angeles County MS4 Permit)	Coastal Watersheds of Los Angeles County, except those discharges originating from the City of Long Beach MS4
Discharge of Groundwater from Construction and Project Dewatering to Surface Waters	Los Angeles RWQCB Order No. Order No. R4-2018-0125	Waste Discharge Requirements for Discharge of Groundwater from Construction and Project Dewatering to Surface Waters in the Coastal Watersheds of Los Angeles and Ventura Counties	Coastal Watersheds of Los Angeles and Ventura Counties

NPDES = National Pollutant Discharge Elimination System

Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended)

Pursuant to CWA Section 402(p), requiring regulations for permitting of certain storm water discharges, the SWRCB has issued a statewide General Permit for Stormwater Discharges Associated with Construction Activity and Land Disturbance Activities (Order No. 2010-0014-DWQ, adopted by the SWRCB on November 16, 2010, and effective February 14, 2011).

Under this Construction General Permit, discharges of storm water from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by completing and filing permit registration documents, which include a Notice of Intent and Stormwater Pollution Prevention Plan (SWPPP), prior to the commencement of construction activity. SWPPPs incorporate erosion control, sediment removal, and construction waste management control measures during construction, site stabilization measures in the short-term post-construction period, and may identify BMPs for post-construction land use.

Dischargers must file a Notice of Termination when construction is complete and final stabilization has been reached or ownership has been transferred. The discharger must certify that all state and local requirements have been met in accordance with this Construction General Permit. For construction to be found complete, the

discharger must install post-construction storm water management measures and establish a long-term maintenance plan.

California Water Plan

Required by the California Water Code Section 10005(a), the California Water Plan, prepared by the California Department of Water Resources, is the state government's strategic plan for managing and developing water resources statewide for current and future generations and provides a framework for water managers, legislators, and the public to consider options and make decisions regarding California's water future. The California Water Plan, which is updated every five years, presents basic data and information on California's water resources, including water supply evaluations and assessments of agricultural, urban, and environmental water uses to quantify the gap between water supplies and uses. The California Water Plan also identifies and evaluates existing and proposed statewide demand management and water supply augmentation programs and projects to address the state's water needs.

The goal for the California Water Plan Update is to meet California Water Code requirements. This plan received broad support among those participating in California's water planning, and is a useful document for the public, water planners throughout the state, legislators, and other decision-makers.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen Code), Part 11 of the California Building Standards Code (Title 24) is designed to improve public health, safety, and general welfare by using design and construction methods that reduce the negative environmental impact of development and to encourage sustainable construction practices. The CALGreen Code provides mandatory direction to developers of all new construction and renovations of residential and non-residential structures with regard to all aspects of design and construction, including, but not limited to, site drainage design, stormwater management, and water use efficiency. Required measures are accompanied by a set of voluntary standards designed to encourage developers and cities to aim for a higher standard of development.

California Building Code

Pursuant to California Government Code Section 50022.2, the California Building Code, 2019 Edition, published at Title 24, Part 2, of the California Code of Regulations, including Appendices F, H, I, and J has been adopted by reference into the El Segundo Municipal Code (ESMC), subject to the amendments, additions and deletions set forth below.

Section J101.7, Storm Water Control Measures, requires the owner and permittee of any property on which grading has been performed and that requires a grading permit must put into effect and maintain all precautionary measures necessary to protect adjacent water courses and public private property from damage by erosion, flooding, and deposition of mud, debris and construction-related pollutants originating from the site during, and after, grading and related construction activities. Furthermore, the owner and permittee are responsible for putting into effect and maintaining appropriate measures necessary to prevent any change in cross-lot surface drainage that may adversely affect any adjoining property as a result of grading and/or construction-related activities. Such measures to prevent any adverse cross-lot surface drainage effects on adjoining property are required whether shown on approved grading plans or not.

Section J113.1, General, requires that all BMPs shall be installed before grading begins and as grading progresses, all BMPs shall be updated as necessary to prevent erosion and control structures related pollutants from discharging from the site. All BMPs shall be maintained in good working order to the satisfaction of the building official unless final grading approval has been granted by the building official and all permanent drainage and erosion control systems, if required, are in place.

Section J113.2 Storm Water Pollution Prevention Plan (SWPPP), requires that when requested by the building official, no grading permit shall 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.

Section J113.3, Wet Weather Erosion Control Plan (WWECP), requires that 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, then on or before October 1 the owner of the site on which the grading is being performed shall file or cause to be filed with the building official a WWECP, 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. The BMPs shown on the WWECP shall be installed on or before October 15. The plans shall be revised annually or as required by the building official to reflect the current site conditions.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was signed into law in 2014. SGMA requires governments and water agencies of high- and medium-priority groundwater basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically overdrafted basins, sustainability should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline for achieving sustainability. Through SGMA, the California Department of Water Resources provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans for crucial groundwater basins in California.

Regional and Local

Water Quality Control Plan, Los Angeles Region

The California legislature has assigned the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter-Cologne Act and portions of the CWA, to the SWRCB and its nine RWQCBs. The SWRCB provides state-level coordination of the water quality control program by establishing statewide policies and plans for implementation of state and federal regulations. The nine RWQCBs throughout California adopt and implement Basin Plans that recognize the unique characteristics of each region with regard to natural water quality, actual and potential beneficial uses, and water quality problems. The Los Angeles RWQCB is responsible for the protection of the beneficial uses of waters within the coastal watersheds of Los Angeles and Ventura counties, including the Project site.

The Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Los Angeles RWQCB Basin Plan) designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through

the plan (California Water Code Sections 13240–13247) (LARWQCB 2014). The Los Angeles RWQCB Basin Plan must conform to the policies set forth in the Porter-Cologne Act as established by the SWRCB in its state water policy. The Porter-Cologne Act also provides the RWQCBs with authority to include within their basin plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The Los Angeles RWQCB Basin Plan is continually being updated to include amendments related to implementation of TMDLs of potential pollutants or water quality stressors, revisions of programs and policies within the Los Angeles RWQCB Region, and changes to beneficial use designations and associated water quality objectives.

Municipal Stormwater Permit (Los Angeles RWQCB Order No. R4-2012-0175-A01, as amended), NPDES Permit No. CAS004001

The Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, except those discharges originating from the City of Long Beach MS4 (MS4 Permit) covers 88 cities and most of the unincorporated areas of Los Angeles County. Under the MS4 Permit, the Los Angeles County Flood Control District is designated as the Principal Permittee. The Permittees are the 88 Los Angeles County cities and Los Angeles County. Collectively, these (including the City of Los Angeles) are the “Co-Permittees.” The Principal Permittee helps to facilitate activities necessary to comply with the requirements outlined in the MS4 Permit but is not responsible for ensuring compliance of any of the other Permittees.

The Los Angeles RWQCB adopted WDRs for MS4 discharges within the Coastal Watersheds of Los Angeles County on June 18, 1990 (Order No. 90-079; NPDES Permit No. CA0061654). The WDRs were later amended on December 13, 2001 (Order No. 01-182; NPDES Permit No. CAS004001, as amended). The current MS4 Permit (Order No. R4-2012-0175; NPDES Permit No. CAS004001) was adopted on November 8, 2012, and became effective on December 28, 2012.

The MS4 Permit contains effluent limitations, receiving water limitations, minimum control measures, and TMDL provisions, and outlines the process for developing watershed management programs, including the Enhanced Watershed Management Program (EWMP). The MS4 Permit incorporates the TMDL waste load allocations applicable to dry- and wet-weather as water quality-based effluent limitations and/or receiving water limitations. The MS4 Permit adopts low-impact development (LID) principles and requires development and redevelopment projects to incorporate stormwater management strategies with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, cisterns, and rain barrels that will store, evaporate, detain, and/or treat runoff may be used.

Enhanced Watershed Management Program

The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles River Watershed are responsible for the implementation of watershed improvement plans or EWMPs to improve water quality and assist in meeting the TMDL milestones. The Dominguez Channel Watershed Management Group consists of the City of Los Angeles as the coordinating agency for the EWMP and Coordinated Integrated Monitoring Program development, Los Angeles County, Los Angeles County Flood Control District, and the Cities of El Segundo, Hawthorne, and Inglewood.

The portion of the City that includes the Project site is located within the Santa Monica Bay (SMB) EWMP Group, which is the western portion of the City. The SMB EWMP Group consists of Jurisdictional Groups 2 and 3 (JG2/JG3) of the City of Los Angeles, City of Santa Monica, City of El Segundo, unincorporated areas of Los Angeles County, and the Los Angeles County Flood Control District. The SMB EWMP Group developed the EWMP pursuant to the requirements set forth by Order No. R4-2012-0175, Los Angeles County MS4 NPDES Permit. The geographical scope of the SMB EWMP Group area excludes areas of land totaling 9,124 acres for which the MS4 permittees do not have jurisdiction, including land owned by the State of California, Caltrans, the United States Government, and an area of the Chevron Facility located in the City of El Segundo. With the exclusion of these areas, the SMB EWMP Group area covers 25,238 acres. Approximately 49% of the SMB EWMP Group area is open space, approximately 93% of the open space is located the northern subwatersheds, and approximately 7% is located in the Dockweiler subwatershed, which includes the Project site.

The SMB EWMP Group Work Plan was developed to detail the water quality priorities in the watershed, to identify existing and potential water quality control measures, and to outline the approach to identifying additional water quality improvement projects. The overarching goal of BMPs in the EWMP is to reduce the impact of stormwater and non-stormwater on receiving water quality. The EWMP emphasizes specific regional BMPs called Regional EWMP projects that capture the 85th percentile, 24-hour storm from upstream areas, and the Permit provides a specific determination of compliance for those captured areas.

Low-Impact Development Standards Manual

The County of Los Angeles prepared the 2014 LID Standards Manual (LACDPW 2014) to comply with the requirements of the NPDES MS4 Permit for stormwater and non-stormwater discharges from the MS4, within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4- 2012-0175), henceforth referred to in this document as the 2012 MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of Los Angeles County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. The LID Standards Manual is an update and compilation of the following documents:

- Development Planning for Storm Water Management: A Manual for the Standard Urban Storm Water Mitigation Plan (September 2002)
- Technical Manual for Stormwater Best Management Practices in the County of Los Angeles (2004 Design Manual, February 2004)
- Stormwater Best Management Practice Design and Maintenance Manual (2010 Design Manual, August 2010)
- Low Impact Development Standards Manual (2009 LID Manual, January 2009)

The LID Standards Manual addresses the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters, and other water bodies. It is intended to minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs and other LID strategies. The Manual is intended to minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly designed, technically appropriate hydromodification control development principles and technologies.

El Segundo General Plan

The following programs and policies of the City of El Segundo General Plan Public Safety Element are relevant to the Project (City of El Segundo 1992):

- 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 PSS-1.1 Continue the construction of flood control facilities to protect areas threatened by potential flooding.
- Program PS5-1.1B The City shall, in cooperation with the City of Los Angeles, develop, maintain, and inform the public of evacuation procedures in the event of failure of the primary sewage reservoir or related equipment or facilities of the Hyperion Wastewater Plant.
- 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.
- Program PS5-1.2A The City shall ensure the adequacy of flood control system capacity with more frequent monitoring, maintenance, repair, or modification of flood channels, culverts, and storm drainage systems.

El Segundo Municipal Code

Chapter 7, Planning and Land Development Program Implementation

Section 5-4-8, Best Management Practices Required, requires that new development and redevelopment projects must 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. For properties exposed to stormwater, the owner must use BMPs or other steps to reduce the discharge of pollutants to the maximum extent practicable, including the removal and lawful disposal of any solid waste or any other substance which, if it were to be discharged to the MS4, would be a pollutant, including fuels, waste fuels, chemicals, chemical wastes and animal wastes, from all parts of the premises exposed to stormwater.

Section 5-4-9, Construction Activity Stormwater Measures, requires each discharger associated with construction activity to comply with all requirements of the Municipal NPDES permit. Proof of compliance with any such permit may be required prior to the issuance of any grading, building, or occupancy permits, or any other type of permit or license issued by the City. Non-stormwater discharges to the MS4 from construction activities are prohibited. Dischargers associated with construction activities must implement effective BMPs, including source control BMPs, in accordance with the Municipal NPDES permit and construction general permit, to reduce pollutants in stormwater from such sites to the maximum extent practicable. Additionally, any grading or building permit for projects disturbing one acre or more of soil for which compliance with the Construction General Permit is required, must submit satisfactory proof to City (1) that a Notice of Intent to comply with the construction general permit was filed, and (2) that a SWPPP has been prepared, before the City can issue any grading or building permit on a construction

project. A copy of the Notice of Intent and the SWPPP must be maintained on site during grading and construction and be made available for inspection, review and copying upon the request of any City inspector.

Section 5-7-8, Best Management Practices, incorporates the BMPs required by the Municipal NPDES permit or the County of Los Angeles LID ordinance (Ordinance No. 2013-0044) into the City's Municipal Code, and allows only for BMPs from these permits, ordinances, and from the County of Los Angeles LID Standards Manual.

Section 5-7-14, Design Standards, requires that all new development and redevelopment projects must install BMPs in accordance with the County of Los Angeles LID ordinance. Compliance with the LID standards set forth in the County of Los Angeles LID ordinance must be demonstrated through the City's LID plan review process. The applicant for any development project must submit a LID plan to the City for review and approval that provides a comprehensive, technical discussion of how the development project will comply with the County of Los Angeles LID ordinance and the applicable provisions specified in the County of Los Angeles LID Standards Manual.

Section 12-5-6, Unlawful Pollution, mandates that no permit shall be issued for, nor shall any person discharge or deposit waste or sewage which creates a public nuisance, a menace to the public safety, pollution or contamination of underground or surface waters, or impairs the use of any public sewer, storm drain channel, or public or private property.

Proposed PCC Specific Plan

Requirements set forth in the Specific Plan's Development Standards that are relevant for the topic of hydrology and water quality include, but may not be limited to the following:

- I.2. The Project parking lot areas must include storm water management practices that treat storm water runoff in compliance with the ESMC and all applicable law.

4.8.3 Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to hydrology and water quality 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 hydrology and water quality would occur if the Project would:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i. result in substantial erosion or siltation on or off site;
 - ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
 - iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - iv. impede or redirect flood flows.
- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

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

4.8.4 Impacts Analysis

Threshold 4.8a **Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Short-Term Construction Impacts

Implementation of the proposed Project would result in demolition of existing buildings, parking areas, and related infrastructure. As discussed in Chapter 3, Project Description, during Phase 1, it was assumed that 41,660 square feet of buildings and 6,000 square feet of pavement would require demolition. For Phases 2 and 3, it was assumed that a total of 131,000 square feet of pavement would require demolition. Grading is estimated to involve 17,700 cubic yards of soil for export, which would be required for Phase 2 of construction activities (see Section 3.4 Project Construction of Chapter 3, Project Description).

Grading and construction would potentially result in short-term erosion and associated siltation that could lead to adjacent storm drain infrastructure. Erosion-induced sedimentation affects water quality and interferes with photosynthesis; oxygen exchange; and the respiration, growth, and reproduction of aquatic species. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported to downstream drainages leading to the Pacific Ocean which could contribute to the degradation of water quality. Other pollutants that could affect surface-water quality during the construction phase include petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, construction equipment leaks, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, and rodenticides).

In accordance with the State NPDES General Construction Permit and WDR Permit, as established by the Porter-Cologne Water Quality Act, the development of an acre or more of land must file a notice of intent with the SWRCB, followed by development of a site-specific SWPPP for construction activities. The property owner/developer must comply with the Construction General Permit applicable at the time a grading permit is issued. As previously discussed, the SWPPP must include erosion- and sediment-control BMPs that will meet or exceed measures required by the determined risk level of the Construction General Permit, as well as BMPs that control the other potential construction-related pollutants. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. The SWPPP is required to identify BMPs that protect stormwater runoff and ensure avoidance of substantial degradation of water quality. Typical BMPs that could be incorporated into the SWPPP to protect water quality include the following:

- Diverting off-site runoff away from the construction site
- Placing perimeter straw wattles to prevent off-site transport of sediment
- Using drop inlet protection (filters and sand bags or straw wattles), with sandbag check dams within paved areas
- Regular watering of exposed soils to control dust during demolition and construction
- Implementing specifications for demolition/construction waste handling and disposal
- Using contained equipment wash-out and vehicle maintenance areas
- Maintaining erosion and sedimentation control measures throughout the construction period
- Stabilizing construction entrances to avoid trucks from imprinting soil and debris onto adjoining roadways

- Training, including for subcontractors, on general site housekeeping
- Vegetating landscaped/vegetated swale areas as soon as feasible following grading activities

Incorporation of required BMPs for temporary materials and waste storage and handling during construction, and equipment and vehicle maintenance and fueling would reduce the potential discharge of polluted runoff from construction sites, consistent with the State NPDES General Construction Permit and the ESMC requirements for construction activities. The ESMC requirements, as set forth in Section 5-4-9, Construction Activity Stormwater Measures, is protect water quality by (a) eliminating non-stormwater discharges to the municipal separate storm drain; (b) controlling the discharge from spills, dumping or disposal of materials other than stormwater to municipal separate storm drains; and (c) reducing pollutants in stormwater discharges to the maximum extent practicable. The proposed Project would adhere to the City's stormwater management and discharge control regulations, and, as such, is not anticipated to violate any water quality standard or waste discharge requirement during operation.

As discussed in Section 4.5, Geology and Soils, of this EIR, the Project site is not located in an area with high groundwater levels, and excavation activities associated with the PCC-South parking garage are not expected to encounter groundwater. However, perched groundwater conditions are dependent on seasonal precipitation, land use, among other factors, and may vary as a result through time. Additionally, the proposed drywells are anticipated to reach depths between 30 feet and 52 feet; therefore, it is possible that the construction of the drywells could encounter perched groundwater. In the event that groundwater is encountered during excavations, potentially polluted groundwater could be released to adjacent storm drains during dewatering activities, resulting in adverse impacts to downstream surface waters.

In the event that groundwater is encountered during excavations, the Project applicant/developer would be required by existing regulatory requirements to procure a dewatering permit from the Los Angeles RWQCB for pumping and disposal of groundwater. Groundwater dewatering would be controlled in compliance with the Waste Discharge Requirements for the Discharge of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994004). This permit requires permittees to conduct monitoring of dewatering discharges and adhere to effluent and receiving water limitations contained within the permit so that the water quality of surface waters is protected.

Application for the permit would involve collecting and analyzing groundwater samples to determine its constituents. In the event that contamination is identified, the permit would include specific types of treatment requirements to ensure compliance with the discharge standards. The permit also establishes requirements for initial and continuous groundwater testing throughout the dewatering process to ensure that the water remains suitable for discharge and that the impacts of dewatering discharges do not constitute a significant and adverse impact to downstream waters.

Compliance with existing regulations would prevent violation of water quality standards and minimize the potential for contributing sources of polluted runoff. Therefore, compliance with existing regulations would ensure that the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface quality from demolition and construction activities. Impacts would be less than significant and no mitigation is required.

Long-Term Operational Impacts

ESMC Section 5-7-21 sets forth requirements for new development and redevelopment that have the potential to adversely impact stormwater quality. Such projects must submit for approval a site-specific plan adequate to

mitigate post-development stormwater quality. Applicable types of projects include those that have vehicle fueling areas, vehicle washing and repair, commercial/industrial waste handling or storage, outdoor manufacturing, outdoor food handling or processing, outdoor animal care, or outdoor horticultural activities. The proposed Project does not involve any of these activities, and therefore does not fall under the ESMC definition of a project that could adversely impact stormwater quality.

The primary source of surface water pollution from long-term operations on the Project site would be incidental spills of vehicle oils in parking garages. Certain metals, along with nutrients and pesticides from landscape areas, could also be present in stormwater runoff, although on-site landscaping would be minimal. During storm events, pollutants from paved areas lacking proper stormwater controls and BMPs could enter the municipal storm drain system. Between periods of rainfall, surface pollutants tend to accumulate, and runoff from the first significant storm of the year (“first flush”) would likely have the largest concentration of pollutants. Such discharges would potentially violate state/federal antidegradation policies, the California Toxics Rule, and water quality objectives as established in the Los Angeles RWQCB Basin Plan.

The Project site falls within the SMB EWMP, which includes numerous existing regional BMPs, as shown in Figure 4.8-3. Existing distributed BMPs were identified through the data request that included a total 2,212 BMPs in the SMB EWMP Group area. Of these distributed BMPs, 340 exist within the City of Los Angeles and 1,872 exist within the City of Santa Monica; however, there are no reported regional BMPs within the City of El Segundo. Therefore, LID BMPs would be implemented at the Project site to meet the local MS4 Permit requirements and remain consistent with the objectives of the SMB EWMP.

Project design, construction, and operation would be completed consistent with the SMB EWMP, and in accordance with the City Stormwater and Urban Runoff Pollution Control Ordinance, Municipal 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 requires that post-construction stormwater runoff from new developments be infiltrated, evapotranspired, captured and reused, and/or treated through a high efficiency BMP onsite for the 85th percentile storm event, or 0.75 inches of precipitation, whichever is greater. The LID Manual states that BMPs are to be designed to manage and capture stormwater runoff. Infiltration systems are the first priority type of BMP improvements, as such systems provide percolation and infiltration of stormwater into the ground, which not only reduces the volume of stormwater runoff entering the MS4, but also contributes to groundwater recharge in some areas. The second priority BMP is capturing and reusing stormwater onsite for either landscape irrigation or toilet flushing. Proposed drainage for the proposed Project would include stormwater treatment features on all three development sites, in accordance with the City of El Segundo LID requirements.

Based on the Geotechnical Due-Diligence Evaluation, prepared by Albus-Keefe & Associates (see Appendix E-1), the Utility Report determined that infiltration is feasible for stormwater treatment. One drywell at each proposed development site (PCC-South, PCC-Fairfield Parking, PCC-North) would be able to capture the required volume and treat that volume as quickly as it enters the drywell system. The infiltration rate for the site is 0.00186 feet per second, and a drywell with a diameter of 4 feet and an infiltration depth of 22 feet would provide a disposal rate of 0.514 cubic feet per second and would dispose of 88,819 cubic feet in 48 hours. Drywells are proposed below structure or on grade, with 20 feet of separation between the bottom of the sublevel or grade and infiltration zone.

The drywells would include overflow piping to convey stormwater to Indiana Street or Mariposa Avenue. Thus, stormwater in the proposed condition would flow only to the City of El Segundo storm drains. Table 4.8-2 summarizes the clear peak flow rate values in the proposed condition based on the 25-year storm event.

Table 4.8-2. Peak Flow Rates Generated by the 25-Year Storm Event

Development Area	Size (Acres)	Existing Peak Flow Rate (CFS)	Proposed Peak Flow Rate (CFS)	Post-Infiltration Peak Flow Rate (CFS)	Peak Flow Difference (CFS)
PCC-North	1.83	3.729	3.139	2.625	-1.104
PCC-Fairfield Parking	0.76	1.804	1.800	1.286	-0.518
PCC-South	1.30	2.580	2.375	1.861	-0.719

Source: Appendix G
CFS = cubic feet per second

The post-Project condition is depicted in Figure 4.8-6, Proposed Drainage Conditions, which show the conceptual location of the drywells and overflow pipes to the existing stormdrain system. The proposed peak flow rate that would be used to design the overflow piping is the reduced peak flow rate generated after infiltration. Because the peak flow rate would be reduced in the proposed condition, it is assumed that the City of El Segundo storm drains will have more than enough capacity to handle the flow rate generated by the proposed Project.

Once the water quality volume is met through the drywells, the “higher flows” would enter overflow pipes, which would discharge stormwater to the local storm drain systems. Therefore, capture and re-use BMPs to be constructed as part of the Project would result in the treatment of the entire required volume for the Project site and the elimination of pollutant runoff up to the 25-year storm event. In the post-Project condition, all stormwater overflow would be conveyed into the City’s storm drain system and would not be conveyed to Caltrans facilities.

The implementation of LID features would, to the maximum extent practicable, reduce the discharge of pollutants into receiving waters, including inadvertent release of pollutants (e.g., hydraulic fluids and petroleum); improper management of hazardous materials; and trash and debris during Project operations. In accordance with the all applicable state and local regulations, Project source controls to improve water quality would be provided for outdoor trash storage/waste areas and outdoor loading/unloading areas. As a result of compliance with existing regulations, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during the long-term Project operations. Impacts would be less than significant and no mitigation is required.

Threshold 4.8b Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Implementation of the proposed Project would decrease the amount of impervious area within each of the three development areas. PCC-South would decrease from 88.6% to 86.3% impervious; PCC-Fairfield Parking would decrease from 100% to 96.3% impervious, and PCC-North would decrease from 100% to 88.4% impervious. However, as discussed under Threshold 4.8a, the proposed Project would incorporate drywells to facilitate infiltration in compliance with applicable LID requirements. The Project site is not currently used for groundwater infiltration, either by spreading or by groundwater injection. Upon construction and operation of the drywells, groundwater recharge at the site would increase in comparison to existing conditions, resulting in beneficial impacts. The West Coast Basin Barrier Project, which consists of groundwater injection wells that prevent seawater from intruding into the underlying aquifers of the West Coast Groundwater Basin, is near the Project site, as

depicted on Figure 4.8-5, West Coast Barrier Project. However, development of the Specific Plan would not interfere with the operation of this barrier system.

As described under Threshold 4.8a, the proposed Project is not anticipated to encounter groundwater during excavation for the subterranean parking garage on PCC-South. However, perched groundwater conditions may vary over time, and in the unlikely event that groundwater is encountered during excavations, the Project applicant/developer would be required by existing regulatory requirements to procure a dewatering permit from the Los Angeles RWQCB for pumping and disposal of groundwater. Groundwater dewatering would be controlled in compliance with the Waste Discharge Requirements for the Discharge of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994004). Temporary dewatering, if required, would be short-term and would not substantially interfere with groundwater supplies.

Additionally, the Project site is within the Coastal Plain of Los Angeles-West Coast (Groundwater Basin 4-011.03), which has been designated as Very Low Priority with respect to establishment of a GSA and completion of a Groundwater Sustainability Plan (SGMA 2020). Therefore, the proposed Project would not substantially decrease groundwater supplies and no mitigation is required. Potable water supplies required to supply the proposed Project are discussed in Section 4.15, Utilities and Service Systems.

Threshold 4.8c **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

- i. result in substantial erosion or siltation on or off site;*
- ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;*
- iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
- iv. impede or redirect flood flows?*

The proposed Project site is fully developed in the existing condition and is located in a highly urbanized portion of El Segundo, surrounded by developed properties. Implementation of the proposed Project would not alter the existing drainage patterns on the site such that downstream streams or rivers would be affected. The Project would infiltrate stormwater in accordance with all applicable LID regulations, as described under Threshold 4.8a, and would continue to outflow into the existing storm drain system. No naturalized drainages or creeks would be affected. Additionally, post-Project runoff is anticipated to be less than in the existing condition and the amount of impervious surfaces would also be reduced, as described under Threshold 4.8a. Therefore, the Project would not substantially alter the existing drainage pattern of the site, including through the alteration of the course of a stream or river or through the addition of impervious surfaces. Impacts would be less than significant and no mitigation is required.

Threshold 4.8d In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

As stated in the City’s General Plan Public Safety Element, along the City’s coastal areas, tsunamis and seiches associated with seismic events could cause devastating damage. The coastal portion of the City and adjacent portions of the City of Los Angeles are identified by the State as tsunami hazard areas, and as a result, there is the potential for damage to Southern California Edison and Chevron facilities, and the Hyperion Treatment Plant located along the coast. Residential portions of the City are located above the potential hazard area and are not at high risk. The Project site is not located within a tsunami inundation map for emergency planning, as delineated by the California Emergency Management Agency, California Geologic Survey (CGS 2009).

The Project site is located in FEMA Zone X, which is an area of minimal flood hazard, and an area determined to be outside the 0.2% annual chance floodplain (i.e., 500-year floodplain) (FEMA 2020). Therefore, the Project would not be located in an area with any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. In addition, the Project site is not located adjacent to or immediately downstream of any large body of water susceptible to seiches (i.e., oscillations in a body of water due to earthquake shaking).

The main document addressing emergency preparedness in the City is the Emergency Operations Plan. The Emergency Operations Plan is applied during emergency situations involving natural disaster (e.g. fire, earthquake, flood, storm, or tsunami), major accidents (transportation, industrial, and nuclear), civil disturbances, pollution episodes, epidemics, and war emergencies. The Emergency Operations Plan provides a basis for operations and for managing critical resources during emergencies, delineation of lines of authority and responsibility, and procedures for requesting interagency and private assistance. The probability of hazardous events occurring in the City of El Segundo are set at low, moderate, and high. A probability of 20% or less is considered “low probability or unlikely,” a probability of 20% to 60% is considered “moderate or likely,” and a probability of 60% or higher is considered “high or very likely.” The General Plan determined that the level of risk associated with a tsunami and seiche are “low” (City of El Segundo 1992). Therefore, existing state, regional and local regulations related to emergency preparedness would be sufficient to address potential hazards associated with floods, tsunamis, or seiches, which have not been identified as hazards for the Project site. Impacts would be less than significant and no mitigation is required.

Threshold 4.8e Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As previously discussed, the proposed Project would comply with applicable water quality regulatory requirements, including implementation of a SWPPP, stormwater BMPs, and LID design, which would minimize potential off-site surface water quality impacts and contribute to a reduction in water quality impacts within the Dockweiler Subwatershed and the overall South Santa Monica Bay Watershed. In addition, with compliance with these regulatory requirements, the Project would reduce potential water quality impairment of surface waters such that existing and potential beneficial uses of key surface water drainages throughout the jurisdiction of the Los Angeles RWQCB Basin Plan would not be adversely impacted. As a result, the Project would not conflict with or obstruct the Los Angeles RWQCB Basin Plan.

With respect to groundwater management, SGMA empowers local agencies to form GSAs to manage basins sustainably, and requires those GSAs to adopt Groundwater Sustainability Plans for crucial groundwater basins in California. A GSA has not been established for the West Coast Basin, as it is not considered a high priority basin. Further, the Project would not substantially deplete groundwater supplies or interfere substantially with

groundwater recharge. As a result, the Project would not conflict with or obstruct this sustainable groundwater management plan. Impacts would be less than significant and no mitigation is required.

4.8.5 Cumulative Impact Analysis

Water Quality

The geographic context for the analysis of cumulative impacts associated with water quality is the South Santa Monica Bay Watershed, which is already largely urbanized with impervious surfaces. The analysis accounts for all anticipated cumulative growth within this geographic area, which includes the list of related projects, as provided in Table 2-4, List of Cumulative Projects, in Chapter 2, Environmental Setting, of this EIR. The cumulative effect of past projects—both point sources of pollution and non-point sources caused by urbanization—have resulted in substantial water quality problems in the region's major waterways. Cumulative development could add new sources of stormwater runoff. Construction activities associated with development could temporarily increase the amount of exposed surfaces that could contribute to sediments in stormwater runoff. Additionally, materials associated with construction activities could be deposited on surfaces and carried to receiving waters in stormwater runoff.

Although the land surrounding the Project site is largely developed with impervious surfaces, continued redevelopment within the Project area could slightly increase the amount of impervious surfaces that could increase stormwater runoff rates and amounts, as well as changes in land use that may increase the amount of pollutants in stormwater runoff. Typical pollutants of concern would be associated with the construction phase (e.g., sediment, fuels, litter), private vehicle use (e.g., any leakage of grease/oils), landscaping/grounds work (e.g., improper/excessive use of pesticides, herbicides, and/or fertilizers), and/or trash (e.g., due to improper waste disposal). The release of such pollutants, however, would be minimized through compliance with terms and conditions of the NPDES permit, CALGreen Code, California Building Code, ESMC, and the ordinance codes of other authorities in the region—which all require implementation of a SWPPP for development and redevelopment projects. In summary, all cumulative development would be subject to existing regulatory requirements to protect water quality and minimize increases in stormwater runoff. For example, the NPDES permit requires the City to effectively prohibit non-stormwater discharges from within its boundaries and to comply with the NPDES permit and to specifically prohibit certain discharges.

Every two years, the Los Angeles RWQCB must reevaluate water quality within its geographic region and identify those water bodies not meeting water quality standards. For those impaired water bodies, a TMDL must be prepared and implemented to reduce pollutant loads to levels that would not contribute to a violation of water quality standards. All development within the South Santa Monica Bay Watershed would be subject to the water quality standards outlined in the Basin Plan and would comply with any established TMDLs. The continuing review process would ensure that cumulative development within the watershed would not substantially degrade water quality.

In addition, the Project would comply with existing and future regulations to protect water quality, including the Construction General Permit. Compliance with existing regulations would prevent violation of water quality standards and minimize the potential for contributing additional sources of polluted runoff. Therefore, Project impacts associated with water quality standards and polluted runoff would be less than significant, and the Project would not contribute considerably to cumulative impacts.

Drainage

The South Santa Monica Bay Watershed is already largely urbanized with impervious surfaces. Cumulative development within the City could potentially increase the amount of impervious surfaces that could cause or contribute to storm drain system capacity exceedance, alter the existing storm drain system, and/or require construction of new or expanded facilities. However, new development within the watershed would be subject to the same requirements for LID infrastructure and BMPs to address the potential for increased runoff from development sites. All projects must comply with current state and local environmental regulations, such as the ESMC mandates. Potential impacts to drainage associated with the Project would be less than significant, and the Project would not contribute considerably to cumulative impacts.

4.8.6 Mitigation Measures

The Project would not result in potentially significant impacts to hydrology or water quality, and no mitigation is required.

4.8.7 Level of Significance After Mitigation

No mitigation is required.

4.8.8 References

CGS (California Geologic Survey). 2009. Tsunami Inundation Map for Emergency Planning, Venice Quadrangle. March 2009. Accessed August 9, 2020. https://www.conservation.ca.gov/cgs/Documents/Publications/Tsunami-Maps/Tsunami_Inundation_Venice_Quad_LosAngeles.pdf.

City of El Segundo. 1992. *General Plan, Chapter 10, Public Safety Element*. Accessed August 9, 2020. <https://www.elsegundo.org/Home/ShowDocument?id=366>.

FEMA (Federal Emergency Management Agency). 2020. Flood Insurance Rate Map 06037C1770. Effective September 26, 2008. <https://msc.fema.gov/portal/search#searchresultsanchor>.

LACDPW (County of Los Angeles Department of Public Works). 2020. "Seawater Barrier." Accessed August 9, 2020. <https://dpw.lacounty.gov/wrd/barriers/>.

LACDPW. 2014. *Low Impact Development Standards Manual*. February 2014. Accessed August 9, 2020. <https://dpw.lacounty.gov/idd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>.

LARWQCB (Los Angeles Regional Water Quality Control Board). 2014. The Water Quality Control Plan, Los Angeles Region. September 11, 2014. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html.

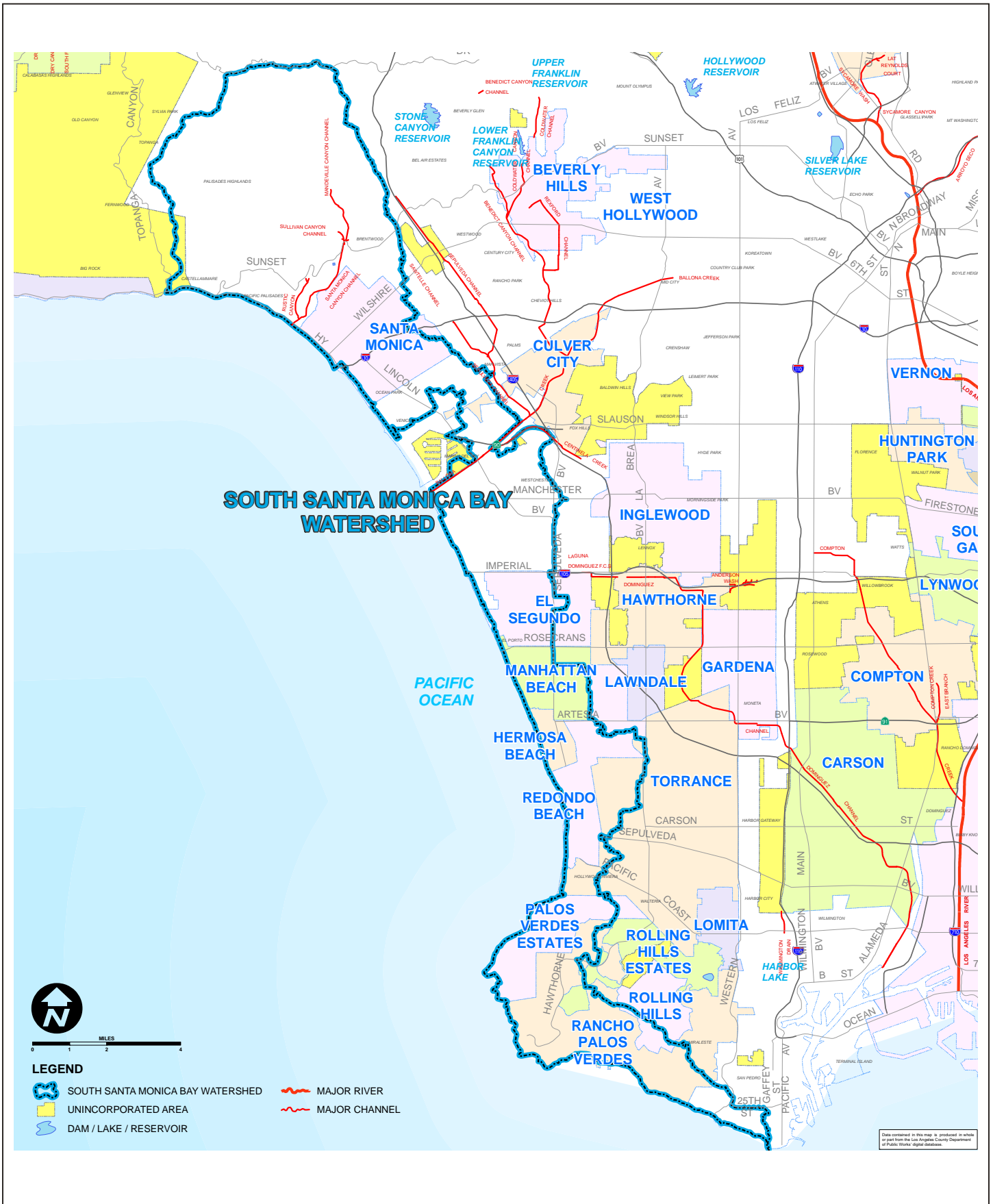
LARWQCB. 2014. *Enhanced Watershed Management Program Work Plan*. Prepared by City of Los Angeles, Los Angeles County Flood Control District, County of Los Angeles, City of Santa Monica, City of El Segundo. June 2014. <https://www.lacitysan.org/san/sandocview?docname=qa002133>.

SGMA (Sustainable Groundwater Management Act). 2020. Groundwater Basin Prioritizations, SGMA Data Viewer. Accessed August 9, 2020. <https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#boundaries>.

SWRCB (State Water Resources Control Board). 2020. “Impaired Water Bodies.” Accessed August 14, 2020. https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml.

WRD (Water Replenishment District). 2020. *Regional Groundwater Monitoring Report Water Year 2018–19, Central and West Coast Basin, Los Angeles County, California*. March 2020. Accessed August 9, 2020. https://www.wrd.org/sites/pr/files/2019%20RGWMR%20FINAL_0.pdf.

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SOURCE: County of Los Angeles

FIGURE 4.8-1

South Santa Monica Bay Watershed
Pacific Coast Commons Specific Plan EIR Project

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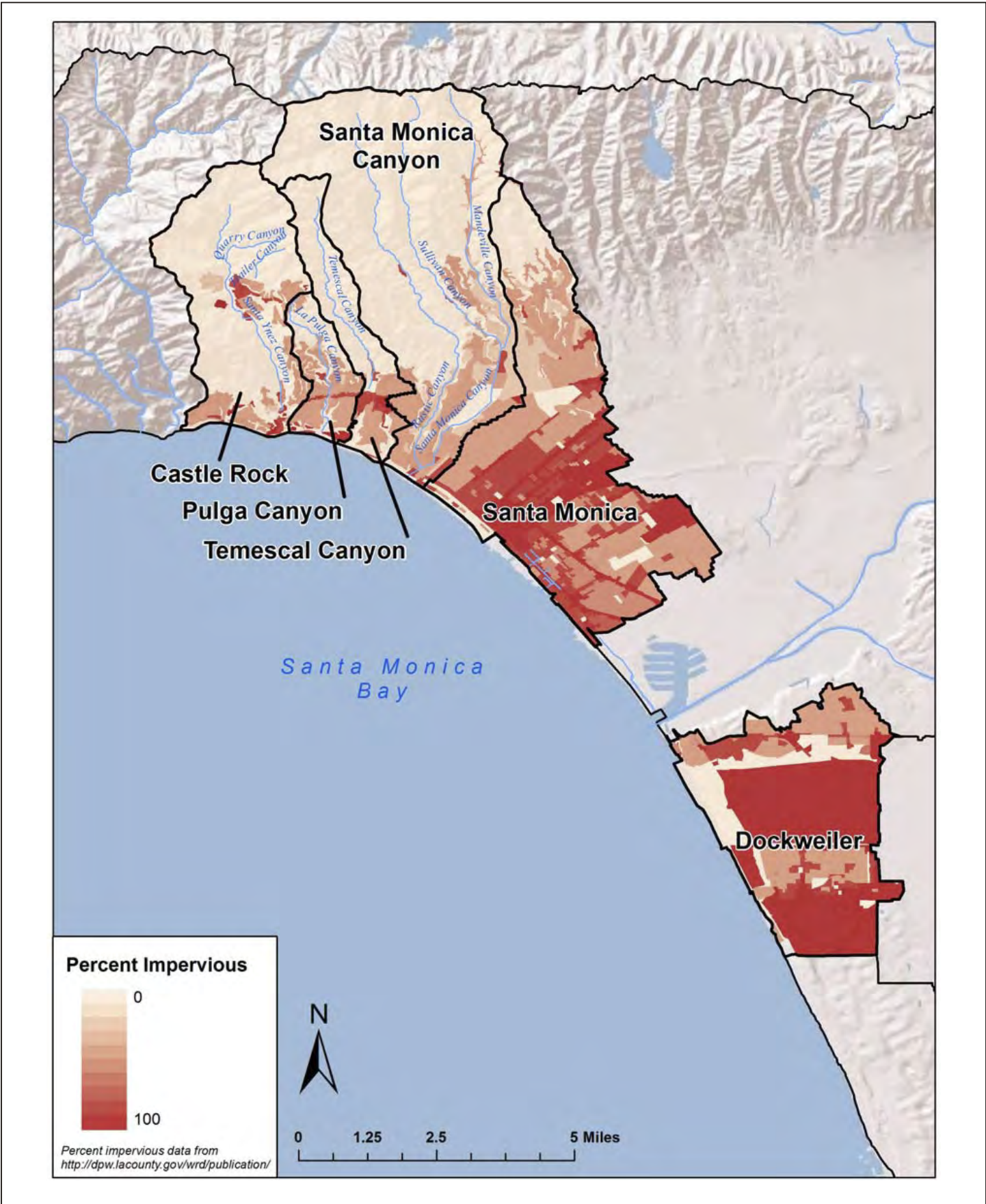
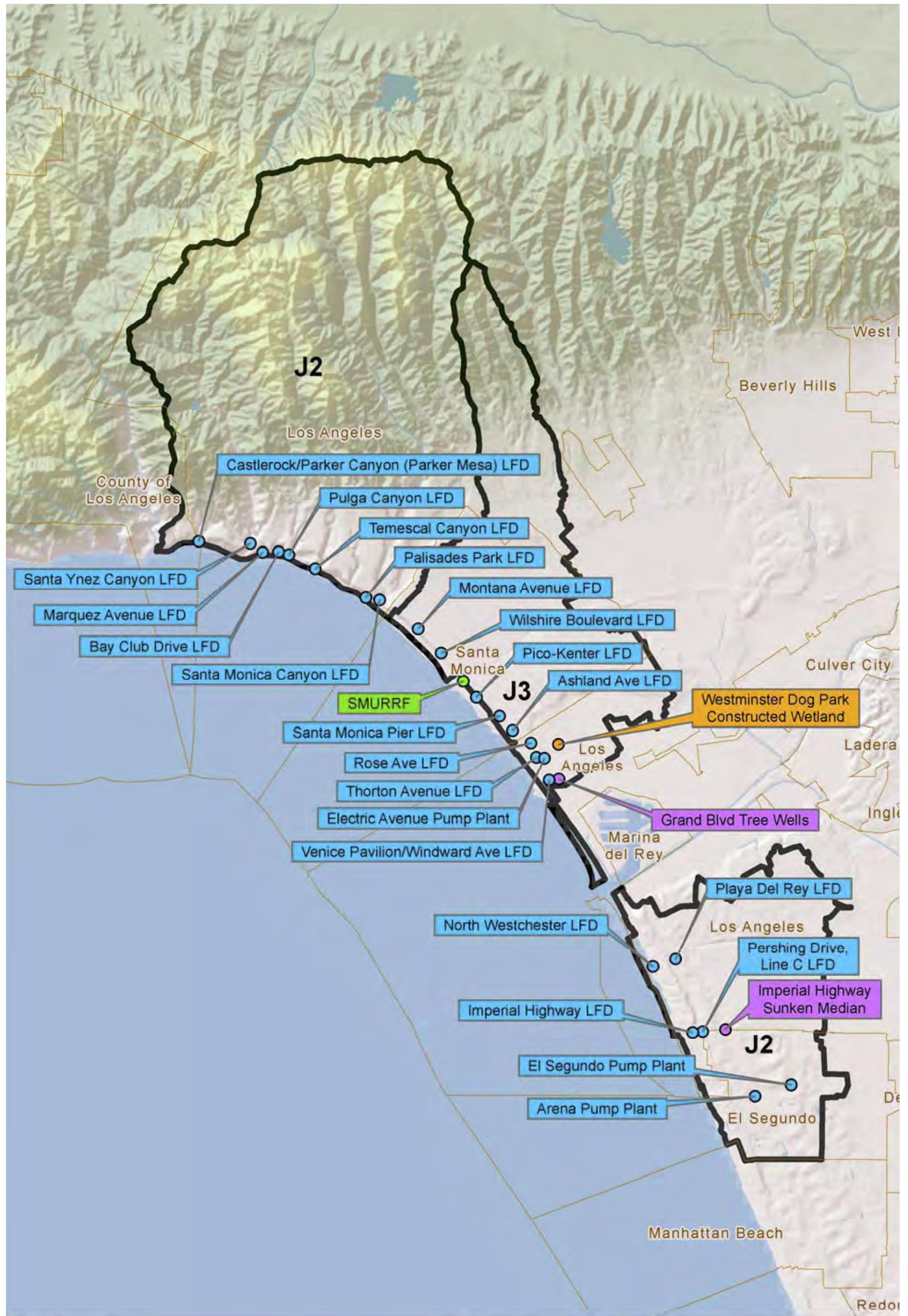


FIGURE 4.8-2

Dockweiler Subwatershed

Pacific Coast Commons Specific Plan EIR Project

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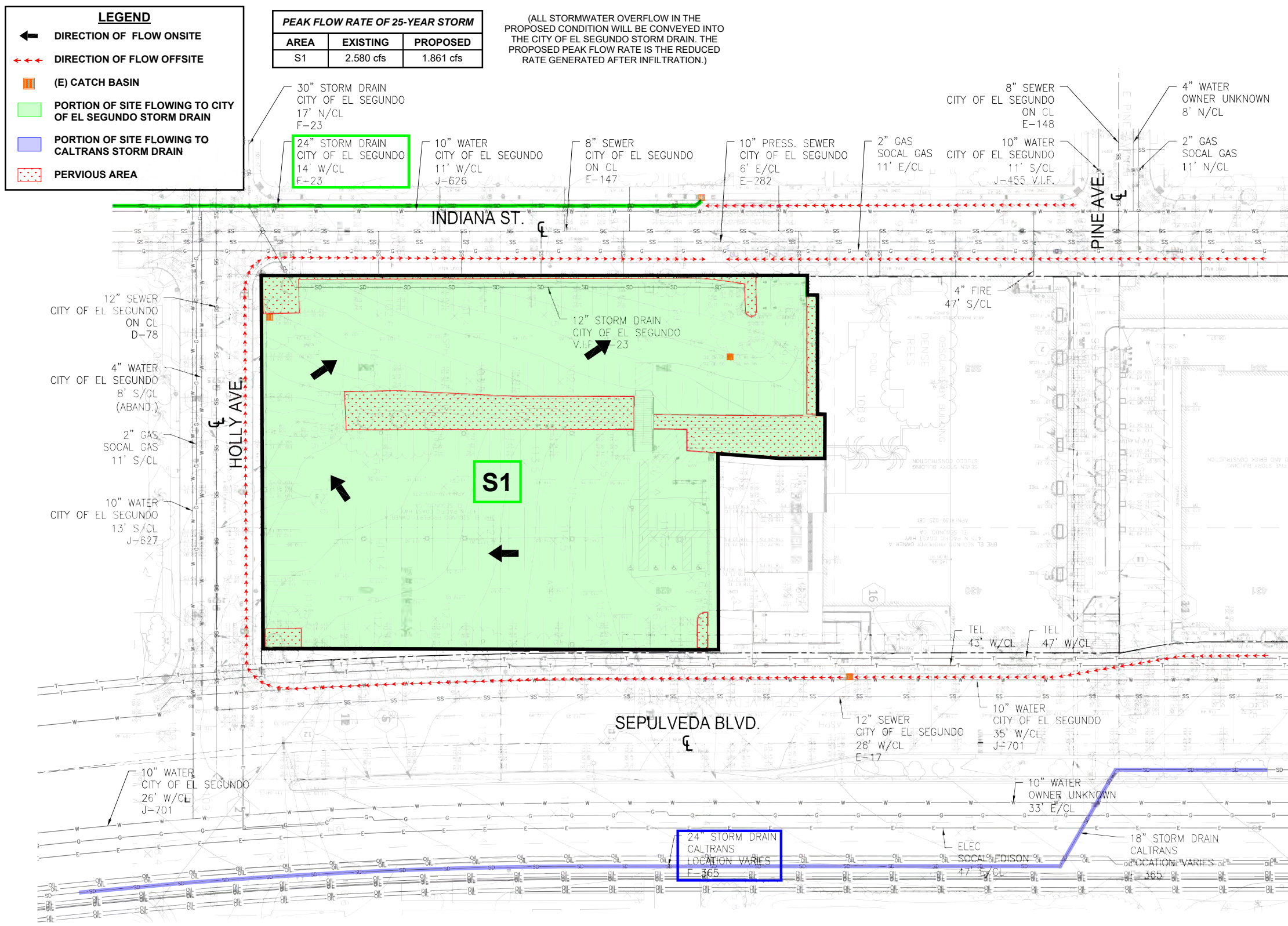
Key to Features

Regional BMPs

- Constructed Wetland
- Low Flow Diversion
- Jurisdictional Groups 2/3 (TMDL IP)
- Infiltration
- Treatment Facility
- City Boundary



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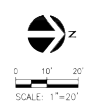
LEGEND

- ← DIRECTION OF FLOW ONSITE
- ←←← DIRECTION OF FLOW OFFSITE
- (E) CATCH BASIN
- PORTION OF SITE FLOWING TO CITY OF EL SEGUNDO STORM DRAIN
- PORTION OF SITE FLOWING TO CALTRANS STORM DRAIN
- PERVIOUS AREA

PEAK FLOW RATE OF 25-YEAR STORM		
AREA	EXISTING	PROPOSED
S1	2,580 cfs	1,861 cfs

(ALL STORMWATER OVERFLOW IN THE PROPOSED CONDITION WILL BE CONVEYED INTO THE CITY OF EL SEGUNDO STORM DRAIN. THE PROPOSED PEAK FLOW RATE IS THE REDUCED RATE GENERATED AFTER INFILTRATION.)

NOTE: EXHIBIT SHOWS DRAINAGE PATTERNS IN THE EXISTING CONDITION ONLY



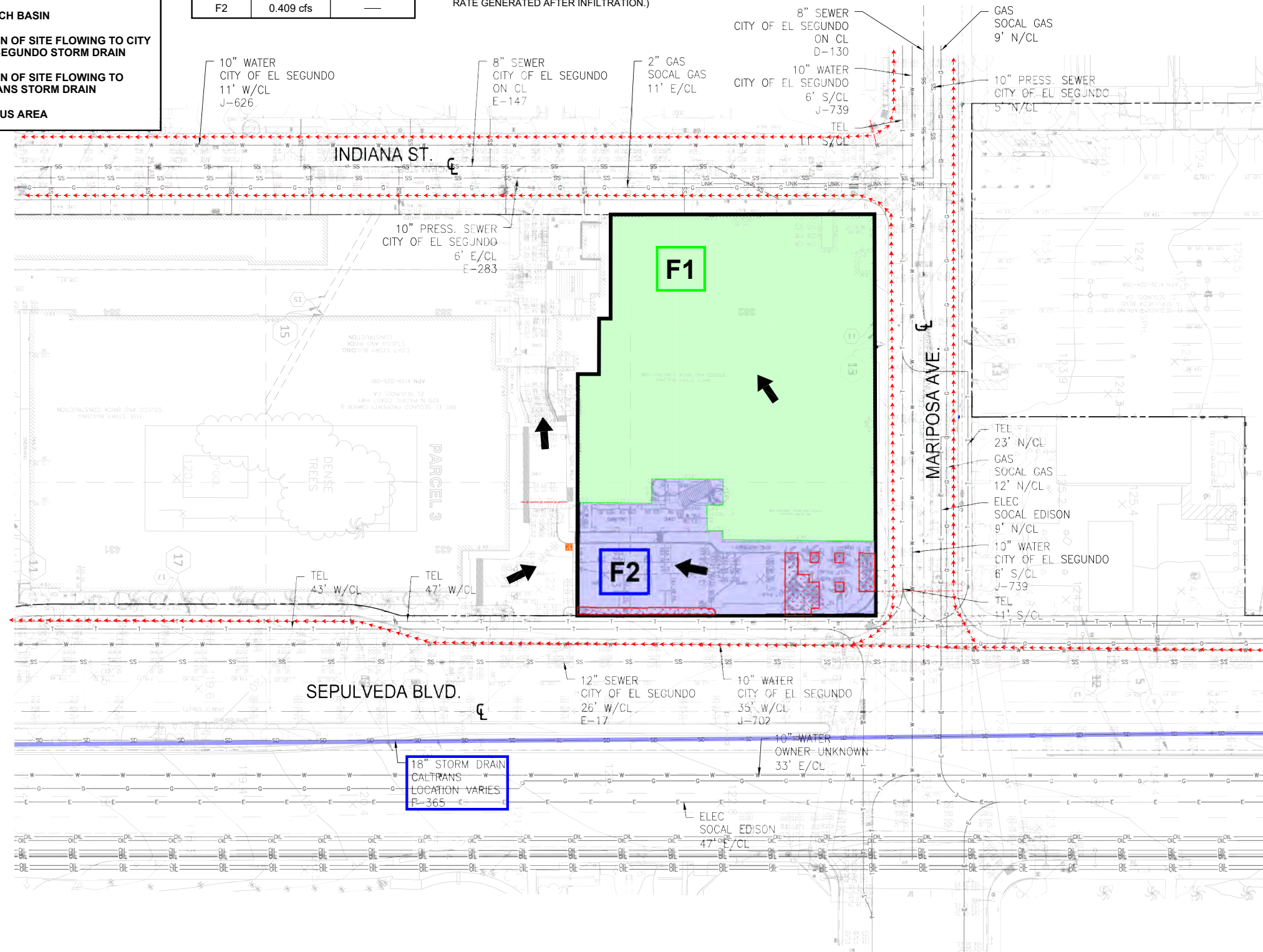
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LEGEND

- ← DIRECTION OF FLOW ONSITE
- DIRECTION OF FLOW OFFSITE
- ▣ (E) CATCH BASIN
- ▭ PORTION OF SITE FLOWING TO CITY OF EL SEGUNDO STORM DRAIN
- ▭ PORTION OF SITE FLOWING TO CALTRANS STORM DRAIN
- ▨ PERVIOUS AREA

PEAK FLOW RATE OF 25-YEAR STORM		
AREA	EXISTING	PROPOSED
F1	1.395 cfs	1.286 cfs
F2	0.409 cfs	—

(ALL STORMWATER OVERFLOW IN THE PROPOSED CONDITION WILL BE CONVEYED INTO THE CITY OF EL SEGUNDO STORM DRAIN. THE PROPOSED PEAK FLOW RATE IS THE REDUCED RATE GENERATED AFTER INFILTRATION.)

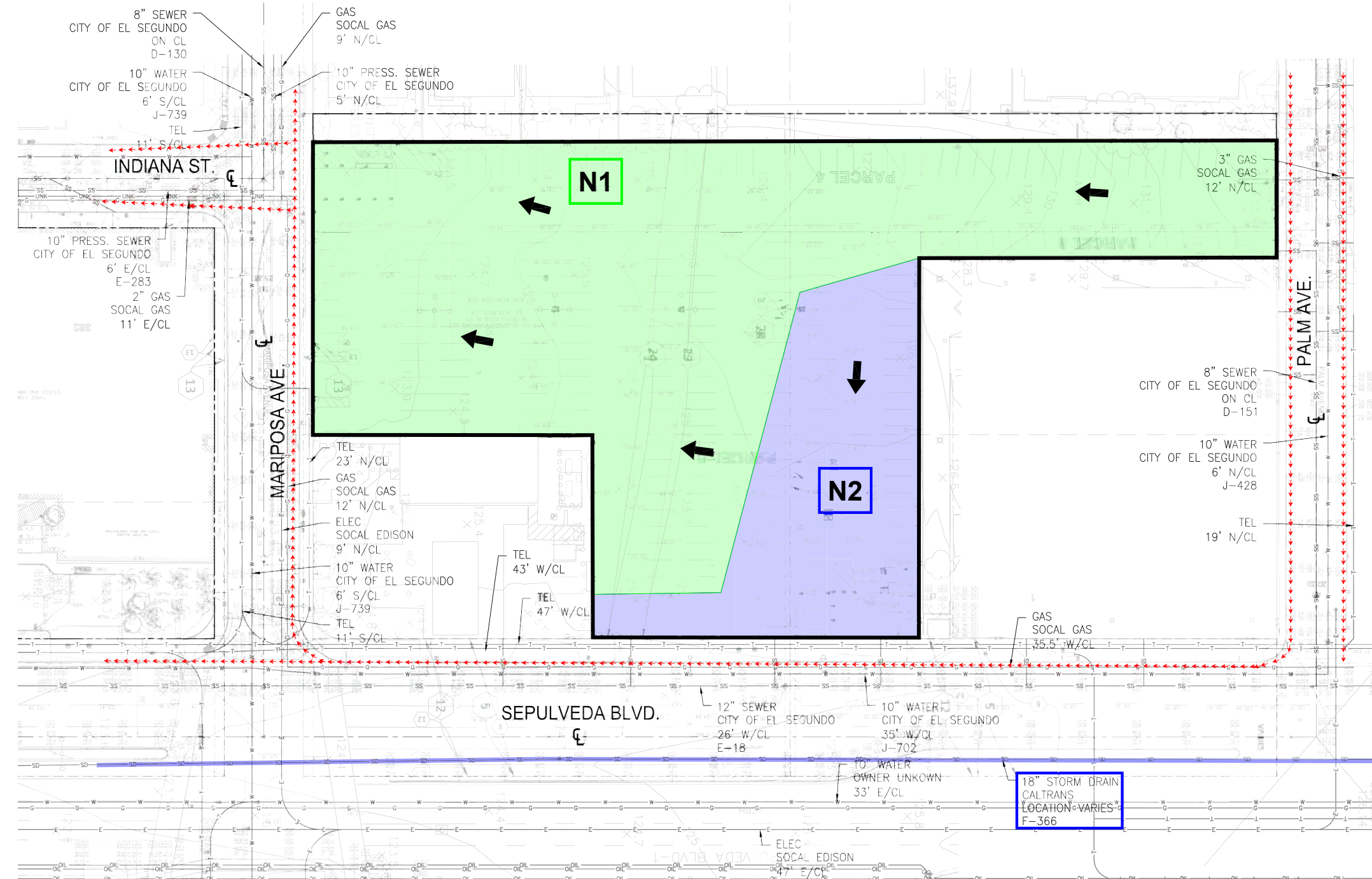


NOTE: EXHIBIT SHOWS DRAINAGE PATTERNS IN THE EXISTING CONDITION ONLY



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NOTE: EXHIBIT SHOWS DRAINAGE PATTERNS IN THE EXISTING CONDITION ONLY



LEGEND

- ← DIRECTION OF FLOW ONSITE
- DIRECTION OF FLOW OFFSITE
- (E) CATCH BASIN
- PORTION OF SITE FLOWING TO CITY OF EL SEGUNDO STORM DRAIN
- PORTION OF SITE FLOWING TO CALTRANS STORM DRAIN
- PERVIOUS AREA

PEAK FLOW RATE OF 25-YEAR STORM		
AREA	EXISTING	PROPOSED
N1	2.815 cfs	2.625 cfs
N2	0.914 cfs	—

(ALL STORMWATER OVERFLOW IN THE PROPOSED CONDITION WILL BE CONVEYED INTO THE CITY OF EL SEGUNDO STORM DRAIN. THE PROPOSED PEAK FLOW RATE IS THE REDUCED RATE GENERATED AFTER INFILTRATION.)



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SOURCE: WRD

FIGURE 4.8-5

West Coast Barrier Project

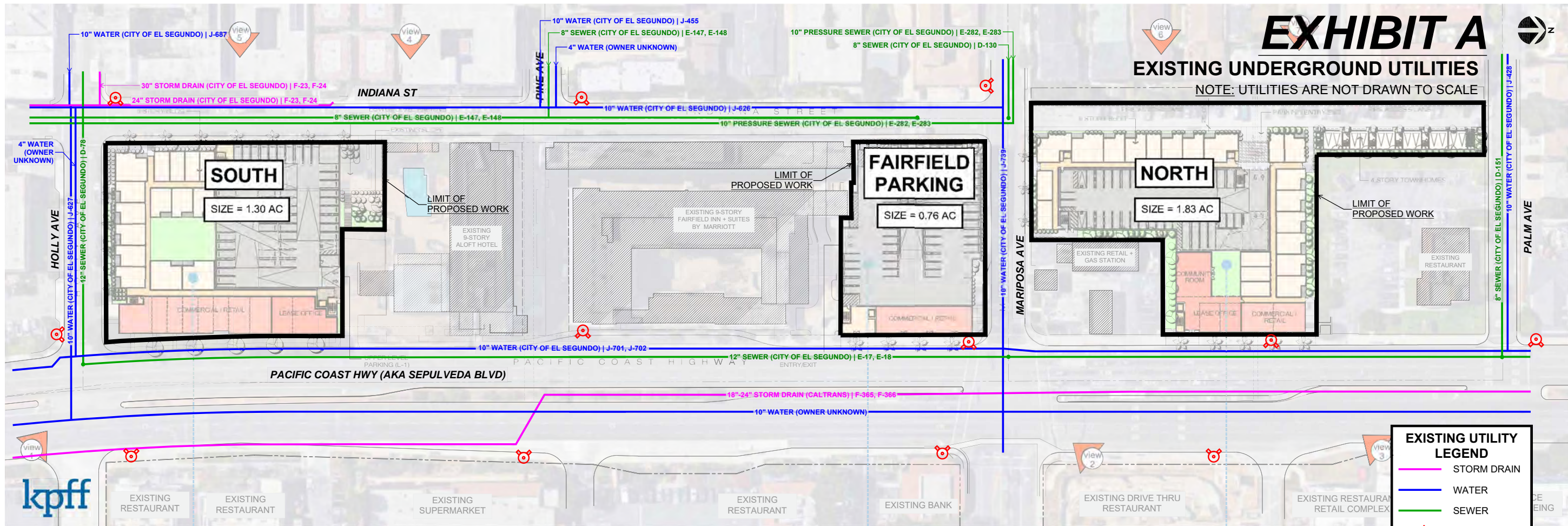
Pacific Coast Commons Specific Plan EIR Project

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EXHIBIT A

EXISTING UNDERGROUND UTILITIES

NOTE: UTILITIES ARE NOT DRAWN TO SCALE



EXISTING UTILITY LEGEND

- STORM DRAIN
- WATER
- SEWER
- FIRE HYDRANT

PACIFIC COAST COMMONS - SOUTH

PROJECT INFORMATION					
DESCRIPTION	5 STORIES TYPE III-A (SPRINKLERED) RESIDENTIAL (R-2) WITH COMMERCIAL (M) ON GROUND FLOOR WRAP AROUND 6-STORIES TYPE I-A PARKING STRUCTURE (S-2)				
ADDRESS	PACIFIC COAST HWY AND HOLLY AVENUE EL SEGUNDO, CA				
ZONING	PROPOSED MIXED USE				
SITE SUMMARY					
LAND AREA	1.27 AC				
DENSITY	120 UNITS				
FAR	2.54				
GROSS BUILDING AREA	141,136 SF				
BUILDING FOOTPRINT	48,279 SF				
BUILDING HEIGHT	66'-0"				
NUMBER OF FLOORS	6				
COMMERCIAL AREA	6,200 SF				
RESIDENTIAL UNIT SUMMARY					
PLAN	DESCRIPTION	QNTY	UNIT MIX	UNIT FLR AREA	AVG AREA
S-1	STUDIO	24	37%	485	548
S-2	STUDIO	20		623	
A-1	1 BEDROOM	40	43%	668	700
A-2	1 BEDROOM	12		805	
B-1	2 BEDROOM	10	20%	982	995
B-3	2 BEDROOM	10		982	
B-4	2 BEDROOM	4		1,057	
		120			

PARKING SUMMARY	
HOTEL PARKING REPLACEMENT	126
RESIDENTIAL PARKING REQUIREMENT	
STUDIO	44
1 BEDRM	78
2 BEDRM	48
	170
GUEST PARKING	40
RETAIL PARKING REQUIREMENT (WILL BE SHARED WITH HOTEL GUEST PARKING)	SHARED
TOTAL PARKING REQUIREMENT	336
TOTAL PARKING PROVIDED INSIDE PARKING STRUCTURE	
LEVEL L-6	36
LEVEL L-5	47
LEVEL L-4	47
LEVEL L-3	47
LEVEL L-2	47
LEVEL L-1	36
BASEMENT B-1	46
BASEMENT B-2	30
	336

PACIFIC COAST COMMONS - FAIRFIELD PARKING

PROJECT INFORMATION	
DESCRIPTION	4 STORIES TYPE I-A PARKING STRUCTURE (S-2) WITH COMMERCIAL (M) ON GROUND FLOOR
ADDRESS	PACIFIC COAST HWY AND MARIPOSA AVENUE EL SEGUNDO, CA
ZONING	PROPOSED MIXED USE
SITE SUMMARY	
LAND AREA	0.72 AC
FAR	0.13
GROSS BUILDING AREA	4,004 SF
BUILDING FOOTPRINT	28,985 SF
BUILDING HEIGHT	43'-0"
NUMBER OF FLOORS	5
COMMERCIAL AREA	2,800 SF
PARKING SUMMARY	
HOTEL PARKING REPLACEMENT	180
RETAIL PARKING REQUIREMENT	SHARED
TOTAL PARKING REQUIREMENT	180
TOTAL PARKING PROVIDED INSIDE PARKING STRUCTURE	
LEVEL L-5	20
LEVEL L-4	42
LEVEL L-3	42
LEVEL L-2	42
LEVEL L-1	34
	180

PACIFIC COAST COMMONS - NORTH

PROJECT INFORMATION					
DESCRIPTION	5 STORIES TYPE III-A (SPRINKLERED) RESIDENTIAL (R-2) WITH COMMERCIAL (M) ON GROUND FLOOR WRAP AROUND 6-STORIES TYPE I-A PARKING STRUCTURE (S-2)				
ADDRESS	PACIFIC COAST HWY AND PALM AVENUE EL SEGUNDO, CA				
ZONING	PROPOSED MIXED USE				
SITE SUMMARY					
LAND AREA	1.85 AC				
DENSITY	143 UNITS				
FAR	2.08				
GROSS BUILDING AREA	168,126 SF				
BUILDING FOOTPRINT	47,423 SF				
BUILDING HEIGHT	66'-0"				
NUMBER OF FLOORS	6				
COMMERCIAL AREA	2,000 SF				
RESIDENTIAL UNIT SUMMARY					
PLAN	DESCRIPTION	QNTY	UNIT MIX	UNIT FLR AREA	AVERAGE
S-1	STUDIO	15	34%	541	597
S-5	STUDIO	32		623	
A-1	1 BEDROOM	63	49%	668	668
A-2	1 BEDROOM	4		668	
B-1	2 BEDROOM	13	17%	1,033	1,011
B-4	2 BEDROOM	10		982	
		137			
TH-1	TOWNHOUSE	5		1,324	
TH-2	TOWNHOUSE	1		1,487	
		6			
TOTAL UNITS		143			

PARKING SUMMARY	
RESIDENTIAL PARKING REQUIREMENT	
STUDIO	47
1 BEDROOM	101
2 BEDROOM	46
	194
GUEST PARKING	46
RETAIL PARKING REQUIREMENT (WILL BE SHARED WITH RESIDENTIAL PARKING)	SHARED
TOTAL PARKING REQUIREMENT	240
TOTAL PARKING PROVIDED INSIDE PARKING STRUCTURE	
LEVEL L-6	42
LEVEL L-5	39
LEVEL L-4	39
LEVEL L-3	39
LEVEL L-2	39
LEVEL L-1	42
	240

MASTER SITE PLAN

SOURCE: KPFF 2020

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4.9 Land Use and Planning

This section describes the existing land use and planning conditions of the Pacific Coast Commons Specific Plan Project (Specific Plan or 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 Plan (RTP/SCS; Connect SoCal), the City of El Segundo General Plan, and the City of El Segundo Municipal Code (ESMC). The proposed Project’s Specific Plan is included for reference:

Appendix B Pacific Coast Commons Specific Plan No. SP 19-01

Other sources consulted are listed in Section 4.9.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

4.9.1 Existing Conditions

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 Sepulveda Boulevard 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 (City of El Segundo 1992).

Existing Project Site Conditions

The approximately 6.385-acre Project site consists of eight parcels located in the central portion of the City of El Segundo. Specifically, the Project site is bound by Palm Avenue on the north, PCH on the east, Holly Avenue on the south, and Indiana Street on the west. Mariposa Avenue bisects the Pacific Coast Commons (PCC) Project site, separating the Fairfield Parking subarea and PCC-North subarea. Figure 2-1, Regional Location and Vicinity Map, included in Chapter 2, Environmental Setting, of this Draft EIR, provides the Project boundaries in the context of the surrounding community and jurisdictions.

Figure 2-3, General Plan Designation, and Figure 2-4, Zoning, included in Chapter 2, Environmental Setting, of this Draft EIR, show the Project site's current general plan designations and zoning, respectively. As shown in Figure 2-3, the City's General Plan identifies the portion of the site that is south of Mariposa Avenue as General Commercial and the portion to the north of Mariposa Avenue as Parking. According to the City's General Plan, the General Commercial designation permits all retail uses, including hotel uses, at a maximum floor area ratio (FAR) of 1.0. Office uses are not permitted except for those providing personal services not exceeding 5,000 square feet, such as travel and insurance agents (City of El Segundo 1992). The City's General Plan Parking designation permits areas for parking automobiles, motorcycles, and bicycles in surface or structured parking (City of El Segundo 1992). As shown in Figure 2-4, the zoning for the Project is General Commercial (C-3) and Automobile Parking (P), which corresponds to the General Plan land use designations.

The Aloft Hotel is 98,741 net square feet in size with an existing 0.992 FAR based upon its current lot size and configuration where a maximum of 1.0 FAR is allowed. The three buildings that comprise the Fairfield Inn and Suites Hotel total 190,026 net square feet in size with an existing 1.94 FAR where 1.0 FAR is allowed (existing legal, non-conforming condition). While hotel uses are allowed in the existing General Commercial (C-3) Zone, and the Fairfield Inn and Suites and the Aloft Hotels both have existing Conditional Use Permits, the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. Under the existing General Commercial (C-3) development standards, no additional development could occur as the existing hotels use the maximum FAR allowed. Further, the parking lot to the north is currently zoned Automobile Parking (P) Zone which only allows surface parking lots and parking structures and has no FAR standard.

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. Figure 2-2, Surrounding and Nearby Land Uses, in Chapter 2 of this Draft EIR, provides an overview of nearby land uses. The Chevron Refinery occupies approximately one-third of the City and is adjacent to the beach, along with other industrial land uses. The Project site is surrounded by a variety of land uses, including residential, recreational, office, and commercial retail uses.

- Land Uses to the North: North of the Project site across Palm Avenue are commercial uses along the east and west sides of PCH; Washington Park, and multi-family residential uses located between commercial and recreational uses. Farther to the north is Interstate 105 and Los Angeles International Airport in the City of Los Angeles. Multi-Family Residential (R-3) Zone and the General Commercial (C-3) Zone are located adjacent to the Project site. Open Space (O-S) Zone is designated to the northwest of the Project site and Corporate Office (CO) Zone is designated to the northeast.
- Land Uses to the East: The Project site is bordered by PCH to the east. Retail, restaurant, grocery, banking, and office land uses, accompanied by surface parking lots within strip-mall shopping centers, are located across PCH to the east. Farther east are numerous corporate offices and associated surface parking lots. The northernmost parcels within the Project site area are adjacent to two developed parcels that include a gas station and a fast food restaurant. Properties to the east of the Project site are zoned C-3 and CO.
- Land Uses to the South: Retail and restaurant uses are located immediately south of the Project site across Holly Avenue. Farther to the south and southeast is the Raytheon Space Systems campus, the Lakes at El Segundo golf course, and the West Basin Municipal Water District campus. The Smoky Hollow Specific Plan

industrial area is located southwest of the Project site. The C-3 Zone is located adjacent to the Project site to the south. Properties located to the southeast and southwest of the Project site are zoned CO and Smoky Hollow Specific Plan (SH), respectively.

- Land Uses to the West: Multi-family residential uses border the Project site west of Indiana Avenue. The linear Washington Park (including the Southern California Edison transmission line easement) is located further west of these residential uses, followed by a large single-family residential community with various schools, community parks, and churches. The Chevron Refinery is approximately 0.4 miles southwest of the Project site. The Hyperion Water Reclamation Plant and Scattergood Generating Station, and the Pacific Ocean, are approximately 2 miles west of the Project site. Properties located adjacent to the Project site to the west are zoned R-3.

4.9.2 Relevant Plans, Policies, and Ordinances

Federal

There are no federal plans, policies, or ordinances applicable to the land use considerations of the proposed Project.

State

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.

Senate Bill 375

The adoption of California's Sustainable Communities and Climate Protection Act Senate Bill (SB) 375 (Steinberg, Chapter 728, Statutes of 2008) on September 30, 2008, aligns with the goals of regional transportation planning efforts, regional greenhouse gas (GHG) reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations, such as SCAG, to adopt an SCS or Alternative Planning Strategy within their regional transportation plan to demonstrate achievement of GHG reduction targets. In compliance with SB 375, SCAG has adopted an SCS that covers all of the City of El Segundo, as well as other cities and counties.

Regional and Local

Regional Transportation Plan/Sustainable Communities Strategy

SCAG is the designated Metropolitan Planning Organizations 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 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 vehicle miles traveled, congestion, and GHG 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 GHG emissions. Overall, the strategies and policies in the RTP/SCS are projected to exceed the GHG emission-reduction targets set forth by the California Air Resources Board under SB 375 (SCAG 2016).

The Proposed Final 2020–2045 RTP/SCS (also referred to as Connect SoCal) was made available in March 2020. The RTP/SCS presents the land use and transportation vision for the SCAG region through 2045. 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 (SCAG 2020a). In May 2020 the Regional Council approved 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 Regional Council formally adopted Connect SoCal and the addendum to the Connect SoCal Program EIR (SCAG 2020b).

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 January 1, 2014, to October 31, 2021. SCAG’s allocation for El Segundo is 69 units. The 69 housing units for El Segundo are out of the anticipated total regional construction need of 401,645 units (7,233 of which are in the South Bay Cities in the SCAG region). The allocation of 69 units for El Segundo is broken down into the four categories as follows: 18 very low-income households, 11 low income

households, 12 moderate income households, and 28 above moderate-income households (City of El Segundo 2014). See Section 4.11, 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 1,341,827 units for the 6th cycle RHNA on October 15, 2019. The SCAG Regional Council is undergoing an update to the methodology of the housing unit allocation per jurisdiction. Following the formal distribution of draft RHNA allocations based on the Final RHNA methodology and a separate appeals phase described in Government Code 65584.05 et seq., approval of the Final RHNA allocation is scheduled for February 2021. Based on SCAG's determination of existing need and projected needs, which considers anticipated vacancies and projected household growth, the draft RHNA allocation to the City includes 189 very low-income units, 88 low income units, 83 moderate income units, and 131 above moderate units (SCAG 2020c). For the purposes of this section of the Draft EIR, the impact analysis will focus on the existing RHNA allocation for the City of El Segundo.

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.

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 (City of El Segundo 1992).

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 development, the physical organization of the City, and can enhance or limit the social and economic activity within the City (City of El Segundo 1992).

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 (City of El Segundo 1992).

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 (City of El Segundo 2014).

This Housing Element covers the Planning Period from October 2013 to October 2021, 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 2013–2021 cycle was adopted by the City Council in January 2014. See Section 4.14, Population and Housing, of this EIR for more discussion.

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, beautification, and maintenance of the small town atmosphere and quality of life in the community (City of El Segundo 1992).

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 (City of El Segundo 1992).

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 (City of El Segundo 1992).

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 aid in defining acceptable land uses and as a guideline for compliance with California Noise Insulation Standards (City of El Segundo 1992).

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 (City of El Segundo 1992).

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.

City of El Segundo Municipal Code

Title 14, Subdivision Regulations

Title 14 of the ESMC provides procedures for the approval of a tentative map that provides vested rights to the applicant. When a tentative map is required, the applicant may file a vesting tentative map instead. The approval of a vesting tentative map confirms that the proposed development has the right to proceed with a development that is in substantial compliance with City’s ordinances, policies, and standards, effective the date the City determine the application complete. The vesting tentative map can be amended with approval from the City’s Planning Commission. The right to proceed with development continues for one year following the recordation of the final map. The one-year timeframe may be extended through an additional application process.

Title 15, Zoning Regulations

Title 15 of the 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.

Amendments to the Zoning Code

Whenever the owner of any land or building desires such an amendment, the owner shall file an application with the Department of Planning and Building Safety. Upon filing of a verified application or upon the adoption of a motion by the City Council, the Planning Commission shall hold a public hearing as provided in Chapter 27 of Title 15. The Planning Commission then announces its findings by formal resolution not more than 40 calendar days following the hearing, and make the approval or denial of the application (ESMC Section 15-26-4). When the Planning Commission's action is to recommend the adoption of the amendment to the City Council, the Planning Commission shall notify the applicant (ESMC Section 15-26-5). Within 40 calendar days following receipt of the resolution from the Planning Commission recommending action on a public hearing item, the City Council shall conduct a duly advertised public hearing on the matter, public notice of which shall be given as provided in Chapter 27 of Title 15 (ESMC Section 15-26-6). The City Council shall announce its decision by resolution not more than 40 calendar days following the receipt of the report from the Planning Commission. Following the adoption by the City Council of a resolution ordering action on an amendment to Title 15, precise plan modification, or denying an application or recommendation for an amendment, or precise plan modification, one copy of the resolution shall be forwarded to the applicant at the address shown upon the application, and one copy shall be attached to the file (ESMC Section 15-26-8).

Proposed PCC Specific Plan

Design Guidelines

The proposed Specific Plan has created design guidelines to govern new construction within the Project site. The design guidelines establish criteria to enhance the coordination, organization, function, and identify of the site, while maintaining compatible relationship with the surrounding development. The criteria for these guidelines are summarized as follows:

- **Site Planning:** This guideline identifies the arrangement of new buildings and accessory buildings with attention to adjacent uses.
- **Access and Parking:** This guideline identifies features that should be visible on entry driveways and other access points and provides guidance on surface parking lot design.
- **Architecture/Orientation/Massing:** This guideline encourages compatibility of new constructed buildings with surrounding development and those within the Specific Plan.
- **Color and Materials:** This guideline refers to colors and types of building materials to be use within the Specific Plan.
- **Screening and Mechanical Equipment:** This guideline promotes screening facilities and other mechanical equipment from public view.

- **Parking Structure:** This guideline encourages design of parking garages that reduces scale, provides security, and screens vehicles and light sources from public view.
- **Landscaping:** This guideline provides general considerations for placement of landscaping throughout the Project site.
- **Walls and Fences:** This guideline identifies wall and fencing materials, compatibility, and screening.
- **Lighting Design:** This guideline ensures lighting prevents glare onto adjacent residential properties and that lighting is at appropriate scale.
- **Signage:** This guideline identifies character of signage, contribution of signage to the Project, and scale of signage.

Development Standards

The proposed Specific Plan sets forth development standards intended to supplement the existing General Plan and ESMC. Where this Specific Plan is inconsistent with the ESMC, the Specific Plan prevails. Where this Specific Plan does not specifically regulate, development must comply with the standards and requirements set forth in the ESMC. The development standards govern permitted uses, development standards, circulation, parking and loading, landscaping, common recreation facilities/open space and private open space, public safety, signage, sustainability, enclosed and unenclosed uses, and non-conforming uses and buildings. Each of these regulations is briefly summarized as follows:

- **Permitted Uses:** This standard governs the uses which are permitted, conditionally permitted, permitted as an accessory use, administratively permitted, or not permitted by the Specific Plan.
- **Development Standards:** These include specific standards to govern allowable lot area, building and structure height, setback distance, minimum lot frontage, maximum residential density, maximum floor area, walls and fences permitted, and accessory structures permitted.
- **Circulation:** This standard identifies the way in which public streets must be designed and constructed, and identifies proposed improvements for the Specific Plan related to circulation,
- **Parking and Loading:** This standard provides for the minimum number of parking spaces and loading spaces required for uses in the Specific Plan.
- **Landscaping:** This standard is included to ensure adequate landscaping area and permanent maintenance for the Specific Plan area. It addresses standards for all landscaping, building perimeter landscaping, property perimeter landscaping, vehicular use areas, and minimum sizes for plant material.
- **Common Recreation Facilities/Open Space and Private Open Space:** This standard identifies common recreation facilities/open space and private open space requirements for each of the proposed land use districts.
- **Public Safety:** This standard incorporates strategies, such as ensuring adequate lighting, compliance with fire and police regulations, and street lighting, to ensure the safety of residents, employees, and visitors, within the Specific Plan area.
- **Signage:** This standard sets forth permitted and not permitted signage types within the Specific Plan area, and requires a Master Sign Program for each land use district.
- **Sustainability:** This standard identifies development requirements related to energy efficiency requirements, bicycle parking, lighting efficiency, utilization of low-emitting building materials, roof structure, and reclaimed water.
- **Enclosed and Unenclosed Uses:** This standard governs which uses are required to be within an enclosed building and the exceptions.

- **Non-Conforming Uses and Buildings:** This standard allows for any uses that became non-conforming at the time of the adoption of the Specific Plan to be permitted to remain.

Administration

The development standards previously presented 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. Major modifications to the Specific Plan require an amendment to the Specific Plan as written at the time of building permit application submittal and approval. Minor modifications may be granted without an amendment. The development of a Project that is in conformance with the Specific Plan shall undergo a Site Plan Review and file an application with the Department of Planning and Building Safety. The Director of Development Services may extend approval of the Site Plan up to 2 years, and may approve minor changes in the Site Plan. In accordance with the Government Code Sections 65450–65457, Specific Plans must be prepared, adopted, and amended in the same manner as General Plans except that Specific Plans may be adopted by resolution or by ordinance. 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.

4.9.3 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:

- a) Physically divide an established community.
- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.9.4 Impacts Analysis

Threshold 4.9a Would the project physically divide an established 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.

The Project site consists of two existing hotel properties and three development areas: (1) PCC-South, (2) PCC-Fairfield Parking, and (3) PCC-North. Access to the Project site is generally provided by PCH on the east, Holly Avenue on the south, Indiana Street on the west, and Palm Avenue on the north. Mariposa Avenue bisects the Project site from east to west.

Specifically, the PCC-South portion of the Project site is located on the southernmost parcel with frontage on PCH, Holly Avenue, and Indiana Street. The Aloft Hotel portion of the Project site fronts PCH and Indiana Street, and is a through lot. The Fairfield Inn and Suites Hotel and the PCC-Fairfield Parking portion of the Project site, which is currently developed with the Fairfield Inn and Suites Hotel Food Beverage Building (formerly the Hacienda Restaurant), is accessible via one driveway on PCH, which continues through to Indiana Street. The PCC-North portion of the Project site is the surface parking area for the Fairfield Inn and Suites Hotel north of Mariposa Avenue.

Access for residential and commercial uses at PCC-North (full access in/out) provided via Mariposa Avenue and Palm Avenue into a private driveway. The proposed Project involves the implementation of the proposed Specific Plan, which would redevelop the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the old Hacienda Restaurant, through the adoption of a Specific Plan that allows for the development of 263 new housing units and approximately 11,252 square feet of commercial/retail uses.

Under the existing condition, the Project site is developed land and is not used as a connection or thoroughfare between established communities. Instead, connectivity within the area surrounding the Project site is facilitated via local roadways. The proposed Project would not result in the construction of new driveways; rather, the Project would allow for access via existing driveways on PCH and Indiana Street, as shown on Figure 4.13-5, Project Site Access in Section 4.13, Transportation. Further, the eastbound lane of Mariposa Avenue at PCH would be reconfigured as a part of the proposed Project, from one left lane and one through-right lane to one left, one through, and one right-turn lane. Therefore, the Project does not include the construction of a new roadway, which would impair mobility within the existing Project site or the surrounding area. Rather, the Project would increase access at existing driveways and provide improved level of service at Mariposa Avenue and PCH through improvements at Mariposa Avenue (see Section 4.13, Transportation, for further details). As such, the Project would not impede movement within the Project site, within an established community, or from one established community to another. In addition, as detailed in Chapter 3, Project Description, of this Draft EIR, the Project has specific objectives which focus on access and mobility: Enhance vehicular circulation through intersection improvements and street widening.

Therefore, impacts associated with the division of an established community would be less than significant. No mitigation is required.

Threshold 4.9b 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 proposed 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

Consistency with the Connect SoCal (SCAG 2020–2045 RTP/SCS)

The proposed Project's consistency with 2020–2045 RTP/SCS Goals, as included in Table 4.6-6, Project Consistency with the Connect SoCal (SCAG 2020-2045 RTP/SCS) in Section 4.6, Greenhouse Gas Emissions of this Draft EIR, demonstrates that the proposed Project would not conflict with the applicable goals in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

As summarized in Table 4.6-6, the Project would redevelop the Project site's existing conditions and would produce approximately 56 new employees within the Specific Plan area within the City of El Segundo (see Section 4.11, Population and Housing, of this Draft EIR). In addition, the Project site's vicinity is served by existing public transit such as various bus routes (Metro Line 232, Metro Line 625, Beach Cities Line 109, Los Angeles Department of

Transportation [LADOT] Commuter Express 438, and LADOT Commuter Express 574) as well as the Metro C Line. The Metro C Line is a light rail line, which runs between Redondo Beach and Norwalk. The nearest station is the Mariposa Station, which is just over 0.5-mile from the Project site. The Project site 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 Table 4.6-6, the Project would not conflict with the applicable goals in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

City of El Segundo General Plan Consistency

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 Project site. By functioning as a regulatory document, the Pacific Coast Commons Specific Plan 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 (Appendix B). See “Proposed PCC Specific Plan” in Section 4.9.2, Relevant Plans, Policies, and Ordinances, for a further discussion on development standards and administrative authorities of the Specific Plan.

Table 4.9-1 outlines the applicable policies identified in the Land Use Element of the General Plan and the proposed Specific Plan’s consistency with each of these policies. As shown below, the Specific Plan would be consistent with applicable goals 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 4.9-1. General Plan Consistency Analysis

Goal/Policy	Analysis
Land Use Element	
<p>Goal LU1: Maintain El Segundo’s “small town” atmosphere, and provide an attractive place to live and work.</p>	<p>Consistent. The Specific Plan includes design guidelines and development standards for the purpose of providing high-quality residential and commercial development within the Specific Plan area; and thus, providing an attractive place to live and work. The Specific Plan would allow increased density and intensification of use of the Project site; however, the proposed Project would increase development density in a location that is along a major corridor (Pacific Coast Highway [PCH]), in proximity to the City’s employment opportunities, and would bring currently non-conforming uses into conformance with the City’s General Plan. The proposed Project would not encroach into existing single-family neighborhoods, alter any residential land uses, or otherwise disrupt the existing community’s atmosphere. The proposed Project seeks to create new housing opportunities within the City through a mixed-use development with 263 new housing units and 11,252 square feet of commercial/retail uses. 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. Thus, the Project would be designed to enhance the City and provide an attractive place to work and live.</p>

Table 4.9-1. General Plan Consistency Analysis

Goal/Policy	Analysis
<p>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.</p>	<p>Consistent. As previously addressed under Goal LU1, the proposed Project would increase the height and density; however, the proposed Project does not encroach into existing residential areas and thus, would preserve and maintain the City's low medium-density nature in residentially zoned areas. The Specific Plan describes the development standards for lot area, height, setbacks, lot frontage, building area, floor area, walls and fences, and accessory structures.</p>
<p>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.</p>	<p>Consistent. The Project would redevelop the existing surface parking lots of the Fairfield Inn & Suites and Aloft Hotel properties, as well as the old Hacienda Restaurant, through the adoption of a Specific Plan that allows for the development of 263 new housing units and approximately 11,252 square feet of commercial/retail uses. As previously mentioned, the commercial uses will provide needed amenities for the residents of the multi-family residential uses and the multi-family residential uses will support the growth of the surrounding commercial businesses. The proposed Project would add decorative pavement treatments at the apron of driveways to improve visual interest to pedestrians or those interacting with the Project site at the street level. The design guidelines are provided in the Specific Plan to promote the quality of design planned for this Project. The design guidelines described in the Specific Plan establish criteria that enhance the coordination, organization, function and identity of the Project site, while maintaining a compatible relationship with the surrounding development. Thus, aesthetics, zoning, and amenities are considered in the proposed Project.</p>
<p>Objective LU1-5: Recognize the City as a comprehensive whole and create policies, design standards, and monumentation that will help create a sense of place for the entire City.</p>	<p>Consistent. The Specific Plan recognizes the distinctive areas of the City and provides a connection between the City's residential base to the west and the employment opportunities to the east of PCH (aka Sepulveda Boulevard). Upon approval of the discretionary actions with the City of El Segundo, the proposed Project would become the governing plan for the Specific Plan area. The proposed Specific Plan includes objectives and design guidelines, which are a part of the zoning regulations, upon approval of the Specific Plan. The Specific Plan would undergo review from the City's staff and Planning Commission to ensure that the Specific Plan is consistent with all applicable goals and policies within the General Plan and would not alter the City's ability to create a sense of place for the entire City.</p>
<p>Policy LU1-5.8: Innovative land development and design techniques as well as new materials and construction methods should be encouraged.</p>	<p>Consistent. The Specific Plan itself would allow for innovative land development by redeveloping existing surface parking lots for the Fairfield Inn and Suites Hotel and Aloft Hotel properties to allow for the development of 263 residential units and approximately 11,252 square feet of commercial uses.</p>
<p>Goal LU3: Promote the health, safety, and well-being of the people of El Segundo by adopting standards for the proper balance, relationship, and distribution of the residential land uses.</p>	<p>Consistent. The Specific Plan includes land use designations which would allow for a mix of residential and commercial uses on the Project site. Implementation of the proposed Project through the Specific Plan would continue to promote standards for the proper balance, relationship, and distribution of residential land uses. The proposed Project would be designed to promote a proper balance of land uses by placing the Project's commercial uses along PCH, fronting other commercial uses, and would place the residential uses to the west, adjacent to existing residential uses.</p>
<p>Objective LU3-1: Preserve, protect, and extend, if possible, existing Single-Family Residential uses.</p>	<p>Consistent. The proposed Project includes the approval of a General Plan Amendment which would change the land use designation of the Project site from "General Commercial" and "Parking" to "Specific Plan." Therefore, the Project would preserve and protect single-family residential uses by allowing multi-family residential uses away from single-family residential areas.</p>

Table 4.9-1. General Plan Consistency Analysis

Goal/Policy	Analysis
<p>Policy LU3-2.1: Promote construction of high quality Multi-Family Residential development with ample open space, leisure and recreational facilities.</p>	<p>Consistent. The proposed Project would be developed in accordance with the Specific Plan’s design guidelines which are provided to promote the quality of design with objectives such as to provide for high-quality residential and commercial development and ensure functional pedestrian, bicycle, and motor vehicle circulation within the Project and convenient pedestrian and bicycle linkages to and from adjacent residential and commercial areas and schools. In addition, common recreation facilities and private outdoor space are required for multiple-family residential uses in the Pacific Coast Commons (PCC) Mixed-Use 1 and PCC Mixed-Use 2 land use districts of the Specific Plan. Specific Plan open space development is discussed in the analysis of Objective LU3-31 below.</p>
<p>Policy LU3-2.2: Multi-family development will be located only in appropriate places and evaluated carefully to ensure that these developments are not detrimental to the existing single-family character.</p>	<p>Consistent. The proposed Project includes the approval of a General Plan Amendment which would change the land use designation of the Project site from “General Commercial” and “Parking” to “Specific Plan.” As such, the amendment to the General Plan would not be detrimental to the existing single-family character by not developing non-single family uses within such a designated use. In addition, the introduction of multi-family residential land uses would be adjacent to existing multi-family residential development and the Project’s commercial uses would be along PCH. Therefore, the Project would be appropriately located and would not impact single-family neighborhoods.</p>
<p>Objective LU3-3.1: Adopt and enforce recreational area requirements for large multiple unit developments.</p>	<p>Consistent. The Specific Plan includes the development of open space in PCC-South and PCC-North. In PCC-South, open space is planned for a total of 17,512 square feet. This includes 11,852 square feet of common open space area, including courtyards, community amenities on the 6th floor, and the roof-deck swimming pool amenity, and a total of 5,660 square feet of private open space (balconies) in the residential units. The PCC-North includes a total of 17,932 square feet of open space. This includes 11,357 square feet of common open space area, including courtyards, community amenities on the 6th floor, and the roof-deck swimming pool amenity, and a total of 6,575 square feet of private open space (balconies) in the residential units. Therefore, the Project would be consistent with this land use objective.</p>
<p>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.</p>	<p>Consistent. The proposed Project includes specific objectives aligned with the City’s goal to provide a stable tax base such as to provide a new customer tax base for existing businesses in the City by increasing the residential population and to provide fiscal benefits to the City’s general fund by way of increased employment, utility, business license, property, and other tax revenues.</p>
<p>Objective LU4-1: Promote the development of high quality retail facilities in proximity to major employment centers.</p>	<p>Consistent. The proposed Project would involve redevelopment of underutilized areas with 11,252 square feet of commercial/retail. As previously shown on Figure 2-3, Project Site General Plan Designation (see Chapter 2, Environmental Setting), the areas to the east of the Project site are designated General Commercial and Corporate Office. Therefore, the incorporation of new retail at the Project site would align with the City’s objective to promote retail within the proximity of major employment centers.</p>
<p>Policy LU4-1.1: Require landscaping, its maintenance, and permanent upkeep on all new commercial developments.</p>	<p>Consistent. The proposed Project would incorporate landscaped areas around the perimeter of the buildings, and within the required setbacks. As previously described under “Proposed PCC Specific Plan” in Section 4.9.2, Relevant Plans, Policies, and Ordinances, the development standards for the Specific Plan include landscaping standards to ensure adequate landscaping area and permanent maintenance for the Specific Plan area. It addresses standards for all landscaping, building perimeter landscaping, property perimeter landscaping, vehicular use areas, and minimum sizes for plant material. As stated further in</p>

Table 4.9-1. General Plan Consistency Analysis

Goal/Policy	Analysis
	<p>the Specific Plan (Appendix B), a Landscape Master Plan must be prepared for each sub-district of the Specific Plan area to ensure a unified appearance implementing the intent of the Design Guidelines and objectives of the proposed Specific Plan. As such, the Project would be consistent with the land use policy to require landscaping and maintenance on all new commercial development.</p>
<p>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.</p>	<p>Consistent. Implementation of the proposed Project would be built and maintained in accordance with health and safety requirements through the required compliance with the El Segundo Municipal Code (ESMC), the PCC Specific Plan, and ensured by the building permit approval process. As further described in Section 4.5, Geology and Soils, Project construction would be completed in accordance with the California Building Code (CBC). As with all development within the City, 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.</p>
<p>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.</p>	<p>Consistent. The proposed Project would introduce new commercial development to the City. As previously stated, development within the Project site would be required to comply with the seismic safety requirements of the CBC. As further described in Section 4.10, Noise, the Project would require mitigation measures during construction to ensure noise levels do not exceed the City’s hourly threshold of 65 dBA L_{eq} at the existing nearest residential properties to the west. Once operational, the Project would be in compliance with the City’s noise ordinance. With regards to air quality, the proposed Project would not exceed the South Coast Air Quality Management District’s significance thresholds for volatile organic compounds (VOC), nitrous oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), coarse particulate matter (PM₁₀), or fine particulate matter (PM_{2.5}) during construction in all construction years. Additionally, the proposed Project would not result in a cumulatively considerable contribution to the nonattainment pollutants in the South Coast Air Basin (see Section 4.2, Air Quality). Further, Project 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 (see Section 4.8, Hydrology and Water Quality). Implementation of the proposed Project 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.</p>
<p>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.</p>	<p>Consistent. The proposed Project would redevelop underutilized areas and construct a mix of land uses including residential and commercial. Specific Project objectives include creating a walkable community along Pacific Coast Highway. Therefore, the Project would be consistent with the City’s objective.</p>
<p>Policy LU4-4.6: Promote mixed-use development near transit nodes and encourage modes of</p>	<p>Consistent. The proposed Project would redevelop underutilized areas and construct a mix of land uses including residential and commercial. Specific Project objectives include creating a walkable community along PCH. Furthermore, the Project site is just over 0.5-mile from the nearest Metro C Line</p>

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Goal/Policy	Analysis
transportation that do not require an automobile.	station (Mariposa Station), which would encourage alternative modes of transportation to an automobile. Therefore, the Project would be consistent with the City's objective.
Goal LU7: Provide the highest quality public facilities, services, and public infrastructure possible to the community.	Consistent. Implementation of the proposed Project would redevelop existing conditions and provide new residential and commercial uses. The construction and operation of the Project would require the payment of development impact fees which would serve to reduce impacts to public facilities and services. See Section 4.12, Public Services and Recreation, of this EIR for more discussion.
Policy LU7-1.2: No new development shall be allowed unless adequate public facilities are in place or provided for.	Consistent. Implementation of the proposed Project would redevelop the Project site and provide new residential and commercial uses. The construction and operation of the Project would require the payment of development impact fees which would serve to reduce impacts to public facilities and services. Thus, the proposed Project would have less than significant impacts to public facilities within the City, and adequate public facilities would be provided. See Section 4.12, Public Services and Recreation, of this EIR for more discussion. Thus, the Project would be adequately served by public facilities.
Policy LU7-2.3: All new development shall place utilities underground.	Consistent. The proposed Project 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 4.15, Utilities and Service Systems, for further discussion.
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. The proposed Project would improve the level of service at Mariposa Avenue and PCH by reconfiguring the eastbound lane of Mariposa Avenue at PCH, from one left lane and one through-right lane to one left, one through, and one right-turn lane. All new driveways and internal access points would be designed and constructed to ensure appropriate line of sight and appropriate turning radii. As further discussed in Section 4.13, Transportation, the Project would ensure adequate access during both construction and operations. During construction, the Project would implement mitigation measure MM-TRA-1, which requires a Construction Traffic Control Plan, to address pedestrian, bicycle, and vehicular circulation during construction activities. Further, the Project includes objectives such as: Enhance vehicular circulation through intersection improvements and street widening; and Facilitate a safe and walkable community along PCH by providing a mix of land uses, including commercial at the street-level with residential uses above.
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's circulation system.	Not Applicable. The Project would not prevent the City from maintaining and updating the citywide traffic for model.
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 4.13, Transportation, 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.

Table 4.9-1. General Plan Consistency Analysis

Goal/Policy	Analysis
<p>Policy C1-1.8: Provide all residential, commercial, and industrial areas with efficient and safe access to the major regional transportation facilities.</p>	<p>Consistent. As previously discussed under Goal C1, the Project would ensure efficient and safe access around the Project site through construction and operations. Additionally, the Project would improve the level of service at Mariposa Avenue and PCH. Further, the Project includes objectives such as enhance vehicular circulation through intersection improvements and street widening, and facilitate a safe and walkable community along PCH by providing a mix of land uses, including commercial at the street-level with residential uses above.</p>
<p>Policy C1-1.9: Provide all residential, commercial, and industrial areas with efficient and safe access for emergency vehicles.</p>	<p>Consistent. As discussed in Section 4.13, Transportation, construction activities have the potential to temporarily impact emergency vehicle access to the Project site. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, MM-TRA-1 is required. MM-TRA-1 requires preparation of a Construction Traffic Control Plan. With implementation of MM-TRA-1 to address pedestrian, bicycle, and vehicular circulation during construction activities, would reduce potential impacts related to emergency access to less than significant. All areas of the Project site would be accessible to emergency responders for the long-term operation of the proposed Project.</p>
<p>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.</p>	<p>Consistent. Section 4.13, Transportation, of this Draft EIR, include a full evaluation of the potential impacts associated with the new development prior to approval. As discussed, MM-TRA-1 requires preparation of a Construction Traffic Control Plan. Implementation of MM-TRA-1 is required to address pedestrian, bicycle, and vehicular circulation during construction activities, and would reduce potential impacts related to emergency access to less than significant.</p>
<p>Objective C1-3: Ensure that the City's Master Plan Truck Route System efficiently serves the shipping needs of the commercial and industrial land uses in El Segundo while balancing potential conflicts with residential and recreation land uses throughout the City.</p>	<p>Not Applicable. The Project would not prevent the City from ensuring the City's Master Plan Truck Route System efficiently serves the shipping needs of the commercial and industrial land uses in El Segundo while balancing potential conflicts with residential and recreation land uses throughout the City.</p>
<p>Policy C1-3.2: Ensure that the development review process incorporates consideration of off-street commercial loading requirements for all new projects.</p>	<p>Consistent. As discussed in Section 4.9.2, the Specific Plan would incorporate development standards such that would incorporate parking and loading areas (loading/unloading from Indiana Street). The proposed Project would comply with existing requirements through the entitlement process.</p>

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Goal/Policy	Analysis
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 proposed Project is to facilitate a safe and walkable community along PCH by providing a mix of land uses, including commercial at the street level with residential uses above. By locating retail along PCH, the Project would provide the enhanced views at the street-level, when compared to the current surface parking lot and vacant “Food and Beverage” building. Pedestrian and handicap access would be provided between buildings and to public sidewalks on the five street frontages along the site. Additionally, the proposed Project would add decorative pavement technique at the apron of driveways to improve visual interest to pedestrians or those interacting with the Project site at the street level. Therefore, the Project would be consistent with the City’s objective.
Policy C2-1.6: Encourage shopping areas to design their facilities for ease of pedestrian access.	Consistent. As previously stated, the Project would include retail at the street-level along PCH, which would facilitate 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.	Consistent. The proposed Project would add decorative pavement technique at the apron of driveways to improve visual interest to pedestrians or those interacting with the Project site at the street level. This would clearly indicate walking paths from the street into the Project site. Other design practices include perimeter landscaping that would not obstruct pedestrian pathways.
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.	Consistent. As further discussed in Section 4.13, Transportation, the Project would not preclude implementation of the South Bay Bicycle Master Plan, including any future plans to complete the additional Class II and III bicycle facilities on Mariposa Avenue. Bicycle parking facilities in accordance with Municipal Code and California Green Building Code requirements would be provided in multiple locations in the parking structures and surface parking areas in the Specific Plan.
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.	Consistent. The proposed Project would improve traffic circulation Mariposa Avenue by adding a right-turn lane onto PCH, which would reduce queuing along that corridor. This improvement would not conflict with the recommendations of the South Bay Master Bicycle Plan. Further, bicycle parking facilities in accordance with Municipal Code and California Green Building Code requirements will be provided in multiple locations in the parking structures and surface parking areas in the Specific Plan.
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 will be provided in multiple locations in the parking structures and surface parking areas in the Specific Plan.
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,	Consistent. The Project consists of specific objectives to promote walkability and the incorporation of bicycle infrastructure on site, such as bicycle parking. The Project also proposes the development of 263 units and 11,252 square feet of commercial as a mixed-use development. The mixed-use nature of the Project encourages the reduction of vehicle use and reduce transportation demand. Additionally, the Specific Plan requires preferential parking must be provided for carpools and vanpools.

Table 4.9-1. General Plan Consistency Analysis

Goal/Policy	Analysis
telecommuting and car/vanpool preferential parking.	
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 4.13, Transportation, the Project would not conflict with any plans or policies regarding existing or proposed transit, bicycle, and pedestrian facilities in the study area. During construction, sidewalk closures around the perimeter may be expected during street improvements. During this time, pedestrians would generally be routed to the other side of the street, but temporary covered pedestrian routes would be provided for access to the existing hotels. Bicycle access to the Project site would continue to be available on Indiana Street, Mariposa Avenue, and PCH. Further, the Project would not preclude implementation of the South Bay Bicycle Master Plan, including any future plans to complete the additional Class II and III bicycle facilities on Mariposa Avenue.
Policy C3-2.1: Ensure the provision of sufficient on-site parking in all new development.	Consistent. The Project would develop 336 new parking spaces for PCC-South, 215 parking spaces for PCC-Fairfield Parking, and 241 parking spaces for PCC-North. As further explained in the Shared Parking Analysis (Appendix J-2), it is possible that Phase 2 and Phase 3 would be constructed at the same time. Construction of Phases 2 and 3 would require 442 spaces, resulting in a deficit of 227 parking spaces. As described under “Development Agreements/Conditions of Approval” in Section 4.13.2, Relevant Plans, Policies, and Ordinances, if the total parking demand would exceed the total parking supply during construction activities, the applicant/developer would be required to accommodate the excess parking demand at an off-site location and provide shuttle service to and from the Project site accordingly to ensure that that parking is adequately provided during short-term construction. Therefore, the Project would be adequately parked during construction activities. Once operational, the Project would also be adequately parked (Appendix J-2).
Economic Development Element	
Goal ED1: To create in El Segundo a strong, healthy economic community in which all diverse stakeholders may benefit.	Consistent. The proposed Project would benefit the existing hotel uses with new commercial/retail land uses which would provide increased economic and fiscal benefits for the City. The redevelopment of surface parking lots with new residential and commercial uses would maximize the site’s economic value.
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 Project would redevelop the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the Fairfield Inn and Suites Hotel “Food and Beverage” building (formerly the Hacienda Restaurant). While hotel uses are allowed in the existing General Commercial (C-3) Zone, and the Fairfield Inn and Suites and the Aloft Hotels both have existing Conditional Use Permits, the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. Through the implementation of the Specific Plan, these two hotels would be brought into full conformity with the land use designation and zoning for the Project site. The proposed Project includes hotels, residences, and commercial uses that would expand the uses on the Project site and provide increased economic and fiscal benefits for the City. Additionally, the Specific Plan would create design guidelines for a site located along one of the City’s major corridors (PCH).
Policy ED1-1.1: Maintain economic development as one of the City’s and the business	Consistent. The proposed Project would introduce new economic development in the City through redevelopment of the underutilized surface parking lots and the vacant Fairfield Inn and Suites Hotel “Food and Beverage” building (formerly the

Table 4.9-1. General Plan Consistency Analysis

Goal/Policy	Analysis
and residential communities' top priorities.	Hacienda Restaurant). Further, by adding 263 residential units to a jobs-rich City, the Project is increasing the City's permanent residential population to aid in maintaining economic development of the City's business and residential uses.
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 proposed Project would involve construction of commercial space and housing units along PCH that would further attract commercial patrons and residential tenants and property owners to one of the City's major corridors. Additionally, the Project would benefit the existing hotel uses with new commercial/retail land uses which would provide increased economic and fiscal benefits for the City.
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 proposed Project would redevelop underutilized surface parking lots and the Fairfield Inn and Suites Hotel "Food and Beverage" building (formerly the Hacienda Restaurant) to provide increased economic and fiscal benefits for the City. Thus, the Project would promote land uses that contribute to the City's tax base. The proposed Project would benefit the existing hotel uses with new residential and commercial land uses. Further, the residential and commercial land uses would be developed through the adoption of a Specific Plan to ensure cohesive design guidelines and development standards, which would provide aesthetic views that enhance the overall quality of the Project site.
Housing Element	
Goal 3: Provide opportunities for new housing construction in a variety of locations and a variety of densities in accordance with the land use designations and policies in the Land Use Element.	Consistent. The Specific Plan seeks to improve the jobs/housing balance in the City of El Segundo, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees. The proposed Project would redevelop underutilized areas of the Project site with new multi-family residential uses. The proposed 263 residential units include a mix of studio, one-bedroom, two-bedroom, and townhome units. Since the City is largely built out, there are few areas to provide such opportunities for new housing. Through Project approval, the proposed uses would be brought into compliance with existing land use designations. The Specific Plan would undergo review from the City's staff and Planning Commission to ensure the Specific Plan is consistent with all applicable goals and policies within the General Plan, Land Use and Housing Elements.
Policy 3.1: Provide for the construction of 69 new housing units during the 2014-2021 planning period in order to meet the goals of the Regional Housing Needs Assessment (RHNA).	Consistent. As discussed in Section 4.11, Population and Housing, the proposed Project would include affordable housing, with the ultimate amount to be determined through the Development Agreement, to the satisfaction of the City of El Segundo. The specific allocation between the types of low income housing has yet to be determined; however, the proposed affordable units would satisfy a portion of the City's mandated 29 low income units, and the City's requirement for 40 moderate/above income units, as set forth in the Housing Element.
Policy 3.3: Permit vacant and underdeveloped property designated as residential to develop with a diversity of types, prices and tenure.	Consistent. The Project would redevelop the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the Fairfield Inn and Suites "Food and Beverage" building (formerly the Hacienda Restaurant) with residential and commercial uses. One of the objectives of the Specific Plan is to provide for additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City's General Plan. The proposed Project would include affordable housing, with the ultimate amount to be determined through the Development Agreement, to the satisfaction of the City of El Segundo. The residential units include studios, one- and two-bedroom units, and townhomes to encourage diverse housing types within the City.
Policy 4.1: Continue to allow second units, condominium conversions, caretaker units and	Consistent. The zoning for the Project is General Commercial (C-3) and Automobile Parking (P), which corresponds to the General Plan land use designations. Through

Table 4.9-1. General Plan Consistency Analysis

Goal/Policy	Analysis
second floor residential use in commercial zones as specified in the El Segundo Municipal Code.	implementation of the Specific Plan, the City would allow residential uses in previously designated commercial zones.
Policy 4.4: Facilitate provision of infrastructure to accommodate residential development	Not Applicable. As discussed in Section 4.15, Utilities and Service Systems, the existing infrastructure surrounding the Project site is capable of accommodating residential development and the proposed Project. Within the Project site, the proposed Project would require upgrades to utility infrastructure through installation of new connections and on-site storm drainage improvements. The City, Project applicant, and utility companies would coordinate to ensure provision of infrastructure is sufficient for the proposed residential development.
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. The proposed Project 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. The proposed Project would also provide on-site open space areas to satisfy the demands of the future resident population. In PCC-South, open space is planned for a total of 17,512 square feet. This includes 11,852 square feet of common open space area, including courtyards, community amenities on the 6th floor, and the roof-deck swimming pool amenity, and a total of 5,660 square feet of private open space (balconies) in the residential units. The PCC-North includes a total of 17,932 square feet of open space. This includes 11,357 square feet of common open space area, including courtyards, community amenities on the 6th floor, and the roof-deck swimming pool amenity, and a total of 6,575 square feet of private open space (balconies) in the residential units.
Policy OS1-1.1: Adopt a park land standard of 5.0 acres/1,000 population, which is the maximum allowable standard ratio as stated in Chapter 4, Article 4, Section 6647(b) of the Subdivision Map Act.	Not Applicable. The proposed Project would not prevent the City from adopting such a park land standard. As discussed in Section 4.12, Public Services and Recreation, since the City’s Parks are within the State of California Parks Department standard of park space at about 3.5 acres of park space per 1,000 residents (Petit 2020), the additional 618 residents would not exceed existing standards of service for parks. Additionally, 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 infrastructures.
Policy OS1-1.2: Encourage a locational service area standard on one-quarter mile for neighborhood parks and one-half mile for community parks.	Not Applicable. The proposed Project would not prevent the City from encouraging a locational service area standard on one-quarter mile for neighborhood parks and one-half mile for community parks. As shown in Figure 4.12-3 (see Section 4.12, Public Services and Recreation), there are several parks within proximity to the Project site. Specifically, Freedom Park Washington Park, Kansas Park, Constitution Park, and Independence Park are within 0.25 mile of the Project site. Additionally, Campus El Segundo and Sycamore Park are within 0.5 mile the Project site.
Objective OS1-2 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.	Consistent. As previously discussed under Goal OS1, the Specific Plan includes the development of private open space in PCC-South and PCC-North, available to the proposed Project’s residents. In PCC-South, open space is planned for a total of 17,512 square feet. The PCC-North includes a total of 17,932 square feet of open space. Thus, residents within the Project site would utilize private open space opportunities, thereby preserving existing park and recreation facilities within the City.
Conservation Element	
Policy CN2-5: Require new construction and development	Consistent. The Project would comply with the proposed Specific Plan’s design standards, including those outlining sustainability-focused measures at or above

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to install water-conserving fixtures and appliances to reduce the amount of new demand.	Title 24 requirements. The installations of green infrastructure combined with high standards for energy-efficient buildings contained within the California Building Code, will 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 management, particularly those conserving water and energy.	Consistent. The Specific Plan includes open space standards to ensure adequate landscaping area and permanent maintenance for the Specific Plan area. 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 4.9.2, the Specific Plan identifies sustainability standards related to energy efficiency requirements, bicycle parking, lighting efficiency, utilization of low-emitting building materials, roof structure, and reclaimed water. The Project 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 will ensure that Project meet the City's requirements for conservation. Reclaimed water would be used in all landscaped areas if available and feasible.
Policy CN2-8: Encourage the retrofitting of existing landscapes to incorporate the principles and practices of sound landscape design and management, particularly those conserving water and energy.	Consistent. The Specific Plan would maintain the existing landscaping, where applicable, around the existing hotels. Additionally, since the existing hotels would be brought into compliance with the General Plan through the adoption of the Specific Plan for these sites, new landscaping incorporated at the existing hotels would comply with the proposed Specific Plan's design standards, including those outlining sustainability-focused measures at or above Title 24 requirements. Further, the installations of low-impact development features and landscaping will ensure that Project meet the City's requirements for conservation.
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. Project design, construction, and operation would be completed consistent with the City of 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, 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 (see Section 4.8, Hydrology and Water Quality). The LID Manual states that best management practices (BMPs) are to be designed to manage and capture stormwater runoff. The Project would comply with the proposed 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 will ensure that Project meet the City's requirements for conservation. Further, the Project parking lot areas must include storm water management practices that treat storm water runoff in compliance with the ESMC and all applicable law.
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. The Project seeks to improve the jobs/housing balance in the City to improve air quality by providing housing for those who work in the City of El Segundo so that they may reduce their vehicle miles traveled to the extent possible. By redeveloping existing surface parking lots with a new mixed-use commercial and residential development, the Project would enhance the urban landscape in the City. Additionally, as stated in the Specific development standards, the Specific Plan would require landscaped areas around the perimeter of the buildings.
Policy CN5-1	Consistent. The proposed development would not exceed the heights of the existing nine-story hotels located within the Project site. Therefore, the Project

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Preserve the character and quality of existing neighborhood and civic landscapes.	would maintain the character and quality of the land uses within the Project site and would not intrude upon existing surrounding properties. Further, the Project would develop a mix of commercial and residential uses along PCH, which would provide for an appropriate transition of uses between the commercial uses and the 9 to 20-story office buildings to the east and the single-family residential neighborhoods to the west.
Air Quality Element	
Goal AQ3: Vehicle work trip reduction for private employees.	Consistent. The Project develops new mixed-use community to support surrounding land uses and 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 proposed 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 Project site includes the Metro C Line and multiple bus lines. The Metro C Line is a light rail line running between Redondo Beach and Norwalk, with the closest station approximately 0.51-mile east of the Project site. There are two Metro bus lines, one Beach Cities bus line, and two LADOT Commuter Express lines that run in the vicinity of the Specific Plan (Metro Line 232; Metro Line 625; Beach Cities Line 109; LADOT Commuter Express 438; and LADOT Commuter Express 574).
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.	Not Applicable. The proposed Project would not influence the City's support of legislation for clean vehicles.
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. The proposed Project 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 approved Ordinance No. 1606, which adopted the 2019 edition of the CALGreen with amendments. Therefore, the proposed Project would be implemented 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 PM10 standards.	Consistent. As shown in Tables 4.2-9 and 4.2-10, the proposed Project would not exceed the SCAQMD threshold for PM10. Impacts associated with Project-generated construction and operational criteria air pollutant emissions would be less than significant.
Goal AQ12: Reduction in Residential, Commercial, and Industrial Energy Consumption.	Consistent. The Project would comply with the proposed Specific Plan's design standards, including those outlining sustainability-focused measures at or above Title 24 requirements. The proposed Project would be consistent with the regulations set forth in CALGreen and the City's Municipal Code, which adopted the 2019 edition of the CALGreen with amendments, which have robust requirements for energy. Other sustainability features of the Project 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 2019 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

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	solar zone requirement is applicable to the entire building, including mixed-occupancy.
<p>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.</p>	<p>Consistent. As previously discussed in Section 4.2, Air Quality, the Project would implement MM-AQ-1 to ensure TAC emissions from construction activities associated with the Project are less than significant. The Project would comply with the proposed Specific Plan’s design standards, including those outlining sustainability-focused measures at or above Title 24 requirements. The Project would incorporate roof structures to support solar roofs to reduce water and pool heating system impacts. As previously mentioned, per the 2019 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 the entire building, including mixed-occupancy.</p>
<p>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.</p>	<p>Consistent. As previously stated, the Project 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 proposed Project is designed with appropriate energy efficient devices. As such, the proposed Project would be consistent with the regulations set forth in CALGreen and the City’s Municipal Code, which adopted the 2019 edition of the CALGreen with amendments, which have robust requirements for energy conservation and electric vehicle charging. The Project would be constructed to be ready for electric vehicle charging stations.</p>
<p>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.</p>	<p>Consistent. The proposed Project would not influence the City’s incentives or regulations. However, the proposed Project would be consistent with the regulations set forth in CALGreen and the City’s Municipal Code.</p>
<p>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.</p>	<p>Consistent. The proposed Project would not influence the City’s enactment of comprehensive solar access. However, the Specific Plan would require that roof structures be designed to support solar panels. Additionally, as set forth in 2019 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 the entire building, including mixed-occupancy.</p>
<p>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).</p>	<p>Consistent. The proposed Project would include solid waste facilities within the Specific Plan area that must comply with all El Segundo Municipal Code requirements pertaining to building, fire, zoning codes (e.g., adequate trash enclosures and screening). The proposed Project would comply with all applicable laws and regulations related to solid waste and recycling, as discussed in Section 4.15, Utilities and Service Systems, of this Draft EIR.</p> <p>As discussed in previously, total proposed Project emissions, including operation and amortized construction, would be approximately 2,921 MT CO₂e per year, which is less than the SCAQMD significant threshold of 3,000 MT CO₂e per year. Furthermore, the Project would be consistent with the CAP and based on the considerations previously outlined, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and no mitigation is required. Therefore, this impact would be less than significant.</p>

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<p>Policy AQS 14-1.1: 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.</p>	<p>Consistent. As discussed in Section 4.2, Air Quality, a Health Risk Assessment (HRA) was prepared for the proposed Project to determine the incremental risk to residents and other sensitive receptors in proximity to the Project site. The results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in an on-site cancer risk above the 10 in 1 million threshold for the proposed Project. The Chronic Hazard Index for the proposed Project would be less than 1. Therefore, TAC emissions from construction activities associated with the proposed Project may expose sensitive receptors to substantial pollutant concentrations of TACs and would result in a potentially significant impact; therefore, MM-AQ-1 is required. With implementation of MM-AQ-1, the HRA results from the mitigated scenario show cancer risks less than the 10 in 1 million threshold and chronic hazard index less than the 1.0 threshold. Impacts would be less than significant with mitigation incorporated.</p>
<p>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.</p>	<p>Consistent. As shown in Tables 4.2-9 and 4.2-10, the proposed Project would not exceed the SCAQMD threshold for VOCs, particulates, NOx, SOx, and CO. Impacts associated with Project-generated construction and operational criteria air pollutant emissions would be less than significant.</p>
Noise Element	
<p>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.</p>	<p>Consistent. As further described in Section 4.10, Noise, the Project 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 to the west. Once operational, the Project would not expose the City's residents to excessive noise as a result of roadway traffic nor stationary operations noise. See Section 4.10, Noise, of this EIR for more discussion.</p>
<p>Objective N1-1: It is the objective of the City of El Segundo to ensure that City residents are not 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.</p>	<p>Consistent. As further discussed in Section 4.10, Noise, the addition of proposed Project traffic to the roadway network would result in a Community Noise Equivalent Level (CNEL) value increase of less than 3 dB, which is below the discernible level of change for the average healthy human ear. In fact, the installation of the proposed Project would add sound-path occlusion and result in predicted SPL that are lower than existing measured levels. Thus, a less-than-significant impact is expected for Project-related off-site traffic noise increases affecting existing residences in the vicinity. In addition, the Project's residents would experience sufficient exterior-to-interior sound insulation from outdoor traffic noise to yield interior background sound levels that are less than 45 dBA CNEL and thus compliant with the City and state standards when windows and doors are closed. Thus, the Project would not expose the City's residents to mobile noise levels in excess of ESMC standards.</p>
<p>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</p>	<p>Consistent. The Project would be subject to the policies and standards outlined in the ESMC. Additionally, the Project would redevelop the site with new residential and commercial uses. The predicted operation of construction equipment and processes do not 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</p>

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of El Segundo's Noise Ordinance standards.	associated with the Project 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. Once operational, the addition of proposed Project traffic to the roadway network would result in a CNEL value increase of less than 3 dB, which is below the discernible level of change for the average healthy human ear. As further describes in Section 4.10, Noise, all studied sample facades are anticipated to exhibit a predicted sound transmission class rating of at least 35, and thus would provide sufficient exterior-to-interior sound insulation from outdoor traffic noise to yield interior background sound levels that are less than 45 dBA CNEL and thus compliant with the City and state standards.
Program N1-1.9A: All new habitable residential construction in areas of the City with an annual CNEL of 60 dBA or higher shall include all mitigation measures necessary to reduce interior noise levels to minimum state standards. Post construction acoustical analysis shall be performed to demonstrate compliance.	Consistent. The proposed Project involves the construction of residential units. As discussed in Section 4.10, Noise, the CNEL for multi-family is 75 for exterior and 55 for interior. Table 4.10-8 shows that at the modeled facade positions representing the exteriors of building walls, patios, and balconies of occupied living rooms or bedrooms that are closest to and face PCH and surrounding local roadways, predicted on-site CNEL values are all less than 72 dBA and are compatible with the City's guidance for exterior noise levels at multi-family residential land uses. Table 4.10-9 illustrates that an open window or an open sliding door to an adjoining patio or balcony greatly compromises the overall sound insulation performance of the studied wall assemblies. However, when such windows and doors are closed, all studied sample facades are anticipated to exhibit a predicted STC rating of at least 35, and thus would provide sufficient exterior-to-interior sound insulation from outdoor traffic noise to yield interior background sound levels that are less than 45 dBA CNEL and thus compliant with the City and state standards.
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 4.10, Noise, of this Draft EIR, implementation of the Project and its component site-specific development, as well as 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). 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 is considered a less than significant impact with mitigation incorporated.
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. The Project would be subject to the policies and standards outlined in the ESMC. As discussed under Policy N1-2.1, implementation of the Project would be subject to the City's Noise Ordinance standards. Noise sources evaluated in Section 4.10 includes 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 4.10, Noise, the Project would require mitigation measures during construction to ensure noise levels do not exceed the City's hourly threshold of 65 dBA L_{eq} at the existing nearest residential properties to the west. Once operational, the Project 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.

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<p>Program N1-2.1B: The City shall establish criteria for determining the type and size of projects that should submit a construction-related noise mitigation plan. Noise mitigation plans shall be submitted to the City Engineer for his review and approval prior to issuance of a grading permit. The plan must display the location of construction equipment and how this noise will be mitigated. These mitigation measures may involve noise suppression equipment and/or the use of temporary barriers.</p>	<p>Consistent. The Project would not prevent the City from establishing criteria for determining the type and size of projects that should submit a construction-related noise mitigation plan. Further, as discussed in Section 4.10, Noise, the Project noise from construction for all phases is anticipated to exceed the City’s hourly threshold of 65 dBA Leq at the existing nearest residential properties to the west. Thus, under these conditions construction noise would result in a temporary but significant noise impact at these receptors and require mitigation measures that—if designed and implemented properly by the Project applicant and its construction contractors—would need to demonstrate at least 5 dBA and as high as 20 dBA of sound abatement in order to yield Project-attributed construction noise levels that are compliant with this City standard. Typical construction “sound blankets”, such as those offered by local suppliers, are capable of providing this 5 to 20 dBA range of acoustical insertion loss (i.e., the difference in measured sound level at a receiver after a sound-occluding element is placed in the direct path between the receiver and the noise source of interest). Thus, with application of MM-NOI-1, construction noise impacts at the nearest multi-family residential properties on the west side of Indiana Street would be reduced to a less than significant level.</p>
<p>Program N1-2.1C: The City shall strictly enforce the El Segundo Municipal Code's time-dependent noise standards for stationary sources. Two of the major sources which shall be closely monitored are industrial facilities and construction activities.</p>	<p>Consistent. The proposed Project would comply with the City’s time-dependent noise standards for stationary sources. As described in Section 4.10, Noise, the incorporation of new multi-family homes and a mix of commercial uses attributed to development of the proposed Project would add a variety of noise-producing mechanical equipment that include those presented and discussed in the following paragraphs. Most of these noise-producing equipment or sound sources would be considered stationary, or limited in mobility to a defined area. As shown in Appendix H-3 and further discussed in Section 4.10, Noise, the proposed Project would not exceed standards for stationary sources and impacts would be less than significant.</p>
<p>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.</p>	<p>Consistent. The analysis provided in Section 4,10, Noise, provides a discussion of short-term and long-term noise impacts to both existing residents and future residents of the Project and determined impacts would be less than significant with mitigation incorporated. As further discussed under Program N1-2.1B, the Project would implement MM-NOI-1 to mitigate construction noise to existing residences near the Project site. Therefore, the analysis conducted in this Draft EIR would allow the City to 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.</p>
<p>Program N1-3.3A: The City shall review and, if necessary, revise the City Noise Ordinance to ensure that proper regulations are being enforced to protect City residents from excessive noise levels from stationary noise sources.</p>	<p>Consistent. The proposed Project would not prevent the City from revising the City Noise Ordinance. Further, the proposed Project would not expose residents to excessive noise levels from stationary sources and impacts would be less than significant.</p>
<p>Public Safety Element</p>	
<p>Goal PS1: Protect the public health and safety and minimize the social and economic</p>	<p>Consistent. The Project would comply with all existing health and safety standards outlined in the ESMC. Specifically, the Project would comply with existing building code regulations. As addressed in Section 4.5, Geology and Soils, all impacts related to potential risk of loss, injury, or death involving geology</p>

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impacts associated with geologic hazards.	and soils are less than significant. Therefore, the Project would minimize impacts associated with geologic hazards.
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 4.5, Geology and Soils, of this Draft EIR provides the City with a thorough review of potentially hazardous geologic conditions at the Project site. As addressed in Section 4.5, Geology and Soils, all impacts related to potential risk of loss, injury, or death involving geology and soils are less than significant.
Policy PS1-1.1: Continue to review proposals for new development and for the expansion of existing development in areas of potential geological hazards.	Consistent. As addressed in Section 4.5, Geology and Soils, the Project site is not located in an area of potential geologic hazards. Nonetheless, the City continues to review the proposal for new development, including the proposed Project.
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 will include stormwater treatment features on multiple sites within the Specific Plan area, in accordance with the City of El Segundo LID requirements. The storm water quality design volume required by LID standards will be stored in the system and infiltrate into the soil beneath the underground system within 48 hours. These treatment features are designed to treat the 85th percentile storm event, while overflow drainage features will be designed based on the 25-year storm event. With regards to the sewer system, it is anticipated that the new sewer laterals will connect to several of the existing gravity lines surrounding the Project. The proposed Project does not currently impact the existing pressure lines. The sewer laterals will be designed to slope at a minimum of 2% and maintain a minimum scouring velocity of 2 feet per second. Points of connection will be based on the City's input and will 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, the Project would minimize runoff through LID standards.
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.	Consistent. As discussed in Section 4.5, Geology and Soils, a Geotechnical Evaluation was prepared for the Project site to evaluate the existing geologic conditions. Compliance with the site-specific geotechnical report would be required upon Project implementation.
Program PS1-1.2A: The City shall review projects to ensure that adequate geotechnical investigation has been completed in areas susceptible to landsliding and debris flows and in areas where collapsible or expansive soils occur, and to approve only those which	Consistent. The Project would comply with all existing health and safety standards outlined in the ESMC. Specifically, the Project would comply with existing building code regulations. See Section 4.5, Geology and Soils, for more discussion.

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mitigate these hazards to the satisfaction of the City Engineer.	
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 4.5, Geology and Soils, 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, Project construction would be completed in accordance with the 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.
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 and environmental controls, e.g., implementation of SB 54 7 (Alquist).	Consistent. As discussed above, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The Project would comply with all existing health and safety standards outlined in the ESMC. Additionally, Project construction would be completed in accordance with the 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.
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.	Consistent. According to the Geotechnical Due-Diligence Investigation (Appendix E-1), the Project site is not located within an area identified as having potential for seismic slope instability, geologic hazards associated with liquefaction and landsliding are not anticipated at the Project site.
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 the proposed Project to result in risk related to the use, storage, and disposal of hazardous materials was analyzed in Section 4.7, Hazards and Hazardous Materials. Hazardous materials that may be used during construction and demolition activities of the proposed Project 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. Due to the presence of asbestos and lead in the “Food and Beverage” building proposed for demolition, MM-HAZ-1 is required. MM-HAZ-1 involves abatement of the “Food and Beverage” building of any asbestos- and lead-containing materials, PCB-containing items, universal wastes, and/or other hazardous materials. The operational phase of the proposed Project would not be expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
Policy PS3-1.2: Promote the safe transportation of hazardous materials.	Consistent. As further discussed in Section 4.7, Hazards and Hazardous Materials, hazardous wastes that cannot be recycled would be transported by a licensed hazardous waste hauler following manifest procedures disposed of at an appropriately permitted offsite facility. The use and handling of these substances are

Table 4.9-1. General Plan Consistency Analysis

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	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.
Policy PS3-1.3: Improve the plans and capabilities for responding to hazardous material incidents.	Consistent. This Draft EIR describes measures put forth to reduce the necessity of the City to respond to hazardous materials incidents. As discussed in Section 4.7, Hazards and Hazardous Materials, management of hazardous materials and waste during pre-demolition surveys and abatement activities would be addressed by MM-HAZ-1. Additionally, due to the a potential for petroleum-impacted soils to be present in excavations adjacent to the gas station at PCC-North, MM-HAZ-2 requires preparation of a Hazardous Materials Contingency Plan (HMCP), which would include procedures to identify, handle, and dispose of potential petroleum-impacted soils related to the gas station. The proposed Project would not preclude the City from implementing such plans and capabilities, and would ensure the proposed Project is required by the City to reduce any potential for hazardous materials incidents.
Policy PS4-1: Monitor industries and activities in and around the City to prevent and reduce the contamination of water and soil.	Consistent. As previously discussed under Policy PS3-1.3, due to the a potential for petroleum-impacted soils to be present in excavations adjacent to the gas station at PCC-North, MM-HAZ-2 requires preparation of a HMCP, which would include procedures to identify, handle, and dispose of potential petroleum-impacted soils related to the gas station. This would address the issue of preventing soil contamination. With regards to water, the property owner/developer must comply with the Construction General Permit applicable at the time a grading permit is issued and development of the Storm Water Pollution Prevention Permit (SWPPP). The SWPPP is required to identify BMPs that protect stormwater runoff and ensure avoidance of substantial degradation of water quality. Once operational, the proposed Project would implement LID features that would, to the maximum extent practicable, reduce the discharge of pollutants into receiving waters. Therefore, mitigation measures and implementation of existing regulations would allow the City to monitor activities around the proposed Project with the potential to contaminate 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.	Consistent. As previously discussed under Policy PS4-1, this Draft EIR would allow the City to monitor activities around the proposed Project with the potential to contaminate water and soil. Section 4.8 Hydrology and Water Quality identifies the potential sources of pollutants that could degrade water quality and identifies appropriate regulations to ensure no significant impacts related to degradation of water quality occur. Section 4.7, Hazards and Hazardous Materials identified one source of potential soil contamination within the Project site and surrounding area, and proposed implementation of MM-HAZ-2 to mitigate potential impacts. The analysis conducted as part of this Draft EIR, with the City as the lead agency ensure the City is protecting its 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 PSS-1.1: Continue the construction of flood control facilities to protect areas threatened by potential flooding.	Not Applicable. The proposed Project would not preclude the City from continuing construction of flood control facilities. Further, as discussed in Section 4.8, Hydrology and Water Quality, the Project site is located in FEMA Zone X, which is an area of minimal flood hazard, and an area determined to be outside the 0.2% annual chance floodplain (i.e., 500-year floodplain) (FEMA 2020). Therefore, the Project would not be located in an area with any significant risks of flooding and would not have the potential to impede or redirect floodwater flows.
Program PS5-1.1B: The City shall, in cooperation with the City of Los Angeles, develop, maintain, and inform the public of evacuation	Not Applicable The proposed Project would not prevent cooperation with the City of Los Angeles.

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Goal/Policy	Analysis
procedures in the event of failure of the primary sewage reservoir or related equipment or facilities of the Hyperion Wastewater Plant.	
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 Draft EIR evaluates the potential of the proposed Project to impact flood flows and surface runoff; thereby allowing the City to monitor the proposed development. As described in Section 4.8, Hydrology and Water Quality, the proposed Project site is fully developed in the existing condition and is located in a highly urbanized portion of El Segundo, surrounded by developed properties. Implementation of the proposed Project would not alter the existing drainage patterns on the site such that downstream streams or rivers would be affected. The Project would infiltrate stormwater in accordance with all applicable LID regulations, and would continue to outflow into the existing storm drain system. Therefore, the Project would not substantially alter the existing drainage pattern of the site.
Program PS5-1.2A: The City shall ensure the adequacy of flood control system capacity with more frequent monitoring, maintenance, repair, or modification of flood channels, culverts, and storm drainage systems.	Not Applicable. The proposed Project would not prevent the City from ensuring adequacy of the floor control system capacity. Further, the proposed Project would not substantially impact flood flows, as discussed under Policy P5-1.2.
Goal PS6: A fire safe community.	Consistent. The Project would comply with all existing health and safety standards outlined in the ESMC. The Project 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 for the Project.
Objective PS6-1: It is the objective of the City of El Segundo that the City minimize threats to public safety and protect property from wildland and urban fires	Consistent. The Project would comply with all existing health and safety standards outlined in the ESMC. The Project is surrounded by roadways and developed properties on all sides and entirely developed, so it is not susceptible to exacerbating wildfire risks. Further, the Project site does not contain extensive amounts of vegetation or wildland fuel. In addition, the proposed Project 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.
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 proposed Project 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 (including those listed above and in Section 4.12.2, Relevant Plans, Policies, and Ordinances) would be ensured through the plan check process and fire review prior to the issuance of building permits for the Project. More specifically, the proposed Project 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. The building would also be equipped with fire pumps and alarms consisting of smoke detection, voice alarm capability, and visual alarms. These fire safety features and compliance with fire code standards

Table 4.9-1. General Plan Consistency Analysis

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	would reduce the potential demand for fire services by decreasing the likelihood and/or severity of a fire emergency at the site.
Policy PS6-1.2: Continue efforts to reduce fire hazards associated with older buildings, high-rise buildings, and fire-prone industrial facilities, and maintain adequate fire protection in all areas of the City. Review projects and development proposals, and upgrade fire prevention standards and mitigation measures in areas of high urban fire hazard.	Consistent. As previously addressed, the Project would comply with fire code standards and would undergo plan check and fire review to ensure compliance. Furthermore, the Project would coordinate with the El Segundo Fire Department Fire Prevention Division to ensure fire flow requirements are met and any required upgrades to the existing water distribution system are addressed.
Program PS6-1.2C: The City shall continue to require that all property be maintained in compliance with the fire code.	Consistent. The Project would be subject to the requirements of the fire code standards (including those listed above and in Section 4.12.2). This would be ensured through the plan check process and fire review prior to the issuance of building permits for the Project.
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. Project construction would be completed in accordance with the CBC. As with all development within the City, 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. Additionally, the abatement of hazardous materials identified on the Project site would remove the potential for exposure of the public and the environment to accidental release of hazardous materials (MM-HAZ-1). Construction and demolition activities on PCC-North adjacent to the adjacent 76 Station would be completed in accordance with the Hazardous Materials Contingency Plan (MM-HAZ-2), which would put procedures in place to identify, manage, properly transport, and dispose of hazardous substances and materials identified on site as a result of environmental contamination. Use of extremely hazardous materials and accumulation of acutely hazardous wastes are not anticipated.
Hazardous Materials and Waste Management Element	
Policy HM5-1.1: Adopt waste minimization as a first priority in waste management strategies in the City.	Consistent. As discussed in Section 4.7, Hazards and Hazardous Materials, the proposed Project 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 offsite facility. The use and handling of these substances are subject to applicable federal, state, and local health and safety laws and regulations. Demolition of the “Food and Beverage” building includes abatement of the “Food and Beverage” building of any asbestos- and lead-containing materials, PCB-containing items, universal wastes, and/or other hazardous materials. Abatement must be conducted by licensed contractors, and materials must be transported offsite for recycling and/or disposal by licensed transporters in accordance with federal, state, and local laws. Hazardous materials are also present in the hotels, including a 500-gallon diesel AST and various janitorial items. As these hotels are not scheduled for demolition or renovation for the proposed Project, it is not anticipated that the presence of these materials would impact construction of the proposed Project. With implementation of MM-HAZ-1,

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	<p>impacts associated with the routine transport of ACM, LBP, universal wastes, and hazardous materials for offsite disposal during construction would be less than significant. Once operational, the proposed Project would only require limited use of commercially-available hazardous materials, including janitorial and landscaping products. Should the amount of onsite 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.</p>

As described in Section 3.3.1, Non-Conforming Uses, in Chapter 3 of this Draft EIR, while hotel uses are allowed in the existing General Commercial (C-3) Zone, and the Fairfield Inn and Suites and the Aloft Hotels both have existing Conditional Use Permits, the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. Through the implementation of the Specific Plan, these two hotels would be brought into full conformity with the land use designation and zoning for the Project site. As previously described, COM-1 and COM-2 allows hotels and several other commercial uses that are either accessory to hotel uses or complementary uses. The existing hotel properties are consistent with this definition, and thus, would no longer be considered non-conforming uses within the Specific Plan area. Additionally, it should be noted there will be no additional floor area added to the hotel properties.

Additionally, as described in Section 3.7, Discretionary Actions, in Chapter 3 of this Draft EIR, the Project requests the approval of a General Plan Amendment (No. GTA 19-01) to change the Land Use Designation from “General Commercial” and “Parking” to “Pacific Coast Commons Specific Plan (PCCSP)” with an accompanying Land Use map change. Upon approval of the proposed amendment, the Project would be brought into compliance with the General Plan Land Use Designation.

Based on Table 4.9-1 and the reasons described above, the proposed Project would be consistent with the General Plan for the purposes of avoiding or mitigating environmental effect.

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.

Amendments to the Zoning Code

As described in Section 3.7, Discretionary Actions, in Chapter 3 of this Draft EIR, the Project requests a Zone Text Amendment No. ZTA 19-08 to add a new ESMC Section 15-3-2(A)(11) “Pacific Coast Commons Specific Plan (PCCSP)”. As such, the Project would be required to follow the procedures outlined in Section 4.9.2, above. Approval of the proposed Project, in accordance with the provisions outlined in Title 15 of the ESMC, would ensure compliance with applicable zoning standards. Additionally, through the application process, the City would

thoroughly review all plans for the proposed Project to ensure compliance with the ESMC, and other relevant plans, policies, and regulations.

Specific Plan

When a specific plan is adopted in accordance with the procedure outlined above, 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 proposed 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 zoning regulations shall apply. As described in Section 4.9.2 under “Proposed PCC Specific Plan,” 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 proposed Project, the Project would be consistent with the El Segundo Zoning Code for the purposes of avoiding or mitigating environmental effect.

Conclusion

Based on the analysis provided above, the proposed 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 the Project site with underutilized properties, into a mixed-use development. The mix of land uses within the Project site, including multi-family residential and commercial uses, would reduce automobile trips by creating a pedestrian-oriented, multi-modal environment. The Specific Plan sets forth the development standards of the three areas; however, where the document does not include specific development standards, the ESMC shall be the controlling document. Thus, the proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project site adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant. No mitigation is required.

4.9.5 Cumulative Impact 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 greater Los Angeles Metropolitan region, including the Project site, cumulative development would likely convert existing underutilized properties in the Project site’s area to revitalized higher-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; add residential uses to a job-rich community; and improve 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 the 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 proposed Project. Therefore, cumulative impacts related to land use and planning would be less than significant. No mitigation is required.

4.9.6 Mitigation Measures

The Project would not result in significant impacts; therefore, no mitigation is required.

4.9.7 Level of Significance After Mitigation

All impacts were determined to be less than significant. No mitigation is required.

4.9.8 References

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4.10 Noise

This section describes the existing noise conditions of the Pacific Coast Commons Specific Plan (Specific Plan or Project) site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. While not required by the California Environmental Quality Act (CEQA), for purposes of information disclosure, the analysis herein includes an assessment of proximate roadway traffic noise to future occupants of new residential land uses associated with the Project. For the relevant modeling data, refer to the following appendices:

Appendix H-1 Construction Noise Modeling Worksheets, prepared by Dudek

Appendix H-2 Traffic Noise Modeling Worksheets, prepared by Dudek

Appendix H-3 Stationary Operations Noise Modeling, prepared by Dudek

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

4.10.1 Existing Setting

The Project involves the implementation of the proposed Specific Plan, which totals approximately 6.35 acres of land (post dedications) located in the City of El Segundo (City) adjacent to Pacific Coast Highway (PCH). Ambient outdoor noise sources at the Project site include traffic along PCH and the adjacent roads.

Noise Terminology and Characteristics

Sound, Noise, and Acoustics

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) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound. In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receptor determine the sound level and characteristics of the noise perceived by the receptor. The field of acoustics deals primarily with the propagation and control of sound.

Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of pressure waves generated by a sound source determines the loudness of that source. Sound pressure amplitude is measured in micro-Pascals (mPa). One mPa is approximately one hundred billionth (0.0000000001) of normal atmospheric pressure. Sound pressure amplitudes for different kinds of noise environments can range from less than 100 to 100,000,000 mPa. Because of this huge range of values, sound is rarely expressed in terms of mPa. Instead, a logarithmic scale is used to describe sound pressure level (SPL) in terms of decibels (dB). The threshold of hearing for young people is about 0 dB, which corresponds to 20 mPa.

Addition of Decibels

Because decibels are logarithmic units, SPL cannot be added or subtracted through ordinary arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3 dB increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a receptor equidistant to each sound source would be 3 dB higher than one source under the same conditions. For example, if one automobile produces an SPL of 70 dB when it passes an observer, two cars passing simultaneously would not produce 140 dB—rather, they would combine to produce 73 dB. Under the decibel scale, three sources of equal loudness together produce a sound level 5 dB louder than one source.

A-Weighted Decibels

The decibel scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness or human response is determined by the characteristics of the human ear.

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the SPL in that range. In general, people are most sensitive to the frequency range of 1,000–8,000 Hz, and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. To approximate the response of the human ear, sound levels of individual frequency bands are weighted, depending on the human sensitivity to those frequencies. Then, an “A-weighted” sound level (expressed in units of dBA) can be computed based on this information.

The A-weighting network approximates the frequency response of the average young ear when listening to most ordinary sounds. When people make judgments of the relative loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Other weighting networks have been devised to address high noise levels or other special problems (e.g., B-, C-, D-, and G-scales), but these scales are rarely used in conjunction with highway traffic noise. Noise levels for traffic noise reports are typically reported in terms of A-weighted decibels (dBA). Table 4.10-1 arranges typical outdoor and indoor noise sources against a decreasing linear scale of A-weighted sound levels.

Table 4.10-1. Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	– 110 –	Rock band
Jet fly-over at 1000 feet		
	– 100 –	

Table 4.10-1. Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Gas lawn mower at 3 feet	– 90 –	
Diesel truck at 50 feet at 50 mph	– 80 –	Food blender at 3 feet
		Garbage disposal at 3 feet
Noisy urban area, daytime	– 70 –	
Gas lawn mower, 100 feet		Vacuum cleaner at 10 feet
Commercial area	– 60 –	Normal speech at 3 feet
Heavy traffic at 300 feet		
	– 50 –	Large business office
Quiet urban daytime		Dishwasher next room
	– 40 –	
Quiet urban nighttime		Theater, large conference room (background)
Quiet suburban nighttime	– 30 –	
		Library
Quiet rural nighttime	– 20 –	Bedroom at night, concert hall (background)
	– 10 –	Broadcast/recording studio
	– 0 –	
Lowest threshold of human hearing		Lowest threshold of human hearing

Source: Caltrans 2013a.

Human Response to Changes in Noise Levels

As discussed above, doubling sound energy results in a 3 dB increase in sound. However, given a sound level change measured with precise instrumentation, the subjective human perception of a doubling of loudness will usually be different than what is measured.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear is able to discern 1 dB changes in sound levels, when exposed to steady, single-frequency (“pure-tone”) signals in the mid-frequency (1,000 Hz–8,000 Hz) range (Caltrans 2013a). In typical noisy environments, changes in noise of 1 to 2 dB are generally not perceptible. However, it is widely accepted that people are able to begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5 dB increase is generally perceived as a distinctly noticeable increase, and a 10 dB increase is generally perceived as a doubling of loudness. Therefore, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3 dB increase in sound would generally be perceived as barely detectable.

Noise Descriptors

Noise in our daily environment fluctuates over time at varying rates. Various noise descriptors have been developed to describe time-varying noise levels. The following are the noise descriptors are utilized in this analysis.

- **Equivalent Sound Level (L_{eq}):** L_{eq} represents an energy average of the sound level occurring over a specified period. The 1-hour A-weighted equivalent sound level ($L_{eq}[h]$) is the energy average of A-

weighted sound levels occurring during a one-hour period, and is the basis for noise abatement criteria used by the California Department of Transportation (Caltrans) and the Federal Highway Administration (FHWA). Note that L_{eq} is not an arithmetic average of varying dB levels over a period of time, it accounts for greater sound energy represented by higher decibel contributions.

- **Percentile-Exceeded Sound Level (L_{xx}):** L_{xx} represents the sound level exceeded for a given percentage of a specified period (e.g., L_{10} is the sound level exceeded 10% of the time, and L_{90} is the sound level exceeded 90% of the time).
- **Maximum Sound Level (L_{max}):** L_{max} is the highest instantaneous sound level measured during a specified period.
- **Day-Night Level (L_{dn}):** L_{dn} is the energy average of A-weighted sound levels occurring over a 24-hour period, with a 10 dB penalty applied to A-weighted sound levels occurring during nighttime hours between 10 p.m. and 7 a.m.
- **Community Noise Equivalent Level (CNEL):** Similar to L_{dn} , CNEL is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10 dB penalty applied to A-weighted sound levels occurring during the nighttime hours between 10 p.m. and 7 a.m., and a 5 dB penalty applied to the A-weighted sound levels occurring during evening hours between 7 p.m. and 10 p.m.

Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The manner in which noise reduces with distance depends on the following factors:

- **Geometric Spreading** – Sound from a localized source (i.e., an ideal point source) propagates uniformly outward in a spherical pattern (or hemispherical when near a surface). The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Roadways consist of several localized noise sources on a defined path, and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source.
- **Ground Absorption** – The propagation path of noise from a sound emission source to a receptor is usually horizontal and proximate to the ground. Under these conditions, noise attenuation from ground absorption and reflective-wave canceling can add to the attenuation associated with geometric spreading. For acoustically “hard” paths over which sound may traverse (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or “soft” sites (i.e., those sites with an absorptive ground surface between the source and the receptor, such as fresh-fallen snow, soft dirt, or dense vegetative ground cover), an additional ground-attenuation value of +1.5 dB per doubling of distance is normally assumed. When added to cylindrical spreading for line source sound propagation, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance.
- **Atmospheric Absorption** – In addition to aforementioned geometric spreading, the fluid medium (i.e., the air) through which sound travels yields frequency-dependent attenuation that increases in magnitude with increasing frequency. The effect is influenced by temperature and relative humidity, and typically negligible over short source-to-receptor distances (e.g., less than 500 feet); but, it helps explain why lower-frequency sound such as a thunderclap appears to “travel farther” over great distances.
- **Meteorological Effects** – Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound

pressure levels can also be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects when distances between a source and receptor are large.

- **Shielding by Natural or Human-Made Features** – A large object or barrier in the direct path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Natural terrain features (e.g., hills and ridgelines) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor specifically to reduce noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dB of noise reduction. Taller barriers provide increased noise reduction. While a line of trees may visually occlude the direct line between a source and a receptor, its actual noise-reducing effect is usually negligible because it does not create an acoustically solid barrier. Deep expanses of dense wooded areas, on the other hand, can offer noise reduction under the right conditions.

Vibration Characteristics

Vibration is oscillatory movement of mass (typically a solid) over time. It is described in terms of frequency and amplitude and, unlike sound, can be expressed as displacement, velocity, or acceleration. For environmental studies, vibration is often studied as a velocity that, akin to the discussion of sound pressure levels, can also be expressed in dB as a way to cast a large range of quantities into a more convenient scale. Vibration impacts to buildings are generally discussed in terms of inches per second (ips) peak particle velocity (PPV), which will be used herein to discuss vibration levels for ease of reading and comparison with relevant standards. Vibration can also be annoying and thereby impact occupants of structures, and vibration of sufficient amplitude can disrupt sensitive equipment and processes (Caltrans 2013b), such as those involving the use of electron microscopes and lithography equipment. Common sources of vibration within communities include construction activities and railroads. Groundborne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and demolition-related activities where sudden releases of subterranean energy or powerful impacts of tools on hard materials occur. Depending on their distances to a sensitive receptor, operation of large bulldozers, graders, loaded dump trucks, or other heavy construction equipment and vehicles on a construction site also have the potential to cause high vibration amplitudes. The maximum vibration level standard used by Caltrans for the prevention of structural damage to typical residential buildings is 0.3 ips PPV (Caltrans 2013b). For human annoyance, Caltrans guidance indicates that a more stringent threshold of 0.2 ips PPV due to continuous vibration (e.g., nearby roadway traffic) would be “annoying.” Vibration velocity limits for transient or single events tend to be less stringent than those for continuous or “steady-state” vibration sources.

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. Based on context from the City Noise Ordinance and General Plan Noise Element as summarized in Section 4.10.2, Relevant Plans, Policies, and Ordinances, sensitive receptors include multi-family homes located immediately to the west and northwest of the Project site. These existing sensitive receptors represent the nearest land uses with the potential to be impacted by construction and operation of future projects under the Project, including noise

levels associated with the addition of Project-related traffic on the local roadway network. Additional sensitive receptors are located farther from the Project site in the surrounding community, such as single-family residences west of Washington Street, and due to this increased distance (over 500 feet from the Project boundary) would be less impacted by noise and vibration levels than the above-listed sensitive receptors. In addition to the off-site receptors listed above, the proposed residential uses to be constructed and occupied as part of the Project would be considered sensitive receptors after completion of construction and occupancy.

Existing Noise Environment

The existing noise environment of the Project area and its vicinity includes a variety of acoustical contributors that include aviation traffic from Los Angeles International Airport (LAX), proximate roadway traffic on PCH and the connected network of local streets, and an assortment of stationary noise sources that include commercial and industrial activities as well as operating heating, ventilating, and air-conditioning systems (HVAC) from residential and commercial land uses.

For purposes of this noise impact assessment, the existing outdoor ambient noise environment is estimated with an FHWA predictive modeling technique that is based on proximity of roadway traffic, which in this case PCH would be the expected dominant acoustical contributor. Under normal conditions, such estimates of the outdoor ambient sound levels would be confirmed with or supplanted by field-collected SPL measurements. However, at the time of this writing and due to COVID-19 response effects, commercial activities and levels of roadway and aviation traffic have likely been reduced in volume or intensity, and would therefore result in measured outdoor ambient sound levels that are lower and consequently unrepresentative of the typical sound environment under normal conditions.

Traffic noise levels representing existing (i.e., baseline or pre-Project) conditions were modeled with the FHWA Traffic Noise Model (TNM, Version 2.5) at representative noise-sensitive receivers ST1 through ST6 (see Figure 4.10-1, Traffic Noise Analysis). Details of the TNM inputs and output appear in Appendix H-2. These six receivers were modeled to be 5 feet above the local ground elevation. The traffic noise model prediction results have CNEL values ranging from 55 to 69 dBA. The predicted CNEL values for existing pre-Project conditions at sample receivers representing those nearest to PCH (ST3 and ST6) are each comparable to traffic-dominated outdoor ambient sound levels as estimated by Federal Transit Administration (FTA) guidance (i.e., Table 5-7 from the Transit Noise and Vibration Impact Assessment [FTA 2006]) and based on proximity to major roadways such as PCH. This correlation, with quantified differences no greater than 3 dB (a barely perceptible difference), between the modeled results and estimates from FTA guidance suggests the same TNM-based model can be used to predict the outdoor ambient levels for other surrounding roadways proximate to the Project and thereby evaluate future “existing + project” traffic noise levels.

The predicted pre-Project traffic sound levels are also generally consistent with what is depicted in Exhibit N-1 from the City’s General Plan Noise Element, which illustrates “existing CNEL noise contours” and suggests that, due to the proximity of LAX, Interstate 105, and PCH, the CNEL for the neighborhood surrounding the Project would at least range from 60–65 dBA CNEL (City of El Segundo 1992a). Predicted existing traffic noise levels that are lower, such as 55 dBA CNEL at ST2, represent the modeled effect of existing buildings (i.e., the Fairfield Inn and Suites Hotel) occluding the sound emission from PCH. Where predicted levels are higher, such as 69.5 dBA CNEL at ST3 and ST6, the positions are merely closer to PCH and fully exposed to its acoustical contribution.

4.10.2 Relevant Plans, Policies, and Ordinances

Federal

There are no relevant federal regulations.

State

California Department of Transportation

In its Transportation and Construction Vibration Guidance Manual, Caltrans recommends a vibration velocity threshold of 0.2 ips PPV (Caltrans 2013b) for assessing annoying vibration impacts to occupants of residential structures. Although this Caltrans guidance is not a regulation, it can serve as a quantified standard in the absence of such limits at the local jurisdictional level. Similarly, thresholds to assess building damage risk due to construction vibration vary with the type of structure and its fragility, but tend to range between 0.2 ips and 0.3 ips PPV for typical residential structures (Caltrans 2013b).

Government Code Section 65302(g)

California Government Code Section 65302(g) requires the preparation of a Noise Element in a general plan, which shall identify and appraise the noise problems in the community. The Noise Element shall recognize the guidelines adopted by the Office of Noise Control in the State Department of Health Services and shall quantify, to the extent practicable, current and projected noise levels for the following sources:

- Highways and freeways
- Primary arterials and major local streets
- Passenger and freight on-line railroad operations and ground rapid transit systems
- Aviation and airport-related operations
- Local industrial plants
- Other ground stationary noise sources contributing to the community noise environment

California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research, provides guidance for the acceptability of specific land use types within areas of specific noise exposure. Table 4.10-2, Land Use Compatibility for Community Noise Environments, presents guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. The Office of Planning and Research guidelines are advisory in nature. Local jurisdictions, including the City of El Segundo, have the responsibility to set specific noise standards based on local conditions.

Table 4.10-2. Land Use Compatibility for Community Noise Environments

	Community Noise Exposure (CNEL)			
	Normally Acceptable ¹	Conditionally Acceptable ²	Normally Unacceptable ³	Clearly Unacceptable ⁴
Residential-low density, single-family, duplex, mobile homes	50-60	55-70	70-75	75-85
Residential – multiple-family	50-65	60-70	70-75	70-85
Transit lodging – motel, hotels	50-65	60-70	70-80	80-85
Schools, libraries, churches, hospitals, nursing homes	50-70	60-70	70-80	80-85
Auditoriums, concert halls, amphitheatres	NA	50-70	NA	65-85
Sports arenas, outdoor spectators sports	NA	50-75	NA	70-85
Playgrounds, neighborhood parks	50-70	NA	67.5-77.5	72.5-85
Golf courses, riding stables, water recreation, cemeteries	50-70	NA	70-80	80-85
Office buildings, business commercial and professional	50-70	67.5-77.5	75-85	NA
Industrial, manufacturing, utilities, agriculture	50-75	70-80	75-85	NA

Source: OPR 2003

CNEL = Community Noise Equivalent Level; NA = not applicable

- 1 Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
- 2 Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.
- 3 Normally Unacceptable: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise-insulation features must be included in the design.
- 4 Clearly Unacceptable: New construction or development should generally not be undertaken.

California Code of Regulations Title 24

The State of California has adopted noise standards in areas of regulation not preempted by the federal government. State standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. State regulations governing noise levels generated by individual motor vehicles and occupational noise control are not applicable to planning efforts, nor are these areas typically subject to CEQA analysis. State noise regulations and policies applicable to the Project include Title 24 requirements and noise exposure limits for various land use categories. The 2019 California Building Code (CBC, Part 2, Title 24, Section 1204.6, California Code of Regulations) stipulates “interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level (L_{dn}) or the community noise equivalent level (CNEL).”

Regional and Local

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 (City of El Segundo 1992a). 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 N1-1: It is the objective of the City of El Segundo to ensure that City residents are not 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.

Program N1-1.9A: All new habitable residential construction in areas of the City with an annual CNEL of 60 dBA or higher shall include all mitigation measures necessary to reduce interior noise levels to minimum state standards. Post construction acoustical analysis shall be performed to demonstrate compliance.

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 equipment, truck loading areas, or outdoor speaker systems.

Program N1-2.1B: The City shall establish criteria for determining the type and size of projects that should submit a construction-related noise mitigation plan. Noise mitigation plans shall be submitted to the City Engineer for his review and approval prior to issuance of a grading permit. The plan must display the location of construction equipment and how this noise will be mitigated. These mitigation measures may involve noise suppression equipment and/or the use of temporary barriers.

Program N1-2.1C: The City shall strictly enforce the El Segundo Municipal Code's time-dependent noise standards for stationary 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.

Program N1-3.3A: The City shall review and, if necessary, revise the City Noise Ordinance to ensure that proper regulations are being enforced to protect City residents from excessive noise levels from stationary noise sources.

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.

Proposed Pacific Coast Commons Specific Plan

Requirements set forth in the Specific Plan's Development Standards that are relevant for the topic of Noise include, but may not be limited to the following:

A.5.b. Loading docks, bays and parking spaces, delivery service areas, outdoor storage areas, stand-alone mechanical equipment facilities, should be located and designed to minimize their visibility, circulation conflicts and adverse noise impacts. Sound attenuation walls should be used where appropriate to reduce noise where required by code or the Project’s environmental analysis.

A.5.e. Trash and recycling receptacles areas should be completely screened from public view from public rights-of-way with solid walls, wood, and/or landscaping.

4.10.3 Thresholds of Significance

The significance criteria used to evaluate a project’s impacts related to noise are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to noise would occur if a project would result in:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- b) Generation of excessive groundborne vibration or groundborne noise levels.
- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

Quantitative thresholds of significance have been established for the purposes of this analysis based on the local polices and regulations described in Section 4.10.2 and are listed below.

- Through adherence to the limitation of allowable construction times provided in the El Segundo Municipal Code (ESMC), construction-related noise levels attributed to the Project of less than 65 dBA (or as adjusted upwards for partial-hour activity durations) at residential property lines would be considered compliant with the ESMC and would result in less than significant impacts. The property lines of the nearest multi-family residences to the west of the Project appear to be as close as 15 feet to the PCC-North, 58 feet to the PCC-Fairfield Parking, and 62 feet to the PCC-South.
- Off-site noise impacts due to Project-generated traffic would be considered significant if Project-generated traffic causes an increase of 3 dBA CNEL (a barely perceptible difference) compared to existing traffic noise levels.
- Noise emission from Project-attributed stationary sources, such as rooftop HVAC systems operating at night to provide interior comfort for new residential and non-residential land uses implemented as a result of the Project, would be limited to a 5 dBA increase over the ambient levels at the nearest off-site existing residential properties.
- Noise emission from Project-attributed stationary sources, such as rooftop HVAC systems operating at night to provide interior comfort for new residential and non-residential land uses implemented as a result of the Project, would be limited to an 8 dBA increase over the ambient levels at the nearest off-site existing commercial properties.
- Guidance from Caltrans indicates that a vibration velocity level of 0.2 ips PPV received at a structure would be considered annoying by occupants within (Caltrans 2013b). As for the receiving structure itself, aforementioned Caltrans guidance from Section 4.10.2 recommends that a vibration level of 0.3 ips PPV would represent the threshold for building damage risk.

- Exposure of workers and occupants of new residences as a result of Project construction to aviation traffic noise levels greater than 65 dBA CNEL would be considered a significant impact.

For informational purposes, roadway traffic noise exposures that exceed 65 dBA CNEL at newly created residential exterior uses (e.g., patios, balconies) would be recognized as exceedances of the City's compatibility threshold.

4.10.4 Impacts Analysis

Threshold 4.10a Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

On-site noise-generating activities associated with the Project would include short-term construction as well as long-term operational noise associated with the Project. The Project would also generate off-site traffic noise along various roadways in the area. These potential effects are analyzed below.

Construction Noise (Short-Term Impacts)

Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor.

Equipment that would be in use during construction would include, in part, graders, backhoes, excavators, loaders, cranes, dozers, cement pump trucks, pavers, rollers, welders, concrete saws, and air compressors. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 4.10-3. Usually, construction equipment operates in alternating cycles of full power and low power, producing average noise levels over time that are less than the listed maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 4.10-3. Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L_{max} , dBA at 50 Feet)
Air compressor	78
Backhoe	78
Concrete mixer truck	79
Concrete Saw	90
Dozer	85
Grader	85
Crane	81
Man-lift	75
Roller	80
Generator	72
Front End Loader	79
Paver	77
Welder	73

Source: DOT 2006.

L_{max} = maximum sound level; dBA = A-weighted decibels.

Aggregate noise emission from Project construction activities, broken down by sequential phase, was predicted for two distances to the nearest existing noise-sensitive receptor: (1) from the nearest position of the construction site boundary; and (2) from the geographic center of the construction site of each phase location, which serves as the time-averaged location or geographic *acoustical centroid* of active construction equipment for the phase under study. The intent of the former distance is to help evaluate anticipated construction noise from a limited quantity of equipment or vehicle activity expected to be at the boundary for some period of time, which would be most appropriate for phases such as site preparation, grading, and paving. The latter distance is used in a manner similar to the general assessment technique as described in the FTA guidance for construction noise assessment, when the location of individual equipment for a given construction phase is uncertain over some extent of (or the entirety of) the construction site area. Because of this uncertainty, all the equipment for a construction phase is assumed to operate—on average—from the acoustical centroid.

For each of the three proposed buildout phases associated with the Project, Table 4.10-4 summarizes construction noise assessment distances with respect to apparent closest receptors for each of the six sequential construction phases as well as the overall nearest position of the construction site boundary. At the site boundary, this analysis conservatively assumes that up to only one piece of equipment (the loudest) of each listed type per phase would be involved in the construction activity and for at least one full hour. In other words, at such proximity, the operating equipment cannot “stack” or crowd the vicinity and still operate in a practical manner. For the acoustical centroid case, which intends to be a geographic average position for all equipment during the indicated phase, this analysis assumes that the equipment would be operating for the full hour.

Table 4.10-4. Estimated Distances between Construction Activities and the Nearest Noise-Sensitive Receptors for Each Buildout Phase of the Project

Construction Phase (and Equipment Types Involved)	Distance (feet) from Nearest Receptor to Construction Site Boundary (Multi-Family on Indiana Street)*	Approximate Distance (feet) from Nearest Receptor to Acoustical Centroid of Site
Buildout Phase 1 (PCC-Fairfield Parking)		
Demolition (Concrete Saw, Excavator, Dozer)	58	170
Site Preparation (Dozer, Backhoe, Front End Loader)	58	170
Grading (Excavator, Grader, Dozer, Backhoe)	58	170
Construction (Crane, Manlift, Generator, Backhoe, Welder)	58	170
Architectural Coating (Air Compressor)	58	170
Paving (Paver, Concrete Mixer Truck, Roller)	58	170
Buildout Phase 2 (PCC-North)*		
Demolition (Concrete Saw, Excavator, Dozer)	15	N/A
Site Preparation (Dozer, Backhoe, Front End Loader)	20	N/A
Grading (Excavator, Grader, Dozer, Backhoe)	20	N/A
Construction (Crane, Manlift, Generator, Backhoe, Welder)	41	N/A
Architectural Coating (Air Compressor)	41	N/A
Paving (Paver, Concrete Mixer Truck, Roller)	20	N/A
Buildout Phase 3 (PCC-South)		
Demolition (Concrete Saw, Excavator, Dozer)	62	175
Site Preparation (Dozer, Backhoe, Front End Loader)	62	175
Grading (Excavator, Grader, Dozer, Backhoe)	62	175

Table 4.10-4. Estimated Distances between Construction Activities and the Nearest Noise-Sensitive Receptors for Each Buildout Phase of the Project

Construction Phase (and Equipment Types Involved)	Distance (feet) from Nearest Receptor to Construction Site Boundary (Multi-Family on Indiana Street)*	Approximate Distance (feet) from Nearest Receptor to Acoustical Centroid of Site
Construction (Crane, Manlift, Generator, Backhoe, Welder)	62	175
Architectural Coating (Air Compressor)	62	175
Paving (Paver, Concrete Mixer Truck, Roller)	62	175

* For Phase 2, the nearest receptors are multi-family residential buildings west of the Project property line at PCC North, at which the construction noise level needs to be assessed and compared with the City's 65 dBA threshold
 N/A = not applicable (since operating construction equipment would largely be near the construction site boundary for a considerable portion of Phase 2 construction).

A Microsoft Excel-based noise prediction model emulating and using reference data from the FHWA Roadway Construction Noise Model (FHWA 2008) was used to estimate construction noise levels at the nearest residential properties. (Although the Roadway Construction Noise Model was funded and promulgated by the FHWA, it is often used for non-roadway projects because the same types of construction equipment used for roadway projects are often used for other types of construction.) Input variables for the predictive modeling consist of the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of time within a specific time period, such as 1 hour, when the equipment is expected to operate at full power or capacity and thus make noise at a level comparable to what is presented in Table 4.10-3, and the distance from the noise-sensitive receiver. Conservatively, no topographical or structural shielding was assumed in the modeling. The Roadway Construction Noise Model has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis, which is detailed in Appendix H-1, Construction Noise Modeling Input and Output, and produce the predicted results displayed in Table 4.10-4, Predicted Construction Noise Levels per Activity Phase.

Although Buildout Phases 2 and 3 are expected to be concurrent, the associated sites (PCC- North and PCC-South), the acoustical centroids of their construction activities are at least 1,000 feet apart. Hence, while a residential receptor may be proximate to activity during one of these two Project buildout Phases, its distance to the other site will be sufficiently great so as to render its acoustic contribution cumulatively negligible. Thus, the construction noise impacts are evaluated by Buildout Phase.

Table 4.10-5. Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	Hourly L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	Hourly L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Buildout Phase 1 (PCC-Fairfield Parking)		
Demolition (Concrete Saw, Excavator, Dozer)	72	74
Site Preparation (Dozer, Backhoe, Front End Loader)	77	74
Grading (Excavator, Grader, Dozer, Backhoe)	77	74
Construction (Crane, Manlift, Generator, Backhoe, Welder)	73	71

Table 4.10-5. Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	Hourly L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)	Hourly L_{eq} at Nearest Noise-Sensitive Receptor to Acoustical Centroid of Site (dBA)
Architectural Coating (Air Compressor)	73	63
Paving (Paver, Concrete Mixer Truck, Roller)	77	71
Buildout Phase 2 (PCC-North)*		
Demolition (Concrete Saw, Excavator, Dozer)	84	N/A
Site Preparation (Dozer, Backhoe, Front End Loader)	82	N/A
Grading (Excavator, Grader, Dozer, Backhoe)	85	N/A
Construction (Crane, Manlift, Generator, Backhoe, Welder)	78	N/A
Architectural Coating (Air Compressor)	78	N/A
Paving (Paver, Concrete Mixer Truck, Roller)	81	N/A
Buildout Phase 3 (PCC- South)		
Demolition (Concrete Saw, Excavator, Dozer)	71	74
Site Preparation (Dozer, Backhoe, Front End Loader)	76	74
Grading (Excavator, Grader, Dozer, Backhoe)	77	74
Construction (Crane, Manlift, Generator, Backhoe, Welder)	72	70
Architectural Coating (Air Compressor)	72	63
Paving (Paver, Concrete Mixer Truck, Roller)	77	71

* For Phase 2, the nearest receptors are multi-family residential buildings west of the Project property line at PCC North, at which the construction noise level needs to be assessed and compared with the City's 65 dBA threshold

N/A = not applicable (since operating construction equipment would largely be near the construction site boundary for a considerable portion of Phase 2 construction).

As presented in Table 4.10-5, the estimated construction noise levels are predicted to be as high as 85 dBA hourly L_{eq} at the nearest existing residences when Project Buildout Phase 2 (PCC-North) grading activities take place. Aside from operation of an air compressor at the acoustical center of buildout Phases 1 and 3, noise from construction for all phases is anticipated to exceed the City's hourly threshold of 65 dBA L_{eq} at the existing nearest residential properties to the west. Thus, under these conditions construction noise would result in a temporary but significant noise impact at these receptors and require mitigation measures that—if designed and implemented properly by the Project applicant and its construction contractors—would need to demonstrate at least 5 dBA and as high as 20 dBA of sound abatement in order to yield Project-attributed construction noise levels that are compliant with this City standard. Typical construction “sound blankets”, such as those offered by local suppliers, are capable of providing this 5 to 20 dBA range of acoustical insertion loss (i.e., the difference in measured sound level at a receiver after a sound-occluding element is placed in the direct path between the receiver and the noise source of interest). Thus, with application of MM-NOI-1, construction noise impacts at the nearest multi-family residential properties on the west side of Indiana Street and west side of Phase 2 (PCC-North) would be reduced to a less than significant level.

Table 4.10-6 illustrates the existing noise levels (2019) at the noise locations, and the anticipated post-Project noise levels. As previously discussed, for purposes of this noise impact assessment, the existing outdoor ambient noise environment is estimated with an FHWA predictive modeling technique that is based on proximity of roadway traffic, which in this case PCH would be the expected dominant acoustical contributor. Under normal conditions, such estimates of the outdoor ambient sound levels would be confirmed with or supplanted by field-collected SPL measurements. However, at the time of this writing and due to COVID-19 response effects,

commercial activities and levels of roadway and aviation traffic have likely been reduced in volume or intensity, and would therefore result in measured outdoor ambient sound levels that are lower and consequently unrepresentative of the typical sound environment under normal conditions.

Table 4.10-6. Off-Site Roadway Traffic Noise Modeling Results

Figure 4.10-1 Modeled Receiver Tag (Location Description)	Existing (2019) Noise Level (dBA CNEL)	Existing (2019) Plus Project Noise Level (dBA CNEL)	Future (2025) Noise Level (dBA CNEL)	Future (2025) Plus Project Noise Level (dBA CNEL)	Maximum Project-Related Noise Level Increase (dB)
ST1 (West of Indiana Street)	59.0	56.1	59.5	55.5	-4.0
ST2 (Northwestern Project Boundary)	55.0	55.9	55.2	55.7	0.9
ST3 (Eastern Project Boundary Approximately 50 Feet from PCH)	69.5	68.2	70.3	68.7	1.6
ST4 (Northeast Corner of E Mariposa Avenue and Illinois Court)	63.0	62.7	63.3	62.9	-0.4
ST5 (Norther Project Boundary approximately 30 feet from E Palm Avenue)	59.2	57.9	59.8	58.5	-1.3
ST6 (Eastern Project Boundary approximately 50 feet from PCH)	69.5	69.6	70.2	70.2	0.1

dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level; dB = decibel.

Table 4.10-6 shows that at all six listed representative receivers, the addition of proposed Project traffic to the roadway network would result in a CNEL value increase of less than 3 dB, which is below the discernible level of change for the average healthy human ear. In fact, the installation of the proposed Project would add sound-path occlusion and result in predicted SPL that are lower than existing measured levels. Thus, a less-than-significant impact would occur for Project-related off-site traffic noise affecting existing residences in the vicinity.

Traffic Noise Exposure to Future Project Occupants

Aside from exposure to aviation traffic noise, current CEQA noise-related guidelines do not require an assessment of exterior-to-interior noise intrusion, environmental noise exposure to occupants of newly created Project residences, or environmental noise exposure to exterior non-residential uses attributed to the development of the proposed Project. Nevertheless, the California Building Code requires that interior background noise levels not exceed a CNEL of 45 dB within habitable rooms. Hence, the following predictive analysis of traffic noise exposure at the exteriors of occupied residences and outdoor living areas is provided for informational purposes. Additionally, this analysis of outdoor environmental noise to the newly created Project residences would be consistent with the “post-construction acoustical analysis” per Program N1-1.9A from the City’s General Plan Noise Element.

In addition to the prediction results presented in Table 4.10-6, the FHWA TNM software was also used to predict the future plus Project scenario traffic noise levels at multiple on-site exterior areas, as listed in Table 4.10-7. At

modeled receiver locations, which appear in Figure 4.10-1 for proposed Project conditions, traffic noise is estimated at the exteriors of the building facades for multiple floor elevations (e.g., M1-1 represents the first floor of the modeled geographic location M1).

Table 4.10-7. On-Site Roadway Traffic Noise Modeling Results

Location	Modeled Receiver	Description	Predicted Traffic Noise Exposure at Modeled Receiver (dBA CNEL)
Pacific Coast Commons – South	M1-1	1st floor	54.3
	M1-2	2nd floor w/ Balcony	54.3
	M1-3	3rd floor w/ Balcony	54.0
	M1-4	4th floor w/ Balcony	53.8
	M1-5	5th floor w/ Balcony	53.6
	M1-6	6th floor w/ Balcony	53.5
	M2-1	1st floor	61.1
	M2-2	2nd floor w/ Balcony	61.6
	M2-3	3rd floor w/ Balcony	61.8
	M2-4	4th floor w/ Balcony	62.0
	M2-5	5th floor w/ Balcony	61.9
	M2-6	6th floor w/ Balcony	61.8
	M3-1	1st floor	71.7
	M3-2	2nd floor w/ Balcony	71.4
	M3-3	3rd floor w/ Balcony	71.1
	M3-4	4th floor w/ Balcony	70.9
	M3-5	5th floor w/ Balcony	70.6
	M3-6	6th floor w/ Balcony	70.5
Pacific Coast Commons – Fairfield Parking	M4-1	1st floor	70.8
	M4-2	2nd floor	70.7
	M4-3	3rd floor	70.4
	M4-4	4th floor	70.2
	M4-5	5th floor	70.2
Pacific Coast Commons – North	M5-1	1st floor	70.2
	M5-2	2nd floor w/ Balcony	70.3
	M5-3	3rd floor w/ Balcony	70.2
	M5-4	4th floor w/ Balcony	69.9
	M5-5	5th floor w/ Balcony	69.7
	M5-6	6th floor w/ Balcony	69.7
	M6-1	1st floor	61.1
	M6-2	2nd floor w/ Balcony	61.5
	M6-3	3rd floor w/ Balcony	62.6
	M6-4	4th floor w/ Balcony	63.0
	M6-5	5th floor w/ Balcony	63.0
	M6-6	6th floor w/ Balcony	62.8
	M7-1	1st floor w/ Patio	50.6
	M7-2	2nd floor w/ Balcony	51.5
	M7-3	3rd floor w/ Balcony	51.7
M7-4	4th floor w/ Balcony	51.8	
M7-5	5th floor w/ Balcony	51.7	

Table 4.10-7. On-Site Roadway Traffic Noise Modeling Results

Location	Modeled Receiver	Description	Predicted Traffic Noise
	M7-6	6th floor w/ Balcony	51.8
	M8-1	1st floor w/ Patio	65.5
	M8-2	2nd floor w/ Balcony	64.8
	M8-3	3rd floor w/ Balcony	64.7
	M8-4	4th floor w/ Balcony	64.5
	M8-5	5th floor w/ Balcony	64.7
	M8-6	6th floor w/ Balcony	64.7
Pacific Coast Commons - Condos	M9-1	1st floor	45.0
	M9-2	2nd floor w/ Balcony	48.1
	M9-3	3rd floor w/ Balcony	48.4
	M9-4	4th floor w/ Balcony	48.5

dB(A) = A-weighted decibel; CNEL = Community Noise Equivalent Level.

Table 4.10-7 shows that at the modeled facade positions representing the exteriors of building walls, patios, and balconies of occupied living rooms or bedrooms that are closest to and face PCH and surrounding local roadways, predicted on-site CNEL values are all less than 72 dBA.

Typically, when they feature open windows, building shells provide an average of 12–18 dB (OPR 2017) of exterior-to-interior noise reduction. Such building facades typical of residential construction with windows closed generally provide a minimum of 25 dB exterior-to-interior noise attenuation (FHWA 2011). An analysis of composite sound transmission class (STC) for a sample Project exterior wall assembly, including fenestration, supports these general assertions as shown in Table 4.10-8 and are based on the following parameters:

- The exterior wall assembly includes (or is acoustically comparable to) at a minimum: one layer of 5/8" gypsum wallboard (GWB) on the interior-facing side, 2"x4" wood studs, glass fiber batt insulation in the stud cavities, and a thin stucco/plaster coating on one layer of 5/8" GWB (or what may instead be underlying wooden structural panels or sheeting having comparable mass).
- Windows are assumed to be single hung operable windows, featuring dual pane assembly composed of two 1/8"-thick glass panes separated by a 3/8" wide air-gap.
- For purposes of this analysis, doors are sliding-type and assumed to feature a dual-pane glazing system similar to the window assembly (i.e., two 1/8"-thick glass panes separated by a 3/8" wide air-gap) in narrow-perimeter frames. The analysis also assumes that these door products—akin to the windows—feature good seals and related hardware, so that when closed, the effective sound insulating performance is represented by the gap-separated glass panes.

Table 4.10-8. Predicted Net Sound Transmission Class of Sample Occupied Room Facade

Building and Sample Occupied Unit	Occupied Room Facade	Predicted Net Sound Transmission Class (STC) for Scenario			
		Closed Window(s) and Door(s)	Open Window, Closed Door	Open Door, Closed Window	Open Door, Open Window
South Building A&S Units	2nd – 6th floor Living Room	35	14	9	7

Table 4.10-8 illustrates that an open window or an open sliding door to an adjoining patio or balcony greatly compromises the overall sound insulation performance of the studied wall assemblies. However, when such windows and doors are closed, all studied sample facades are anticipated to exhibit a predicted STC rating of at least 35, and thus would provide sufficient exterior-to-interior sound insulation from outdoor traffic noise to yield interior background sound levels that are less than 45 dBA CNEL and thus compliant with the City and state standards. Recall that none of the predicted exterior traffic noise levels at the studied receptor locations exceeded 72 dBA CNEL; thus, the STC rating value (for closed windows and doors) subtracted from these exterior noise values must result in interior noise levels of less than 45 dBA CNEL (e.g., $72 - 36 = 36$ dBA CNEL, which is less than 45). The apparent requirement for closed windows and doors means that the design of these habitable rooms should feature mechanical ventilation or an air-conditioning system to provide interior comfort for the occupants.

Stationary Operations Noise

The incorporation of new multi-family homes and a mix of commercial uses attributed to development of the proposed Project would add a variety of noise-producing mechanical equipment that include those presented and discussed in the following paragraphs. Most of these noise-producing equipment or sound sources would be considered stationary, or limited in mobility to a defined area. Using a Microsoft Excel-based outdoor sound propagation prediction model, Project-attributed operational noise at nearby community receptors was predicted using several assumptions:

- Treatment of exposed roof-mounted air-cooled condensing (ACC) units as point-type sound emission sources.
- Point-source sound propagation (i.e., 6 dB per doubling of distance) that conservatively ignores acoustical absorption from atmospheric and ground surface effects.
- These condenser units would be installed at rooftop locations currently depicted in Project design drawings as of this writing.
- Because the condenser units are expected to be roof-mounted, the prediction model separately evaluates potential noise path occlusion due to intervening building structure.

Please see Appendix H-3, Stationary Operations Noise Modeling, for quantitative details of the below predictions.

Residential Unit Heating, Ventilation, and Air Conditioning Noise

For purposes of this analysis and consistent with apparent Project design information, each of the new occupied residential units would be expected to feature a split-system type air-conditioning unit. For the PCC-North buildout, a 62 Goodman GSX140251 2-ton capacity ACC units (or comparable equipment) were modeled as being mounted on the building roof. For the PCC-South buildout, 34 ACC units were modeled on rooftops. Each ACC unit has an SPL of 71 dBA at 3.28 feet based on available data from the manufacturer (Goodman 2020). Using the aforementioned noise prediction model, and without consideration of noise reduction due to building structure acoustical occlusion, the predicted sound emission level from the combination of all operating condenser units at off-site single-family receptors would be as high as 57 dBA L_{eq} to the west of the PCC-South and 61 dBA L_{eq} to the west of PCC-North.

The City of El Segundo states that noise levels (from stationary, non-transportation sources such as these studied operating ACC units) shall be limited to a 5 dB increase over the ambient outdoor sound levels at the nearest off-site existing residential property. Existing night-time outdoor ambient levels were determined by subtracting 10 dB from the existing daytime levels estimated in Table 4.10-6, where the 10 dB daytime-to-nighttime differential is consistent with FTA guidance (FTA 2006). By adding 5 dB to these calculated nighttime ambient noise levels, a

threshold of 50 dBA for the PCC-South and 58 dBA for the PCC-Fairfield Parking and PCC-North were used to determine a significant impact.

As shown in Appendix H-3, the effect of building structure occlusion (i.e., rooftop mass and parapet blocks the direct sound path between noise-producing equipment and the off-site residential receptors) on the predicted HVAC sound exposure levels at nearest existing off-site residences is expected to be at least 10 dB of noise reduction. Applying this noise reduction quantity arithmetically to the displayed geographic grid of predicted HVAC noise levels in Appendix H-3 results in off-site noise exposure levels from rooftop condenser units that are lower than the City's aforementioned ambient-plus-5dB thresholds determined above. Therefore, the operation of these Project residential air-conditioning units would result in a less-than-significant noise impact to the surrounding residential community.

At the outdoor area (i.e., pool and outdoor amenities) of the existing Aloft hotel that is north of the PCC-South area and its collection of operating rooftop ACC units, application of the aforementioned 10 dB structural occlusion to predicted operation noise results displayed in the graphics of Appendix H-3 yield a Project-attributed aggregate ACC noise level no greater than 47 dBA, which is below the estimated existing nighttime sound level of 61.5 dBA L_{eq} for this offsite commercial property location. The 61.5 dBA impact assessment value in this case is based on the traffic noise level of 69.5 dBA as appearing in Table 4.10-6, but adjusted as follows: upwards by 8 dB, reflecting the City's noise ordinance, reduced by 10 dB for difference between daytime and nighttime sound levels, and reduced further by 6 dB to account for two approximate "doublings" of distance between the Aloft Hotel pool area and the position of ST3 with respect to the PCH alignment. (Arithmetically, this assessment value is $69.5 + 8 - 10 - 6 = 61.5$.) A similar analysis could be applied at locations associated with the commercial properties near the PCC-North development. Therefore, the operation of these Project residential air-conditioning units would result in a less-than-significant noise impact to the surrounding commercial properties.

Threshold 4.10b Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Under the right conditions, construction activities may expose persons to excessive groundborne vibration or groundborne noise, causing a potentially significant impact. Caltrans has collected groundborne vibration information related to construction activities (Caltrans 2013b). Information from Caltrans indicates that continuous vibrations with a PPV of approximately 0.2 ips is considered annoying. For context, heavier pieces of construction equipment, such as a bulldozer that may be expected on the Project site, have peak particle velocities of approximately 0.089 ips or less at a reference distance of 25 feet (FTA 2006).

Groundborne vibration attenuates rapidly, even over short distances. The attenuation of groundborne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance. By way of example, for a bulldozer operating on site and as close as the western Project boundary (i.e., 46 feet from the nearest receiving sensitive land use) the estimated vibration velocity level would be 0.035 ips per the equation as follows (FTA 2006):

$$PPV_{rcvr} = PPV_{ref} * (25/D)^{1.5} = 0.035 = 0.089 * (25/46)^{1.5};$$

where PPV_{rcvr} is the predicted vibration velocity at the receiver position, PPV_{ref} is the reference value at 25 feet from the vibration source (the bulldozer), and D is the actual horizontal distance to the receiver.

Therefore, because this predicted vibration velocity PPV from an anticipated sample of operating heavy construction equipment is less than the Caltrans guidance-based annoyance threshold of 0.2 ips PPV, the impact of vibration-induced annoyance to occupants of nearby existing homes would be less than significant. No mitigation is required.

Construction vibration, at sufficiently high levels, can also present a building damage risk. However, the predicted 0.035 ips PPV at the nearest residential receiver 46 feet away from on-site operation of the bulldozer during grading would not surpass the guidance limit of 0.3 ips PPV for preventing damage to residential structures (Caltrans 2013b). Because the predicted vibration level at 46 feet is less than both the annoyance and building damage risk thresholds, vibration from conventional construction activities would be less than significant. No mitigation is required.

Once operational, the Project would not be expected to feature major onsite producers of groundborne vibration. Anticipated onsite mechanical systems like pumps, compressors, and fans are designed and manufactured to feature rotating or reciprocating components (e.g., impellers, rotors, and pistons) that are well-balanced with isolated vibration within or external to the equipment casings. On this basis, potential vibration impacts due to Project operation would be less than significant. No mitigation is required.

Threshold 4.10c For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

There are no private airstrips within the vicinity of the Project site. The closest airport to the Project site is the Los Angeles International Airport approximately 0.66-mile north of the site. According to the Final LAX Part 150 Noise Exposure Map Update Report (ESA 2016), the Project site is outside of the 65 dBA CNEL aviation operation noise contour predicted in the report for 2020, and therefore would not expose workers or new occupants of the proposed Project residences or exterior uses to aviation overflight noise levels greater than 65 dBA CNEL (see Figure 4.10-2, LAX Noise Contours). Hence, on this basis the potential impact with respect to aviation traffic noise would be less than significant.

4.10.5 Cumulative Impact Analysis

Noise in Excess of Standards

Implementation of the Project and its component site-specific development, as well as 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). 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 with mitigation incorporated.

Temporary/Periodic Increases in Ambient Noise Levels

The Project would result in temporary noise increases during construction activities, as discussed under 4.10.4(a) above. The construction period of future developments under the Project has the potential to overlap with the construction of other development projects in the City; however, as shown in Figure 2-5 in Chapter 2,

Environmental Setting, none of the anticipated cumulative projects are in close enough proximity to the Project site. At a distance of over 1,000 feet, aggregate noise emission levels from the nearest cumulative project to the southeast on Grand Avenue would attenuate due to the decrease in noise levels with distance and the presence of physical barriers (i.e., intervening buildings and topography). Hence, 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 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).

Additionally, all future development under implementation of the Project, as well as unrelated construction projects within City limits, would be required to comply with limits on allowable construction hours per relevant portions of the City's noise ordinance. Hence, for the above reasons, cumulative impacts due to cumulative construction noise would be less than significant.

Vibration

Construction-related vibration from future development under the Project was addressed under Threshold 4.10.4(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; therefore, cumulative impacts associated with excessive groundborne vibration would be less than significant.

Permanent Increase in Ambient Noise Levels

Off-Site Traffic

Future development from implementation of the Project along with other unrelated projects would generate off-site traffic noise. When calculating future traffic impacts, the traffic study included traffic attributed to both the Project and unrelated projects. Thus, future traffic noise prediction results with and without the Project already account for the cumulative impacts from unrelated projects contributing to traffic increases. Since the noise impacts are generated directly from the traffic analysis results, the Existing and Year 2025 traffic with and without Project predicted increases in traffic noise levels described herein already reflect cumulative impacts. As described herein, the noise level increases associated with both of these scenarios would generate a noise level increase of less than 3 dBA along the studied sample roadways in the vicinity of the Project. As such, anticipated increases would be below the significance threshold of 3 dBA; hence, the incremental effect of the Project on off-site traffic noise is not cumulatively considerable. Cumulative off-site traffic noise impacts would be less than significant.

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 under Section 4.10.4, Impacts Analysis, under Threshold 4.10a. 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.

4.10.6 Mitigation Measures

MM-NOI-1 Prior to issuance of a demolition or grading permit, whichever occurs first, the Project Applicant/Developer or its approved construction contractor shall develop and submit to the City of El Segundo a Construction Noise Mitigation Plan (CNMP) for review and approval. The CNMP shall include, at a minimum, the following noise reduction means and related measures:

- a. To protect the existing occupied residences on the west side of Indiana Street (and west of the PCC North (Phase 2) portion of the Project, between E. Mariposa Avenue and E. Palm Avenue) from excessive Project construction-related noise attributed to demolition, site preparation, grading, building construction, and paving activities during PCC-Fairfield Parking (Phase 1) and PCC-South (Phase 3), and those same five activities plus architectural coating activities during Phase 2, temporary noise barriers of sufficient height and extent along the Project's western site boundary shall be installed and shall be confirmed to achieve (depending on construction phase activity and involved equipment) at least 5 dBA and as much as 20 dBA of barrier noise insertion loss. The temporary barrier elements should resemble an outdoor-use vinyl-covered acoustical blanket comprising one or more materials that demonstrate a sound transmission class (STC) of 30 or better. The Project Applicant/Developer shall retain the services of a qualified acoustical consultant or noise control engineer to advise on or review the design, installation, and expected performance of such temporary barriers when used during Project construction. Anticipated locations, horizontal extents, heights, and durations of installation of the temporary sound barriers over the course of Project phased buildout shall be part of the CNMP submitted to the City for review.
- b. Operation of a concrete saw during the demolition phase shall include some form of proximate and portable solid-walled partial enclosure, acoustical-blanket tent, or comparably-performing shroud that can reliably deliver 10 dBA of noise reduction—separate from the temporary barrier insertion loss need described in MM-NOI-1(a) above. Alternately, slotted low-noise saw blades may be used to yield some or all of this noise reduction, so that operation of the concrete saw at a distance of 50 feet does not exceed 80 dBA. If this limit cannot be wholly achieved due to saw operation noise control or localized sound abatement (i.e., partial enclosure), then the balance of needed attenuation shall be provided by either the temporary noise barrier per MM-NOI-1(a) or by limiting duration of saw operation within

an hour: each halving of duration should yield a 3 dB reduction to the hourly noise level produced by the saw.

- c. Residents within 200 feet of the Project shall be informed at least two (2) weeks in advance when construction phase activities will occur. An information telephone hotline and/or website shall be established and managed to receive resident complaints, and the Applicant and its contractors shall respond to received complaints and document their investigations and any complaint resolutions in regular reports to the City Building Safety division.

4.10.7 Level of Significance After Mitigation

With implementation of MM-NOI-1 prior to and during construction of the Project, potential construction noise impacts as received at the nearest residential properties would be reduced to less-than-significant levels.

4.10.8 References

Caltrans (California Department of Transportation). 2013a. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. September 2013.

Caltrans. 2013b. *Transportation and Construction Vibration Guidance Manual*. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. Sacramento, California. September 2013.

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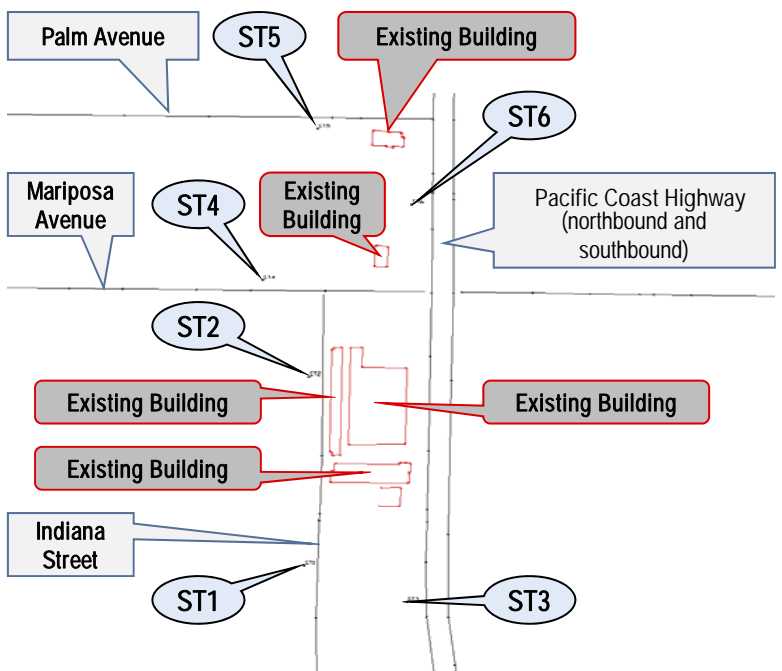
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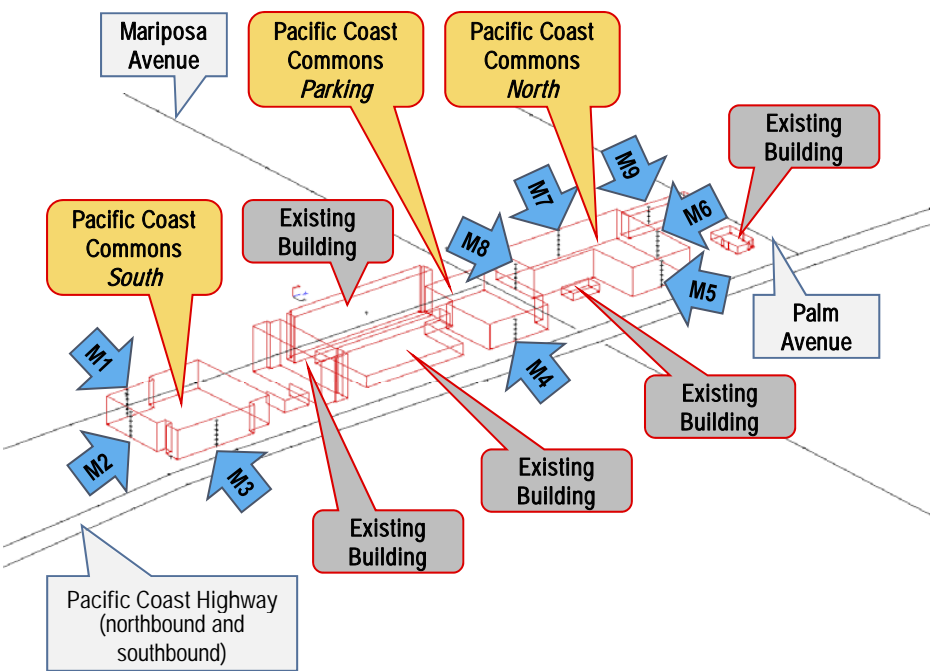
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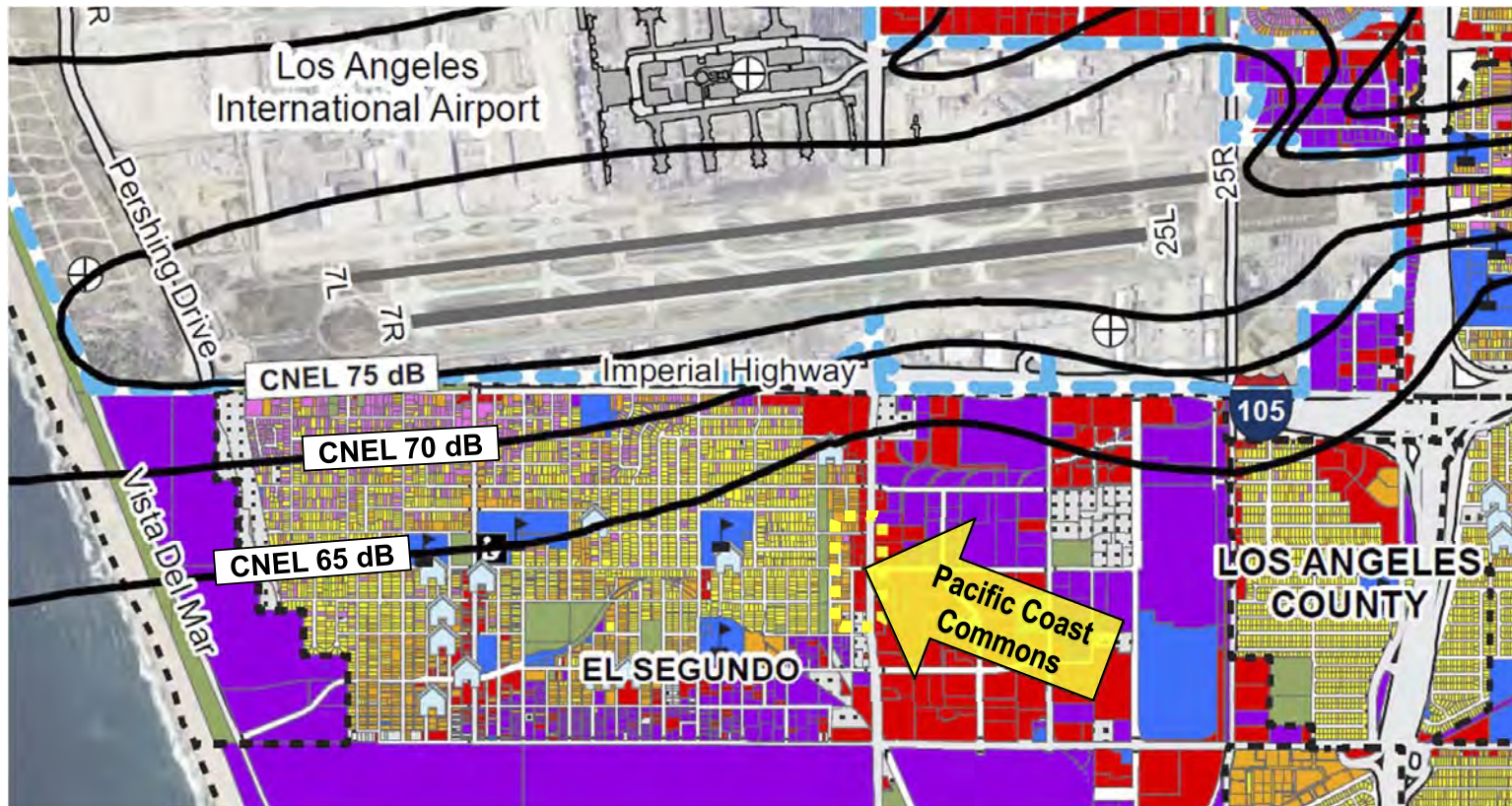
Traffic Noise Model of *Existing Conditions* (Planar View)



Traffic Noise Model of *Proposed Project Conditions* (Isometric View)

SOURCE: Dudek 2020

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SOURCE: Noise Exposure Map Update, ESA 2016

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4.11 Population and Housing

This section describes the existing population and housing conditions within the Pacific Coast Commons Specific Plan (Specific Plan or 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 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 2010 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 4.11.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

Methodology

A portion of the Project site currently is occupied by the Fairfield Inn and Suites Hotel and the Aloft Hotel and adjacent surface parking lots. These two hotel facilities contain a total of 596 hotel rooms as well as associated amenity areas, including two swimming pools, dining areas, and other hotel facilities. These existing hotels would remain in their current condition with implementation of the proposed Specific Plan. As described in Chapter 3, Project Description, of this Draft EIR, approximately 41,660 square feet of accessory building space associated with the Fairfield Inn and Suites Hotel would be demolished to allow for development of the proposed Project. This Draft EIR does not consider the elimination of this 41,660 square feet in the calculation of projected Project-related operations, including employment estimates. Therefore, the analysis of employment in the Draft EIR provides a conservative assessment.

4.11.1 Existing Conditions

Existing Population, Housing, and Employment Data

Southern California Association of Governments Region Overview

SCAG is the nation's largest metropolitan planning organization, representing six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura), 191 cities, and approximately 19 million residents. The City of El Segundo is within Los Angeles County. The SCAG region is a major hub of global economic activity, representing the 16th largest economy in the world and contains two of the largest ports in the nation. At the time of the issuance of the NOP, the applicable regional growth forecasts were included in SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted April 2016 (SCAG 2016a, 2016b).

SCAG completes a comprehensive update of the plan every 4 years to update the growth forecast, integrate new projects and programs funded by the six county transportation commissions, confirm alignment with federal and state performance standards and environmental requirements, and to review and refine regional strategies to address gaps in achieving the region's vision for greater mobility, sustainability and economic prosperity. The plan

is a “living” document that can be amended and refined in between the 4-year cycles, as necessary, to address regionally significant changes in transportation programs and funding

The 2020–2045 RTP/SCS (also referred to as Connect SoCal) was made available for public review in March 2020 (SCAG 2020). On May 7, 2020, the Regional Council adopted Resolution No. 20-621-1 certifying the “Connect SoCal” and the associated Program Environmental Impact Report (PEIR) and approving Connect SoCal for federal conformity purposes only. The Resolution postponed for up to 120 days the date by which the Regional Council would be asked to consider approval of Connect SoCal. During that time, adjustments were made to the Connect SoCal in response to public comments and stakeholder coordination. 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.

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 (SCAG 2020a).

According to SCAG, for the purpose of determining consistency with Connect SoCal for California Environmental Quality Act (CEQA), lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency; consistency should be evaluated utilizing the goals and policies of Connect SoCal and its associated Program 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 (SCAG 2020a).

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 4.11-1.

Table 4.11-1. SCAG Regional Population, Households, and Employment Forecasts

	2016	2045	Total Change	Percent Change
SCAG Region				
Population	18,832,000	22,504,000	3,672,000	19.5%
Households	6,012,000	7,633,000	1,621,000	27.0%
Employment	8,389,000	10,049,000	1,660,000	19.8%
Los Angeles County				
Population	10,407,000	11,674,000	1,267,000	12.2%
Households	3,319,000	4,119,000	800,000	24.1%
Employment	4,743,000	5,382,000	639,000	13.5%

Source: SCAG 2020b; Table 13.

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 0.75% in 2016 to approximately 0.40% by the 2040s. In the SCAG region, growth is similarly slowing down, from about 0.85% in 2020 to about 0.45% by 2045. While growth rates are at a historic low; an increase to the total population is expected. In the SCAG region, a 0.6% annual growth rate corresponds to about 126,621 new residents annually, or 3.6 million new residents between 2016 and 2045. For Los Angeles County, a total population increase of 12.2% is anticipated between 2016 and 2045 (SCAG 2020a).

County and City Demographic Overview

Population Growth

Table 4.11-2 presents historic data and projections for population growth in the City of El Segundo (City) and Los Angeles County between 2010 and 2045 based on data from the U.S. Census Bureau (2010 Census data projections), California Department of Finance 2020 estimates, and from SCAG’s Connect SoCal.

Table 4.11-2. City and Los Angeles County Population Growth and Forecasts 2016–2045

Year	City of El Segundo Total Residents	County of Los Angeles Total Residents
2010	16,654 ^a	9,823,246 ^b
SCAG’s Connect SoCal		
2016 ^c	16,700	10,110,000
2020	16,777 ^d	10,407,000 ^c
2030 ^c	–	10,900,000
2035 ^c	–	11,174,000
2045 ^c	17,200	11,647,000
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%

Sources:

- ^a U.S. Census Bureau 2020a
- ^b U.S. Census Bureau 2020b
- ^c SCAG 2020b (Tables 13 and 14)
- ^d DOF 2020

As shown in Table 4.11-2, the City’s projected total and incremental annual rate of population growth is substantially lower than Los Angeles County’s population growth rate when compared over the same time period. According to SCAG, a total of 500 new residents are anticipated to move to the City of El Segundo between 2016 and 2045.

Household Growth

Table 4.11-3 presents historic data and projections in the City’s and Los Angeles County’s households between 2010 and 2045 based on data from the City of El Segundo General Plan Housing Element, U.S. Census Bureau (2010 Census data projections), California Department of Finance 2020 estimates, and from SCAG’s Connect SoCal.

Table 4.11-3. City and Los Angeles County Household Growth and Forecasts 2016–2045

Year	City of El Segundo Total Households	County of Los Angeles Total Households
2010	7,410 ^a	3,239,280 ^b
SCAG’s Connect SoCal		
2016 ^c	7,000	3,319,000
2020	7,111 ^d	3,472,000 ^c
2030 ^c	–	3,749,000
2035 ^c	–	3,885,000
2045 ^c	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%

Sources:

- a City of El Segundo 2014
- b U.S. Census Bureau 2019
- c SCAG 2020b (Tables 13 and 14)
- d DOF 2020

As shown in Table 4.11-3, the City’s projected total and incremental annual rate of growth in the housing stock is substantially lower than Los Angeles County’s growth rate in housing when compared over the same time period. According to SCAG, a total of 300 households are forecasted in the City of El Segundo between 2016 and 2045.

Employment Growth

Table 4.11-4 presents historic data and forecasts of employment in the City and Los Angeles County between 2010 and 2045 based on data from the City of El Segundo General Plan Housing Element, U.S. Census Bureau (2010 Census data projections), and from SCAG’s Connect SoCal.

Table 4.11-4. City and Los Angeles County Employment and Forecasts 2016–2045

Year	City of El Segundo Total Employment	County of Los Angeles Total Employment
2008/2010	53,800 ^a	3,239,280 ^b
SCAG’s Connect SoCal		
2016 ^c	48,300	4,743,000
2020 ^c	–	4,838,000
2030 ^c	–	5,060,000
2035 ^c	–	5,172,000
2045 ^c	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%

Sources:

- a SCAG 2016b; City of El Segundo 2014
- b U.S. Census Bureau 2019
- c SCAG 2020b (Tables 13 and 14)

As shown in Table 4.11-4, the City’s projected total and incremental annual rate of growth in employment is substantially lower than Los Angeles County’s growth rate in employment when compared over the same time period. According to SCAG, a total of 4,100 new jobs are anticipated to be created in the City of El Segundo between 2016 and 2045.

El Segundo General Plan

General Plan Buildout

The City’s 1992 General Plan includes buildout projections for the City based on the Land Use designations. Table 4.11-5 includes the General Plan’s 2010 buildout projections for population, dwelling units, and non-residential square footage.

Table 4.11-5. 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

Sources: City of El Segundo 1992, 2014

As shown in Table 4.11-5, 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. Using the 2016 and 2045 population projections for the City of El Segundo as set forth in the Connect SoCal as shown in Table 4.11-2, (16,700 and 17,200 persons, respectively), the City is not expected to meet the population growth expectations set forth in the General Plan until after 2045.

Housing Element Regional Housing Needs Allocation

The City’s 1992 General Plan projected demographic information for the year 2010. In 2014, the City updated the Housing Element of the General Plan. The 2013–2021 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 stated there were approximately 7,410 residential units in the City in 2010 (reduced to 7,305 units by 2011), which is fewer than projected in the 1992 General Plan, as shown in Table 4.11-5. The average household size estimated for 2010 was 2.34 persons per household (City of El Segundo 2014).

The Housing Element stated that the City’s daytime employment of 53,800 in 2008 was estimated to reach 54,000 by 2020, which was included in SCAG’s 2016 RTP/SCS Integrated Growth Forecasts. Those projections have since been revised to be lower through SCAG’s updated Connect SoCal, as shown in Table 4.11-4, which estimates 52,400 jobs by 2045.

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) (City of El Segundo 2014).

SCAG is responsible for allocating the RHNA to individual jurisdictions within the region. The RHNA is distributed by income category for the 2013–2021 Housing Element. While the Housing Element covers the planning period of October 15, 2013 through October 15, 2021, the RHNA planning period is slightly different – January 1, 2014 through October 31, 2021 (i.e., 2014–2021 RHNA).

The City of El Segundo's RHNA allocation was 69 total units and distributed as follows:

- Extremely Low Income (up to 30% of Area Median Income [AMI]): 9 units (13%)
- Very Low Income (31% to 50% of AMI): 9 units (13%)
- Low Income (51% to 80% of AMI): 11 units (16%)
- Moderate Income (81% to 120% of AMI): 12 units (17%)
- Above Moderate Income (more than 120% of AMI): 28 units (41%)

As stated in the City's Housing Element, of the City's 1,130 extremely low and very low-income households, approximately 50% were extremely low income and 50% were very low income. Therefore, the City's RHNA of 18 very low-income units may be split accordingly into 9 extremely low (50%) and 9 very low income (50%) units (City of El Segundo 2014).

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 (City of El Segundo 2014). 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 4.11-3 and 4.11-4. 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 (SCAG 2020).

Project Site Demographics

The Project site consists of surface parking areas associated with the operations of the Fairfield Inn and Suites Hotel and Aloft Hotel properties. The existing Aloft Hotel currently includes approximately 89 employees split over three shifts. The existing Fairfield Inn and Suites Hotel includes approximately 88 employees split over three shifts. Under existing conditions, the Project site does not include any residents or housing.

4.11.2 Relevant Plans, Policies, and Ordinances

Federal

There are no federal programs, policies, or regulations related to population or housing that are applicable to the Project.

State

Section 65580 of the Government Code (Housing Element Law)

Pursuant to Section 65580 of the Government Code, a Housing Element of a General Plan must contain local commitments to the following:

- Provide sites with appropriate zoning and development standards and with services and facilities to accommodate the jurisdiction’s RHNA for each income level. The RHNA is the only population and/or housing requirement that applies to the General Plan Update.
- Assist in the development of adequate housing to meet the needs of lower and moderate-income households.
- Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities.
- Conserve and improve the condition of the existing affordable housing stock.
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status or disability.
- Preserve assisted housing developments for lower income households.

Department of Housing and Community Development

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. The HCD, in cooperation with local governments and councils of governments, are charged with making a determination of the existing and projected housing need as a share of the statewide housing need of their city or region. The housing construction need is determined for four broad household income categories: very low (households making less than 50% of median family income), low (50% to 80% of median family income), moderate (80% to 120% of median family income), and above moderate (more than 120% of median family income). The intent of the future needs allocation by income groups is to relieve the undue concentration of very low and low-income households in a single jurisdiction and to help allocate resources in a fair and equitable manner.

The “fair share” allocation process begins with the California Department of Finance’s projection of statewide housing demand for an 8-year period, which is then apportioned by the HCD among each of the state’s official regions, which are represented by councils of government. A local jurisdiction’s fair share of regional housing need is the number of additional dwelling units that will need to be constructed during a given 8-year planning period. Once a local government has received its final RHNA, it must revise its Housing Element to show how it plans to accommodate its portion of the region’s housing need.

Regional and Local

Southern California Association of Governments

SCAG is the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. As the designated Metropolitan Planning Organization, SCAG is mandated to research and develop plans for transportation, growth management, hazardous waste management, and air quality. SCAG is responsible for planning efforts that result in the RTP and the Federal Transportation Improvement Program; SCAG also develops the SCS to reduce greenhouse gas emissions as required by the Sustainable Communities and Climate Protection Act (Senate Bill 375).

SCAG is responsible for developing demographic projections; developing land use, housing, employment, transportation programs and strategies for South Coast Air Quality Management District; ensuring that the RTP and the Federal Transportation Improvement Program conform to the State Implementation Plans for transportation-related criteria pollutants, per the Clean Air Act; preparing the Regional Housing Needs Assessment, including planning for future population, housing, and employment growth throughout the SCAG region; and preparing the Southern California Hazardous Waste Management Plan. SCAG is the responsible agency for developing and adopting regional housing, population, and employment growth forecasts within the SCAG region. SCAG's demographic data is developed to enable the proper planning of infrastructure and facilities to adequately meet the needs of the anticipated growth. Growth forecasts contained in the RTP/SCS for Los Angeles County and the City are used in this section to analyze population, housing, and employment forecasts.

Regional Comprehensive Plan

The 2008 Regional Comprehensive Plan (RCP) was prepared in response to SCAG's Regional Council directive in its 2002 Strategic Plan to define solutions to housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions under current trends, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The RCP addresses land use and housing, transportation, air quality, energy, open space and habitat, water, solid waste, economy, security, and emergency preparedness. The RCP provides a series of recommended near-term policies that developers and stakeholders can consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review. The Land Use and Housing chapter of the RCP promotes sustainable planning for land use and housing in Southern California through maximizing the efficiency of the existing and planning transportation network, providing the necessary amount and mix of housing for a growing population, and enabling a diverse and growing economy and protecting important natural resources (SCAG 2008).

Regional Transportation Plan/Sustainable Communities Strategy

The RTP is a long-range transportation plan that is developed and updated by SCAG every 4 years to guide transportation investments throughout the region. The SCS is a required element of the RTP that integrates land use and transportation strategies to achieve California Air Resources Board emissions reduction targets pursuant to Senate Bill 375. On April 7, 2016, the SCAG Regional Council adopted the 2016–2040 RTP/SCS, which 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. On September 3, 2020, the SCAG Regional Council adopted the 2020-2045 RTP/SCS (Connect SoCal). 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 (SCAG 2016a; SCAG 2020a).

To address the mobility challenge of the region’s continuing roadway congestion, the RTP/SCS proposes transportation investments in transit; passenger and high-speed rail; active transportation; transportation demand management; transportation systems management; highways; arterials; goods movement; aviation and airport ground access; and operations and maintenance projects. 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. As part of its RTP/SCS document, SCAG develops population and housing forecasts for the SCAG region and for the jurisdictions that make up the SCAG region.

Regional Housing Needs Allocation (RHNA)

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 5th Cycle RHNA Allocation Plan is the RHNA that was in effect at the time that the NOP was issued for the proposed Project and covers a planning period of October 2013 through October 2021 and it showed a need for 412,721 additional housing units within the SCAG region. Table 4.11-6 shows the 5th Cycle RHNA Final Allocation Plan.

Table 4.11-6. SCAG’s 5th Cycle RHNA Allocation Plan

Total	Very-Low Income	Low Income	Moderate Income	Above Moderate Income
SCAG Region				
412,137	100,632	64,947	72,053	147,505
Los Angeles County				
179,881	45,672	27,469	30,043	76,697
City of El Segundo				
69	18	11	12	28

Source: SCAG 2012

As described in Section 4.11.1, Existing Conditions, subsequently, on September 3, 2020, SCAG’s Regional Council adopted Resolution No. 20-624-1 to (1) adopt the 2020–2045 RTP/SCS (Connect SoCal) 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.

SCAG is required to develop a final RHNA methodology to distribute existing and projected housing need for the 6th cycle RHNA for each jurisdiction, which will cover the planning period October 2021 through October 2029. Several guiding principles that SCAG staff has developed to use as the basis for developing the distribution

mechanism for the RHNA methodology. These principles are based on the input and guidance provided by the RHNA Subcommittee during their discussions on RHNA methodology between February 2019 and June 2019.

1. The housing crisis is a result of housing building not keeping up with growth over the last several decades. The RHNA allocation for all jurisdictions is expected to be higher than the 5th RHNA cycle.
2. Each jurisdiction must receive a fair share of their regional housing need. This includes a fair share of planning for enough housing for all income levels, and consideration of factors that indicate areas that have high and low concentration of access to opportunity.
3. It is important to emphasize the linkage to other regional planning principles to develop more efficient land use patterns, reduce greenhouse gas emissions, and improve overall quality of life.

HCD provided SCAG a final regional determination of 1,341,827 units for the 6th cycle RHNA on October 15, 2019. Following the formal distribution of draft RHNA allocations based on the Final RHNA methodology and a separate appeals phase described in Government Code 65584.05 et seq., RHNA allocations are anticipated to be adopted in February 2021. Based on SCAG’s determination of existing need and projected needs, which considers anticipated vacancies and projected household growth, the regional existing need for additional housing units has been determined to be 836,857 units, and the regional projected need is 504,970 units (SCAG 2020c). HCD’s regional determination of 1,341,827 exceeds SCAG’s 2020–2045 household growth forecast of 1,297,000 by 3.68% (SCAG 2020c).

SCAG’s 6th Cycle RHNA allocation to local jurisdictions based on the Regional Council-approved Final RHNA Methodology described above includes the allocations shown in Table 4.11-7. With Regional Council’s adoption of Connect SoCal in its entirety on September 3, 2020, SCAG is distributing the draft RHNA Allocation to local jurisdictions. The appeals process began on September 11, 2020 following the adopted RHNA Appeals Procedures with timelines updated to reflect the delay of the Connect SoCal Plan full adoption.

Table 4.11-7. SCAG’s 6th Cycle Estimate of RHNA Allocation based on Approved RHNA Methodology

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				
813,082	217,565	123,171	131,532	340,814
City of El Segundo				
491	189	88	83	131

Source: SCAG 2020d

City of El Segundo 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 2013

to October 2021, 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 2013–2021 cycle was adopted by the City Council in January 2014 (City of El Segundo 2014). Upon confirmation of SCAG's new RHNA numbers, the City's Housing Element will be updated.

The Housing Element states that less than 25% of the land within the City has been historically used for residential development. The remaining land has been used primarily for a mixture of light and heavy industrial purposes and is not available for residential use, except for caretaker units. Approximately 335 acres were designated for residential/commercial mixed use in El Segundo as identified in the Housing Element. Limited land resources thus restrict the amount of residential development that could occur in the City (City of El Segundo 2014).

Goals and policies that are applicable to the proposed Project are listed below (City of El Segundo 2014):

GOAL 3: Provide opportunities for new housing construction in a variety of locations and a variety of densities in accordance with the land use designations and policies in the Land Use Element.

Policy 3.1: Provide for the construction of 69 new housing units during the 2014-2021 planning period in order to meet the goals of the Regional Housing Needs Assessment (RHNA).

Policy 3.3: Permit vacant and underdeveloped property designated as residential to develop with a diversity of types, prices and tenure.

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

Proposed Pacific Coast Commons Specific Plan

Requirements set forth in the Specific Plan's Development Standards that are relevant for the topic of population and housing are set forth in Table VI-1, Allowable Uses, which set forth the land uses that are permitted (P), permitted as an accessory use (A), permitted subject to a conditional use permit (CUP), permitted subject to an administrative use permit (AUP), and not permitted (- -), within each of the five land use districts. For a complete listing of uses within the Specific Plan, refer to Appendix B of this Draft EIR. The Specific Plan sets forth a maximum of 120 dwelling units within Pacific Coast Commons (PCC) MU-1 and a maximum of 143 dwelling units within PCC MU-2.

Development Agreements/Conditions of Approval

As part of the proposed Project, the City and Applicant propose to enter into a Development Agreement that would ensure that the Project can be developed as proposed for a set number of years. In return, the Project would provide benefits to the City including some provision for affordable housing. The specific number of affordable housing units and the allocation among very low, low, moderate and above-moderate income units will be negotiated between the parties through the Development Agreement. The provision of affordable housing on the Project site would not create any environmental impacts.

4.11.3 Thresholds of Significance

The significance criteria used to evaluate a project's impacts to population and housing are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to population and housing would occur if the project would:

- 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).
- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

4.11.4 Impacts Analysis

Threshold 4.3a **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 of El Segundo, as used in the development of the 2020–2045 RTP/SCS (Connect SoCal).

Short-Term Construction Impacts

Construction activities at the Project site 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. Construction of the Project is anticipated to begin as early as July 2021 and would end in April 2024, for construction activities spanning over approximately 34 months. 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 and only for varying portions of the Project phases, it is reasonable to assume that workers/crews would work at the Project site 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 Project site 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.

Long-Term Operational Impacts

The proposed Project would redevelop the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties through the adoption of the Specific Plan to allow for the development of 263 residential

units and 11,252 square feet of commercial space. The Specific Plan's three development areas are Pacific Coast Commons – South (PCC-South); Pacific Coast Commons – Fairfield Parking (PCC-Fairfield Parking); and Pacific Coast Commons – North (PCC-North). PCC-North would be developed with 143 residential units and 2,223 gross square feet of commercial space. PCC-Fairfield Parking would be developed with approximately 3,273 gross square feet of ground-floor commercial and a parking structure for the Fairfield Inn and Suites Hotel. PCC-South would be redeveloped with 120 residential units and 5,756 gross square feet of commercial space. Up to 3,700 square feet of the commercial space across all three sites could be fast casual restaurant space and the remainder would be general retail. The Project would replace the existing General Commercial (C-3) and Automobile Parking (P) zones with the proposed Specific Plan, thereby enabling future development within the Specific Plan area. As such, the proposed Project would directly result in the building new housing where housing currently does not exist. The redevelopment of existing parking lots could result in new and unplanned population growth within the City.

Population Projections

SCAG estimates that Los Angeles County would have 10,407,000 residents by 2020 and 11,647,000 residents by 2045 (see Table 4.11-2). SCAG and the Department of Finance estimate that the City would have 16,777 residents by 2020 and 17,200 residents by 2045 (see Table 4.11-2). SCAG's forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045.

Using population and housing estimates from the California Department of Finance, the City has an occupancy rate of 2.35 persons per household (DOF 2020). Assuming 2.35 persons per household, the proposed Project's residential units would accommodate 618 individuals.¹ If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG's estimated projections through 2045 by 118 persons. It is likely that the proposed residential units would accommodate a combination of existing residents and new residents that either currently work within the City and/or new residents that would be hired as a result of projected employment generation within the City. Additionally, the City's 2020 housing vacancy rate of 4.7% is less than Los Angeles County's housing vacancy rate 6.1% (DOF 2020). As such, the proposed Project is anticipated to be growth-accommodating rather than growth-inducing.

The U.S. Census Bureau determined, based on the 2010 Census results, there were 16,654 residents in the City in 2010 (see Table 4.11-2); however, the City's General Plan estimated a population of 17,269 residents in the City by 2010 (see Table 4.11-5). Therefore, the City's General Plan predicted there would be 615 more residents in the City of El Segundo in 2010 than there actually were. As such, it is clear that the City anticipated more robust residential growth during the preparation of the General Plan than was able to be realized. When considering the 2010 buildout of the General Plan, and the deficit of 615 residents within the City by 2010, it can be interpreted that the proposed Project's anticipated population of 618 residents would be fulfilling a 2010 population projection that was anticipated at the time of the preparation of the City's General Plan. The City's General Plan projected a population of 17,269 persons by 2010, but did not project beyond 2010 (see Table 4.11-5). Therefore, the SCAG projections are used for this analysis.

The proposed Project would accommodate an expected 618 residents which from the implementation of the Specific Plan exceed the overall population growth projections included in the Connect SoCal of 500 residents between 2016 and 2045.

¹ This estimated number of new residents conservatively assumes full occupancy of all units. 263 new housing units x 2.35 persons per household = 618 residents accommodate by the proposed Project

As stated in the Connect SoCal 2020–2045 RTP/SCS, there is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with the RTP/SCS, and lead agencies have the sole discretion in determining a local project’s consistency with the RTP/SCS (SCAG 2020a). Because there is no wholly reliable population, housing, or employment data after 2010, as the U.S. Census is conducted every ten years, all data for years prior to the upcoming 2020 Census should be viewed as projections or estimates. As demonstrated in Section 4.9, Land Use and Planning, the proposed Project would implement the guiding principles, goals and policies of SCAG’s 2020–2045 RTP/SCS as they relate to livability, economic prosperity, and sustainability through the development of walkable, mixed use communities along major transportation corridors. The development of a mix of housing and job opportunities within 0.51-mile of transit, thereby alleviating pressure on suburban and open space areas to develop, is fully supportive of SCAG’s strategies, as summarized in Chapter 1 of SCAG’s 2020–2045 RTP/SCS (SCAG 2020):

Strategies, therefore, emphasize growth in areas rich with destinations and mobility options, promote diverse housing choices, leverage technology innovations, support implementation of sustainability policies and promote a green region. This more compact development pattern, combined with the identified transportation network improvements and strategies, results in improved pedestrian and bicycle access to community amenities, lowers average trip length and reduces vehicle miles traveled.

As stated in Chapter 3 of SCAG’s 2020–2045 RTP/SCS (SCAG 2020):

Our vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips.

SCAG’s 2020–2045 RTP/SCS describes numerous strategies to focus growth near destinations and mobility options, including the following (SCAG 2020):

- Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations
- Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets
- Plan for growth near transit investments and support implementation of first/last mile strategies
- Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses
- Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods
- Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)
- Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)

The proposed Project would support and facilitate implementation of all strategies outlined above.

As described in Connect SoCal, the Priority Growth Areas include Job Centers, Transit Priority Areas, High-Quality Transit Areas, Neighborhood Mobility Areas, and Livable Corridors and Spheres of Influence, which account for only 4% of region's total land area, but implementation of SCAG's recommended growth strategies will help these areas accommodate 64% of forecasted household growth and 74% of forecasted employment growth between 2016 and 2045 (SCAG 2020). The Project site is adjacent to the SCAG-designated Transit Priority Area and High-Quality Transit Area at the intersection of Mariposa Avenue and Pacific Coast Highway.

The Livable Corridor strategy encourages local jurisdictions to plan and zone for increased density at nodes along key corridors, and to "redevelop" single-story under-performing retail with well-designed, higher density housing and employment centers. The proposed Project would support and implement this Livable Corridor strategy in that it would remove surface parking and underperforming commercial development with a mix of housing along a primary transportation thoroughfare (Pacific Coast Highway), and adjacent to the nearby job centers (e.g., LAX, energy/gas/oil and aerospace companies, and the City's "super block" of corporate office development, and Smoky Hollow to the southwest).

Neighborhood Mobility Areas are Priority Growth Areas with robust residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds. Neighborhood Mobility Areas can encourage safer, multimodal, short trips in existing and planned neighborhoods and reduce reliance on single occupancy vehicles. Additionally, the incremental changes in population would not result in increased or accelerated demolition of existing residential uses in the City. The proposed Project would support and implement this Neighborhood Mobility Area strategy in that it would develop a mix of land uses adjacent to existing and established residential areas and recreational amenities.

As stated above, the proposed Project would be considered growth-accommodating rather than growth-inducing in that the proposed Project's 263 new residential units would accommodate 618 residents, which are anticipated to be a mix of current and future residents to the City. If all 618 residents would be new to the City, implementation of the Specific Plan would exceed the overall population growth projections included in the Connect SoCal..

Because the proposed Project would support SCAG's goals and strategies for growth in the region as described above and further described in Section 4.9, Land Use and Planning, and because the proposed Project would assist the development of new housing and improves the City's job/housing balance (as described below), impacts related to population growth would be less than significant. Although the proposed Project would provide a resident population that exceeds SCAG's projections, this growth is not considered substantial and it would further attainment of local and regional goals, as described above.

Employment Projections

The proposed Project would introduce 11,252 gross square feet of commercial uses to the Project site. Based on the assumption that up to 3,700 square feet of the commercial development would be fast-casual restaurant use, the proposed Project is estimated to generate approximately 56 new employees within the Specific Plan area, as shown below in Table 4.11-8.

Table 4.11-8. Employment Estimate

Land Use/Structure	Size	Employee Generation Factor	Number of Employees
Retail-Community	7,552 square feet	1 employees per 600 square feet	12.6
Restaurant-Fast Food	3,700 square feet	1 employee per 100 square feet	37
Residential	236 units	1 Site Manager, 1 Leasing Agent, 1 Collections, 1 Lead Maintenance, 2 Maintenance Technicians	6
Total			55.6

Source: South Florida Regional Planning Council 2006

^a Assumes “Neighborhood Shopping Center” commercial category

^b Assumes carry-out with seating generally a fast food operation where the food is partially ready before serving.

The employment opportunities generated by the proposed Project would not necessarily be considered specialized industries that would require a highly trained workforce to relocate to the City or the region. According to the California Employment Development Department, approximately 18.2% (897,500 persons) of the Los Angeles County’s 4,940,000 person-labor force were unemployed as of July 2020, and approximately 21.0% (2,000 persons) of the City’s 9,500 person-labor force were unemployed in July 2020 (EDD 2020). Given the fact that unemployment rates during COVID-19 may be skewed when compared to previous years, the 2019 rates were also evaluated. According to the California Employment Development Department, approximately 4.4% (223,100 persons) of the Los Angeles County’s 5,111,500 person-labor force were unemployed as of July 2019, and approximately 5.8% (6,000 persons) of the City’s 9,600 person-labor force were unemployed in July 2019 (EDD 2020). As such, it can be assumed that many of the 56 new jobs would be filled by individuals that live within the City.

With the occupancy of the proposed Project, the number of jobs in the City would increase by approximately 56 positions, which could be filled by unemployed persons in the City or by unemployed persons in Los Angeles County. The proposed Project’s anticipated employment would represent a nominal percent (0.009%) 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 4.11-4). The proposed Project’s anticipated employment would represent a nominal percent (1.36%) of SCAG’s projected 4,100 new jobs in the City between 2016 and 2045.

The estimated 56 new full-time employees resulting from the proposed Project would make up a small percentage of the overall expected growth in the City and would not exceed the SCAG employment projections.

Housing Projections Analysis

SCAG projects that Los Angeles County will have an increase of 800,000 housing units between 2016 and 2045, and that the City will have an increase of 300 units during this same period. The proposed Project’s 263 residential units would represent 0.03% of SCAG’s projected housing for Los Angeles County and 87.7% of the projected housing for the City (see Table 4.11-3). Therefore, the proposed Project’s housing units would not exceed the projections for housing within the City, as set forth in the 2020–2045 RTP/SCS.

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 certain mobility among households within the regional market.

Table 4.11-6 provides the 5th Cycle RHNA allocation for 2013 to 2021 as set forth in the City's Housing Element. The City's fair share allocation for the planning period is 69 units. This indicates that between the years 2013 and 2021, the City needs to accommodate at least 69 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 proposed Project would create new housing and would include affordable housing in accordance with the negotiated Development Agreement. The specific allocation between the types of low income housing has yet to be determined; however, the proposed low-income units would satisfy a portion of the City's mandated 29 low income units, and a portion of the City's requirement for 40 moderate/above income units, as set forth in the Housing Element.

Table 4.11-7 provides the 6th Cycle RHNA allocation for 2021 to 2029 as set forth in the Connect SoCal 2020–2045 RTP/SCS. Because the proposed Project will be occupied within the timeframe of the 6th Cycle, it is most relevant to the analysis. The City's fair share allocation for the planning period is 491 units. This indicates that between the years 2021 to 2029, the City needs to accommodate at least 491 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 proposed Project would create new housing and would include affordable housing in accordance with the negotiated Development Agreement. The specific allocation between the types of low-income housing has yet to be determined; however, the proposed low-income units would satisfy a portion of the City's mandated 6th Cycle RHNA allocation.

As such, the proposed Project's 263 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.

Jobs/Housing Balance

As previously described, the City is considered to be a very jobs-rich community. The proposed Project would generate additional housing available for the community, as the jobs-housing balance of the proposed Project would be 0.3:1, which is a very housing-rich project. Therefore, the proposed Project would facilitate a more balanced jobs-housing profile for the City, which currently maintains an approximately 6.9:1 jobs/housing balance.

Threshold 4.3b Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Project site consists of surface parking areas of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the underutilized commercial space associated with the hotel. No housing uses are located on the Project site, and Project implementation would not require demolition of existing housing or displace people or housing. The proposed Project would include the construction of a mixed-use development that would add approximately 263 housing units to the City. Impacts would be less than significant.

4.11.5 Cumulative Impact Analysis

As discussed above, assuming 2.35 persons per household, the proposed Project's residential units would accommodate 618 individuals. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG's estimated projections through 2045 by 118 persons. Planned related projects identified in Section 2.5, Cumulative Projects, in Section 2, Environmental Setting of this Draft EIR identify very few residential projects. Other than the proposed Project, only the proposed 540 E. Imperial Avenue and 1225 Mariposa Avenue proposals, are anticipated to include residential development in the City. Therefore, the remaining cumulative projects would be primarily increasing employment in the City and potentially further exacerbating 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 Project falls well within current projections for employment growth in the City and Los Angeles County. The proposed housing growth generated by the 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. Although, the proposed Project's residential population would exceed SCAG's population projections, it can be assumed that many of the residential units would accommodate workers within the City and could reduce vehicle miles traveled by providing housing in proximity to employment centers. Therefore, the unplanned population growth is not considered to be substantial and impacts would be less than significant. Therefore, it is not anticipated that the proposed Project, in combination with other future foreseeable projects, would create a cumulatively considerable impact to population, housing or employment.

4.11.6 Mitigation Measures

No mitigation measures are required.

4.11.7 Level of Significance After Mitigation

The proposed Project would not result in significant impacts, and no mitigation measures is required.

4.11.8 References

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4.12 Public Services and Recreation

This section describes the existing public services and recreation conditions of the Pacific Coast Commons Specific Plan (Specific Plan or 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 a review of relevant online data from the City of El Segundo's (City) website and written correspondence with the El Segundo County Fire Department (ESFD), the El Segundo Police Department (ESPD), and the El Segundo Unified School District (ESUSD). For the relevant information, refer to the following appendix:

Appendix I Public Services Correspondence Letters

Other sources consulted are listed in Section 4.12.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

4.12.1 Existing Conditions

Fire Protection

Fire Prevention Services

Fire and emergency response services at the Project site are provided by the ESFD. The ESFD in conjunction with the El Segundo Planning and Building Safety Department perform review services and inspections of new buildings. Additionally, the ESFD enforces building standards related to fire and panic safety adopted by the California Building Standards Commission and other regulations formally adopted by the City for fire prevention (El Segundo Fire Department 2020a). 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 three personnel that include a Fire Marshal and two Fire Prevention Inspectors. Environmental Safety is comprised of three personnel that include one Environmental Safety Manager, one Principal Environmental Specialist and one Management Analyst.

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 human-caused), executing specialized technical rescue response, controlling hazardous materials incidents, and providing general public assistance (El Segundo Fire Department 2020b).

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 human-caused disaster (El Segundo Fire Department 2020b).

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. These personnel staff two Fire Engine Companies, one tractor-drawn Ladder Truck, two paramedic Rescue Ambulances, and one Battalion Chief Command vehicle. The Urban Search and Rescue unit is crossed staffed by the Ladder Truck personnel and is always available to respond to any technical emergency (El Segundo Fire Department 2020c).

As shown in Figure 4.12-1, Existing Fire and Police Stations, Fire Station 1 is located approximately 1 mile west of the Project site¹ at 314 Main Street and serves the residential community, Chevron Refinery, El Segundo Beach and light industrial and manufacturing businesses located in the “Smoky Hollow” area. The station was remodeled in 1986 and again in 2017. Engines 31, Rescue 31 and Battalion 31 are staffed and housed out of Station 1. Fire Station 2 is located approximately 0.6 miles east of the Project site² at 2261 East Mariposa Avenue, and serves the commercial and industrial businesses east of Pacific Coast Highway (see Figure 4.12-1). Station 2 was built in 2009 and houses Engine 32, Truck 32, Rescue 32, and Urban Search and Rescue 32.

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 operates 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 (El Segundo Fire Department 2020d).

The ESFD has a Policy 306, Response Time Standards, which is as follows (Carver 2020):

- a. One minute or less for dispatch processing time.
- b. One minute or less for turnout time for EMS incidents.
- c. One minute 20 seconds or less for turnout time for non-EMS incidents.
- d. Four minutes or less for the arrival of the first engine company at a fire suppression incident.
- e. Eight minutes or less for the arrival of a full first-alarm assignment at a fire suppression incident.
- f. Four minutes or less for the arrival of a unit with first responder or higher level capability at an EMS incident.
- g. Eight minutes or less for the arrival of an advanced life support unit at an EMS incident when this service is provided by the Department.

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 Hazard Severity Zones (CAL FIRE 2020; City of El Segundo 1992a). Due to the urban setting of the City, the potential for wildland fire hazards are extremely limited.

¹ Distance measured from the northwest corner of Grand Avenue and Standard Street to the northeast corner of East Holly Avenue and Indiana Street.
² Distance measured from the northeast corner of East Mariposa Avenue and Parkview Drive to the southwest corner of East Mariposa Avenue and Pacific Coast Highway.

Police Protection

As shown in Figure 4.12-1, Existing Fire and Police Stations, the ESPD is located approximately 1 mile west of the Project site³ at 348 Main Street, adjacent to Fire Station 1. There are 56 sworn officers and 22 full-time civilian staff. The ESPD is budgeted for 62 sworn officers and 15 cadets (part-time spots) (McDaniel 2020). The ESPD provides police protection services to the City through Support Services Bureau and the Field Operations Bureau. The Support 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 offer assistance to 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 site 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 control, animal control, K-9 and SWAT Team operations (El Segundo Police Department 2020a).

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. The current response times for Priority 1 calls are between 2.16 minutes and 4.25 minutes. Priority 2 calls are between 5.15 minutes and 10.08 minutes, as shown in Table 4.12-1.

Table 4.12-1. Police Services in the City of El Segundo

Response From	Reporting District	Priority 1 ¹	Priority 2 ²
Police Station	315 (2.6 miles)	3.23 minutes	8.46 minutes
Police Station	318 (3.2 miles)	3.51 minutes	9.28 minutes
Police Station	112 (0.5 miles)	2.16 minutes	5.15 minutes
Police Station	204 (3.5 miles)	4.25 minutes	10.08 minutes

Source: McDaniel 2020

- ¹ Priority 1 = Emergency call which requires immediate response and there is reason to believe that an immediate threat to life exists.
- ² Priority 2= Emergency call which requires immediate response and there exists an immediate and substantial risk of major property loss or damage.

Schools

The ESUSD provides public educational services to the City and the Project site. ESUSD currently has an enrollment of 3,400 students at six schools. 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 (City of El Segundo 2020a). Table 4.12-2 indicates the public schools serving the Project site, including

³ Distance measured from the northwest corner of Grand Avenue and Standard Street to the northeast corner of East Holly Avenue and Indiana Street.

location, size, enrollment, and capacity, which are shown in Figure 4.12-2, El Segundo Unified School District Boundaries and Schools.

Table 4.12-2. Public Schools Serving the Project Site

School	Address	Size (square feet)	Enrollment (2019)	Capacity (2019)
Eagle’s Nest Preschool	641 Sheldon Street	132,101	100	100
Center Street Elementary School	700 Center Street	72,200	776	800
El Segundo Middle School	332 Center Street	51,500	864	1,000
Arena High School/Virtual High School	641 Sheldon Street	N/A	36	70
El Segundo High School	640 Main Street	132,101	1,214	1,400

Sources: City of El Segundo 2020b; ESUSD 2018; Farris 2020

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 site is within the service area of Center Street Elementary (grades K–5), El Segundo Middle School (grades 6–8), and El Segundo High School and Arena Continuation High School (grades 9–12) (ESUSD 2018).

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 (ESUSD 2018). According to ESUSD, the student generation factors are provided in Table 4.12-3.

Table 4.12-3. Public Schools Serving the City of El Segundo

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: Farris 2020

Parks/Recreation

Parks and Facilities

The City’s Parks and Facilities 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. Table 4.12-4 indicates the parks and facilities serving the City, including location, amenities, and capacities, which are shown in Figure 4.12-3, El Segundo Parks and Facilities.

Table 4.12-4. Parks and Facilities in the City of El Segundo

School	Address	Amenities	Capacity
Acacia Park	600 Block of West Acacia Avenue	<ul style="list-style-type: none"> • Grass Play Area • Park • Picnic Tables • Pool • Restrooms • Water Fountain 	—
Campus El Segundo ¹	2201 East Mariposa	<ul style="list-style-type: none"> • Athletic Field • Available to Rent • Restrooms • Smoke-free • Soccer Fields • Water Fountain 	100+
Candy Cane Park	100 Block of Whiting Street	<ul style="list-style-type: none"> • Grass Play Area • Kid-friendly • Park • Playground 	—
Checkout Building	401 Sheldon Street	<ul style="list-style-type: none"> • Facility • Restrooms • Water Fountain 	—
City of El Segundo Wiseburn Unified School District Aquatics Center	2240 East Grand Avenue	<ul style="list-style-type: none"> • Accessible • Available to Rent • Facility • Parking • Pool • Restroom with Showers • Restrooms • Water Fountain 	100+
Constitution Park	Washington Street between Sycamore Street & Maple Avenue	<ul style="list-style-type: none"> • Grass Play Area • Park 	—
El Segundo Dog park	East Imperial Avenue between Sheldon Street and McCarthy court	<ul style="list-style-type: none"> • Grass Play Area • Park 	—
Freedom Park	Illinois Street between Mariposa Avenue and Holly Avenue	<ul style="list-style-type: none"> • Grass Play Area • Park • Pet-friendly 	—
George Brett Field	Northeast corner of Recreation Park	<ul style="list-style-type: none"> • Athletic Field • Available to Rent • Ball field • Restrooms • Smoke-free 	—
George E. Gordon Clubhouse	300 East Pine Avenue	<ul style="list-style-type: none"> • Air Conditioning • Available to Rent • Facility • Restrooms • Smoke-free • Water Fountain 	50-100

Table 4.12-4. Parks and Facilities in the City of El Segundo

School	Address	Amenities	Capacity
Hilltop Park	Corner of Maryland Street and Grand Avenue	<ul style="list-style-type: none"> • Available to Rent • BBQ Grill • Park • Picnic Tables • Playground • Pool • Restrooms • Water Fountain 	—
Holly Valley Park	Corner of West Holly Avenue and Valley Street	<ul style="list-style-type: none"> • Park • Picnic Tables • Playground 	—
Imperial Strip & Memory Tree Row	Imperial Avenue between Hillcrest Avenue and Center Street	<ul style="list-style-type: none"> • Grass Play Area • Park • Pet-friendly 	—
Independence Park	Washington Street between Walnut Avenue and Sycamore Avenue	<ul style="list-style-type: none"> • Park 	—
Joslyn Center	339 Sheldon Street	<ul style="list-style-type: none"> • Grass Play Area • Park • Picnic Tables • Playground 	—
Kansas Park	Corner of Kansas Street and Holly Avenue	<ul style="list-style-type: none"> • Grass Play Area • Park • Picnic Tables • Playground 	—
Library Park	600 Block Main Street	<ul style="list-style-type: none"> • Gazebo • Grass Play Area • Park • Water Fountain 	—
Recreation Park	401 Sheldon Street	<ul style="list-style-type: none"> • 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 	—

Table 4.12-4. Parks and Facilities in the City of El Segundo

School	Address	Amenities	Capacity
		<ul style="list-style-type: none"> • Smoke-free • Tennis Courts • Volleyball • Water Fountain 	
Recreation Park Softball Field	Holly Avenue and Eucalyptus Drive	<ul style="list-style-type: none"> • Grass Play Area • Park 	—
Richmond Street Field	Corner of Virginia Street and Mariposa Avenue	<ul style="list-style-type: none"> • Athletic Field • Available to Rent • Ball field • Water Fountain 	—
Stevenson Field	Holly Avenue and Eucalyptus Drive	<ul style="list-style-type: none"> • Athletic Field • Available to Rent • Ball field • Restrooms 	—
Sycamore Park	Corner of Sycamore Avenue and California Street	<ul style="list-style-type: none"> • BBQ Grill • Grass Play Area • Park • Picnic Tables • Playground • Water Fountain 	—
Teen Center and Skate Park	405 Grand Avenue	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Available to Rent • Facility • Pool • Restroom with Showers • Restrooms • Smoke-free • Water Fountain 	50-100
Washington Park ²	Washington Street between Maple Avenue and Mariposa Avenue	<ul style="list-style-type: none"> • Grass Play Area • Park • Picnic Tables • Playground 	—

Source: El Segundo Rec & Parks 2020a, 2020b

"—" = N/A

¹ Shade canopies at Campus El Segundo have been installed.

² Construction at Washington Park for the new playground has begun. With the completion of these playgrounds, all playgrounds within the El Segundo parks will be ADA compliant

In addition, the 26 parks and facilities identified in Table 4.12-4, the Lakes at El Segundo is an executive nine-hole golf course and two-story lighted driving range, complete with a pro shop, cafe and banquet facilities owned by the City. The State of California Parks Department typically uses 3.0 acres per 1,000 residents as a standard of park space within communities; the City's Parks are within the standard at about 3.5 acres of park space per 1,000 residents (Petit 2020).

Recreation Programs and Activities

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. In addition, every Thursday from 3:00 p.m. to 7:00 p.m. on the 400 block of Main Street is the El Segundo Certified Farmers Market. Other community services offered include the El Segundo Community Garden located on the north side of the Joslyn Center (El Segundo Rec & Parks 2020c).

Library Services

The El Segundo Public Library (ESPL) is located at 111 West Mariposa Street. The ESPL also partners with 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 School (ESPL 2020a). Figure 4.12-4, El Segundo Public Library, 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, Friends of El Segundo 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 and programming in the community. 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 2019, the ESPL had 233,131 library visits; 162,599 items borrowed; 2,333 community programs; 54,136-event attendance; and 45,257 requests for information (ESPL 2020b).

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 (ESPL 2020c):

- 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, however, to help evaluate performance and identify growth opportunities. Fiscal year 2018–2019 data, as shown in Table 4.12-5, based on

El Segundo’s population of 16,784 indicates that the ESPL meets or exceeds most benchmarks compared to the LA County Library system and California public libraries median (McCollum 2020).

Table 4.12-5. El Segundo Public Library Benchmark

Benchmark	El Segundo Public Library	Los Angeles County Library	California Median
Input Measures			
Square feet per capita	2.354 (40,173 square feet)	0.3306	0.4549
Seats per 1,000	6.3	2.13	Not Available
PCs per 1,000	3.69	0.5301	0.6285
Items per capita	9.046 (152,390 items)	1.65	2.82
Output Measures			
Annual Circulation	9.57 (163,330)	4.47	4.63
Annual Program Attendance	0.4173 (7,122)	0.1538	0.2701
Annual Public Computer Use (per 1,000)	665.42 (11,356 sessions)	436.76	478.64
Percent of Population Registered	97.73% (16,679)	73.88%	58.32%
Annual Gate Count	13.23 (225,821)	2.88	3.39
Circulation of Electronic Materials	11,123	2,345,072	29,550

Source: McCollum 2020

4.12.2 Relevant Plans, Policies, and Ordinances

Federal

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 (NFPA 2010).

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.

State

California Building Code and California Fire Code

The California Building Code is a compilation of building standards, including fire safety standards for new buildings, which are provided in the California Fire Code. The California Fire Code is Chapter 9 of Title 24 of the California Code of Regulations. The California Fire Code provides regulations for safeguarding life and property from fire and

explosion hazards derived from the storage, handling, and use of hazardous substances, materials, and devices. The provisions of this code apply to construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenance connected or attached to such building structures throughout the state.

California Occupational Safety and Health Administration

In accordance with California Code of Regulations, Title 8, Section 1270, Fire Prevention, and Section 6773, Fire Protection and Fire Equipment, the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials; fire hose size requirements; restrictions on the use of compressed air; requirements for access roads; and guidelines for testing, maintaining, and using all firefighting and emergency medical equipment.

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 directed the proceeds of a 0.50% sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051–30056 provide rules to implement Proposition 172. 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 1992–1993 fiscal year. An agency 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. Board of Trustee 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 fire protection, emergency medical services, and police protection services.

California Education Code

The facilities and services of ESUSD are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. Traditionally, the state has passed legislation for the funding of local and public schools and provided the majority of monies to fund education in the state. To assist in providing facilities to serve students generated from new development projects, the state passed Assembly Bill 2926 in 1986, allowing school districts to collect impact fees from developers of new residential, commercial, and industrial developments. Development impact fees are also references in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of the cost of construction, modernization, or reconstruction of school facilities. Subsequent legislation has modified the fees structure and general guidelines. Section 65996 of the California Government Code designates Section 17620 of the Education Code (the mitigation fees authorized by Senate Bill [SB] 50) and Section 65970 of the Government Code to be the exclusive method for considering and mitigating development impacts on school facilities.

Senate Bill 50 and Proposition 1A

SB 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. It placed a \$9.2 billion State bond measure (Proposition 1A), which includes grants for modernization of existing school and construction of new schools, on the ballot for the November 3, 1998, election. Proposition 1A was approved by

voters, thereby enabling SB 50 to become fully operative. Under SB 50, a program for funding school facilities largely based on matching funds was created. Its construction grant provides funding on a 50/50 state and local match basis, while its modernization grant provides funding on a 60/40 basis. Districts unable to provide some, or all, of the local match requirement may meet financial hardship provisions and are potentially eligible for additional State funding. In addition, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential impacts.

Regional and Local

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 (City of El Segundo 1992b):

Goal LU7: Provide the highest quality public facilities, services, and public infrastructure possible to the community.

The goal, policies, and objective outlined in the General Plan Open Space and Recreation Element relevant to the Project are as follows (City of El Segundo 1992c):

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.

Policy OS1-1.1 Adopt a park land standard of 5.0 acres/1,000 population, which is the maximum allowable standard ratio as stated in Chapter 4, Article 4, Section 6647(b) of the Subdivision Map Act.

Policy OS1-1.2 Encourage a locational service area standard on one-quarter mile for neighborhood parks and one-half mile for community parks.

Objective OS1-2 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.

El Segundo Municipal Code – 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 9, Fire Code, of the El Segundo Municipal Code authorizes the ESFD to regulate building and other construction as it relates to fire prevention. Regulations applicable to the Project include the following:

- Access Roadway for Fire Apparatus Fire Lanes
- Fire Department Connections and Fire Sprinkler System Control Valves
- Fire Hydrant and Private Fire Main System Installation
- Water-Based Fire Extinguishing Systems Servicing
- Fire Sprinkler System
- Five Year Test of Fire Sprinkler Systems

- Key Box Installations
- Maintenance and Test of Fire Protection Systems
- Standards for Fire Alarm Systems

El Segundo Municipal Code – Chapter 27A 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
- G. Road project construction, right of way acquisition, and engineering

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.

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 (ESUSD 2018).

4.12.3 Thresholds of Significance

The significance criteria used to evaluate Project impacts to public services and recreation 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 public services and to recreation would occur if the Project would:

- 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 any of the public services:
 - 1) Fire protection.
 - 2) Police protection.
 - 3) Schools.
 - 4) Parks.
 - 5) Other public facilities.
- 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.
- c) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.12.4 Impacts Analysis

Threshold 4.12a **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:**

- 1) Fire protection?**

Construction

Construction activities associated with the proposed Project may temporarily (i.e., 48 months during proposed construction) increase demand for fire protection and emergency medical services. Construction activities may involve the operation of construction equipment and machinery, storage, handling, and disposal of combustible materials, and the use of flammable or toxic materials.

To comply with California Department of Industrial Relations, Division of Occupational Safety and Health and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on site. Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. City and state regulations and code requirements would, in part, require personnel to be trained in fire prevention and emergency response, maintenance for fire suppression equipment, and implementation of proper procedures for

storage and handling of flammable materials. Thus, compliance with regulatory requirements would reduce the potential for construction activities to expose people to the risk of fire explosion related to hazardous materials.

Project construction could also temporarily affect the provision of ESFD and/or services in the Project vicinity as a result of construction activities, including segments of Pacific Coast Highway and Mariposa Avenue where new curbs would be installed. Temporary lane closures around the Project site may be expected. The existing hotels on the Project site would remain open during the duration of construction. Pedestrian access to the existing hotel uses on the Project site would be open, although temporary sidewalk closures around the portions of the Project site may be expected, specifically during Mariposa Avenue street improvements for approximately 1 to 2 months. These construction activities have the potential to temporarily impact emergency vehicle access to the Project site. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, Mitigation Measure (MM-)TRA-1 is required. MM-TRA-1 requires preparation of a Construction Traffic Control Plan. With implementation of MM-TRA-1 to address pedestrian, bicycle, and vehicular circulation during construction activities, would reduce potential impacts related to emergency access to less than significant.

Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic. Based on these considerations, construction of the proposed Project would not be considered a high-risk activity, and the ESFD is equipped and prepared to deal with construction-related traffic and fires, should they occur. Due to compliance with applicable codes and fire safety standards, Project construction would not adversely impact firefighting and emergency services to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, impacts are less than significant, and no mitigation is required.

Operation

ESFD currently serves the Project site and the surrounding area. Each additional development that provides net new square footage creates a greater demand on existing resources. The increased use of the Project site resulting from the Project would be expected to increase the frequency of emergency response calls relative to existing conditions. However, for the reasons enumerated below, the proposed increase in development intensity at the Project site would not be expected to result in the need for new or expanded fire protection facilities.

The need for new or expanded public services (such as fire protection facilities) is typically associated with a population increase. As described in Section 4.11, Population and Housing, Project employment and new residential uses would result in approximately 56 new employees and 618 residents on the Project site. The Southern California Association of Government's (SCAG's) forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. In the context of the City's population projections, the proposed Project would exceed the forecasted population growth. The proposed Project would accommodate an expected 618 residents which from the implementation of the Specific Plan exceed the overall population growth projections included in the Connect SoCal. ESFD has reviewed the proposed Project and has determined existing protection facilities were sufficient for the proposed Project (Carver 2020). Therefore, it is expected that the population and employment growth associated with the Project would not outpace the existing or future service capacity of the ESFD.

The Project site is currently served by two existing fire stations. No expansion of these facilities is currently contemplated. Payment of development fees by the Project applicant/developer would be used to offset the costs of increased personnel or equipment that could be required to maintain acceptable service ratios, response times, or other performance objectives.

Furthermore, the proposed Project 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 (including those listed above and in Section 4.12.2, Relevant Plans, Policies, and Ordinances) would be ensured through the plan check process and fire review prior to the issuance of building permits for the Project. More specifically, the proposed Project would be designed to include the following fire protection features, which would help prevent fire hazards: appropriate roadway access for fire lines, ESFD connections and fire sprinkler system control valves, and a fire alarm system. The building would also be equipped with fire pumps and alarms consisting of smoke detection, voice alarm capability, and visual alarms. 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.

The operational phase of the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Although the Project would introduce commercially available potentially hazardous materials, such as cleaning supplies and landscaping products, to future residents, employees, and visitors of the Project site, the use of these substances would be subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials. Refer to Section 4.7, Hazards and Hazardous Materials, for a discussion of hazardous materials that are potentially associated with the Project. The use of commercially available hazardous materials would not significantly impact ESFD services.

As shown in Figure 4.15A, Conceptual Water Utility Plan, in Section 4.15, Utilities and Service Systems, of this Draft EIR, the Project currently includes water service connection for domestic water and fire protection. The specific location of new connections required for Project implementation and pipe sizing would be based upon the City's requirements and subject to City approval. The system must provide adequate water supply for operation of the building's domestic requirements, automatic sprinkler systems and on-site fire hydrants (if required by the state or City Fire Marshal). Fire flows for the proposed development must be based on the requirements listed in the California Fire Code that is in effect at the time of plan submission, as amended by the City. Based on the requirements outlined by the ESFD in Regulation H-2-a for Fire Hydrant and Private Fire Main System Installation, two additional fire hydrants may need to be installed to provide coverage for portions of the proposed buildings that are in excess of 150 feet from a public fire hydrant. Coordination with the ESFD Fire Prevention Division is required to determine whether the additional fire hydrants would be required.

The Project site is located within an urbanized area and is not located within a Very High Fire Hazard Severity Zone (CAL FIRE 2020). The Project is surrounded by roadways and developed properties on all sides and entirely developed, so it is not susceptible to exacerbating wildfire risks. Further, the Project site does not contain extensive amounts of vegetation or wildland fuel. Therefore, the Project would not result in increased potential for wildland fire hazards that could affect ESFD services.

Given the reasons described above, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. Impacts would therefore be less than significant. No mitigation is required.

Threshold 4.12a Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

2) Police protection?

Construction

There is the potential for Project construction activities to create an increase in demand for police protection services, as construction sites can be sources of attractive nuisances, can provide hazards, and can invite theft and vandalism when not properly secured. This could result in an increase in the demand for police protection services. Consequently, developers and construction contractors typically take precautions to prevent trespassing through construction sites. During construction, the Project applicant/developer or its construction contractor would implement temporary security features including security fencing, lighting, and locked entry. These features would reduce the need for police protection services during the Project's construction phase. Potential short-term construction impacts to police services would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, and impacts would be less than significant.

Operation

As with fire protection services, the increased use of the Project site attributable to the proposed Project would be expected to increase the frequency of emergency and non-emergency calls to the ESPD. While the Project site currently places some demand on the ESPD due to the occupied hotel uses, the proposed Project would increase demands relative to existing conditions. The ESPD has stated that the existing police station facilities are sufficient to provide service to the proposed Project and that the development of the proposed Project would not result in the need for new facilities and/or physically altered facilities to maintain acceptable service ratios, response times, or other performance objectives (McDaniel 2020).

The Project site is currently served by the ESPD at 348 Main Street. No expansion of this facility is currently contemplated (McDaniel 2020). Payment of development fees by the Project applicant/developer would be used to offset the costs of increased personnel or equipment that could be required to maintain acceptable service ratios, response times, and other performance objectives. The proposed Project would incorporate operational practices and design elements to increase safety and to reduce the potential for crime to occur, which could lessen the demand for police protection services at the Project site. The Project would be designed to minimize secluded areas and potential hiding places and would be equipped with alarm systems and access controls. Signage and lighting would be used to facilitate wayfinding and safe pedestrian movement throughout the site and within the proposed buildings. These design practices and operational practices would lessen the demand for police protection services at the Project site by reducing the potential for crime to occur and by providing on-site security to address minor issues not requiring immediate ESPD involvement.

The ESPD has reported the current ESPD established performance standards are being achieved and the existing police station is sufficient to provide service to the proposed Project (McDaniel 2020). For these reasons, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities and potential impacts would be less than significant.

Threshold 4.12a Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

3) Schools?

The proposed Project’s approximately 56 new employees and 618 residents would generate students that would attend ESUSD schools. Using the student generation rates from ESUSD, at 263 dwelling units, the Project could generate approximately 35 elementary school students, 20 middle school students, and 28 high school students (Farris 2020).

Table 4.12-6. Public Schools Capacity

School	Enrollment (2019)	Enrollment plus Project	Capacity (2019)	Post-Project Remaining Capacity/ (Excess)
Eagle’s Nest Preschool	100	100	100	0
Center Street Elementary School	776	811	800	(11)
El Segundo Middle School	864	884	1,000	116
Arena High School/Virtual High School	36	36	70	34
El Segundo High School	1,214	1,242	1,400	158

Sources: City of El Segundo 2020b; ESUSD 2018; Farris 2020

As shown in Table 4.12-6, all the schools with the exception of Center Street Elementary School have continue to have capacity with the addition of proposed Project enrollment. However, communication with EUSD indicates the existing schools are sufficient to support the proposed Project (Farris 2020). Nonetheless, as previously discussed in Section 4.12.2, 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. No mitigation is required.

Threshold 4.12a Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

4) Parks?

The Project would include 56 new employees and 618 residents. At least a portion of these residents are anticipated to patronize the various public parks and recreation facilities located in proximity to the Project site. Since the City's Parks are within the State of California Parks Department standard of park space at about 3.5 acres of park space per 1,000 residents (Petit 2020), the additional 618 residents would not exceed existing standards of service for parks.

Additionally, 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 infrastructures. Pursuant to the Development Impact Fee Program, the Project applicant/developer would pay its fair share of impact fees based on the fee category and adopted Development Impact Fee rates. The El Segundo Recreation and Parks Department indicated that "no new facilities would be required [as part of the proposed Project]. However, some updates to the benches, picnic tables, trash cans and other park fixtures would be welcomed, as well as funds to make improvements to the existing walking paths" (Petit 2020). The Project contribute funds to the El Segundo Recreation and Parks Department through Development Impact Fees. Further, the Project would include common open space areas, including rooftop pools and community rooms. These on-site amenities would provide an alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project site while incrementally reducing impacts to off-site public parks and recreational facilities. Therefore, impacts associated with the need for new or expanded park facilities would be less than significant. No mitigation is required.

Threshold 4.12a Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

5) Other public facilities (libraries)?

Other public facilities and services provided within the City include library services and City administrative services. Library services are provided at ESPL located at 111 West Mariposa Street, approximately 1.8 miles west of the Project site.⁴ As discussed further in Section 4.11, Population and Housing, the proposed Project would generate approximately 56 new employees and 618 residents. As described above under "fire protection," would exceed the overall expected growth in the City. However, pursuant to the Development Impact Fee Program, the Project applicant/developer would pay its fair share of impact fees based on the fee category and adopted Development Impact Fee rates. The ESPL indicated that no new facilities would be required as part of the proposed Project; although the digital library needs to be enhanced. Additional financial support would be used to grow electronic access to eBooks and audio books, movies and music, and educational databases via the library's portal (Petit 2020). The Project would contribute funds to the ESPL through Development Impact Fees. Therefore, impacts to

⁴ Distance measured from the northeast corner of Mariposa Avenue and Main Street to the southeast corner of Mariposa Avenue and Indiana Street.

other public facilities in the area resulting from the proposed Project would be less than significant. No mitigation is required.

Threshold 4.12b 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 Project would include 56 new employees and 618 residents. 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. At least a portion of these residents are anticipated to patronize the various public parks and recreation facilities located in proximity to the Project site. The Project would include common open space areas, which would consist of a central community space with a variety of recreational amenities, as well as landscaped areas around the Project site. These on-site amenities would provide an alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project site while incrementally reducing impacts to off-site public parks and recreational facilities. The El Segundo Recreation and Parks Department indicated no new facilities would be required as part of the proposed Project; although some updates to the benches, picnic tables, trash cans and other park fixtures would be welcomed, as well as funds to make improvements to the existing walking paths (Petit 2020). Additionally, 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 infrastructures. Pursuant to the Development Impact Fee Program, the Project applicant/developer would pay its fair share of impact fees based on the fee category and adopted Development Impact Fee rates.

As such, with payment of the required development impact fees related to parks and recreation in combination with provision of on-site recreational facilities, the Project would meet the anticipated demand for neighborhood and regional parks or other recreational facilities. Project residents and the public would have access to adequate on-site recreational facilities, which would offset increased use of existing parks and recreational facilities in the City. Therefore, implementation of the Project would not result in a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur. Impacts to neighborhood and regional parks would be less than significant. No mitigation is required.

Threshold 4.12c Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

The Project would include common open space areas, which would consist of a central community space with a variety of recreational amenities, as well as landscaped areas around the Project site. The construction of these common open space areas and associated recreational amenities is analyzed under this EIR. As demonstrated throughout this Draft EIR, any environmental impacts as a result of Project implementation would be reduced to a less-than-significant level through the incorporation of the mitigation measures described throughout. Additionally, 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 infrastructures. Pursuant to the Development Impact Fee Program, the property owner/developer would pay its fair share of impact fees based on the fee category and adopted Development Impact Fee rates. As such, Project

implementation would not require the construction or expansion of recreational facilities, and impacts would be less than significant.

4.12.5 Cumulative Impacts 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 population, housing, and employment. The cumulative study area used to assess potential cumulative population and housing impacts includes the City of El Segundo, ESFD and ESPD service areas, and ESUSD. Cumulative impacts on public services including fire and police protection, parks, and schools would result when projects collectively increase demand on services such that additional facilities or services must be constructed or provided. Cumulative projects would likely result in an incremental increase in the demand for fire protection, police protection, parks, schools (for cumulative projects that have a residential component), and other public services. Because the City is nearly built out, the proposed Project and all cumulative projects are located in areas currently served by ESFD, EPSD, and ESUSD.

Fire Protection

A cumulatively significant impact related to fire protection and emergency services could occur as a result of population growth within the ESFD service area due to the Project and cumulative projects. The Project, along with cumulative projects, could result in increased calls for fire protection and emergency services. However, both the Project and cumulative projects would be subject to the requirements of the fire code standards (including those listed above and in Section 4.12.2). This would be ensured through the plan check process and fire review prior to the issuance of building permits for the Project and cumulative projects. Furthermore, the Project and cumulative projects would coordinate with the El Segundo Fire Department Fire Prevention Division to ensure fire flow requirements are met and any required upgrades to the existing water distribution system are addressed for each individual project. As determined by ESFD, existing fire protection facilities are sufficient to meet the proposed Project (Carver 2020), and cumulative increases in demand for fire protection services due to cumulative projects would be identified and addressed through Development Impact Fees. Based on the above considerations, the Project's contribution to cumulative impacts to police protection services would be less than significant.

Police Protection

A cumulatively significant impact related to police protection services could occur as a result of population growth within the ESPD service area due to the Project and cumulative projects. The ESPD has stated that the existing police station facilities sufficient to provide service to the proposed Project and that the development of the proposed Project would not result in the need for new facilities and/or physically altered facilities to maintain acceptable service ratios, response times, or other performance objectives (McDaniel 2020). As with the proposed Project, the applicants of the cumulative projects would be required to incorporate appropriate safety features into the design and construction of their respective projects to minimize the potential for crime and to maximize safety, ultimately minimizing the need for police protection services. In addition, the cumulative projects would contribute to funding police protection services or new facilities through Development Impact Fees. Based on the above considerations, the Project's contribution to cumulative impacts to police protection services would be less than significant.

Schools

The increase in student population as a result of the proposed Project and cumulative residential projects could require the construction or expansion of school facilities. The proposed Project itself, as determined by ESUSD would not result in significant impacts on service demand. While the majority of cumulative projects require discretionary actions, they would incrementally increase the need for school facilities. However, as discussed above in Section 4.12.2, 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. Therefore, the increase in the demand for school facilities and services due to cumulative development would be less than significant level by the payment of Development Impact Fees.

Parks and Recreational Facilities

Buildout of the Project along with cumulative projects would increase use of existing local and regional parks, and could result in the accelerated deterioration of recreational facilities. The proposed Project itself, as determined by El Segundo Recreation and Parks would not result in significant impacts on service demand. However, the deterioration that would occur to local parks and recreational facilities from regional population growth may be offset with funding from new development through the City's Development Impact Fee. Cumulative projects would be required to demonstrate compliance with CEQA prior to Project approval, and 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 expansion of such facilities. Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact to park facilities.

Other Public Facilities (Libraries)

Future cumulative development would generate new tax revenues and would be subject to the City's Development Impact Fees, which act as funding sources for City libraries. The proposed Project itself, as determined by the ESPL, would not result in new physical facilities. The Project and cumulative projects would be required to fund their fair-share of an established fee program designed to alleviate the cumulative impact. These revenues would help offset the increase in demand for library services as a result of the Project. Therefore, cumulative impacts to library services would be less than significant.

4.12.6 Mitigation Measures

No mitigation measures are required.

4.12.7 Level of Significance After Mitigation

Impacts would be less than significant.

4.12.8 References

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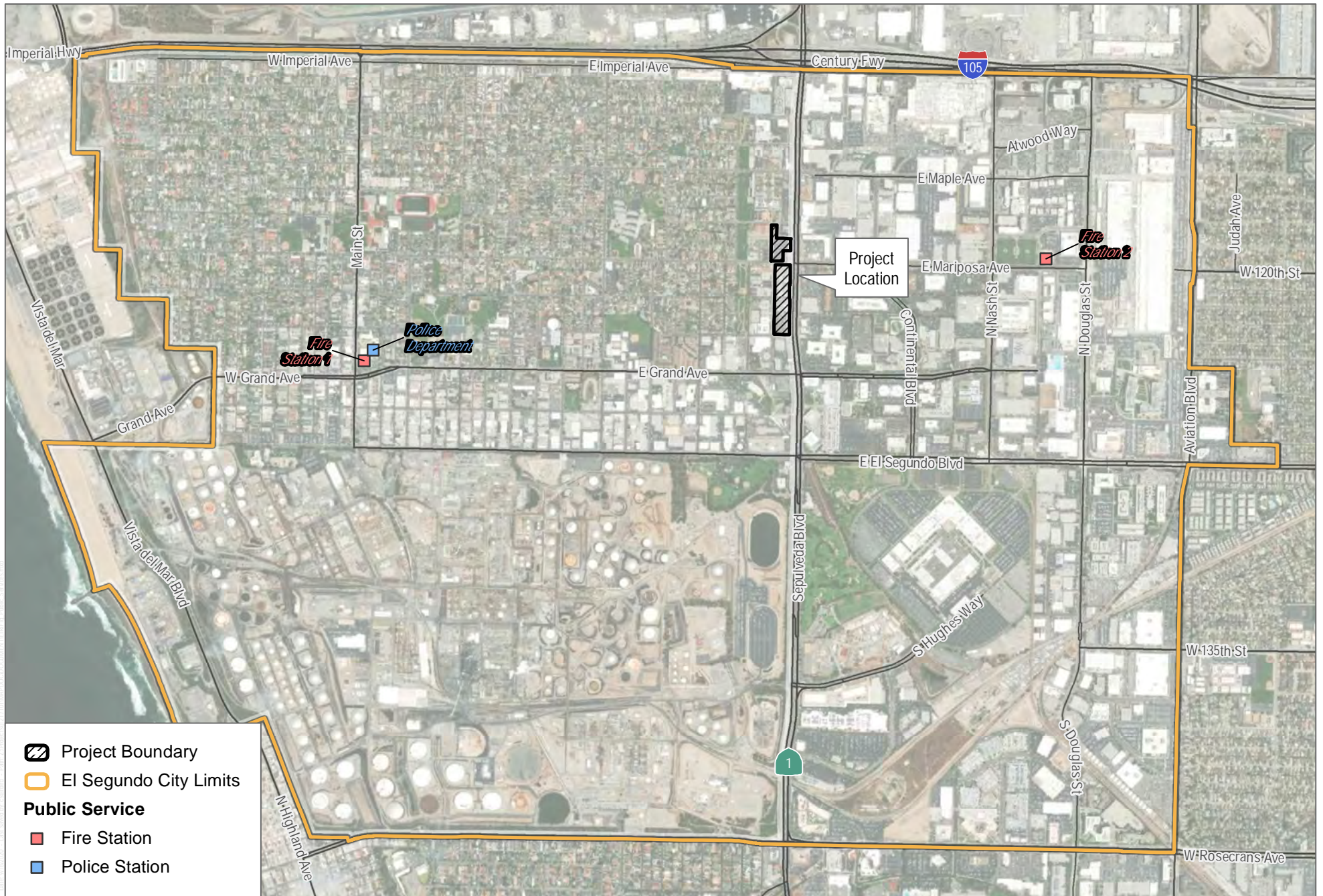
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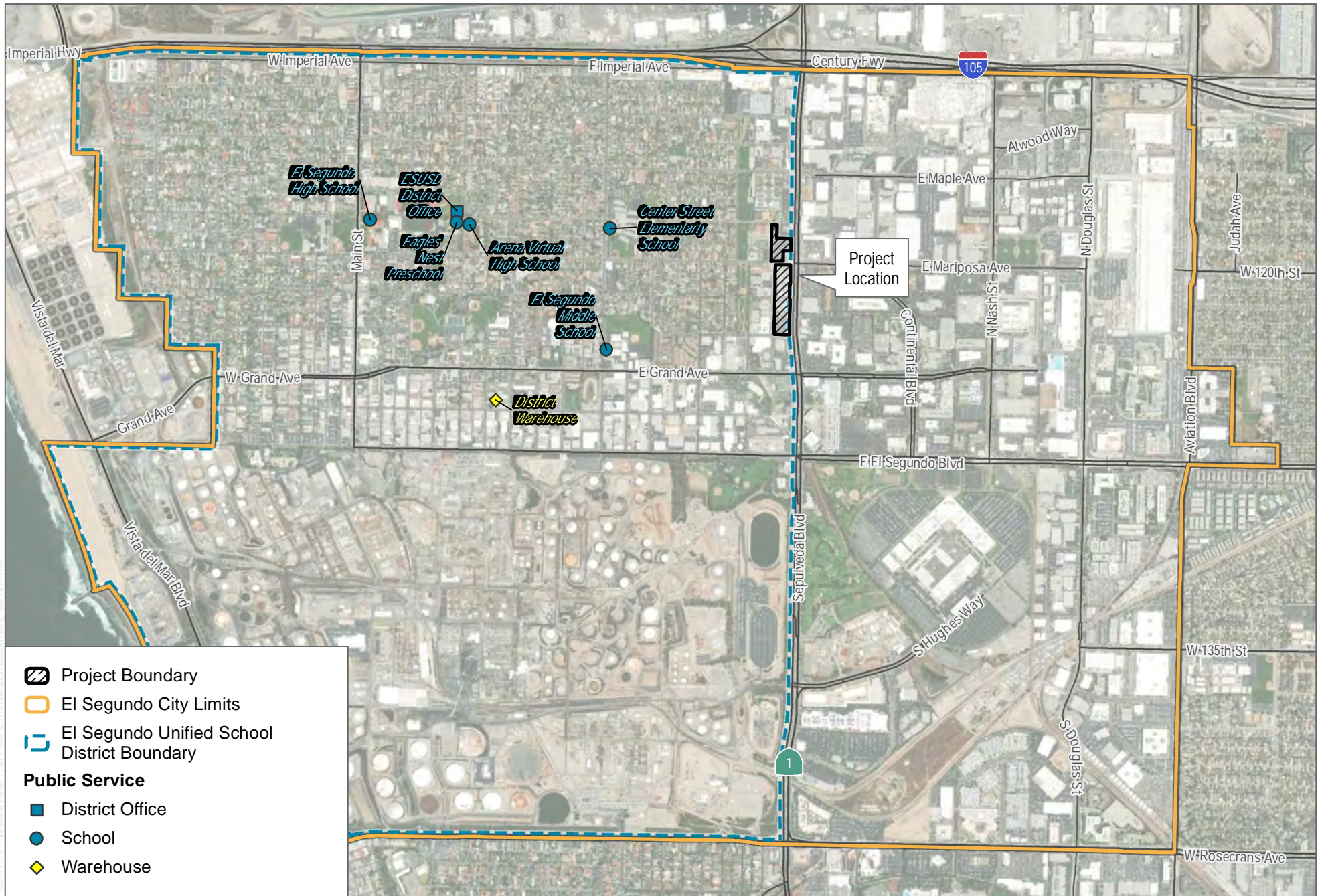
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SOURCE: Esri and Digital Globe 2019; Open Street Map 2019

FIGURE 4.12-1
Existing Fire and Police Stations
 Pacific Coast Commons Specific Plan EIR Project

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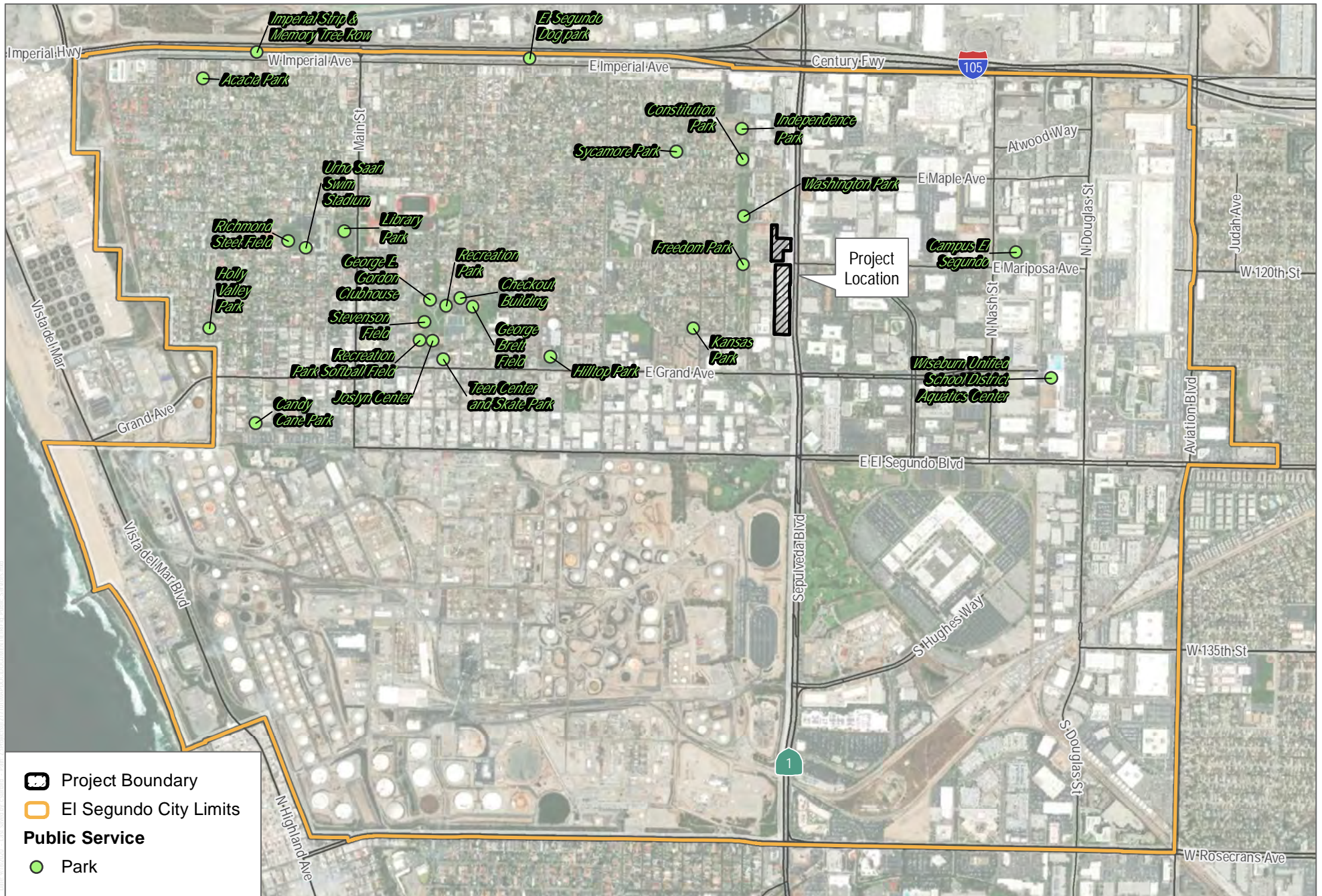


SOURCE: Esri and Digital Globe 2019; Open Street Map 2019

FIGURE 4.12-2

El Segundo Unified School District Boundaries and Schools

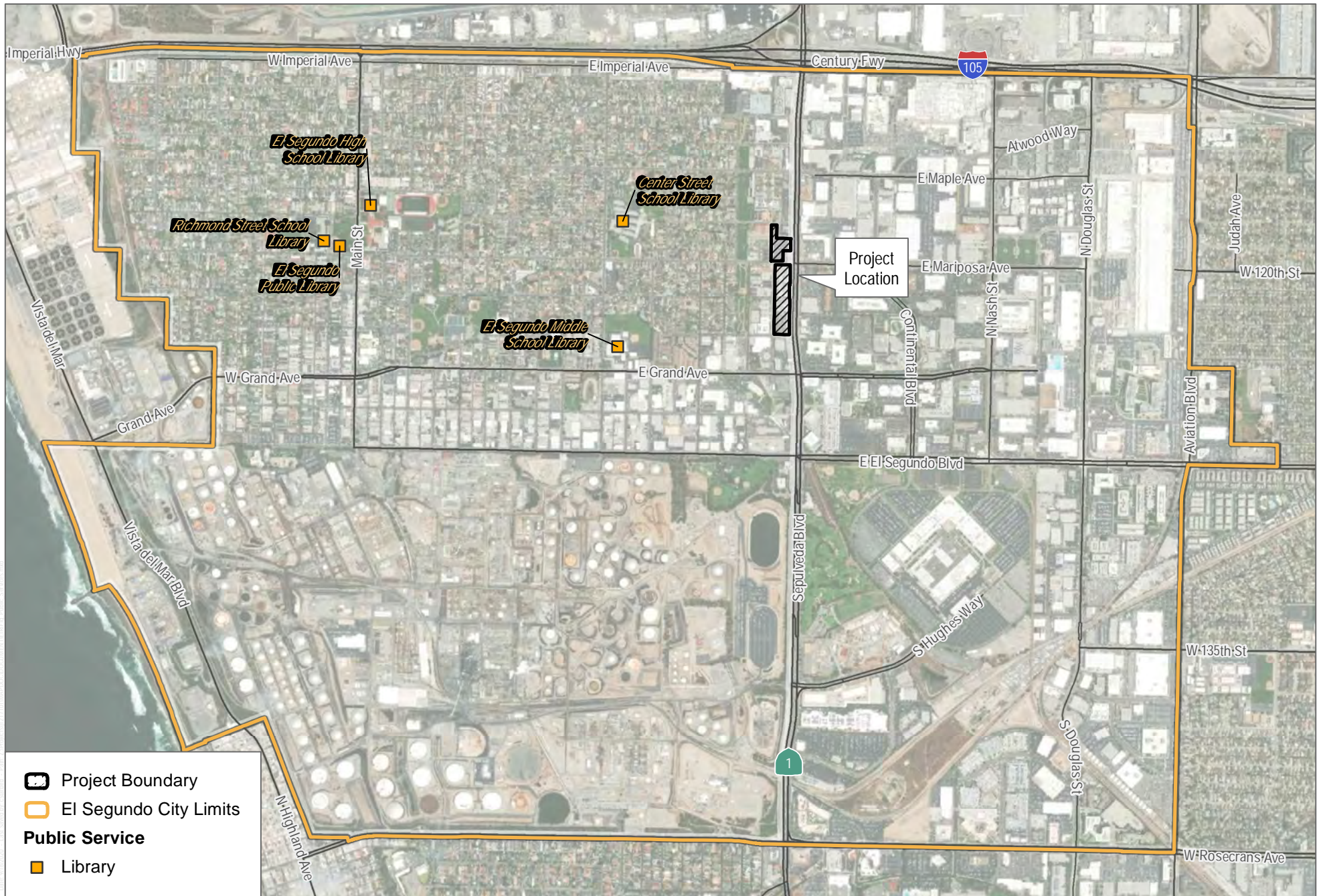
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SOURCE: Esri and Digital Globe 2019; Open Street Map 2019

FIGURE 4.12-3

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SOURCE: Esri and Digital Globe 2019; Open Street Map 2019

FIGURE 4.12-4

El Segundo Public Library

Pacific Coast Commons Specific Plan EIR Project

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4.13 Transportation

This section describes the existing transportation conditions of the Pacific Coast Commons Specific Plan Project (Specific Plan or Project) site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. Information contained in this section is based on the following appendices:

Appendix J-1 Transportation Impact Analysis (TIA) prepared by Fehr & Peers

Appendix J-2 Shared Parking Analysis prepared by Fehr & Peers

Other sources consulted are listed in Section 4.13.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

Methodology

The Project site currently is occupied by the Fairfield Inn and Suites Hotel and the Aloft Hotel and adjacent surface parking lots. These two hotel facilities contain a total of 596 hotel rooms as well as associated amenity areas, including two swimming pools, dining areas, and other hotel facilities. These existing hotels would remain in their current condition with implementation of the proposed Specific Plan. As described in Chapter 3, Project Description, of this Draft EIR, approximately 41,660 square feet of accessory building space associated with the Fairfield Inn and Suites Hotel would be demolished to allow for development of the proposed Project. This Draft EIR does not consider the elimination of this 41,660 square feet in the calculation of projected Project-related operational trips (i.e. the Project's operational trips are not reduced to account for the elimination of these occupiable buildings); therefore, this Draft EIR provides a conservative assessment of operational impacts.

4.13.1 Existing Conditions

The study area selected for analysis in the TIA extends to and includes Center Street to the west, Nash Street to the east, Imperial Highway/Interstate (I) 105 to the north, and El Segundo Boulevard to the south. The streets in the study area are under the jurisdiction of the City of El Segundo (City) with the exception of Pacific Coast Highway (PCH), which is under the jurisdiction the California Department of Transportation (Caltrans). Figure 4.13-1, Project Site Location and Traffic Study Area, illustrates the Project site location and study area analyzed in the Project's TIA.

Existing Street System

I-105 lies 0.5 miles north of the Project site. This interstate provides regional access to and from the study area. I-105 connects to the San Diego Freeway (I-405) located more than 1 mile from the Project site. Major arterials serving the study area include PCH in the north/south direction and El Segundo Boulevard and Imperial Highway in the east/west direction. The characteristics of the major roadways serving the study area are described below.

Freeways

I-105 runs in an east/west direction north of the Project site and extends from Los Angeles International Airport to Norwalk. In the vicinity of the study area, I-105 provides three to four lanes in each direction. Interchanges are provided at Nash Street and PCH in the study area. I-105 connects to I-405 approximately 1.5 miles from the Project site.

I-405 runs in a north/south direction east of the Project site and extends from the San Fernando Valley to Irvine. In the vicinity of the of the study area, I-405 provides four travel lanes and a carpool lane in each direction (a total of 10 lanes). Interchanges are provided via the I-105 and at El Segundo Boulevard in the study area.

East/West Streets

- **Imperial Highway** is classified as a secondary arterial in the study area and runs north of the Project site. It provides three lanes in both directions with a raised median in the study area. Parking is not permitted along either side of the street in the study area.
- **Walnut Avenue** is classified as a local commercial street west of PCH and secondary arterial east of PCH in the study area. It runs north of the Project site and provides one lane in both directions in the study area. Parking is permitted along either side of the street in the study area.
- **Maple Avenue** is classified as a local residential street west of PCH and 4-lane collector east of PCH in the study area. It runs north of the Project site and provides one lane in both directions west of PCH and two lanes in both directions east of PCH in the study area. Parking is permitted along either side of the street in the study area.
- **Palm Avenue** is classified as a local commercial street in the study area and runs north of the Project site. It provides one lane in both directions in the study area. Parking is permitted along either side of the street in the study area.
- **Mariposa Avenue** is classified as a two-lane collector west of PCH and a secondary arterial east of PCH in the study area and runs between the Pacific Coast Commons – North (PCC-North) and Pacific Coast Commons – Fairfield Parking (PCC-Fairfield Parking) Project sites. It provides one lane in both directions west of PCH and two lanes in both directions east of PCH in the study area. Parking is permitted along either side of the street in the study area.
- **Holly Avenue** is classified as a local commercial/residential street in the study area and runs south of the Project site. It provides one lane in both directions in the study area. Parking is permitted along either side of the street in the study area.
- **Grand Avenue** is classified as a secondary arterial in the study area and runs south of the Project site. It provides three lanes in both directions between PCH and Nash Street. Grand Avenue is constructed with two lanes in both directions west of PCH. Parking is not permitted along either side of the street in the study area east of PCH, however there are time restricted parking zones along some portions of Grand Avenue west of PCH.
- **El Segundo Boulevard** is classified as a secondary arterial west of PCH and major arterial east of PCH in the study area. It runs south of the Project site and provides two lanes in both directions west of PCH and three lanes in both directions with a raised median east of PCH in the study area. Parking is not permitted along either side of the street in the study area.

North/South Streets

- **Kansas Street** is classified as a local residential street in the study area that runs west of the Project site and provides one lane in both directions. Parking is permitted along either side of the street in the study area.
- **Indiana Street** is classified as a local commercial/residential street that fronts the western side of the Project site. It provides one lane in each direction with parking permitted on both sides of the street in the study area.
- **PCH** also known as State Route 1, is a major north/south state highway that runs along most of the Pacific coastline of California. It fronts the eastern side of the Project site and provides four lanes in both directions with a center median within the study area. Parking is not permitted along either side of the road in the study area. Previously in the City, this major arterial was referred to as **Sepulveda Boulevard**.
- **Lairport Street** is classified as a secondary arterial in the study area and runs east of the Project site. It provides one lane in both directions. Parking is permitted along either side of the street in the study area. Lairport Street becomes Continental Boulevard south of Mariposa Avenue.
- **Continental Boulevard** is classified as a secondary arterial in the study area and runs east of the Project site. It provides three lanes in both directions. Parking is not permitted along either side of the street in the study area. Continental Boulevard becomes Lairport Street north of Mariposa Avenue.
- **Nash Street** is classified as a secondary arterial in the study area and runs east of the Project site. It provides two lanes in both directions. Parking is not permitted along either side of the street in the study area.

Existing Public Transit Services

The Project site is served by public transit. Figure 4.13-2, Transit Routes, shows the various bus routes and Metro C Line that provide service in the study area. The Project site is located west of the Metro C Line Mariposa Station. The following bus routes are within the study area: two local Metro (Route 232 and 625), one local Beach Cities Transit (109), and two Los Angeles Department of Transportation (LADOT) Commuter Express (Route 438, 574) routes.

Details on the transit lines in the vicinity of the Project site are as follows:

- Metro C (formerly Green) Line – The C Line is a light rail line running between Redondo Beach and Norwalk in Los Angeles County. This line runs north/south east of the Project site along Nash Street. The C Line has average headways of 10 minutes during the weekday AM and PM peak periods. The C Line Mariposa Station is just over 0.5 miles from the Project site.
- Metro Line 232 – Line 232 provides local service between the City and downtown Long Beach. It runs along PCH east of the Project site in the study area. Line 232 has average headways of 20 minutes during the weekday AM peak period and 30 minutes during the weekday PM peak period.
- Metro Line 625 – Line 625 provides local service between the City and Los Angeles International Airport. It runs along Imperial Highway, north of the Project site in the study area. Line 625 has average headways of 25 minutes during the weekday AM peak period and 30 minutes during the weekday PM peak period.
- Beach Cities Line 109 – Line 109 provides local service between the City of Redondo Beach and Los Angeles International Airport. This line runs along east of the Project site along PCH. Headways average 30 to 45 minutes during peak periods.
- LADOT Commuter Express 438 – Line 438 provides express service from El Segundo to Downtown Los Angeles along Imperial Highway, north of the Project site. Line 438 has headways of 15 to 30 minutes during weekday AM and PM peak periods.

- LADOT Commuter Express 574 – Line 574 provides express service from Encino to the City of Hawthorne along PCH and El Segundo Boulevard, east and south of the Project site, respectively. Line 574 has headways of 30 to 60 minutes during weekday AM and PM peak periods.

Existing Bicycle and Pedestrian Facilities

Sidewalks are generally present throughout the study area, and marked crosswalks are provided at all major arterial intersections. Pedestrian access to the Project is provided along all of the roadways surrounding the Project site. There are no identified Safe Routes to School along streets fronting the Project site. The service area for Center Street Elementary School and El Segundo Middle School is located west of PCH. No existing students are anticipated to walk past the Project site (from the east or along the PCH) to attend school.

Existing bicycle facilities in the study area include a Class II bike lane along Imperial Highway. Figure 4.13-3, Existing and Future Bicycle Facilities, identifies the existing and planned bicycle facilities in the Project's study area. The City's Circulation Element and the South Bay Bicycle Master Plan indicates that additional Class II and III facilities are planned in the study area. The City installed signs and stencils on several streets in 2019 to implement Class III bike routes in the City. The Streets include: (1) Grand Avenue from the west City boundary to Duley Road (0.1-mile south of the Project site); (2) Main Street from El Segundo Boulevard to Imperial Highway (1 mile west of the Project site); and (3) Utah Avenue from Douglas Street to Aviation Boulevard (1.3 miles southeast of the Project site).

Existing Traffic Volumes

New weekday AM (7:00 to 10:00 a.m.) and PM (4:00 to 7:00 p.m.) peak-hour turning movement counts were collected at the study intersections in May and October 2019. Bicycle and pedestrian counts were also collected at select locations near the Project site. The existing weekday morning and afternoon peak-hour traffic volumes at the study intersections are provided in Appendix A of the TIA (Appendix J-1). Count sheets for these intersections are contained in Appendix B of the TIA (Appendix J-1).

4.13.2 Relevant Plans, Policies, and Ordinances

Federal

There are no applicable federal regulations related to transportation that would apply to the proposed Project.

State

Senate Bill 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the California Environmental Quality Act (CEQA) process for several categories of development projects including the development of infill projects in transit priority areas and to 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. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit Oriented Infill Projects, to the CEQA Statute (Public Resources Code [PRC] Section 21099). Section 21099(d)(1) provides that aesthetic

and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. In addition, 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.

In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for impacts on vehicular delay often involves increasing capacity such as widening a roadway or the size of an intersection, which in turn encourages more vehicular travel and greater pollutant emissions. Additionally, improvements to increase vehicular capacity can often discourage alternative forms of transportation such as biking and walking. SB 743 directed the Governor’s Office of Planning and Research (OPR) to develop an alternative metric(s) for analyzing transportation impacts in CEQA documents. The alternative shall promote the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of multimodal transportation system, and providing clean, efficient access to destinations. Under SB 743, it was anticipated that the focus of transportation analysis will shift from vehicle delay to vehicle miles traveled (VMT) within transit-priority areas (i.e., areas well served by transit).

Pursuant to SB 743, OPR released the draft revised CEQA Guidelines in November 2017, recommending the use of VMT for analyzing transportation impacts. Additionally, OPR released Updates to Technical Advisory on Evaluating Transportation Impacts in CEQA, to provide guidance on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular jurisdictions. While OPR’s Technical Advisory is not binding on public agencies, CEQA allows lead agencies to “consider thresholds of significance ... recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence” (CEQA Guidelines Section 15064.7[c]).

In December 2018, the CEQA Guidelines were updated to add new Section 15064.3, Determining the Significance of Transportation Impacts, that describes specific considerations for evaluating a project’s transportation impacts using the VMT methodology. This new methodology is required to be used for projects beginning on July 1, 2020.

CEQA Guidelines Section 15064.3(b) is divided into four subdivisions as follows:

- (1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
- (2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

- (3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
- (4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.

Sustainable Communities Act; Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008) supports the state's climate action goals to reduce greenhouse gas emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, the California Air Resources Board sets regional targets for greenhouse gas emissions reductions from passenger vehicle use. In 2010, the California Air Resources Board established these targets for 2020 and 2035 for each region covered by one of the state's Metropolitan Planning Organizations (MPO). The California Air Resources Board will periodically review and update the targets, as needed.

Each of California's MPOs must prepare a Sustainable Communities Strategy (SCS) as an integral part of its Regional Transportation Plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its greenhouse gas emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. California Air Resources Board must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional greenhouse gas targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy to meet the targets. The alternative planning strategy is not a part of the RTP.

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the alternative planning strategy. Developers can get relief from certain CEQA requirements if their new residential and mixed-use projects are consistent with a region's SCS (or alternative planning strategy) that meets the targets (see PRC Sections 21155, 21155.1, 21155.2, and 21159.28).

California Department of Transportation

As the owner and operator of the State Highway System, Caltrans implements established state planning priorities in all functional plans, programs, and activities. Caltrans has the responsibility to coordinate and consult with local jurisdictions when proposed local land use planning and development may impact state highway facilities. Pursuant to PRC Section 21092.4, for projects of statewide, regional, or area-wide significance, the lead agency shall consult with transportation planning agencies and public agencies that have transportation facilities which could be affected by a project.

To comply with SB 743 implementation, the Caltrans Transportation Impact Study Guide (May 2020), replaced the Guide for the Preparation of Traffic Impact Studies (Caltrans 2002). Per the 2020 Transportation Impact Study Guide, Caltrans' primary review focus is VMT, replacing LOS as the metric used in CEQA transportation analyses. Caltrans recommends use of OPR's recommended thresholds and guidance on methods of VMT assessment found in OPR's Technical Advisory (OPR 2018) for land use projects. In addition to VMT, the 2020 Transportation Impact Study Guide states that it may request a targeted operational and safety analysis to address a specific geometric or operational issue related to the State Highway System and connections with the State Highway System (Caltrans 2020).

Regional and Local

SCAG Regional Transportation Plan/Sustainable Communities Strategy

Southern California Association of Governments (SCAG) is the designated MPOs 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 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 (SCAG 2016).

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 (SCAG 2020).

However, the SCAG travel demand model used for the proposed Project’s VMT analysis is based on 2016 RTP/SCS. The SCAG model is currently being updated to reflect the new 2020–2045 RTP/SCS Connect SoCal, but is not available at the time of the preparation of this Draft EIR,

Local

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 proposed Project include the following (City of El Segundo 2004):

- Goal C1** Provide a safe, convenient, and cost-effective circulation system to serve the present and future circulation needs of the El Segundo community.
- 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’s circulation system.
- 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.
- 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.
- 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.
- Policy C1-1.9** Provide all residential, commercial, and industrial areas with efficient and safe access for emergency vehicles.
- 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.

- Objective C1-3** Ensure that the City’s Master Plan Truck Route System efficiently serves the shipping needs of the commercial and industrial land uses in El Segundo while balancing potential conflicts with residential and recreation land uses throughout the City.

- Policy C1-3.2** Ensure that the development review process incorporates consideration of off-street commercial loading requirements for all new projects.

- 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.

- 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.

- Policy C3-1.8** Require the provision of adequate pedestrian and bicycle access for new development projects through the development review process.

- Policy C3-2.1** Ensure the provision of sufficient on-site parking in all new development.

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% decrease from 2005 levels by 2020 as recommended in the State Assembly Bill 32

Scoping Plan and a 49% decrease from 2005 levels by 2035 (City of El Segundo 2017). The proposed Project is compared to the goals and measures of the CAP to determine consistency with the CAP.

Proposed PCC Specific Plan

Requirements set forth in the Specific Plan's Development Standards that are relevant for the topic of Transportation include the following:

C.1. Public streets must be designed and constructed in accordance with the General Plan and in the overall right-of-way size identified in the Street Classification and Standards (Exhibit C-8) in the Circulation Element of the General Plan or as exempted or a waiver granted subject to the regulations in ESMC Chapter 15-24A Right of Way Dedications and Improvements. No private streets are located within the Specific Plan area. A portion of one public street, Mariposa Avenue (a commercial collector), bisects the northern and southern portions of the Specific Plan area. Streets that adjoin the boundaries of the Specific Plan area include Pacific Coast Highway (a major arterial street that is a Caltrans owned State Highway Facility), Holly Avenue, Indiana Street and Palm Avenue. Holly Avenue, Indiana Street and Palm Avenue are classified as local streets. A portion of Mariposa Avenue between Indiana Street and Pacific Coast Highway is proposed to be expanded on the south side of the street to include a dedicated right turn lane (eastbound on Mariposa Avenue to southbound on Pacific Coast Highway).

D.1 Parking and loading must be provided in accordance with the requirements of ESMC Chapter 15-15, except as provided in 1.a through 1.j.

D.2 Preferential Parking must be provided for carpools and vanpools.

D.3. Bicycle parking and EV [electric vehicle] charging must comply with the stricter of El Segundo Municipal Code (ESMC) Chapters 15-15 and 15-16 or Cal Green Code.

I.3. Bicycle parking must comply with the ESMC and Cal Green Code.

Development Agreements/Conditions of Approval

The City would implement the following requirements as a condition of Project approval:

Condition of Approval:

- If the timing of the proposed construction of PCC-South and PCC-North (i.e. Phase 2 and Phase 3) would overlap and the total parking demand would exceed the total parking supply, the Project applicant/developer would be required to accommodate the excess parking demand at an off-site location and provide shuttle service to and from the Project site accordingly to ensure that that parking is adequately provided during short-term construction activities.
- Up to 3,700 square feet of the commercial space across all three sites could be fast casual restaurant space, with the remainder would be general commercial/retail.

4.13.3 Thresholds of Significance

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

- a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- d) Result in inadequate emergency access.

Approach and Assumptions

Construction

Based on the schedule provided by the developer, construction of the Project is anticipated to begin in October 2021 and is expected to be completed by July 2024. Each phase of construction is expected to involve six general phases, which would overlap to some extent. See Section 4.2, Air Quality, for further details on the construction assumptions.

The TIA (Appendix J-1) estimates construction of the proposed Project to generate up to four truckloads per day during Phase 1 and three truckloads per day during Phase 2 and 3. Haul trucks are anticipated to use PCH north to Imperial Highway and PCH south to El Segundo Boulevard. All three of these streets are currently designated as truck routes in the City. Imperial Highway links directly to I-105 to the north and El Segundo Boulevard links directly to I-405 to the south. Haul truck routes are shown in Figure 4.13-4, Haul Truck Routes.

In addition to haul trucks, the site is also expected to generate equipment and delivery trucks during various phases of construction. One example would be concrete delivery, which would be required for the parking garage and the buildings on site. Other materials would include plumbing supplies, electrical fixtures, and items used in furnishing the buildings. These materials would be delivered to the site and stored on-site. These deliveries are expected to occur in variously sized vehicles including small delivery trucks to cement mixer trucks and 18-wheel trucks. Additionally, construction equipment would have to be delivered to the site. This equipment could include cranes, bulldozers, excavators, and other large items of machinery, which would be transported to the site on large trucks. Up to 30 delivery trucks per day are anticipated on peak activity days during Phases 2 and 3.

Operation

The Project would consist of the adoption of the Specific Plan to allow for the development of 263 residential units and 11,252 square feet of commercial space. The Specific Plan's three development areas are PCC-South, PCC-Fairfield Parking, and PCC-North. PCC-North would be developed with 143 residential units and 2,223 gross square feet of commercial space. PCC-Fairfield Parking would be developed with approximately 3,273 gross square feet of ground-floor commercial for the Fairfield Inn and Suites Hotel. PCC-South would be redeveloped with 120 residential units and 5,756 gross square feet of commercial space. Up to 3,700 square feet of the commercial space across all three sites could be fast casual restaurant space and the remainder would be

general retail. The Project would construct sidewalk improvements to accommodate the proposed right-turn lane along Mariposa Avenue. The right- turn lane will be designed in accordance with Caltrans standards due to the required encroachment upon PCH to accommodate the improvement. No other sidewalk or public right-of-way improvements are proposed.

Vehicle access for the Project is to be provided via PCH, Indiana Street, Mariposa Avenue, and Palm Avenue. The driveway configurations for the individual sites are as follows (see also Figure 4.13-5, Project Site Access):

PCC-North

- Access for residential and commercial (full access in/out) provided via Mariposa Avenue and Palm Avenue into a private driveway. The existing curb cut on PCH would be removed and there would be no access from PCH.

PCC-Fairfield Parking

- Access for hotel and commercial (right in only) provided via existing access to PCH
- Access for hotel and commercial (full access out only) provided via existing internal drive aisle with existing access to Indiana Street

PCC-South

- Access for hotel and commercial (right in/right out) provided via existing access to PCH
- Access for residential (full access in/out) provided primarily via Indiana Street, with additional access via PCH (right in/right out)

Project Trip Generation

The development of trip generation estimates for the proposed Project involved a three-step process: trip generation, trip distribution, and traffic assignment. Trip generation rates from Trip Generation, 10th Edition (ITE 2017) were used to estimate the number of trips associated with the Project and are presented in Table 4.13-1. The total number of trips generated by the new development were adjusted to account for walk/bike/transit credit.

A 5% walk/bike/transit credit was applied to all proposed land uses. This credit accounts for trips made to and from the Project site using modes other than automobiles. These include trips on rail and bus transit, bicycle, walking, etc. The site is located within walking distance of the Mariposa C Line station and in close proximity to other regional transit lines, and a wide diversity of land uses within reasonable walking distance. As shown in Table 4.13-1, the Project is projected to generate an estimated net increase of 2,517 daily trips, including 132 trips (47 inbound/85 outbound) during the AM peak hour and 178 trips (103 inbound/75 outbound) during the PM peak hour.

Table 4.13-1. Project Trip Generation Estimates

Land Use	ITE Land USE Code	Size	Trip Generation Rates							Estimated Trip Generation							
			Daily	AM Peak Hour			PM Peak Hour			Daily	AM Peak Hour			PM Peak Hour			
				Rate	In	Out	Rate	In	Out		Rate	In (%)	Out (%)	Rate	In (%)	Out (%)	
Pacific Coast Commons North																	
Residential Units ¹	221	143 DU	Eq.	Eq.	24%	76%	Equation	61%	39%	778	12	37	49	38	24	62	
Less: Transit/Walk/Bike			5%	5%			5%			(39)	(1)	(2)	(3)	(2)	(1)	(3)	
Total Driveway Trips											<u>739</u>	<u>11</u>	<u>35</u>	<u>46</u>	<u>36</u>	<u>23</u>	<u>59</u>
Retail	820	2.223 KSF	37.75	0.94	62%	38%	3.81	48%	52%	84	1	1	2	4	4	8	
Less: Transit/Walk/Bike			5%	5%			5%			(4)	0	0	0	0	0	0	
Total Driveway Trips											80	1	1	2	4	4	8
Pacific Coast Commons Fairfield Parking																	
Retail	820	3.273 KSF	37.75	0.94	62%	38%	3.81	48%	52%	124	2	1	3	6	6	12	
Less: Transit/Walk/Bike			5%	5%			5%			(6)	0	0	0	0	0	0	
Total Driveway Trips											<u>118</u>	<u>2</u>	<u>1</u>	<u>3</u>	<u>6</u>	<u>6</u>	<u>12</u>
Pacific Coast Commons South																	
Residential Units ¹	221	120 DU	Eq.	Eq.	24%	76%	Equation	61%	39%	652	10	31	41	32	21	53	
Less: Transit/Walk/Bike			5%	5%			5%			(33)	(1)	(2)	(3)	(2)	(1)	(3)	
Total Driveway Trips											<u>619</u>	<u>9</u>	<u>29</u>	<u>38</u>	<u>30</u>	<u>20</u>	<u>50</u>
Retail	820	2.056 KSF	37.75	0.94	62%	38%	3.81	48%	52%	78	1	1	2	4	4	8	
Less: Transit/Walk/Bike			5%	5%			5%			(4)	0	0	0	0	0	0	
Total Driveway Trips											<u>74</u>	<u>1</u>	<u>1</u>	<u>2</u>	<u>4</u>	<u>4</u>	<u>8</u>
Fast Casual Restaurant ²	930	3.700 KSF	315.17	14.13	55%	45%	14.13	55%	45%	1,166	29	23	52	29	23	52	
Less: Transit/Walk/Bike			5%	5%			5%			(58)	(1)	(1)	(2)	(1)	(1)	(2)	
Total Driveway Trips											<u>1,108</u>	<u>28</u>	<u>22</u>	<u>50</u>	<u>28</u>	<u>22</u>	<u>50</u>
Less: Pass-by ³			20%	20%			20%				(221)	(5)	(4)	(9)	(5)	(4)	(9)
Net External Vehicle Trips											<u>887</u>	<u>23</u>	<u>18</u>	<u>41</u>	<u>23</u>	<u>18</u>	<u>41</u>
Total Project External Vehicle Trips										2,517	47	85	132	103	75	178	

Source: Institute of Transportation Engineers (ITE), *Trip Generation, 10th Edition, 2017*, unless otherwise noted.

DU = dwelling unit; KSF = thousand square feet; Eq. = Equation

¹ ITE code 221 Multifamily Housing (Mid-Rise) was used with the General Urban/Suburban setting rate. Daily Equation: $T = 5.45(X) - 1.75$; AM Equation: $\ln(T) = 0.98 \ln(X) - 0.98$; PM Equation: $\ln(T) = 0.96 \ln(X) - 0.63$

² ITE code 930 Fast Casual Restaurant was used with the General Urban/Suburban setting rate. Due to lack of sufficient data, PM rates were used for AM time period.

³ The pass-by credit is based on data available in the ITE, *Trip Generation Handbook, 3rd Edition, 2014*.

To provide flexibility in the buildout of the commercial spaces for the Project, analysis was tested with the fast-casual restaurant square footage (3,700 square feet) allocated across all three buildings. That is, a full fast casual buildout was tested for both the PCC-North and PCC-Fairfield Parking sites, with extra fast casual square footage spilling over into the PCC-South site. Traffic analysis indicates that the fast-casual land use could be included in any portion of the Project site as long as it does not exceed 3,700 square feet. The rest of the commercial square footage would remain as retail. The LOS analysis in the TIA assumed the fast-casual restaurant is fully contained in the PCC-South site.

Traffic Distribution

The geographic distribution of trips generated by the proposed Project is dependent on characteristics of the street system serving the Project site; the level of accessibility of routes to and from the proposed Project site and locations of employment areas from which residents would be drawn. Similar projects in the study area were used to help inform the general distribution pattern for this study. The distribution of Project trips is illustrated in Figure 4.13-6, Project Trip Distribution.

Consideration was given to Project traffic distribution from the three proposed development sites. The Project access points are proposed as unsignalized and some of the driveways are limited to right-in/right-out movements.

Traffic Assignment

The traffic to be generated by the proposed Project was assigned to the street network using the distribution patterns described in Figure 4.13-6. Figure 4.13-7A through Figure 4.13-7C, Project Trip Assignment, which provides the assignment of the Project-generated peak-hour traffic volumes and lane configurations at the analyzed intersections during the AM and PM peak hours. The assignment of traffic volumes took into consideration the locations of the proposed Project driveways on PCH and Indiana Street as well as the relocation of the Fairfield Inn and Suites Hotel parking.

Project Improvement

As set forth in the Specific Plan (see Development Standard C.1), the eastbound lane of Mariposa Avenue at PCH would be reconfigured as a part of the proposed Project, from one left lane and one through-right lane to one left, one through, and one right-turn lane. The proposed right-turn lane is recommended to be approximately 50 feet in length from stop bar or crosswalk with a 60-foot taper to accommodate peak-hour 95th percentile queues. This infrastructure improvement has been taken into account for the plus-Project scenarios of the impact analysis. The plus-Project scenarios of the impact analysis have also been analyzed without the Project improvement to show its potential benefit when compared to the baseline conditions. A queuing analysis was conducted for the eastbound approach with and without Project improvement to show the estimated improvement in queue length. The results of this analysis are shown in Appendix E of the TIA (Appendix J-1).

Methodology

This section summarizes the methodologies used to perform the VMT and traffic analyses. The methodologies described are consistent with the updated CEQA Guidelines. In December 2018, CEQA Guidelines were updated to include a threshold for evaluating traffic impacts using the VMT methodology. This new methodology was required to be used statewide beginning on July 1, 2020.

The state's updated CEQA guidance does not require VMT analysis for local-serving retail land uses on the grounds that they do not increase VMT and defines local serving as less than 50,000 square feet. Since the proposed commercial components of the Project totals 11,252 square feet, this VMT analysis focuses on the proposed residential components of the Project.

The proposed Project's VMT was estimated using SCAG's Travel Demand Forecasting Model which provides ability to evaluate the transportation network in the SCAG region. SCAG developed Transportation Analysis Zones (TAZ), for the SCAG region to facilitate traffic forecasting based on socioeconomic data such as population, employment, and households. Fehr & Peers used the SCAG model to calculate the VMT per capita for the Project based on the vehicle trips and average trip lengths for the TAZ in which the Project is located.

As the City has not yet adopted new transportation impact study guidelines including the VMT metric and significance criteria in compliance with SB 743 guidelines, the impact thresholds used for this Project are based on OPR guidelines. The OPR VMT guidelines establish that a significant project impact may occur when a certain threshold is exceeded. For residential projects, OPR recommends that a project exceeding a level of 15% below existing daily household VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. The SCAG regional daily household VMT per capita is higher than the City's daily household VMT per capita. Therefore, to be conservative, existing daily household VMT per capita is measured against the City's daily household VMT per capita for this study.

4.13.4 Impacts Analysis

Threshold 4.13a Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, as discussed further below.

RTP/SCS Consistency Analysis

The proposed Project's consistency with the 2020–2045 RTP/SCS (Connect SoCal) is summarized in Table 4.9-1 (see Section 4.9, Land Use and Planning). The Project would redevelop the Project site's existing conditions and would produce approximately 56 jobs in operation within the City of El Segundo (see Section 4.11, Population and Housing, of this Draft EIR). In addition, the Project site's vicinity is served by existing public transit such as various bus routes (Metro Line 232, Metro Line 625, Beach Cities Line 109, LADOT Commuter Express 438, and LADOT Commuter Express 574) as well as the Metro C Line. The Metro C Line is a light rail line, which runs between Redondo Beach and Norwalk. The nearest station is the Mariposa Station, which is just over 0.5-mile from the Project site.

For these reasons, and as shown in Table 4.9-1 in Section 4.9, Land Use and Planning of this Draft EIR, the proposed Project would not conflict with the applicable goals in the RTP/SCS.

City of El Segundo General Plan Consistency

The proposed Project's consistency with the City's General Plan is summarized in Table 4.9-2 (see Section 4.9, Land Use and Planning). Additionally, as described in Section 3.7, Discretionary Actions, of this Draft EIR, the

Project requests the approval of a General Plan Amendment (No. GPA 19-01) to change the Land Use Designation from “General Commercial” and “Parking” to “Pacific Coast Commons Specific Plan (PCCSP)” with an accompanying Land Use map change. Upon approval of the proposed amendment, the Project would be brought into compliance with the General Plan Land Use Designation.

General Plan Buildout Comparison

Because the adoption of the proposed Specific Plan would change the overall framework development for the Project site established in the General Plan, a comparison of trip generation estimates of the proposed Project with the currently designated General Plan land uses was conducted.

The City’s General Plan identifies the portion of the site that is south of Mariposa Avenue as General Commercial, with a maximum floor area ratio of 1.0 for PCC-Fairfield Parking and PCC-South, and the portion to the north of Mariposa Avenue as Parking. Trip generation estimates of the currently designated General Plan land uses on the Project site were developed using the following assumptions:

- 21,660 square feet of general retail
- 10,000 square feet of high turnover restaurant
- 10,000 square feet of fast casual restaurant

The size of the General Plan land use assumptions was developed by multiplying the site area by the 1.0 floor area ratio to get the total building area. A majority retail was assumed for the general commercial land use with a mix of restaurant uses (approximately two restaurants of each type). Fast casual and high turnover were assumed as the most likely restaurant types to be built at this location. Fast food and quality restaurant classifications were not assumed due to the site’s location along a high traffic corridor like PCH and based upon the conceptual site plan/floor plan design. Table 4.13-2 identifies the General Plan trip generation estimates.

As shown in Table 4.13-2, the General Plan land uses are projected to generate an estimated 4,026 daily trips, including 203 trips (112 inbound/91 outbound) during the AM peak hour and 262 trips (145 inbound/117 outbound) during the PM peak hour. The Project is projected to generate an estimated net increase of 2,517 daily trips, including 132 trips (47 inbound/85 outbound) during the AM peak hour and 178 trips (103 inbound/75 outbound) during the PM peak hour, as shown in Table 4.13-1. The General Plan land uses are projected to generate 1,509 more daily trips than the proposed Project, including 71 more trips during the AM peak hour and 84 more trips during the PM peak hour. The City does not have an adopted numeric threshold as to compare Project trip generation to General Plan trip generation. Rather, this analysis is presented for informational purposes. However, it can be noted that the proposed Project would generate fewer trips compared to the General Plan land uses (Appendix J-1).

Table 4.13-2. General Plan Trip Generation Estimates

Land Use	ITE Land Use Code	Size	Trip Generation Rates							Estimated Trip Generation							
			Daily	AM Peak Hour			PM Peak Hour			Daily	AM Peak Hour			PM Peak Hour			
				Rate	In	Out	Rate	In	Out		Rate	In (%)	Out (%)	Rate	In (%)	Out (%)	
Retail	820	21.660 KSF	37.75	0.94	62%	38%	3.81	48%	52%	818	12	8	20	40	43	83	
Less: Transit/Walk/Bike			5%	5%			5%			(41)	(1)	0	(1)	(2)	(2)	(4)	
Total Driveway Trips											<u>777</u>	<u>11</u>	<u>8</u>	<u>19</u>	<u>38</u>	<u>41</u>	<u>79</u>
High Turnover Restaurant	932	10.000 KSF	112.18	9.94	55%	45%	9.77	62%	38%	1,122	54	45	99	61	37	98	
Less: Transit/Walk/Bike			5%	5%			5%			(56)	(3)	(2)	(5)	(3)	(2)	(5)	
Total Driveway Trips											<u>1,066</u>	<u>51</u>	<u>43</u>	<u>94</u>	<u>58</u>	<u>35</u>	<u>93</u>
Less: Pass-by ²			20%	20%			20%				(213)	(10)	(8)	(18)	(11)	(7)	(18)
Net External Vehicle Trips											<u>853</u>	<u>41</u>	<u>35</u>	<u>76</u>	<u>47</u>	<u>28</u>	<u>75</u>
Fast Casual Restaurant ¹	930	10.000 KSF	315.17	14.13	55%	45%	14.13	55%	45%	3,152	78	63	141	78	63	141	
Less: Transit/Walk/Bike			5%	5%			5%			(158)	(4)	(3)	(7)	(4)	(3)	(7)	
Total Driveway Trips											<u>2,994</u>	<u>74</u>	<u>60</u>	<u>134</u>	<u>74</u>	<u>60</u>	<u>134</u>
Less: Pass-by ²			20%	20%			20%				(598)	(14)	(12)	(26)	(14)	(12)	(26)
Net External Vehicle Trips											<u>2,396</u>	<u>60</u>	<u>48</u>	<u>108</u>	<u>60</u>	<u>48</u>	<u>108</u>
General Plan Trip Generation									4,026	112	91	203	145	117	262		
Project Trip Generation (as shown in Table 4.13-1)									2,517	47	85	132	103	75	178		

Source: Institute of Transportation Engineers (ITE), *Trip Generation, 10th Edition, 2017*, unless otherwise noted.

KSF = thousand square feet

¹ ITE code 930 Fast Casual Restaurant was used with the General Urban/Suburban setting rate. Due to lack of sufficient data, PM rates were used for AM time period.

² The pass-by credit is based on data available in the ITE, *Trip Generation Handbook, 3rd Edition, 2014*.

Level of Service Analysis for General Plan Consistency

Although the City's LOS policy would not be applicable as a transportation impact under CEQA per SB 743, the study area intersection operations analysis results are summarized below for the following scenarios:

Existing Plus Project Traffic Conditions

CEQA Guidelines Section 15064.3(b) focuses on newly adopted criteria (VMT) pursuant to SB 743 for determining the significance of transportation impacts. Pursuant to SB 743, the focus of transportation analysis changed from vehicle delay to VMT. The related updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. As stated in CEQA Guidelines Section 15064.3(c), the provisions of Section 15064.3 shall apply prospectively, and a lead agency may elect to be governed by the provision of Section 15064.3 immediately. The provisions were required to be implemented statewide by July 1, 2020. However, the information below related to LOS is provided for information purposes and for assessment of consistency with General Plan policies.

According to Tables 6A and 6B of the TIA (Appendix J-1), the same four study intersections that currently operate at LOS E or worse during the AM or PM peak periods are projected to continue to operate at LOS E or worse during the AM or PM peak period with the addition of Project traffic. These intersections are as follows:

5. PCH and Imperial Highway (LOS E during PM)
6. PCH and El Segundo Boulevard (LOS F during PM)
13. PCH and Palm Avenue (LOS F during both AM and PM for the stop-controlled movements only)
14. PCH and Holly Avenue (LOS F during both AM and PM for the stop-controlled movements only)

The rest of the study intersections are projected to operate at LOS D or better during both peak periods.

The Existing plus Project scenario of the impact analysis at Mariposa Avenue and PCH has also been analyzed without the Project improvement to show its potential benefit when compared to the Existing Base and Existing plus Project with improvement conditions (as described under Approach and Assumptions). The analysis shows that LOS at Mariposa Avenue and PCH is better with the addition of the Project-related improvement than without. A queuing analysis was conducted for the eastbound approach with and without Project improvement to show the potential improvement in queue length. The results of this analysis are shown in Appendix E of the TIA (Appendix J-1).

Future Plus Project Traffic Conditions

According to Tables 8A and 8B of the TIA (Appendix J-1), the same five study intersections projected to operate at LOS E or worse during the AM or PM peak periods under Future Base conditions are also projected to operate at LOS E or worse during the AM or PM peak periods with the addition of Project traffic. These intersections are as follows:

1. PCH and Imperial Highway (LOS E during PM)
5. PCH and Grand Avenue (LOS E during AM and LOS F during PM)
6. PCH and El Segundo Boulevard (LOS F during PM)

13. PCH and Palm Avenue (LOS F during both AM and PM for the stop-controlled movements only)

14. PCH and Holly Avenue (LOS F during both AM and PM for the stop-controlled movements only)

The Future plus Project scenario of the impact analysis at Mariposa Avenue and PCH has also been analyzed without the Project improvement to show its potential benefit when compared to the Future Base and Future plus Project with improvement conditions at Mariposa Avenue (as described under Approach and Assumptions). The analysis shows that LOS at Mariposa Avenue and PCH is better with the addition of the Project-related improvement than without. A queuing analysis was conducted for the eastbound approach with and without Project improvement to show the potential improvement in queue length. The results of this analysis are shown in Appendix E of the TIA (Appendix J-1).

City of El Segundo Climate Action Plan

The proposed Project's consistency with the City's CAP is summarized in Table 4.6-6 (see Section 4.6, Greenhouse Gas Emissions). The City's CAP includes measures related to the circulation, including parking, multi-modal streets, pedestrian/bicycle networks, and transit accessibility. As discussed in Table 4.6-6, the Project would provide a combination of electric vehicle charging and alternative fuel vehicles and carpooling parking in compliance with El Segundo Municipal Code and CALGreen requirements. The proposed Project would include shared parking, which would provide a more efficient use of land. As such, a shared parking analysis for the Project has been prepared by Fehr & Peers to assess the potential parking demand and determine if adequate parking supply would be available on the site. The shared parking analysis is included in Appendix J-2.

Bicycle parking and storage would be provided in compliance with CALGreen and the City's Municipal Code. The proposed 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 Project site includes the Metro C Line and multiple bus lines. Additionally, the proposed Project would reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City's downtown. For these reasons, and as shown in Table 4.6-6, the Project would not conflict with the applicable measures related to the circulation system in the City's CAP.

Transit, Bicycle, and Pedestrian Facilities

The Project would not conflict with any plans or policies regarding existing or proposed transit, bicycle, and pedestrian facilities in the study area. During construction, sidewalk closures around the perimeter may be expected during street improvements. During this time, pedestrians would generally be routed to the other side of the street, but temporary covered pedestrian routes would be provided for access to the existing hotels. There are no identified Safe Routes to School along streets fronting the Project site; therefore, the construction of the Project would not temporarily affect such routes. During long-term operations of the Project site, when residences are occupied with families, it is expected that some students would walk from the site to the local schools. As shown in Table 4.12-2 and Figure 4.12-2 in Section 4.12, Public Services and Recreation, local public schools that would serve the Project site are located to the west and would not require students to cross the PCH or other major roadways.

As previously shown on Figure 4.13-3, there are no existing bicycle facilities that would be temporarily impacted by Project construction. The South Bay Bicycle Master Plan indicates that additional Class II and III bicycle facilities are planned along Mariposa Avenue. No plans for the completion of the additional Class II and II bicycle

facilities are anticipated to occur during Project construction. Bus stops are located east of the Project site, on Mariposa Avenue and on PCH. Construction is not anticipated to affect bus operations as construction and staging would not be immediately adjacent to these bus stops. The Metro C Line and Mariposa Station are located over 0.5 miles from the Project site and would not be impacted by Project construction. Therefore, the Project construction would not require relocation of bus stops and the construction impacts on transit, bicycle, and pedestrian facilities would be less than significant.

Once operational, bicycle and pedestrian access to the Project site would not be affected as no new driveways are being added. Bicycle access to the Project site would continue to be available on Indiana Street, Mariposa Avenue, and PCH. Further, the Project would not preclude implementation of the South Bay Bicycle Master Plan, including any future plans to complete the additional Class II and II bicycle facilities on Mariposa Avenue. The bus stops and other transit facilities would not be affected by Project operations. Due to the distance between the Project site and the Metro C Line, and because the Project would not impact right of way currently used or planned to be used for bus or light rail activities, the Project would not conflict with any plans or policies related to transit. Given the various transit facilities available near the Project site, sufficient transit capacity in the study area is available. Therefore, the Project’s impact on transit, bicycle, and pedestrian facilities would be less than significant.

Threshold 4.13b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

State CEQA Guidelines Section 15064.3(b) focuses on newly adopted criteria (VMT) adopted pursuant to SB 743 for determining the significance of transportation impacts. The City has yet to adopt its own VMT analysis guidelines and thresholds. For the purposes of this EIR, the recommended VMT analysis methodology and thresholds identified within the OPR’s Technical Advisory have been used. The VMT analysis is included in TIA (Appendix J-1).

The daily household VMT per capita for the Project was determined by using the SCAG 2016 RTP/SCS travel demand model (SCAG 2016). The SCAG model is currently being updated to reflect the new 2020–2045 RTP/SCS Connect SoCal, but is not available at the time of the preparation of this Draft EIR. The SCAG travel demand model identifies trip purposes as Home-Based Work and Home-Based Other, where trips have been produced by residential land uses and trips have been attracted by nonresidential land uses. The other trip type, Non-Home-Based, is produced and attracted by nonresidential land uses. The average trip length and vehicle trips for all Home-Based Work and Home-Based Other productions are used to calculate the daily household VMT per capita for residential uses.

Residential is already an existing land use in the TAZ located in the City in which the Project is located, and the model therefore includes residential trips and average trip lengths. It is assumed that the Project’s residential trips would have the same characteristics as the existing residential trips in the zone. The VMT per capita assumed for the Project site was therefore based on the vehicle trips and average trip lengths for the TAZ in which the Project is located from the SCAG model, which indicates a daily household VMT per capita of 10.9 for all home-based production trips within the TAZ. Table 4.13-3 summarizes the VMT analysis.

Table 4.13-3. Project Vehicle Miles Traveled Analysis Summary

Description	Home-Based VMT per Employee
<i>Project</i>	
Regional Household VMT per Capita ¹	15.3

Table 4.13-3. Project Vehicle Miles Traveled Analysis Summary

Description	Home-Based VMT per Employee
Project	
City of El Segundo Household VMT per Capita ¹	14.2
Threshold (15% less than City VMT) ²	12.1
Project TAZ 21125100 Household VMT per Capita ¹	10.9
Project VMT Percent Below City's VMT	23.2%
Is Project above or below Regional Threshold with 15% reduction?	Below 15% Threshold
Significant Transportation Impact	No

Source: Appendix J-1

VMT = vehicle miles traveled; TAZ = transportation analysis zone

- ¹ SCAG Travel Demand Forecasting Model provides the ability to evaluate the transportation system in the SCAG region. The model forecasts AM and PM peak period and daily vehicle and transit flows on the transportation network in the region and calculates trip origins and destinations for those vehicle flows. Household VMT per capita is based on the home-based work and home-based other productions trips from the SCAG model as run by Fehr & Peers, July 2019.
- ² As the City has not yet adopted new traffic impact study guidelines including the VMT metric and significance in compliance with SB 743 guidelines, the impact thresholds are based on OPR guidelines.

For residential projects, OPR recommends that a project exceeding a level of 15% below existing daily household VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. The SCAG regional daily household VMT per capita (15.3) is higher than the City's daily household VMT per capita (14.2). Therefore, to be conservative, existing daily household VMT per capita is measured against the City's daily household VMT per capita for this analysis.

As shown in Table 4.13-3, per the SCAG model, the existing City daily household VMT per capita for residential land uses are 14.2 per resident. The threshold of 15% below the City average is 12.1 daily household VMT per capita (i.e., per resident). The proposed Project is estimated to generate 10.9 daily household VMT per capita, which is lower than 15% below the existing City daily household VMT per capita. Therefore, proposed Project would not conflict with State CEQA Guidelines Section 15064.3(b) and impacts would be less than significant.

Threshold 4.13c 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)?

Project Access

Project access would not substantially increase hazards due to design features or incompatible uses. The driveway configurations for the individual sites are as follows and illustrated in Figure 4.13-5:

- PCC-South would provide eight levels of parking garage (i.e. approximately two levels of subterranean and six levels above ground, depending on elevation grade). The parking garage would provide 165 parking spaces exclusively for residential tenant use, and 171 spaces would be shared between residential guest parking, commercial use, and for overflow if needed from other sites, resulting in a total of 336 parking spaces within the multi-level parking structure. Ingress/egress into the parking structure would be via driveways on PCH and Indiana Street.
- PCC-Fairfield Parking includes a five-level parking garage (50 feet in height) with 215 replacement parking spaces for the Fairfield Inn and Suites Hotel, which would be shared between the hotel and the commercial/retail uses. Ingress to the parking structure would be provided via a driveway on PCH

adjacent to the Fairfield Inn and Suites Hotel. Additionally, a right-turn and left-turn out only would be provided via Indiana Street.

- PCC-North includes a six-story parking garage in the central portion of property. The parking garage would provide 189 spaces for the residential units, and 52 shared spaces for commercial patrons and guests of the residents, resulting in a total of 241 spaces within the multi-level parking structure. Additionally, the six townhome units would each contain a two-car garage for an addition 12 parking spaces. Ingress/egress into the parking structure would be via one driveway that fronts the 26-foot-wide fire lane/access drive that would be constructed along the western boundary of the property and would connect with Palm Avenue to the north and Mariposa Avenue to the south.

Access to the parking garages would be provided via multiple driveways, as described above. The Project would not result in the construction of new driveways; rather, the Project would allow for full access onto Mariposa Avenue, Palm Avenue, and Indiana Street, where access is currently limited to in-only/out-only. The proposed driveways at PCC-North would allow for full access in/out via Mariposa Avenue and Palm Avenue, and the existing curb cut on PCH would be removed. The residential access from Indiana Street at PCC-South would allow for full access in/out rather than access out-only, as under the existing conditions. No changes are proposed to access for the PCC-Fairfield Parking site. Additionally, as part of the Project, the eastbound leg of Mariposa Avenue at PCH would be reconfigured from one left lane and one through-right lane to one left, one through, and one right-turn lane.

All new driveways and internal access points would be designed and constructed to ensure appropriate line of sight and appropriate turning radii. Additionally, to ensure the Project would not result in driveway queueing onto PCH, a major corridor in the Project vicinity, which could create hazards to oncoming traffic, a queuing analysis was conducted for the PCH/Pacific Coast Commons South Driveway (Appendix J-1).

A queuing analysis, from within the Project site, was conducted for the driveway approach at the PCH/PCC-South driveway to show the estimated length of queues for vehicles exiting the Project site. Queues at the driveway are anticipated to be minimal given the volume of outbound Project trips at this driveway. Queue results are shown in Table 4.13-4.

Table 4.13-4. Driveway Queue Analysis

Driveway	Peak Hour	Existing Plus Project	Future Plus Project
		95th Percentile Queue (feet)	95th Percentile Queue (feet)
PCH and PCC-South Driveway	AM	25	25
	PM	25	25

Source: Appendix J-1

Table 4.13-4 provides queuing information measured in feet. Twenty-five (25) feet is equivalent to approximately one car waiting to exit from the Project driveway onto PCH during the peak hour. Future plus Project Conditions, queues are anticipated to be minimal given the volume of outbound Project trips at this driveway. Therefore, the unsignalized and stop-controlled PCC-South driveway on PCH would not substantially increase hazards for vehicles using this Project access.

Further, a signal warrant analysis conducted for the two unsignalized intersections at PCH and Palm Avenue and PCH and Holly Avenue, determined neither intersection trigger a signal warrant for both Existing plus Project and

Future plus Project. Therefore, Project traffic at these intersections would not create increase hazards due to a geometric design feature or incompatible uses (Appendix J-1). Impacts would be less than significant.

Threshold 4.13d Would the project result in inadequate emergency access?

Construction

Short-Term Site Access

Short-term adverse traffic and parking impacts could occur in the Project vicinity during construction of the Project. Additional trips generated by the truck deliveries and construction employees could affect traffic flow in the study area; construction activity could impact traffic near the Project site; and pedestrian traffic flow near the Project site could also be altered as a result of construction.

Based on the construction period trip generation analysis conducted for the proposed Project (Appendix J-1), the peak construction activity is estimated to generate fewer total daily trips and peak-hour trips than are projected for the Project once it is completed and occupied. Although the influx of equipment and materials to the Project site could create temporary adverse effects to the adjacent roadway, potential impacts associated with construction of the Project would be limited to those locations immediately adjacent to the Project site. Segments of PCH and Mariposa Avenue would have short-term impacts at locations where new curbs are installed. Temporary lane closures around the Project site may be expected. The existing hotels on the Project site would remain open during the duration of construction. Pedestrian access to the existing hotel uses on the Project site would be open, although temporary sidewalk closures around the portions of the Project site may be expected, specifically during Mariposa Avenue street improvements for approximately 1 to 2 months.

These construction activities have the potential to temporarily impact emergency vehicle access to the Project site. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, Mitigation Measure (MM-)TRA-1 is required. MM-TRA-1 requires preparation of a Construction Traffic Control Plan. With implementation of MM-TRA-1 to address pedestrian, bicycle, and vehicular circulation during construction activities, would reduce potential impacts related to emergency access to less than significant.

Short-Term Construction Parking

An analysis of parking availability is not a requirement pursuant to CEQA. The evaluation of parking (see Appendix J-2) is included in this Draft EIR for information purposes because the topic of parking was raised during the NOP public review period for this Draft EIR. The shared parking analysis conducted for the proposed Project (see Appendix J-2) also addressed short-term parking for construction activities to understand the parking needs of construction employees and uses on-site. Vehicle access would be accommodated for the existing hotel uses on the Project site throughout the duration of construction. It is possible that the construction of PCC-Fairfield Parking, PCC-South, and PCC-North would occur sequentially. During Phase 1 construction, Fairfield Inn and Suites Hotel guests would continue to park at the existing surface lot at PCC-North. Once Phase 1 is completed, parking for the Fairfield Inn and Suites Hotel guests could be moved into the newly constructed garage. During Phase 2 construction, Aloft Hotel parking would be accommodated via the existing surface lot at PCC-North. Once Phase 2 is completed, PCC-South and its respective land uses would park on-site at the new garage. Phase 3, the North site, would begin construction and during this buildout no vehicles would need special parking accommodations (Appendix J-2).

However, as analyzed throughout this Draft EIR, it is possible that Phase 2 and Phase 3 would be constructed at the same time. Under a concurrent timeline, Phase 1 would construct the replacement parking and new retail for the Fairfield Inn and Suites Hotel site adjacent to the existing hotel. During Phase 1, the Aloft Hotel and Fairfield Inn and Suites Hotel would continue to be in operation. During the construction of Phase 2 and Phase 3, both hotels would continue to operate, and new retail built in Phase 1 would be occupied. During Phase 1 of construction, Fairfield Inn and Suites Hotel and Aloft Hotel guests would continue to park at the existing surface lots at their respective sites. The existing Fairfield Inn and Suites Hotel surface lot has 232 parking spaces and the existing Aloft Hotel surface lot has 165 parking spaces, for a total of 397 parking spaces. During construction hours, a peak demand of 171 parking spaces for the Fairfield Inn and Suites Hotel and 119 parking spaces for the Aloft Hotel would need to be accommodated, along with a peak demand of 60 construction employee parking spaces. The total demand of 350 spaces would be entirely accommodated by the existing 397 spaces. However, only the newly-constructed PCC-Fairfield Parking structure (215 parking spaces) would be available for parking during PCC-South and PCC-North construction. Construction of Phases 2 and 3 would require 442 spaces, resulting in a deficit of 227 parking spaces.

As described under Development Agreements/Conditions of Approval above, if the total parking demand would exceed the total parking supply during construction activities, the Project applicant/developer would be required to accommodate the excess parking demand at an off-site location and provide shuttle service to and from the Project site accordingly to ensure that that parking is adequately provided during short-term construction activities (Appendix J-2).

Operation

All areas of the Project site would be accessible to emergency responders for the long-term operation of the proposed Project. Local access to the Project site would be provided via PCH, Indiana Street, Mariposa Avenue, and Palm Avenue. All of the Project access points would be confirmed to be designed according to applicable design standards. The proposed Project would provide adequate access to the Project site, including access for emergency vehicles. The internal drive aisles, and loading and parking areas would be designed to comply with City's width, clearance, and turning radius requirements of the Fire Department. Additionally, as identified on Figure 3-1, Master Site Plan, a fire access driveway would be constructed within PCC-North to provide access to the development.

The Specific Plan requires structures, roadways, and facilities to comply with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation plans. As discussed in Chapter 3, Project Description, the Project would require approval of a Site Plan Review No. 19-01 to allow the site plan and architectural design to construct the mixed-use commercial and residential development. Thus, all development proposed under the Specific Plan, including the proposed Site Plan, would be reviewed and approved during plan check review to ensure appropriate emergency access. Adherence to these requirements would ensure that impacts due to inadequate emergency access are below a level of significance. Therefore, potential impacts associated with inadequate emergency access would be less than significant.

Long-Term Shared Parking

An analysis of parking availability is not a requirement pursuant to CEQA. The evaluation of parking (see Appendix J-2) is included in this Draft EIR for information purposes because the topic of parking was raised during the NOP public review period for this Draft EIR. As described in Section 3.7, Discretionary Actions, of this Draft EIR, the proposed Project's required entitlements include the following:

- Parking Demand Study and Shared Parking Analysis to establish the parking requirements for the proposed commercial and residential development combined with the existing hotel development;
- Off-Site Parking Covenants in conjunction with the Parking Demand Study and Shared Parking Analysis, to replace the previous approval of Off-Site Parking Covenant Nos. MISC 14-03 and MISC 14-06;
- Reciprocal Access Agreements for driveways and drive aisles accessing multiple parcels

The Shared Parking Analysis was conducted to determine the minimum amount of parking needed to adequately park the Project's proposed and existing land uses. This analysis assumes that a number of parking spaces on site can be shared between the residential guests, hotel guests, and patrons of the on-site retail and restaurant uses. Because a shared parking supply is proposed, the Project would not be providing excess parking spaces that could encourage the driving of non-residents to/from the site. In fact, the Project would be providing a parking supply lower than the City's Municipal Code requirements, but would adequately support the Project's parking demand through shared parking. The reduction of required parking on site meets Caltrans' objectives stated in their June 24, 2020 NOP comment letter: *"...Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving."*

Because each of the three proposed parking garages would be used as "overflow" parking if needed, the Project was analyzed as one combined site. It was determined that the peak parking demand for the Project site, based on the conceptual site plan would occur in the month of June at 10:00 PM on a weekday.

The PCC-North site plan proposes 252 parking spaces (with 12 of those spaces in individual garages), with 189 parking spaces reserved for residential tenant use. The remaining 51 spaces would be shared between the residential guest parking, commercial uses, and for overflow if needed from the other sites., PCC-North is projected to have a peak residential parking demand of 160 parking spaces and a peak shared parking demand of 49 spaces. As such, the PCC-North is projected to have a surplus of two shared parking spaces during the peak demand period.

The PCC-Fairfield Parking peak parking demand is estimated to be 191 spaces. The site plan proposes 215 parking spaces, indicating sufficient supply for the anticipated demand with a surplus of 24 spaces during the peak demand period.

The PCC-South site plan proposes 336 parking spaces, with 165 parking spaces reserved for residential tenant use. The remaining 171 spaces would be shared between the residential guest parking, hotel, commercial uses, and for overflow if needed from the other sites. The PCC-South is estimated to have a peak residential parking demand of 144 parking spaces and a peak shared parking demand of 192 spaces. As such, PCC-South would have a deficit of 21 shared parking spaces during the peak demand period. The excess demand can be accommodated by the surplus of spaces at the PCC-North and PCC-Fairfield Parking garages, which have a combined surplus of 26 spaces.

It is noted that the Specific Plan allows an adjustment to the parking requirements of Development Standard D1 if a separate parking study can justify the need for adjustments to parking. The shared parking analysis demonstrates that sufficient parking would be provided to meet the demand of the various uses on-site, as proposed by the site plan. Shared parking analysis worksheets can be found in the Appendix A of Appendix J-2. The shared parking would serve to efficiently use available developable land and would avoid an "over-parked" Project that could inadvertently encourage single-occupancy vehicle use. The shared parking is supportive of some policies within the City's CAP, as previously described in Section 4.6, Greenhouse Gas Emissions, including the following (City of El Segundo 2017):

- LUT: A1.3 Lower parking minimums for developments providing EV [electric vehicle] parking
- LUT: E1.2 Reduce/eliminate parking minimums for new developments
- LUT: E1.3 Reduce/eliminate parking minimums for mixed-use, pedestrian, and transit-oriented developments

4.13.5 Cumulative Impacts Analysis

Plan, Program, Ordinance, or Policy Addressing Circulation

As described under the discussion for Threshold (a) and examined in Section 4.6, Greenhouse Gas Emissions, and Section 4.9, Land Use and Planning, the proposed Project is consistent with the following plans addressing the circulation system and would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities under cumulative conditions:

- SCAG 2020–20405 RTP/SCS – the proposed Project’s proximity to existing public transit such as various bus routes and the Metro C Line would increase transit accessibility of jobs and services, support use of transit, and encourage sustainable land use patterns by redeveloping areas near accessible transit.
- City of El Segundo General Plan – approval of the proposed Project would ensure the proposed uses for the Project site are consistent with the General Plan. Under Future Year 2027, traffic conditions, the same five study intersections projected to operate at LOS E or worse during the AM or PM peak periods under Future Base conditions are also projected to operate at LOS E or worse during the AM or PM peak periods with the addition of Project traffic.
- City of El Segundo Climate Action Plan – the Project site is well located to facilitate pedestrian activity, bicycle usage, and the use of public transit services, particularly due to the proximity of the two Metro bus lines, one Beach Cities bus line, two LADOT Commuter Express lines, and Metro C Line. Bicycle access to the proposed Project site is facilitated by the City’s bicycle roadway network. Existing and proposed bicycle facilities identified in the South Bay Bicycle Master Plan will be located within and adjacent to the proposed Project site.
- Metro Long Range Transportation Plan – Los Angeles County voters approved Measure R, a half-cent sales tax increase for transportation, which has allowed Metro to develop projects to improve the existing transportation system. Thus, Metro developed the 2009 Long Range Transportation Plan (LRTP), which outlines a range of transit and highway projects throughout Los Angeles County that were aimed to improve mobility and address future growth (Metro 2009). This plan is being updated to address transportation issues and projects identified by local jurisdictions, Councils of Governments, and transportation agencies. Additionally, the 2014 Short Range Transportation Plan identifies projects and programs that will be implemented in accordance with the Project priorities and funding schedules of the 2009 LRTP (Metro 2014). It is recognized that with these plans in place, Metro will continue to maintain and expand regional transit service in order to accommodate cumulative demand in the region. Although the Project (and other related projects) would cumulatively add transit ridership, Metro would continue to maintain and expand regional transit service to accommodate cumulative demand in the region; therefore, cumulative impacts on public transit would be less than significant.
- LADOT Short Range Transit Plan – According to the 2014-2015 LADOT Short Range Transit Plan, federal transportation statutes require that Metro, in partnership with state and local agencies, development and periodically update a LRTP and a Transportation Improvement Program (TIP), which implements the LRTP by programming federal funds to transportation projects contained in the LRTP. In order to execute these planning and programming responsibilities, Metro requires each transit operator its region which receives federal funding through the TIP prepare, adopt and submit a Short Range Transit Plan to Metro (LADOT

2015). Therefore, the Short Range Transit Plan has been prepared to carry forward future planning and programming activities for LADOT. As previously discussed, although the Project would cumulatively add ridership to LADOT bus services, the preparation of the 2014-2015 Short Range Transit Plan, along with Metro's LRTP would continue to maintain and expand regional transit service to accommodate cumulative demand in the region; therefore, cumulative impacts on public transit would be less than significant.

Therefore, cumulative impacts related to a program, plan, ordinance, or policy related to addressing the circulation system would be less than significant.

CEQA Guidelines Section 15064.3(b)

The long-term cumulative impacts related to VMT have been reviewed per the SCAG VMT thresholds. The Project is located within an urbanized area served by public transit. The Project would not exceed the SCAG threshold for VMT; therefore, the Project's contribution to cumulative VMT would not be cumulatively considerable and would be a less-than-significant impact.

Hazardous Design Features

As discussed above, the Project would not result in the construction of new driveways; rather, the Project would allow for full access onto Mariposa Avenue, Palm Avenue, and Indiana Street, where access is currently limited to in-only/out-only. The proposed Project has a completed circulation analysis using a LOS methodology that indicates that the trips generated by the proposed Project would not result in adverse circulation conditions. Because the impacts related to Project access points and circulation are site specific, and would be less than significant, the Project would not contribute to cumulative impacts with respect to hazardous design features.

Emergency Access

As analyzed above, the Project would not result in inadequate emergency access and Project impacts to emergency access would be less than significant. As with the proposed Project, driveways and/or circulation modifications proposed in the surrounding area would comply with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation plans. Further, since modification to access are largely confined to the Project site and the immediately surrounding area, Project-specific emergency access impacts would likely not impact other cumulative projects. Therefore, the Project's contributions to cumulative impacts would be less than significant.

4.13.6 Mitigation Measures

MM-TRA-1 Prior to the issuance of demolition or grading permits, the Project applicant/developer shall develop and implement a City-approved Construction Traffic Control Plan. The Plan shall be prepared in accordance with applicable City and Manual on Uniform Traffic Control Devices guidelines and shall address the potential for construction-related vehicular traffic, as well as pedestrian and bicycle circulation disruption in the public right-of-way. The Plan shall describe safe detours and shall include protocols for implementing the following, if determined necessary and feasible: temporary traffic controls (e.g., a flag person) during construction to maintain smooth traffic flow; dedicated turn lanes for movement of construction trucks and equipment on and off site; scheduling of construction activities that affect traffic flow on the arterial system to off-peak hours; consolidation of truck deliveries; and/or rerouting of construction trucks away from congested streets or sensitive receptors.

4.13.7 Level of Significance After Mitigation

With incorporation of MM-TRA-1, potential significant impacts related to short-term access to the Project site would be reduced to less than significant. All other potential environmental impacts to Transportation would be less than significant.

4.13.8 References

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- SCAG. 2020. *2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association Of Governments*. Adopted May 7, 2020. <https://www.connectsocial.org/Documents/Adopted/fConnectSoCal-Plan.pdf>.
- Transportation Research Board. 2016. *Highway Capacity Manual, 6th Edition*. Published 2016.

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SOURCE: Fehr + Peers 2020

FIGURE 4.13-1

Project Site Location and Traffic Study Area
Pacific Coast Commons Specific Plan EIR Project

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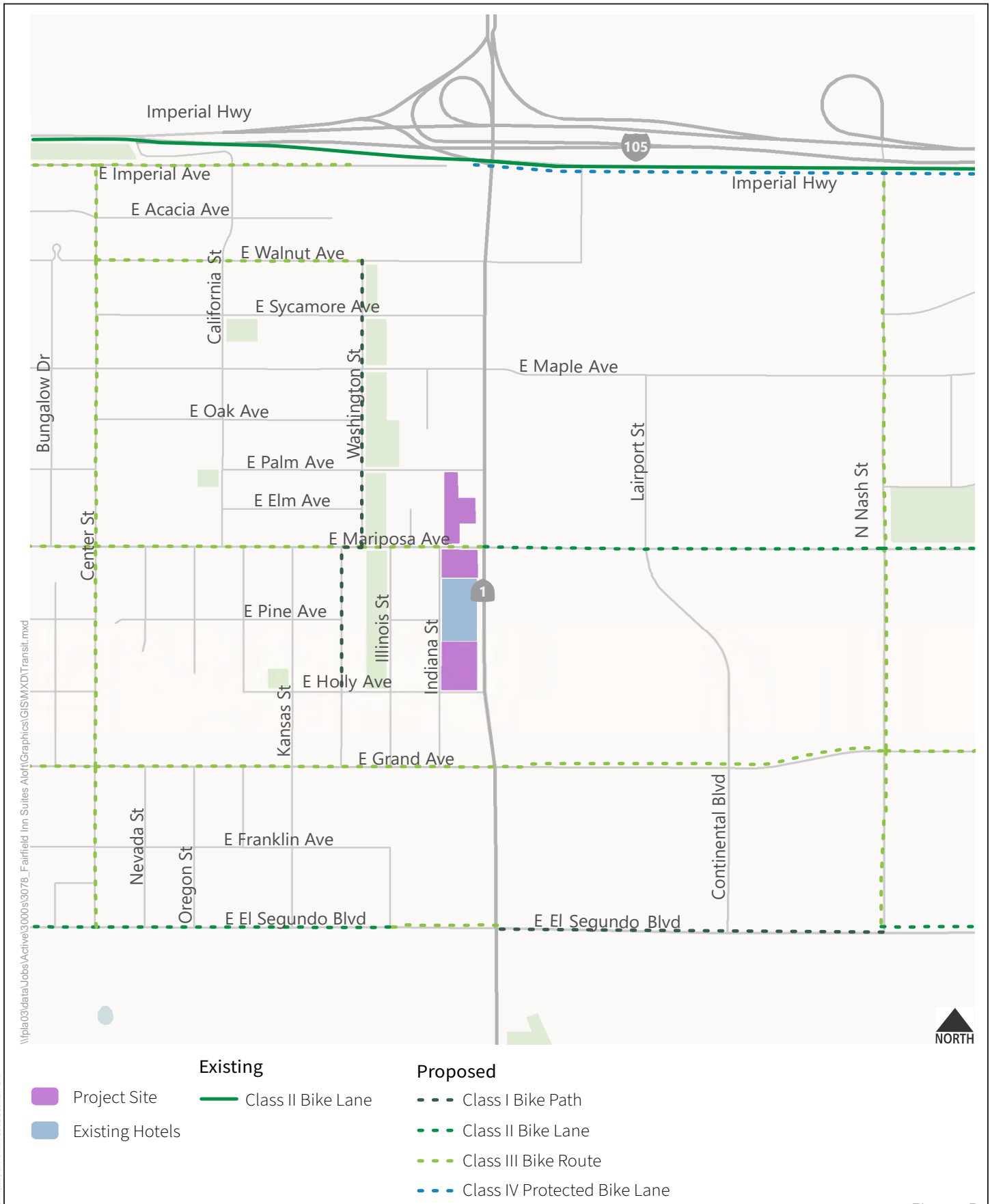
SOURCE: Fehr + Peers 2020

FIGURE 4.13-2

Transit Routes

Pacific Coast Commons Specific Plan EIR Project

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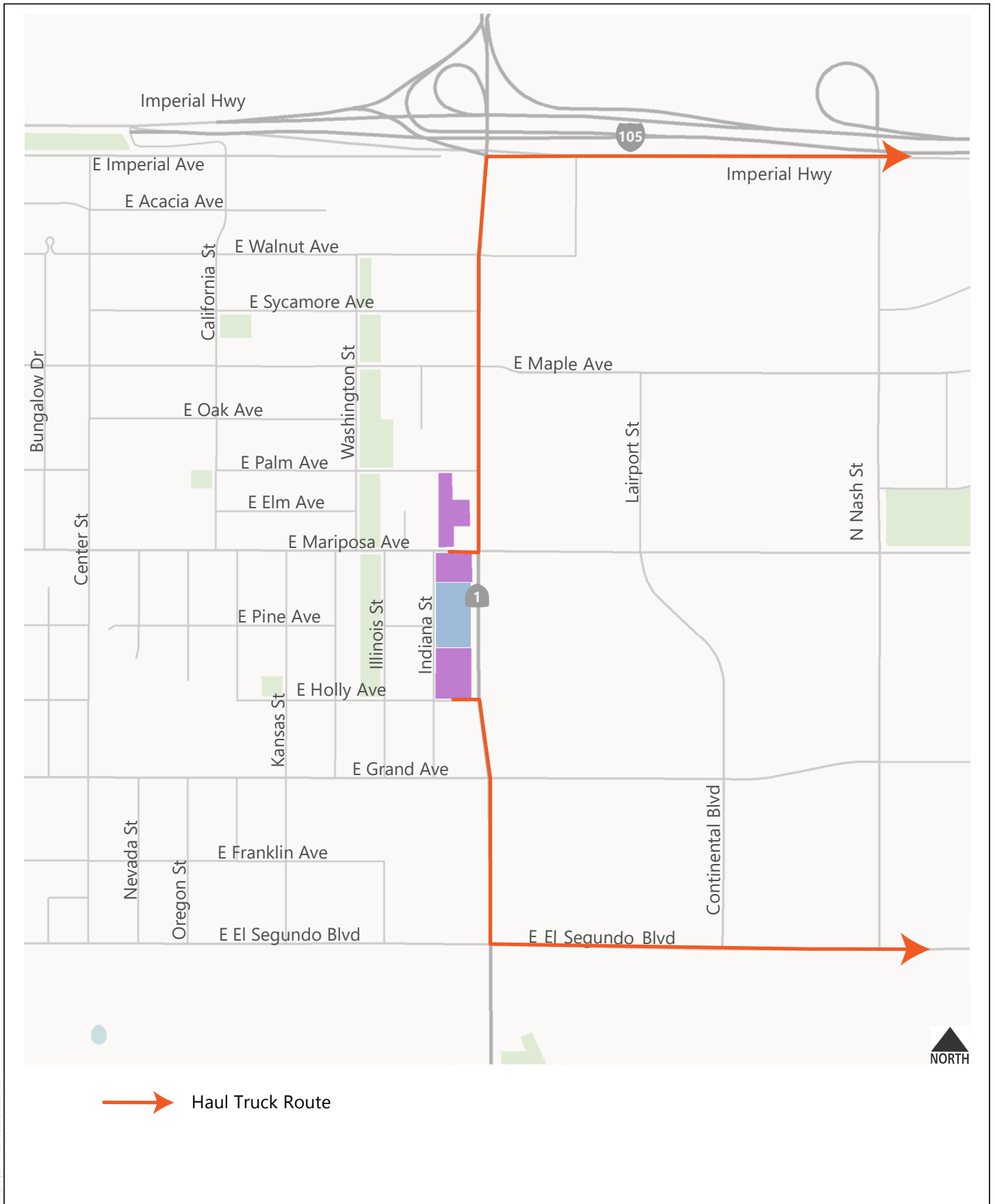


SOURCE: Fehr + Peers 2020

FIGURE 4.13-3

Existing and Future Bicycle Facilities
Pacific Coast Commons Specific Plan EIR Project

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SOURCE: Fehr + Peers 2020

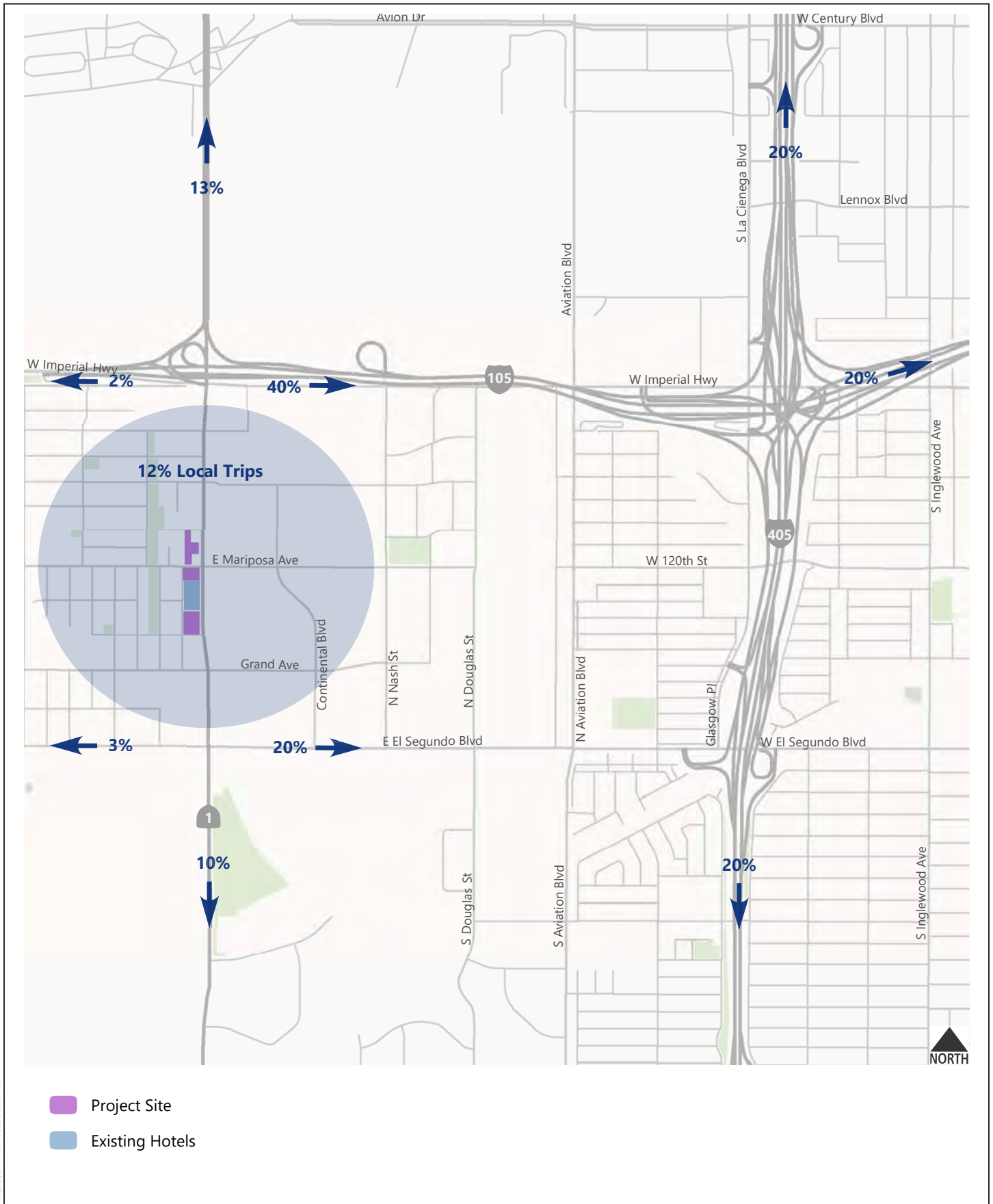
FIGURE 4.13-4

Haul Truck Routes

Pacific Coast Commons Specific Plan EIR Project

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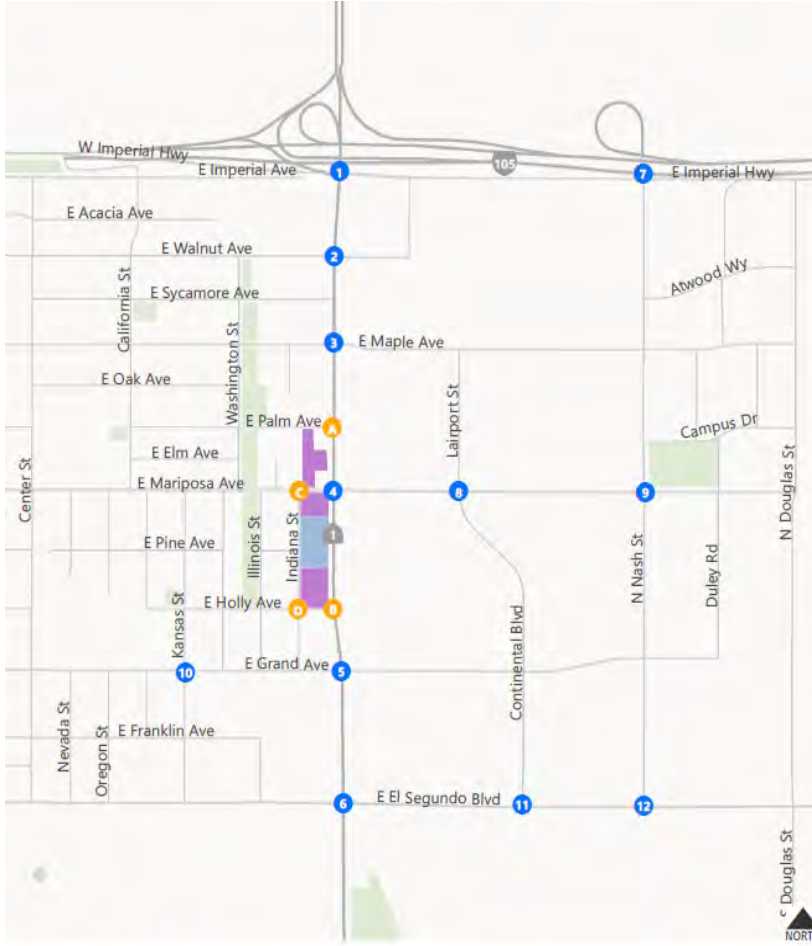
SOURCE: Fehr + Peers 2020

FIGURE 4.13-6

Project Trip Distribution

Pacific Coast Commons Specific Plan EIR Project

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Study Intersections

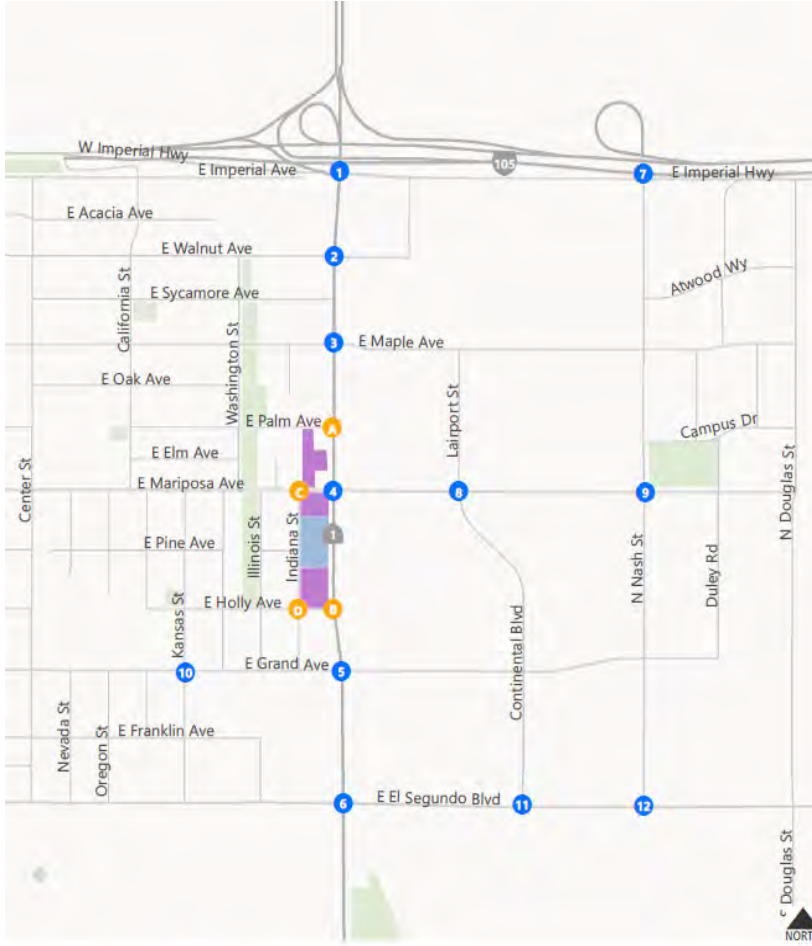
- Signalized
- Unsignalized
- Project Site
- Existing Hotels

1. Pacific Coast Hwy/Imperial Hwy	2. Pacific Coast Hwy/Walnut Ave	3. Pacific Coast Hwy/Maple Ave
4. Pacific Coast Hwy/Mariposa Ave**	5. Pacific Coast Hwy/Grand Ave	6. Pacific Coast Hwy/EI Segundo Blvd
7. Nash St/Imperial Hwy	8. Lairport St/Mariposa Ave	9. Nash St/Mariposa Ave

*De facto right turn

**As part of the project, the eastbound leg of Mariposa Avenue at Pacific Coast Highway (Intersection 4) will be reconfigured from one left lane and one through-right lane to one left, one through, and one right turn lane.

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Study Intersections

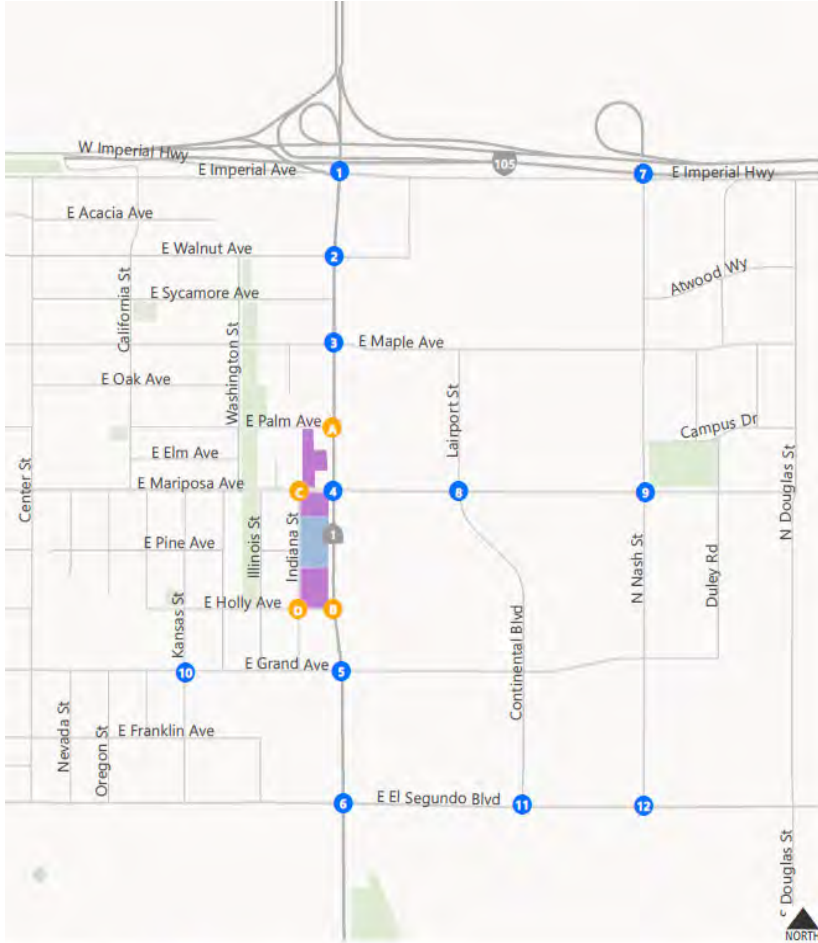
- Project Site
- Signalized
- Unsignalized
- Existing Hotels

<p>10. Kansas St/Grand Ave</p>	<p>11. Continental Blvd/EI Segundo Blvd</p>	<p>12. Nash St/EI Segundo Blvd</p>
<p>A. Pacific Coast Hwy/Palm Ave</p>	<p>B. Pacific Coast Hwy/Holly Ave</p>	<p>C. Indiana St/Mariposa Ave</p>
<p>D. Indiana St/Holly Ave</p>	<p>D1. Pacific Coast Hwy/Fairfield Driveway</p>	<p>D2. Pacific Coast Hwy/PCC South Driveway</p>

*De facto right turn

*As part of the project, the eastbound leg of Mariposa Avenue at Pacific Coast Highway (Intersection 4) will be reconfigured from one left lane and one through-right lane to one left, one through, and one right turn lane.

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Study Intersections

- Signalized
- Unsignalized
- Project Site
- Existing Hotels

D3. Alley/PCC North Driveway	D4. Indiana St/Fairfield Driveway	D5. Indiana St/PCC South Driveway
<div style="display: flex; flex-direction: column; align-items: center;"> <div style="margin-bottom: 10px;"> $0 (0)$ $8 (26)$ </div> <div style="margin-bottom: 10px;"> $9 (7)$ $27 (20)$ </div> <div style="margin-bottom: 10px;"> $0 (0)$ $4 (14)$ </div> </div>	<div style="display: flex; flex-direction: column; align-items: center;"> <div style="margin-bottom: 10px;"> $4 (13)$ </div> <div style="margin-bottom: 10px;"> $1 (4)$ $0 (2)$ </div> <div style="margin-bottom: 10px;"> $18 (13)$ </div> </div>	<div style="display: flex; flex-direction: column; align-items: center;"> <div style="margin-bottom: 10px;"> $1 (2)$ $4 (13)$ </div> <div style="margin-bottom: 10px;"> $18 (12)$ $9 (6)$ </div> <div style="margin-bottom: 10px;"> $1 (1)$ $4 (12)$ </div> </div>

*De facto right turn

**As part of the project, the eastbound leg of Mariposa Avenue at Pacific Coast Highway (Intersection 4) will be reconfigured from one left lane and one through-right lane to one left, one through, and one right turn lane.

SOURCE: Fehr + Peers 2020

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4.14 Tribal Cultural Resources

This section describes the existing tribal cultural resources (TRCs) conditions of the Pacific Coast Commons Specific Plan (Specific Plan or 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 contained in this section is based on survey and evaluation of cultural resources within the Project site and surrounding area, as well as the following:

Appendix D Cultural Resources Technical Report for the Pacific Coast Commons Specific Plan Project, prepared by Dudek.

Appendix K CONFIDENTIAL: Record of Assembly Bill (AB) 52 Consultation

Information contained in this section is based on survey conducted by Dudek on February 24, 2020, a California Historical Resources Information System records search conducted by Dudek on November 14, 2019, a Native American Heritage Commission (NAHC) Sacred Lands File search conducted on October 28, 2019, and subsequent tribal outreach conducted by the City of El Segundo (City) on May 18, 2020 and August 13, 2020 .

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Section 1, 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-2 of this Draft EIR.

4.14.1 Existing Conditions

A summary of the existing conditions of the Project site, including its prehistoric, ethnographic, and historical setting, can be found in Appendix D of this Draft EIR.

4.14.1.1 Ethnohistoric Overview

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The tribes of this area have traditionally spoken Takic languages that may be assigned to the larger Uto–Aztecan family (Appendix D). These groups include the Gabrieleño (alternately Gabrieleño), Cahuilla, and Serrano. Golla has interpreted the amount of internal diversity within these language-speaking communities to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto–Aztecan ca. 2600 BC–AD 1, which was later followed by the diversification within the Takic speaking tribes, occurring approximately 1500 BC–AD 1000 (Appendix D).

The archaeological record indicates that Project site and vicinity was occupied by the Gabrieleño, who arrived in the Los Angeles Basin around 500 B.C. Surrounding cultural groups included the Chumash and Tataviam to the northwest, the Serrano and Cahuilla to the northeast, and the Juaneño and Luiseño to the southeast.

The name “Gabrieliño” or “Gabrieleño” denotes those people who were administered by the Spanish from the San Gabriel Mission, which included people from the Gabrieleño area proper as well as other social groups (Appendix D). Therefore, in the post-Contact period, the name does not necessarily identify a specific ethnic or tribal group. The names by which Native Americans in southern California identified themselves have, in some cases, been lost. Many modern Gabrieleño identify themselves as the Tongva (Appendix D), within which there are a number of regional bands. Though the names “Tongva” or “Gabrieleño” are the most common names used by

modern Native American groups, and are recognized by the Native American Heritage Commission, there are groups within the region that self-identify differently, such as the Gabrielino Band of Mission Indians - Kizh Nation. In order to be inclusive of the majority of tribal entities within the region, the name “Tongva” or “Gabrieleño” are used here.

Tongva lands encompassed the greater Los Angeles Basin and three Channel Islands, San Clemente, San Nicolas, and Santa Catalina. The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. A total tribal population has been estimated of at least 5,000 and as high as 10,000 (Appendix D). Houses constructed by the Tongva were large, circular, domed structures made of willow poles thatched with tule that could hold up to 50 people (Appendix D). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probably communal granaries.

The largest, and best documented, ethnographic Tongva village in the vicinity was that of *Yanga* (also known as *Yaangna*, *Janga*, and *Yabit*), which was in the vicinity of the downtown Los Angeles (Appendix D). This village was reportedly first encountered by the Portola expedition in 1769. In 1771, Mission San Gabriel was established. *Yanga* provided a large number of the recruitments to this mission; however, following the founding of the Pueblo of Los Angeles in 1781, opportunities for local paid work became increasingly common, which had the result of reducing the number of Native American neophytes from the immediately surrounding area (Appendix D). Mission records indicate that 179 Gabrieleno inhabitants of *Yanga* were recruited to San Gabriel Mission (Appendix D). Based on this information, *Yanga* may have been the most populated village in the Western Gabrieleno territory. The nearest named village to the project would have likely been *Sa’anga*, understood to be near the mouth of Ballona Creek. *Sa’anga*, has also been commonly referred to as *Guaspét* or *Guashna*, *Saan*, or *Saa’anga* or *Waachnga* (Appendix D). Ethnohistoric research completed by John Johnson (Appendix D) pertaining to the inhabitants of San Clemente Island and Santa Catalina Island has indicated that there were many marriage ties between these islands and this village in the vicinity of the Ballona wetlands. Mission records indicate that a total of 95 neophytes came from this village; 87 of these individuals at Mission San Gabriel and the remaining eight at Mission San Fernando (Appendix D). These records further suggest that marriage was common with the surrounding outside villages, but perhaps most often occurring with members of the large village of *Yanga*.

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most native Californians, acorns were the staple food (an established industry by the time of the early Intermediate Period). Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Fresh water and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed (Appendix D).

A wide variety of tools and implements were used by the Tongva to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands. Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (Appendix D). At the time of Spanish contact, the basis of Tongva religious life was the Chinigchinich cult, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions, and also taught the people how to dance, the primary religious act for this society (Appendix D).

4.14.2 Relevant Plans, Policies, and Ordinances

Federal

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]).

State

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) of 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.

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.

California Environmental Quality Act

As described further below, the following 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 CEQA Guidelines Section 15064.5(a) define “historical resources.” In addition, 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 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 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.

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.

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.

Local

There are no local policies related to TCRs that are applicable to the proposed Project.

4.14.3 Thresholds of Significance

The significance criteria used to evaluate Project impacts to tribal cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to tribal cultural resources would occur if the Project would:

- 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).
 - 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.

4.14.4 Impacts Analysis

Threshold 4.14a **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)?*
- 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?*

Observation of the present conditions within the proposed Project site indicate that all areas have been disturbed from urban development. Neither a California Historical Resources Information System records search nor survey were able to identify any archaeological resources within the Project site. An NAHC Sacred Lands File search did not identify Native American resources within the search area, which included the proposed Project site and a surrounding 1-mile buffer. The NAHC recommended contacting five Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project site.

- 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

Pursuant to California Assembly Bill (AB) 52 and Senate Bill (SB) 18, the City of El Segundo contacted the five NAHC Native American individuals and/or tribal organizations provided on May 18, 2020. The Gabrieleno Band of Mission Indians, Kizh Nation, responded on May 29, 2020, affirming the Project lies within their Ancestral Tribal Territory and requested formal consultation with the City of El Segundo. During a subsequent consultation meeting on August 13, 2020 between the Kizh Nation and City, the Kizh Nation provided information including historical maps showing the limits early Spanish-Mexican era ranchos, the distribution of early travel routes, and approximate locations of mapped Native American village locations in the region. The City received email correspondence from the Kizh Nation on August 13th and August 27th in 2020 that further provided information relating to traditional use of the area and documented villages located in what is now known as Playa Del Rey and Redondo Beach. Recommended mitigation was additionally provided by the Kizh Nation for City review (Appendix K). No Tribal Cultural Resources were identified within the proposed Project site by the Kizh Nation as a result of their formal consultation with the City. The City sent a follow-up email on September 10, 2020 acknowledging receipt of information provided by the Kizh Nation and noting the provided information along with the proposed mitigation measures would be considered during preparation of the Draft EIR. No further communication was received by the Kizh Nation. The City sent an email to Kizh Nation on October 1, 2020 to state consultation is considered complete.

No known tribal cultural resources or cultural resources were identified by the tribe that have potential to be impacted by project activities. As documented in detail within Section 4.3, Cultural Resources of this Draft EIR, no archaeological sites are on file with the SCCIC within the Project site or a surrounding one-mile area. Government to government tribal consultation pursuant to SB 18 and AB 52 has not resulted in the identification of a TCR within the Project site. Given that no TCR has been identified, no resource-specific mitigation measures pertaining to known TCRs have been developed. Based on this information, the City has determined that the Project would not cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

As described in Section 4.3, Cultural Resources of this Draft EIR, MM-CUL-1 requires preparation and implementation of a Worker Environmental Awareness Program (WEAP), wherein all construction personnel must be trained to respond appropriately to inadvertent discovery of cultural resources. Additionally, MM-CUL-2, requires that all construction work occurring within 100 feet of any potential archaeological discovery shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, evaluates the significance of the find, and any potentially significant impacts to resources.

In consideration of the information provided by the Gabrieleno Band of Mission Indians, Kizh Nation, measures for appropriate management requirements in the event that unknown tribal cultural resources are inadvertently encountered during Project construction-related earthwork activities are outlined in the following MM-TCR-1. MM-TCR-1 requires that if potential tribal cultural resources are discovered through earthwork activities, the City shall be notified and coordination with Native American tribes that have been identified by the NAHC to be traditionally and culturally affiliated with the geographic area of the Project must be conducted. Any affected tribe would be provided a reasonable period of time to conduct a site visit and make recommendations regarding future ground disturbance activities as well as the treatment and disposition of any discovered tribal cultural resources. With incorporation of MM-TCR-1, as well as MM-CUL-1, and MM-CUL-2 from Section 4.3, Cultural Resources of this Draft EIR, impacts to tribal cultural resources would be less than significant.

4.14.5 Cumulative Impacts Analysis

Cumulative impacts on tribal cultural resources consider whether impacts of the proposed Project together with other related projects identified within the vicinity of the Project site, when taken as a whole, substantially diminish the number of such resources within the same or similar context or property type.

As discussed above in this section, there are no known tribal cultural resources on the Project site and the area is considered to be of low potential to contain unanticipated cultural or tribal cultural resources. No archaeological resources have been documented by the SCCIC within the Project site or a surrounding one-mile records search area.

Other individual projects occurring in the vicinity of the Project site would also be subject to the same requirements of CEQA as the proposed Project and any impacts to tribal cultural 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, impacts on archaeological resources would not be cumulatively considerable with mitigation incorporated as MM-TCR-1, MM-CUL-1, and MM-CUL-2.

The proposed Project was determined to have less than significant direct impacts on human remains. Existing regulations are adequate to address the potential for impacts due to the inadvertent discovery of human remains on the Project site. Other individual projects occurring in the vicinity of the Project site would also be subject to the same state requirements to contact appropriate agencies and coordinate with the County Coroner. Therefore, the proposed Project would not result in any cumulatively considerable impacts related to human remains.

4.14.6 Mitigation Measures

MM-TCR-1 Should a potential tribal cultural resource (TCR) (as defined by PRC Section 21074) be inadvertently encountered during construction activities, consistent with the process required by MM-CUL-2, all construction work occurring within 100 feet of the find shall immediately stop and the City shall be notified of the discovery. The City shall notify Native American tribes that have been identified by the Native American Heritage Commission to be traditionally and culturally affiliated with the geographic area of the Project. Any affected tribe shall be provided a reasonable period of time to conduct a site visit and make recommendations regarding future ground disturbance activities as well as the treatment and disposition of any discovered TCRs. Depending on the nature of the potential resource and Tribal recommendations, review by a qualified archaeologist may be required. Implementation of proposed recommendations shall be made based on the determination of the City that the approach is reasonable and feasible.

4.14.7 Level of Significance After Mitigation

With the implementation of MM-TCR-1, as well as MM-CUL-1, and MM-CUL-2 from Section 4.3, Cultural Resources, potential impacts tribal resources would be less than significant.

4.14.8 References

NPS (National Park Service). 1997. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. UA. Department of the Interior, National Park Service, Cultural Resources. Website: <https://www.energy.gov/sites/prod/files/2016/02/f30/nrb15.pdf>

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4.15 Utilities and Service Systems

This section describes the existing utilities and service systems conditions of the Pacific Coast Commons Specific Plan Project (Specific Plan or 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 the following appendix:

Appendix G-1 Pacific Coast Commons Existing and Proposed Utility Report, prepared by KPFF

Appendix G-2: Water Supply Will Serve Letter, prepared by City’s Water Department

Other sources consulted are listed in Section 4.15.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, 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-2 of this Draft EIR.

Methodology

The Project site currently is occupied by the Fairfield Inn and Suites Hotel and the Aloft Hotel and adjacent surface parking lots. These two hotel facilities contain a total of 596 hotel rooms as well as associated amenity areas, including two swimming pools, dining areas, and other hotel facilities. These existing hotels would remain in their current condition with implementation of the proposed Specific Plan. As described in Chapter 3, Project Description, of this Draft EIR, approximately 41,660 square feet of accessory space associated with the Fairfield Inn and Suites “Food and Beverage” building would be demolished to allow for development of the proposed Project. This Draft EIR does not consider the elimination of this 41,660 square feet in the calculation of projected Project-related additional water demand, and therefore provides a conservative assessment.

4.15.1 Existing Conditions

Potable Water Supply

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. MWD has more than 5 million acre-feet (AF) of storage capacity available in reservoirs and banking/transfer programs. MWD is estimated to have 1.29 million AF of water in Water Surplus Drought Management storage and additional 626,000 AF in emergency storage, as of January 1, 2017 (Appendix G).

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 it was founded, 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 (City of El Segundo 2016). From 2006 to 2015, retail water demand in the WBMWD service area declined approximately 7% although population continued to rise, indicating increased water use efficiency.

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 approximately 106,000 acre-feet per year (AFY) of potable water through MWD and 29,000 AFY of recycled water (City of El Segundo 2016).

Ocean water desalination has been proposed as a potential future supply source in the WBMWD service area. In 2002, WBMWD initiated a multi-phase pilot study program to evaluate the potential to provide desalinated water as a viable drinking water supply for its customers. The pilot study operated until 2009, desalinating approximately 20 gallons per minute. Following the pilot study, a small full-scale desalination demonstration project was established from 2010–2014, producing 50,000 gallons per day (GPD) of drinking water quality desalinated ocean water. This small-scale facility demonstrated the viability of a full-scale ocean water desalination facility in the WBMWD service area (City of El Segundo 2016). The final EIR of a full-scale facility capable of providing 21,500 AFY of desalinated water in El Segundo was approved by WBMWD on November 18, 2019 (WBMWD 2019a).

City of El Segundo

The City of El Segundo is a retail water supplier to both residential and commercial customers. There are currently two available water supply sources for the City; imported water from the Colorado River and SWP (delivered via the WBMWD) and recycled water for landscaping irrigation and industrial use (also supplied by the WBMWD). In addition, there are four interconnections with three neighboring water agencies; Los Angeles Department of Water and Power, City of Manhattan Beach, and California Water Service, that can be activated during emergency situations (City of El Segundo 2016).

The City purchases the entirety of its water supply from the WBMWD and does not receive any supplies from groundwater. The City provides water for municipal purposes to more than 17,000 customers, supplies water within a 5.5-square-mile area, and is responsible for ensuring that water demand within the City of El Segundo is met and that state and federal water quality standards are achieved. The City's current and projected water supplies are provided in Table 4.15-1, as included in the City's Urban Water Management Plan (UWMP).

Table 4.15-1. El Segundo Water Supplies – Current and Projected

Water Supply Source	2015	2020	2025	2030	2035
WBMWD (AFY)	8,127	7,999	8,157	8,318	8,482
Percentage	46.1%	46.6%	47.1%	47.6%	46.1%
Recycled Water	9,336	9,336	9,336	9,336	9,336
Percentage	53.9%	53.4%	52.9%	52.4%	53.9%
Total (AFY)	17,463	17,335	17,493	17,654	17,818

Source: City of El Segundo 2016

WBMWD = West Basin Municipal Water District; AFY = acre-feet per year

Since the supply is not directly obtained by the City, the determination of reliability is largely determined by WBMWD and MWD analyses to provide a consistent water supply to the City during normal, single dry, and multiple dry years. Both WBMWD and MWD have declared the water supply reliable on both districts' 2015 UWMPs (City of El Segundo 2016).

The amount of water obtained from these sources varies from year to year, and is primarily dependent on weather conditions and demand. Water storage is essential for the City to supply water during high demand conditions and for firefighting and emergencies. The City's water system includes two storage reservoirs and one elevated storage tank, ranging in size from 200,000 gallons to 6.3 million gallons, with a total capacity of approximately 29.2 AF. The water storage facilities are connected to the City's water distribution system by two electric and one natural gas pumps, capable of pumping at a rate of 7,000 gallons per minute. Water is distributed through a network of 57.5 miles of water mains (City of El Segundo 2016).

To determine the 20% per-capita water use reduction by the year 2020 required by Senate Bill (SB) x7-7, the City used the California Department of Water Resources (DWR) methods to determine the baseline, interim, and water use target values. The City is part of the WBMWD that has formed a regional alliance, and has thus determined its baseline and target values both individually and as part of the alliance. The individually calculated baseline for the City is 513 gallons per-capita demand (GPCD), the interim target in 2015 is 462 GPCD, and the target for 2020 compliance is 411 GPCD. The City has successfully met the 2015 interim goal and will continue to implement water conservation measures in order to meet the 2020 target goal (City of El Segundo 2016).

Recycled Water

In an attempt to diversify its water supply to more locally-controlled sources, WBMWD has increasingly supplied recycled potable water to its customers for landscaping irrigation and industrial use, including in the City of El Segundo. WBMWD purchases treated wastewater from the Los Angeles Department of Water and Power's Hyperion Water Reclamation Plant/Treatment Plant (HTP), which does not treat wastewater to recycled water standards. WBMWD further treats water purchased from the HTP at its Edward C. Little Water Recycling Facility, located within the City. In 2014–2015, WBMWD distributed 29,110 AF of recycled water through its member agencies.

While the City of El Segundo delivered 9,336 AF of this recycled water to its customers in 2014–2015, over 90% of this water (8,720 AF) was distributed to a single customer, the Chevron Refinery. The remaining 616 AF of recycled water was delivered to parks, schools and golf courses for irrigation through a system of recycled water pipelines. The nearest recycled water pipeline is approximately located in Washington Street, 500 feet from the intersection of Palm Avenue and Indiana Street (City of El Segundo 2016).

Groundwater

The Project site overlies the West Coast Basin (DWR No. 4-011.03), which is a subbasin of the Coastal Plain of Los Angeles groundwater basin (DWR No. 4-011). The “West Coast Basin” is bounded on the north by the Ballona Escarpment, on the east by the Newport-Inglewood fault zone, and on the south and west by the Pacific Ocean and consolidated rocks of the Palos Verdes Hills. This subbasin was adjudicated in 1961, establishing water extraction rights in the case *California Water Service Company et al. v. City of Compton et al.*, Civil Case No. 506806, Los Angeles Superior Court. In the adjudication, the City of El Segundo was granted 953 AFY of groundwater extraction rights. However, as neither the City of El Segundo nor the WBMWD extract groundwater to meet water utility demand, groundwater supplies are not evaluated in this Draft EIR.

Potable Water Demand

The City of El Segundo provides water utility to approximately 17,000 people within its service area, a population that has remained relatively static over the past 15 years (U.S. Census Bureau 2018). Water use in the City, however, has continued to decline from 14,528 AF in 2001 to 8,025 AF in 2015, lowering the per-capita usage from 801 GPCD to 427 GPCD (City of El Segundo 2016). This per-capita value, however, is much greater than that of surrounding communities, given that it includes a large portion of industrial use, specifically the Chevron Refinery, which is approximately 0.4-mile to the southwest of the Project site. Excluding the 4,794 AF of water demand from industrial uses in 2015, the actual residential per-capita demand was only 88.2 GPCD (City of El Segundo 2016).

Utility Infrastructure

Figure 4.8-4A, PCC-South Existing Site Drainage, Figure 4.8-4B, PCC-Fairfield Parking Existing Site Drainage, and Figure 4.8-4C, PCC-North Existing Site Drainage included in Section 4.8, Hydrology and Water Quality, also identify the locations of the water, wastewater, storm drain, natural gas, and electrical utility lines located in proximity to the Project site.

Water

The potable water infrastructure near the Project site includes an existing 10-inch-diameter asbestos-cement water line located 11 feet west of the centerline of Indiana Street. There are also two existing water lines in Pacific Coast Highway (PCH). One is a City of El Segundo 10-inch-diameter ductile iron pipe located 32 feet west of the street centerline. The other is a 10-inch-diameter pipe located 33 feet east of the street centerline, and its owner is unknown. In Palm Avenue north of the Pacific Coast Commons (PCC)-North site, there is a City of El Segundo 10-inch-diameter asbestos-cement pipe located 6 feet north of the street centerline. In Holly Street south of PCC-South, there is a City of El Segundo 10-inch-diameter asbestos-cement pipe located 13 feet south of the street centerline. There is also an existing City of El Segundo 10-inch-diameter ductile iron water line in Mariposa Avenue located 6 feet south of the street centerline (Appendix G).

Water for fire suppression is provided by on-site building sprinklers and from seven off-site fire hydrants. Existing fire hydrants owned by the City of El Segundo are located along PCH, Holly Avenue, and Indiana Street. There are no existing reclaimed water mains in the streets adjacent to the Project; the closest reclaimed water main is located in Washington Avenue, approximately 500 feet from the intersection of Palm Avenue and Indiana Street (Appendix G).

Wastewater Treatment

The HTP is part of a joint outfall system commonly known as the Hyperion Treatment System, which consists of the wastewater collection system, the HTP, and three upstream wastewater treatment plants: Donald C. Tillman Water Reclamation Plant, Los Angeles–Glendale Water Reclamation Plant, Burbank Water Reclamation Plant, and their associated outfalls. The HTP 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% of the sewage and commercial/industrial wastewater comes from the City of Los Angeles. The remaining 15% comes from the contract cities and agencies. There are approximately 4 million people in the HTP treatment system service area (LARWQCB 2017).

The HTP has preliminary, advanced primary, and secondary treatment. Following the secondary treatment of wastewater, the majority of effluent from HTP is discharged into Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reused as reclaimed water. HTP has two outfalls that are authorized discharge points for discharging treated wastewater to the Pacific Ocean, including the “1-Mile Outfall” (used for overflows) and the “5-Mile Outfall” (used to discharge secondary treated effluent). Both outfalls are 12 feet in diameter. HTP effluent is required to meet the Los Angeles Regional Water Quality Control Board’s requirements for beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system’s National Pollution Discharge Elimination System permit.

To ensure adequate capacity, a written report must be submitted to the Los Angeles Regional Water Quality Control Board within 90 days after the “30-day (monthly) average” daily dry-weather flow equals or exceeds 75% of the design capacity of the plant (0.75 x 450 million gallons per day [MGD] = 337 MGD) of waste treatment and/or disposal facilities. The report must include the following (LARWQCB 2017):

- i. The average daily flow for the calendar month, the date on which the peak flow occurred, the rate of that peak flow, and the total flow for the day;
- ii. The Permittee’s best estimate of when the monthly average daily dry-weather flow rate will equal or exceed the design capacity of the POTW; and
- iii. A schedule for studies, design, and other steps needed to provide additional capacity for waste treatment and/or disposal facilities before the waste flow rate equals the capacity of present units.

Sanitary Sewer

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 site are owned by the City. The City’s existing wastewater collection system is made up of a network of gravity sewers and nine sewer pump stations. The City’s sanitary sewer lines are located on all sides of the proposed Project. An 8-inch-diameter gravity sanitary sewer line is located west of the Project site under the street centerline of Indiana Street, with a depth varying from 2 feet to 9 feet below grade to the pipe invert. The sewer begins at a manhole located approximately 98 feet south of Mariposa Avenue, before sloping south where it connects to two 12-inch-diameter sewer lines: one on Holly Avenue and one that continues south of Indiana Street. Additionally, below Indiana Street, there is a 10-inch-diameter iron pressure line located 6 feet east of the street centerline. Below PCH, a 12-inch-diameter gravity line is located 26 feet west of the street centerline. In PCH, there is an existing 12-inch-diameter vitrified clay pipe located 26 feet west of the street centerline. The pipe slopes from north to south and varies in depth from 6 feet to 18 feet. At the

intersection with Holly Avenue, the pipe connects to a 12-inch-diameter sewer running west on Holly Avenue. Below Palm Avenue, an 8-inch-diameter gravity line is located under the street centerline of the street. Below Mariposa Avenue, one 8-inch-diameter gravity line is located beneath the street centerline and one 10-inch-diameter pressure sewer line is located 5 feet north of the street centerline (Appendix G).

Wastewater generated to the west of PCH, including the Project site, drains to the Los Angeles Department of Water and Power HTP. The HTP is located west of the City and south of the Los Angeles International Airport, approximately 1.8 miles northwest of the Project site. HTP has the capacity to treat approximately 450 MGD of wastewater to full secondary treatment level and currently treats 275 MGD. The remaining capacity at HTP is approximately 175 MGD, or approximately 39% of its total capacity (City of Los Angeles 2020). The treated water is discharged to the Santa Monica Bay via an outfall that extends 5 miles offshore. The City of El Segundo 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 HTP. The permitted peak flow is 7 cubic feet per second or approximately 4.5 MGD (City of El Segundo 2014a). The average yearly flow to the HTP for 2014–2014 was measured s 1.24 MGD. This is well below the capacity limit of 2.75 MGD (City of El Segundo 2014a).

Storm Water Drainage

There are two existing storm drains near this Project that are owned by Caltrans and the City of El Segundo. The existing Caltrans storm drain is located below PCH. The storm drain is reinforced concrete pipe and varies in size from 18 inches to 24 inches in diameter. It is located 66.5 feet east of the centerline in the portion that is south of Pine Avenue and is located approximately 23 feet east of centerline in the portion that is north of Pine Avenue, although this location varies. The pipe flows from north to south. The depth of the pipe invert varies from approximately from 4 feet to 6 feet below grade (Appendix G).

The City of El Segundo storm drain is an existing 24-inch-diameter, reinforced concrete pipe storm drain that runs through Indiana Street, and flows from north to south. It conveys stormwater from a catch basin on the west side of Indiana Street and is located 11 feet east from the Project's property line. This storm drain runs south and ties into another storm drain on Holly Street that runs west before ultimately discharging into a basin located approximately 0.5 miles southwest of the project, on the intersection of Center Street and Grand Avenue. The catch basin is located approximately 230 feet north of Holly Street (Appendix G).

Electricity

Electrical power is provided to the Project area by Southern California Edison (SCE). There are existing underground electrical lines below PCH and Mariposa Avenue adjacent to the Project site (Appendix G).

Natural Gas

Natural gas service is provided by Southern California Gas Company (SoCal Gas) and is currently available within the developed portions of the site and in streets surrounding the Project site. Specifically, existing SoCal Gas utilities are located in the following streets adjacent to the Project site: PCH, Palm Avenue, Mariposa Avenue, Indiana Street, and Holly Avenue (Appendix G).

Telecommunications

Cable and telecommunication service are provided by Sonify, Velocity, Verizon, CenturyLink, and Charter Communications in the vicinity of the Specific Plan area. Verizon and CenturyLink currently have underground

facilities in PCH. Charter Communications has a combination of aerial and underground facilities in Indiana Street, Mariposa Avenue, Palm Avenue and Holly Avenue. Velocity provides phone and internet service to the Aloft Hotel and the Fairfield Inn and Suites Hotel. Currently, Sonify provides television service to the Aloft Hotel and the Fairfield Inn and Suites Hotel (Appendix G).

Solid Waste

Waste Collection and Transport

Trash and recycling services for 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 14 haulers permitted with the City to collect solid waste, organics, or recyclables. Single-family and duplex residents are provided waste and recycling collection services by EDCO (City of El Segundo 2020).

Landfills

Solid waste that is not hazardous is transported to municipal landfills. Table 4.15-2 describes permitted and active disposal facilities within 25 miles of the Project site.

Table 4.15-2. Solid Waste Facilities

Solid Waste Facility	Distance from Project Site	Remaining Capacity (Cubic Yards)	Maximum Permitted Daily Capacity (Tons per Day)	Final Operation Year
Scholl Canyon Landfill	20 miles northeast	9,900,000	3,400	2030
Burbank Landfill Site No. 3	20 miles northeast	5,174,362	240	2053
Calabasas Landfill	23 miles northwest	14,500,000	3,500	2029

Source: CalRecycle 2020a

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. The Azusa Land Reclamation Landfill, located approximately 30 miles northeast of the Project site, only accepts inert waste. The landfill has a maximum permitted daily capacity of 8,000 tons of waste and receives an average of 1,356 tons of inert waste per day. The landfill has a remaining capacity of 51,512,201 cubic yards and is expected to remain open for approximately 25 years, as of 2020 (CalRecycle 2020a).

4.15.2 Relevant Plans, Policies, and Ordinances

Federal

There are no relevant federal laws for utilities and service systems.

State

California Public Utilities Commission

The California Public Utilities Commission (CPUC) regulates natural gas utility rates and services provided by SoCal Gas, among many other gas utilities. The natural gas services regulated by CPUC include in-state transportation of natural gas over the utilities' extensive transmission and distribution pipeline systems, gas storage, procurement, metering and billing. The CPUC ensures that intra-state natural gas and liquid petroleum gas pipeline systems are designed, constructed, operated, and maintained according to safety standards set by the CPUC and the federal government. The CPUC enforces natural gas and liquid petroleum gas safety regulations; inspects construction, operation, and maintenance activities; and makes necessary amendments to regulations to protect and promote the safety of the public, the utility employees that work on the gas pipeline systems, and the environment. State and federal regulators are tasked with ensuring that pipeline and hazardous materials operators have risk management programs in place, that those programs are designed in conformance with state and federal laws and regulations, that the programs are effective in enhancing public safety, the operator's employees safety, environmental safety, and that the safety of the entire system and operation continues to improve. The CPUC conducts operation and maintenance compliance inspections, accident investigations, reviews utilities' reports and records, conducts construction inspections, conducts special studies, and takes action in response to complaints and inquiries from the public on issues regarding gas pipeline safety.

California Urban Water Management Plan (California Water Code Sections 10610-10656)

The California Urban Water Management Planning Act (California Water Code Division 6, Part 2.6, Sections 10610–10656) 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 5 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 AFY of water to customers.

California Safe Drinking Water Act of 1976

California enacted its own Safe Drinking Water Act in 1976. As of July 2014, the State Water Resources Control Board is responsible for the administration of the California Safe Drinking Water Act. Title 22 of the California Administrative Code establishes the California Department of Public Health authority and stipulates drinking water quality and monitoring standards. These standards are equal to or more stringent than the federal standards.

Regional Water Conservation

SB X7-7, also known as the Water Conservation Act of 2009, was enacted in November 2009 and requires that all water suppliers increase water use efficiency. The main features of this legislation are divided into two sectors, Urban Water Conservation and Agricultural Water Conservation. The law requires, among other things, that the Department of Water Resources, in consultation with other state agencies, develop a single standardized water use reporting form to be used by both urban and agricultural water agencies.

Senate Bill 610 and Senate Bill 221

SB 610 and SB 221 became effective January 1, 2002, amending Sections 10910–10915 of the State Water Code, and requiring that counties and cities consider the availability of adequate water supplies for certain new large development projects. These statutes require that cities and counties obtain from the local water supplier written verification of sufficient water supply to serve proposed large development projects in their jurisdiction. Pursuant to SB 610, the types of projects that are required to obtain Water Supply Assessments include the following:

- A proposed residential development of more than 500 dwelling units
- A proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons
- A proposed commercial office building of more than 250,000 square feet of floor space of employing more than 1,000 persons
- A proposed hotel or motel of 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 areas, or employing more than 1,000 persons
- A mixed-use project that falls in one or more of the above-identified categories
- A project not falling in one of the above-identified categories but that would demand water equal to or greater than that required by a 500-dwelling unit project

The requirements of SB 221 and SB 610 have also been incorporated into the Subdivision Map Act, which provides that “[t]he legislative body of a city or county or the advisory agency, to the extent that it is authorized by local ordinance to approve, conditionally approve, or disapprove the tentative map, shall include as a condition in any tentative map that includes a subdivision a requirement that a sufficient water supply shall be available” (see California Government Code Section 66473.7[b][1]). The public water system’s written verification of either its ability or inability to provide sufficient water supplies to meet the projected demand must be supported by “substantial evidence.” The “substantial evidence” may include any of the following: (1) the public water system’s most recently adopted UWMP; (2) a Water Supply Assessment completed pursuant to Water Code Section 10910; or (3) other information relating to the sufficiency of the water supply that contains analytical information that is substantially similar to the assessment required by Section 10635 of the Water Code (see California Government Code Section 66473.7[c]).

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% by 1995 and 50% 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.

In 2011, AB 341 was passed, requiring CalRecycle to require that local agencies adopt strategies that will enable 75% diversion of all solid waste by 2020.

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% to 75% 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.

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 for the use of recyclable materials in development projects. Local agencies were then required to adopt the model ordinance, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects.

Assembly Bill 1826: Mandatory Commercial Organics Recycling

In October 2014, Governor Brown signed AB 1826 Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. (Organic waste is defined as food waste, green waste, landscape, and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.) This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. This law phases in the mandatory recycling of commercial organics over time. In particular, the minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to recycle organic waste.

California Code of Regulations

Title 20, Division 2, Article 4, Appliance Efficiency Regulations

Title 20, Division 2, Article 4, Section 1605.3 establishes water efficiency standards (i.e., maximum flow rates, maximum gallons per flush) for all new plumbing fittings and fixtures (e.g., showerheads, sink faucets, water closets, urinals). Among the standards, the maximum flow rate for showerheads and lavatory faucets manufactured after July 1, 2018 are 1.8 gallons per minute at 80 pounds per square inch with an optional temporary flow of 2.2 gallons per minute at 60 pounds per square inch for kitchen faucets and aerators. The standard for public lavatory faucets and aerators is 0.5 gallons per minute at 60 pounds per square inch. The standard for water closets and urinals is 1.28 gallons per flush. In addition, Section 1605.3(h) establishes state efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

Title 22, Division 4, Chapter 3, Water Recycling Criteria

Title 22 regulates the sources, production and use of reclaimed water in California. In addition to defining reclaimed water uses, Title 22 also defines requirements for dual plumbed recycled water systems, indirect use for groundwater replenishment, required methods of treatment, sampling and analysis of effluent, specific design requirements for facilities, and reliability requirements for permitted uses.

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. Per CALGreen standards, 65% of construction and demolition (C&D) waste from new construction must be diverted from landfills and either recycled or salvaged for reuse. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

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% requirement.

Title 24, Building Standards Code, Part 5, California Plumbing Code

The 2019 California Plumbing Code sets forth safety requirements and regulations for plumbing systems, including but not limited to plumbing fixtures and fittings, water heaters, water supply and distribution systems, sanitary drainage, indirect wastes (e.g., food preparation), vents, traps and interceptors, storm drainage, fuel gas piping, health care facilities, firestop protection, alternative water sources for non-potable applications, and non-potable rainwater catchment systems. It also sets forth efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets.

Title 27, Environmental Protection, Division 2, Solid Waste

Title 27 of the sets forth regulatory standards promulgated by the CIWMB that apply to all disposal sites meaning active, inactive closed or abandoned. It governs the handling and disposal of solid waste and operation of landfills, transfer stations, and recycling facilities.

Regional

Integrated Water Resources Plan

The MWD's Integrated Water Resources Plan (IRP) is the long-term water resources strategy for the MWD in Southern California. As it was first adopted in 1996, the goal of the IRP has been to ensure that a reliable water system will extend into the future. The 2015 IRP Update, adopted in January 2016, provides MWD's strategy for water resource reliability through the year 2040 and establishes targets for a diversified portfolio of water supply investments. The 2015 IRP Update calls for stabilizing and maintaining imported water supplies; meeting future growth through increased water conservation and sustaining and developing new local supplies; pursuing a comprehensive transfers and exchanges strategy; building storage in wet and normal years to manage risks and drought; and preparing for uncertainty with Future Supply Actions. Overall, the strategies presented in the 2015 IRP Update include investments to maintain the reliability of imported water supplies, expansion of local water supplies and reduction in water demand through a variety of conservation and water use efficiency initiatives. The 2020 IRP is under preparation at the time of this analysis.

MWD 2015 Urban Water Management Plan

MWD's 2015 UWMP addresses the future of MWD's water supplies and demand through the year 2040. Based on its 2015 UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under single dry-year and multiple dry-year hydrologic conditions. MWD has comprehensive plans for stages of actions it would undertake to address up to a 50% 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 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. As set forth in its 2015 UWMP, MWD will also continue investments in water use efficiency measures to help the region achieve the 20% per person potable water use reduction by 2020 (MWD 2016).

West Basin Municipal Water District's 2015 Urban Water Management Plan

As a member agency of MWD, the WBMWD provides wholesale potable water from the SWP and Colorado River Aqueduct to 17 cities through investor-owned utilities, municipal water districts and the Los Angeles County Waterworks District 29. WBMWD's 185-square-mile service area includes approximately 800,000 residents in communities of southern and southwestern Los Angeles County, including the City of El Segundo. In addition, West Basin supplies recycled water to over 400 customer meter connections for municipal, commercial and industrial use as well as for injection into the West Coast Basin Seawater Barrier to halt seawater intrusion and replenish the West Coast Groundwater Basin aquifers (WBMWD 2016).

WBMWD's 2015 UWMP reports on recent water deliveries and sources while addressing future water supply and demand through the year 2040. As many of the communities in the WBMWD service area are older cities that anticipate reaching build-out in the near term, the service population is projected to grow only at a minimal 0.4%

annually, growing from 813,000 in 2015 to an estimated 891,617 in 2040 (UWMP). Considering factors of decreased per-capita use through increased efficiency and increasing recycled water demand, WBMWD estimates that total water demand will increase only 6% in this period, from 135,369 AF in 2015 to 144,126 AF in 2040 (WBMWD 2016).

Prior to the founding of WBMWD in 1947, its current members relied almost entirely on groundwater as a water supply. WBMWD has historically provided imported water as its primary source, but since the 1990s has increased its development of local supplies in response to declining reliability of imported supply. These local supplies include recycled water from the City of Los Angeles' HTP for non-potable groundwater reinjection into the West Coast Basin Seawater Barrier. This injection has the dual purpose of preventing seawater intrusion into the West Coast Groundwater Basin and replenishing groundwater extracted by WBMWD's members (UWMP). Additionally, WBMWD provides desalted brackish groundwater for potable water use from the inland side of the West Coast Basin Seawater Barrier that has been treated at the C. Marvin Brewer Desalter Facility. Future local supply may include 21,500 AFY of ocean water desalination from a plant that is currently undergoing environmental review, with an estimated construction start in 2023. Water supplied by WBMWD in 2015 was 78% imported water, 21.5% recycled water and 0.5% desalted brackish groundwater. Although some of its customers use groundwater to meet approximately 20% of their demand, WBMWD does not directly supply groundwater for retail use and does not extract groundwater from the Plan Area (WBMWD 2016).

MWD's Water Surplus and Drought Management Plan

Prior to 1999, MWD had provided a water shortage contingency analysis as part of any UWMP. In 1999, MWD incorporated the water shortage contingency analysis into a separate, more detailed plan, called the Water Surplus and Drought Management Plan. The overall objective of the Water Surplus and Drought Management Plan is to ensure that shortage allocation of MWD's imported water supplies is not required (MWD 1999). The Water Surplus and Drought Management Plan provides policy guidance to manage MWD's supplies and achieves the goals laid out in the agency's IRP. The Water Surplus and Drought Management Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The Water Surplus and Drought Management 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 and then outside of the region. The Shortage Actions of the Water Surplus and Drought Management Plan are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as a part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.

MWD's Water Supply Allocation Plan

While the Water Surplus and Drought Management 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, MWD adopted a water supply plan called the Water Supply Allocation Plan in February 2008 that has since been implemented three times, most recently in April 2015. The Water Supply Allocation Plan includes a formula for determining reductions of water deliveries to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen cuts in water supplies). The formula allocates shortages of MWD supplies and seeks to balance the impacts of a shortage at the retail level while maintaining equity on the wholesale level, and takes 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. The allocation period covers 12 months from July of a given year through the following June (MWD 2016).

Local

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 (City of El Segundo 1992a, 1992b):

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 CN2-5: 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 landscape design and management, particularly those conserving water and energy.

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.

Proposed Pacific Coast Commons Specific Plan

Requirements set forth in the Specific Plan's Development Standards that are relevant for the topic of Utilities and Service Systems would include the following:

A.5.e. Trash and recycling receptacles areas should be completely screened from public view from public rights-of-way with solid walls, wood, and/or landscaping.

B.8.a. Trash and recycling areas, outdoor storage areas, utility and mechanical equipment, rooftop and ground mounted equipment, transformers and similar structures are permitted subject to screening requirements in El Segundo Municipal Code Section 15-2-8 and the Design Guidelines in Section V.A(5) of this Specific Plan.

E.1. Landscaping must conform to the City's Water Conservation in Landscaping requirements as set forth in El Segundo Municipal Code Chapter 15-15A.

I.7. Reclaimed water must be utilized for all landscaped areas if available and feasible.

4.15.3 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 CEQA Guidelines, a significant impact related to utilities and service systems would occur if the project would:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
- c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.15.4 Impacts Analysis

Threshold 4.15a **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?**

Water Service

Figure 4.15-1, Conceptual Water Utility Plan, provides the locations of the existing water lines and identifies the estimated domestic water demand for each of the proposed development areas within the Specific Plan, including PCC-South, PCC-Fairfield Parking, and PCC-North. The water service connection for domestic water and fire protection would be made to one or more of the existing City water lines surrounding each development area. The specific location of these connections and pipe sizing would be based upon the City's approval. The system would provide adequate water supply for operation of the building's domestic requirements, automatic sprinkler systems and on-site fire hydrants, if required by the state or City Fire Marshal. The size requirements for the water infrastructure would be based on the calculations summarized in Table 4.15-3.

Table 4.15-3. Estimated Peak Domestic Water Demand Flow Estimates

Site	Unit Type	Unit Count	Unit	Flow per Unit (GPM)	Total Peak Flow (GPM)	Total Peak Flow per Site (GPM)
PCC-North	Multi-Residential	143	Dwelling Unit	2.4	343	343 (Resident) 16.7 (Commercial)
	Commercial/Retail	1.1	Per 1,000 SF	4.1	4.5	
	Commercial/Restaurant	1.1	Per 1,000 SF	11.1	12.2	
PCC-Fairfield	Commercial/Retail	1.6	Per 1,000 SF	4.1	6.5	24.3 (Commercial)
	Commercial/Restaurant	1.6	Per 1,000 SF	11.1	17.8	
PCC-South	Multi-Residential	120	Dwelling Unit	2.4	288	288 (Resident) 44.1(Commercial)
	Commercial/Retail	2.9	Per 1,000 SF	4.1	11.9	
	Commercial/Restaurant	2.9	Per 1,000 SF	11.1	32.2	

Source: Appendix B; Appendix G

GPM = gallons per minute; PCC = Pacific Coast Commons; SF = square feet

The peak water flow estimates shown in Table 4.15-3 provide the required flow rate for each development area for the purpose of infrastructure capacity. Fire flows for the proposed Project would be based on the requirements listed in the version of the California Fire Code that is in effect at the time of plan submission, as amended by the City. Based on the requirements outlined by the El Segundo Fire Department in Regulation H-2-a for Fire Hydrant and Private Fire Main System Installation (see Appendix G), two additional fire hydrants may need to be installed in order to provide coverage for portions of the proposed buildings that are in excess of 150 feet from a public fire hydrant. Coordination with the El Segundo Fire Department Fire Prevention Division is required to determine whether the additional fire hydrants will be located in the public street and/or within the development. The minimum number of fire hydrants required was calculated using Table C102.1 from the California Fire Code. The spacing between fire hydrants for all three sites would be 300 feet for public fire hydrants, as stated in the City of El Segundo Fire Prevention Division's Regulation H-2-a Fire Hydrant and Private Fire Main System Installation (City of El Segundo 2014b). Per requirements set forth by the City of El Segundo, any existing water meters, potable water service connections, fire backflow devices and potable water backflow devices must be upgraded to current City Water Division standards. These devices shall be placed or relocated onto private property. Impacts within the Project site as part of construction of the proposed Project have been evaluated throughout this Draft EIR. Thus, the construction of new fire hydrants within the Project site would not cause a significant environmental effect.

The Utility Report included in Appendix G also includes an analysis of the proposed Project's flow requirement on the City-owned water mains. The study was performed in accordance with the guidelines from the City of El Segundo Water Master Plan (City of El Segundo 2005) and Using a Pump Curve to Approximate a Connection to an Existing System (Bentley n.d.). According to the Water Master Plan, the proposed Project is located in the high pressure zone of the City. The following City-owned existing water mains were included in each hydraulic model: a 10-inch-diameter ductile iron main located in Mariposa Avenue, a 10-inch-diameter ductile iron water main located in Indiana Street, and a 10-inch-diameter ductile iron main in Holly Avenue. At each site, new residential and commercial domestic water services, including a meter and backflow preventer at each service, were modeled. The results of the modeling identified the service size necessary for the Project as less than-inches for each of the sites. Because the modeled flows are much higher than the estimated flows and the results of the analysis for the higher modeled flows prove that the City main does not need to be upsized, it can be concluded

that the City main would have more than enough capacity for the lower estimated flows and will not need to be upsized. Therefore, impacts to water facilities would be less than significant.

Sanitary Sewer

The City’s sanitary sewer lines are located on all sides of the proposed Project. Figure 4.15-2, Conceptual Sewer Plan, provides the locations of the existing sewer lines and identifies the estimated sewer generation for each of the proposed development areas within the Specific Plan, including PCC-South, PCC-Fairfield Parking, and PCC-North. New sewer laterals are proposed for all the new buildings. It is anticipated that the new sewer laterals would connect to several of the existing gravity lines surrounding the Project. The proposed Project does not currently impact the existing pressure lines. The sewer laterals would be designed to slope at a minimum of 2% and maintain a minimum scouring velocity of 2 feet per second. Points of connection would be based on the City’s input and would require a Sewer Connection Permit from the City. A sewer study was prepared for the Project site to analyze the impact of the proposed development on the existing sewer system and to determine if the system has sufficient capacity to handle the anticipated additional sanitary loads. The peak wet weather flow that would be generated after the Project is completed is calculated and used to determine the system capacity. The peak wet weather flow is obtained by multiplying the average dry weather flow by a peaking factor to obtain the peak dry weather flow, and then multiplying the peak dry weather flow by another peaking factor provided in the report. Both the existing and proposed project sewer flows are considered in the average dry weather flow. To obtain the existing demands, sewer flow monitoring was conducted from April 28, 2020 to May 13, 2020.

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. For the purposes of the sewer study, the total flow from all three development areas were considered in evaluating the Project’s impact to the sewer system. Table 4.15-4 summarizes the proposed sewer demands from each of the development areas. The total flow from the Project is estimated to be 40,330 GPD or 0.0403 MGD.

Table 4.15-4. Estimated Sewer Generation

Site	Unit Type	Unit Count	Unit	Flow per Unit (GPD)	Total Flow (GPD)	Total Flow per Site (GPD)
PCC-North	Multi-Residential	143	Dwelling Unit	110	15,730	18,030
	Commercial/Restaurant	2.3	Per 1,000 SF	1,000	2,300	
PCC-Fairfield	Commercial/Restaurant	3.3	Per 1,000 SF	1,000	3,300	3,300
PCC-South	Multi-Residential	120	Dwelling Unit	110	13,200	19,000
	Commercial/Restaurant	5.8	Per 1,000 SF	1,000	5,800	
Total Project Flow						40,330

Source: Appendix G
 GPD = gallons per day; PCC = Pacific Coast Commons; SF = square feet

The City’s criteria to determine that a sewer system has enough capacity for the proposed development is that the pipe must be able to flow half-full at a maximum. Based on this study, it appears that all sewer systems analyzed would still flow less than 50% full with the additional flows from the Project and that the sewer systems have

capacity to serve the new developments. Therefore, no upgrades to the existing sewer pipeline infrastructure would be required as a result of Project implementation. Impacts would be less than significant.

Stormwater Drainage

There are two existing storm drains near the Project site that are owned by Caltrans and the City. Figure 4.15-3, Conceptual Drainage Plan, provides the locations of the existing storm drain and identifies the estimated peak flow rate of the 85th percentile storm event for each of the proposed development areas within the Specific Plan, including PCC-South, PCC-Fairfield Parking, and PCC-North. As described in Section 4.8, Hydrology and Water Quality, the Utility Report (Appendix G) determined that infiltration is feasible for stormwater treatment, in compliance with City of El Segundo low-impact development requirements. One drywell at each proposed development site would be able to capture the required volume and treat that volume as quickly as it enters the drywell system. The infiltration rate for the site is 0.00186 feet per second, and a drywell with a diameter of 4 feet and an infiltration depth of 22 feet would provide a disposal rate of 0.514 cubic feet per second and would dispose of 88,819 cubic feet in 48 hours. Drywells are proposed below structure or on grade, with 20 feet of separation between the bottom of the sublevel or grade and infiltration zone. The drywells would include overflow piping would be sized based on the 25-year storm event to convey stormwater to Indiana Street or Mariposa Avenue. Thus, stormwater in the proposed condition would flow only to the City of El Segundo storm drains. Table 4.8-2 in Section 4.8, Hydrology and Water Quality, summarizes the clear peak flow rate values in the proposed condition based on the 25-year storm event. The proposed peak flow rate that would be used to design the overflow piping is the reduced peak flow rate generated after infiltration. Because the peak flow rate would be reduced in the proposed condition, it is assumed that the City of El Segundo storm drains will have more than enough capacity to handle the flow rate generated by the proposed Project. Therefore, no upgrades to the existing storm water drainage infrastructure would be required as a result of Project implementation. Impacts would be less than significant.

Dry Utilities

Figure 4.15-4, Conceptual Electric, Gas, and Telecommunication Plan, provides the locations of the existing dry utility lines adjacent to each of the proposed development areas within the Specific Plan, including PCC-South, PCC-Fairfield Parking, and PCC-North.

Natural gas is provided to the Project area by the SoCal Gas, and gas utility infrastructure is located in all streets adjacent to the Project site, including PCH, Palm Avenue, Mariposa Avenue, Indiana Street, and Holly Avenue. New connections would be required for all the new buildings. The existing gas service would be maintained and future gas service would be provided through the Project's private gas service line connections to the SoCal Gas utilities in the surrounding streets. As included in Appendix G, SoCal Gas has confirmed that there are existing facilities in the area and that service would be provided to the Project site in accordance with applicable policies and rules set forth by the CPUC.

Electrical power is provided to the Project area by SCE. There are existing underground electrical lines below PCH and Mariposa Avenue adjacent to the Project site. New underground utility conduit systems would be needed to intercept the existing underground electric system and provide electrical power to the proposed improvements. Final locations and points of connection for the electrical system will be based on a final approved design, in coordination with SCE. As included in Appendix G, SCE has confirmed that there are existing facilities in the area, and service would be provided to the Project site in accordance with applicable policies and rules set forth by the CPUC.

There are existing underground telecommunication lines below PCH, Palm Avenue, and Mariposa Avenue adjacent to the Project site. It is anticipated that Velocity and Sonify would continue to provide service to the Aloft Hotel and the Fairfield Inn and Suites Hotel. As included in Appendix G, Verizon, CenturyLink, and Charter Communications have all confirmed that they have existing services in the area. New underground utility conduit systems would intercept the existing underground telecommunications system and provide services to the proposed buildings.

Upgrades to dry utilities could be required based on the change in land use (i.e., higher density and increase in onsite technology). Any required upgrades are anticipated to be limited the lateral connections to the Project site and not any centralized facilities. This significance criterion is generally applicable to projects that are not already served by municipal utilities, or for greenfield development projects outside of urban areas, because it is those projects that either need to construct new electrical power, natural gas, and telecommunication centralized facilities, or that would tax existing infrastructure.

Upgrades would be coordinated with appropriate service providers (such as SCE, SoCal Gas) to minimize disruptions on service and would be completed by either trenchless technology or open trenching to the depth of the underground utilities. 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, the Project 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 utility construction activities 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. Therefore, impacts to dry utilities would be less than significant.

Threshold 4.15b Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

As described in the Utility Report for the proposed Project (Appendix G), the sewer generation estimates for the proposed Project at full buildout are based on guidelines from the 2014 City of El Segundo System Evaluation and Capacity Assurance Plan and Rehabilitation and Replacement Program (SECAP & RRP) report. To be conservative and because the uses for each 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. Using the site-specific data generated for the proposed Project’s sewer demands, a potable water demand was generated assuming 120% of the sewer demand, which the Utility Report determines to be a reasonable estimate (Appendix G).

Table 4.15-5 Estimated Domestic Water Demand shows the estimated water demand for the proposed Project based on 120% of the estimated sewer demand for the Specific Plan area. The total domestic (potable) water demand from the Project is estimated to be 48,396 GPD or 0.048 MGD or 54.2 AFY.

Table 4.15-5. Estimated Domestic Water Demand

Site	Unit Type	Unit Count	Unit	Flow per Unit (GPD)	Total Flow (GPD)	Total Flow per Site (GPD)
PCC-North	Multi-Residential	143	Dwelling Unit	132	18,876	21,636
	Commercial/Restaurant	2.3	Per 1,000 SF	1,200	2,760	

Table 4.15-5. Estimated Domestic Water Demand

Site	Unit Type	Unit Count	Unit	Flow per Unit (GPD)	Total Flow (GPD)	Total Flow per Site (GPD)
PCC-Fairfield Parking	Commercial/Restaurant	3.3	Per 1,000 SF	1,200	3,960	3,960
PCC-South	Multi-Residential	120	Dwelling Unit	132	15,840	22,800
	Commercial/Restaurant	5.8	Per 1,000 SF	1,200	6,960	
Total Project Flow						48,396

Source: Appendix B; Appendix G

GPD = gallons per day; PCC = Pacific Coast Commons; SF = square feet

As previously shown in Table 4.15-5, the proposed Project is estimated to require approximately 48,396 GPD (54.2 AFY) of new demand of potable water, based on the calculations provided in the Utility Report (Appendix G). Therefore, the Project's water demand would be far below the estimated 210 AFY benchmark for determining whether a Water Supply Assessment is required under SB 610 for a water use equivalent to a 500 dwelling unit development.¹

Although the proposed Project would not meet the threshold for the preparation of a Water Supply Assessment, it would generate a demand for potable water supplies that were not anticipated during the preparation of the City's 2015 UWMP, as the proposed Project would introduce new land uses that are not currently anticipated in the General Plan. Table 4.15-6 below presents the City's projected water supplies and demands, and the surplus or deficit between supply and demand in normal, wet, and multiple dry years. The proposed Project's estimated 54.2 AFY would be approximately 0.31% of the City's overall supply total in 2025, and would be both within the estimates, and exceed the estimates, depending on whether it is a normal, wet, and multiple dry years, as shown in Table 4.15-6 below.

Table 4.15-6. UWMP Projected Water Demand

Water Supply Source	2020	2025	2030	2035
Normal Year (acre-feet per year)				
Supply Total ^a	17,335	17,493	17,654	17,818
Demand Totals ^b	17,299	17,457	17,618	17,782
UWMP Difference	36	36	36	36
Single Dry Year (acre-feet per year)				
Supply Total ^c	18,028	18,193	18,360	18,531
Demand Totals ^c	17,991	18,155	18,323	18,493
UWMP Difference	37	37	37	37
Multiple Dry Year 1 (acre-feet per year)				
Supply Total ^d	18,548	18,718	18,890	19,065
Demand Totals ^d	17,991	18,155	18,323	18,493
UWMP Difference	557	562	567	572

¹ SB 610 requires preparation of a Water Supply Assessment for projects that have a potential to generate a potable water demand equivalent to 500 dwelling units. Assuming 2.5 persons per household consuming 150 gallons per day within 500 dwelling units, a reasonable estimation of the potable water demand for 500 dwelling units would be 187,500 gallons per day (210 acre-feet per year).

Table 4.15-6. UWMP Projected Water Demand

Water Supply Source	2020	2025	2030	2035
Multiple Dry Year 2 (acre-feet per year)				
Supply Total ^d	19,069	19,242	19,419	19,600
Demand Totals ^d	18,711	18,881	19,056	19,233
UWMP Difference	358	361	363	367
Multiple Dry Year 3 (acre-feet per year)				
Supply Total ^d	19,589	19,767	19,949	20,134
Demand Totals ^d	19,646	19,826	20,008	20,195
UWMP Difference	-58	-58	-59	-60

Source: City of El Segundo 2016

- ^a Per Table 6.1.2: Water Supplies- Projected in the 2015 UWMP, and Table 7.3.1
- ^b Per Table 4.1.8: Total Water Demands- Projected in the 2015 UWMP, and Table 7.3.1
- ^c Per Table 7.3.2: Supply and Demand Comparison- Single Dry Year Projected in the 2015 UWMP
- ^d Per Table 7.3.2: Supply and Demand Comparison- Multiple Dry Year Projected in the 2015 UWMP
UWMP = Urban Water Management Plan

As stated in the City’s UWMP, “During a multiple dry year scenario with hydrology similar to that of 2001-2003, it is anticipated that, based on the supplies outlined in Chapter 6 of the City’s UWMP and the surplus identified in the WBMWD 2015 UWMP, the City would be able to meet the demand.” As stated in Appendix G-2, Water Will Serve Letter, the City of El Segundo will serve the proposed Project and will both provide and require the development to have redundant potable water connections, subject to the City’s Water Department approval for all water connections. The City will charge various fees for providing potable water and wastewater services, which include but are not limited to readiness to serve, water usage (quantity), treatment, and utility user taxes.

As discussed above, the 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. 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. Because the City of El Segundo purchases the entirety of its water supply from the WBMWD, which is supplied through MWD, the reliability of the City’s water supply is heavily dependent on the reliability analyses of these agencies. The amount of water the City obtains from these sources may vary from year to year, depending on weather conditions and demand. During multiple dry year scenarios, the demand exceeds the supply, however, WBMWD will be able to supply this difference. It was estimated in the MWD 2015 UWMP that surplus supplies are available to meet the increased demands during normal, dry, and multiple dry year scenarios through 2035. If the City uses more water than is naturally replenished during these years the City, WBMWD, and MWD can enact the measures outlined in their respective Water Shortage Contingency Plans (WSCPs) to ensure that water is used as efficiently and sparingly as possible. This will help preserve the water supplies available, and ensure continued reliability for the future (City of El Segundo 2016).

While additional imported water from MWD can be purchased, if required, to address any additional demands, the City has also implemented measures to address potential water shortages. To respond to potential water supply shortages, including up to a 50% reduction in supply, the City has developed a four-stage rationing plan to be implemented if the City experiences a shortage in the water supply. Mandatory conservation is always required to prevent water waste. The stages are outlined below, with a general summary of the resulting restrictions on water use:

- Stage 1: Water Watch Citizens to voluntarily reduce water consumption by 15%
- Stage 2: Water Alert Restrictions on outdoor use of water; limits on irrigation times of day
- Stage 3: Water Warning Stage 2 restrictions; no new construction permits (some exceptions); No vehicle washing (some exceptions); hand-bucket landscape irrigation only (some exceptions); daily schedule for irrigation
- Stage 4: Water Emergency Stage 3 restrictions; no vehicle washing (fewer exceptions); hand-bucket landscape irrigation only (fewer exceptions); daily schedule for irrigation; no filling of pools/spas; ponds; no water for air conditioning

The City has also adopted a WSCP as part of its Municipal Code. The WSCP describes the measures to take in the event of a water shortage, including different stages of action corresponding to different levels of drought. As mentioned above, the WSCP has four stages of actions to take and several policies to implement to minimize the impacts of water shortage, prepare for an increase in shortage, and attempt to conserve water to prevent further shortage (City of El Segundo 2016).

Since the City of El Segundo receives its imported water supplies from the WBMWD and MWD, the City is also subject to the WSCPs of these Districts. Each District has water rationing stages and a WSCP that specifies the actions to be taken during a water shortage of 50% or greater. In the event that a water shortage becomes severe and a 50% reduction is necessary, the City will comply with the conservation measures as provided by the WBMWD and MWD WSCPs (City of El Segundo 2016).

WBMWD's 2015 UWMP has identified plans to reduce its imported water use by 17% within the next 20 years through diversifying its water sources; namely developing a full-scale ocean water desalination plant and expanding recycled water use. Water desalination is not included as a potential source in the City's UWMP because WBMWD would be the operator of the desalination plant; however, the City may be able to purchase desalination water as a part of the City's overall purchased water supply (City of El Segundo 2016). The WBMWD's environmental review of their Ocean Water Desalination Project was completed on November 20, 2019, which would include construction and operation of an ocean water desalination facility in El Segundo, with offshore ocean water intake and brine discharge structures, and an inland water conveyance system. The project would produce 20 MGD of potable drinking water and would provide a reliable local water supply, thereby offsetting the need for imported water from the SWP and increasing drought resiliency (WBMWD 2019b).

The City's UWMP must be updated every 5 years, and at the time of the preparation of this evaluation, the City is in the process of preparing the 2020 UWMP. Planned growth is incorporated into the supply and demand projections within the UWMP, in compliance with applicable regulations and standards. The Update to the UWMP would also consider changes to future supplies, such as desalination water. As described above (see Appendix G-2), the City would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years (Xu pers. comm. 2020). Therefore, the City would have sufficient water supplies available to serve the proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years and impacts would be less than significant. No mitigation is required.

Threshold 4.15c 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?

Wastewater generated from the Project site would be treated at the HTP, which has the capacity to treat a maximum daily dry weather flow of 450 MGD of wastewater and a peak wet weather flow of 800 MGD, while on average dry weather days, the facility treats 275 MGD (City of Los Angeles 2020). The difference between the average dry weather flows and the maximum flows is 175 MGD. The City of El Segundo 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 HTP. Project wastewater discharges would be typical of the wastewater already generated at nearby properties; it would not include large quantities of unusual industrial/hazardous discharges that can interfere with the ability of a treatment plant meeting the water quality requirements for its discharges.

The anticipated increase in wastewater generation from the proposed Project were calculated in the Utility Report (Appendix G) and are included in Table 4.15-4. To be conservative, it was assumed that commercial areas of the proposed Project would consist of restaurants, which generate a higher demand of 1,000 GPD compared to other commercial spaces. Based on the Utility Report, the proposed Project would generate 40,330 GPD (0.0403 MGD) of sewer demand. This wastewater flow would represent approximately 1.46% of the City's permitted average flow to HTP, as well as would represent approximately 0.024% of HTP's remaining capacity. As such, the increase in wastewater generation attributable to the Project would be accommodated within the existing treatment capacity of the HTP and would represent a minimal to negligible percentage of the facility's remaining capacity. Additionally, the requirement to maintain capacity at HTP is monitored through permit requirements with the Los Angeles Regional Water Quality Control Board, which required the submittal of a report within 90 days after the "30-day (monthly) average" daily dry-weather flow equals or exceeds 75% of the design capacity of the plant ($0.75 \times 450 \text{ MGD} = 337 \text{ MGD}$) of waste treatment and/or disposal facilities. This report must include A schedule for studies, design, and other steps needed to provide additional capacity for waste treatment and/or disposal facilities before the waste flow rate equals the capacity of present units. 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 projected demand in addition to the provider's existing commitment. Furthermore, water conservation measures as established at the local and state level would be implemented and would help reduce the amount of wastewater generated by the Project. Therefore, impacts would be less than significant.

Threshold 4.15d Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Construction

The proposed Project would involve redevelopment of the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the Fairfield Inn and Suites Hotel Food and Beverage Building (formerly the Hacienda Restaurant). Redevelopment activities associated with the proposed Project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, plastics, and soils. Per CALGreen standards, 65% of construction and demolition waste must be diverted from landfills (CalRecycle 2020b). As such, at least 65% of all construction and demolition debris from the site would be diverted. Additionally, any hazardous wastes that are generated during demolition and construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws. The remaining

35% of construction and demolition material 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 in Section 4.15.1, Existing Conditions, the inert landfill in the County (Azusa Land Reclamation landfill) has a remaining capacity of 51,512,201 tons and is expected to remain open for approximately 25 years, as of 2020. Due to the temporary nature of construction and required compliance with the City's recycling mandates, construction would not generate waste in excess of standards or in excess of the capacity of local infrastructure and would not otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

Operation

Once operational, the proposed Project would produce solid waste on a regular basis, in association with operation and maintenance activities. Based on the CalEEMod solid waste generation rates, the proposed Project would generate approximately 86.34 tons of solid waste per day (Appendix C-1, CalEEMod Outputs). This amount assumes compliance with AB 939 requirements for 50% waste diversion from landfills. Solid waste generated by the proposed Project would be collected and transported to a local or regional landfill. As previously discussed in Section 4.15.1, Existing Conditions, there are three landfills within approximately 25 miles of the Project site. Scholl Canyon landfill has a remaining capacity of 9,900,000 tons and is expected to remain open for another 10 years. Burbank Landfill Site No. 3 has a remaining capacity of 5,174,362 tons and is expected to remain open for another 33 years. Calabasas landfill has a remaining capacity of 14,500,000 tons and is expected to remain open for another 9 years. The proposed Project is expected to generate approximately 86.34 tons per year. Collectively, the Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill have approximately 29,574,362 tons of available space remaining. As such, the net solid waste that is anticipated to be produced by the proposed Project would equate to approximately 0.00029% of the available capacity of the combined landfills through their estimated closure dates. This number would be further reduced in order to comply with CALGreen requirements for 65% waste diversion, which would require the Project Applicant/Developer to either submit a construction waste management plan to the City that identifies the C&D waste materials to be diverted from the landfills, or 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% requirement.

Once the Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill reach capacity, additional landfills and strategies would be identified so that disposal needs continue to be met. Furthermore, according to the latest annual report for the Countywide Integrated Waste Management Plan, there are landfills used by the County with up to 100 years of remaining life (County of Los Angeles Department of Public Works 2019). For example, the Prima Deshecha Sanitary Landfill in Orange County is expected to remain open for another 85 years, the Mesquite Regional Landfill in Imperial County is expected to remain open for another 100 years, and the Simi Valley Landfill in Ventura County is expected to remain open for another 67 years (CalRecycle 2020a). As such, in the event of closure of the Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill, other landfills in the region would be able to accommodate solid waste from the proposed Project, and regional planning efforts would ensure continued landfill capacity into the foreseeable future.

For the reasons described above, Project operations would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant. No mitigation is required.

Threshold 4.15e Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed Project would be required to comply with all applicable local and state regulations related to solid waste. The solid waste facilities in proximity to the Project site, Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill, are regulated under federal, state, and local laws. Additionally, the City is required to comply with the solid waste reduction and diversion requirements set for in AB 939, AB 341, AB 1327, and AB 1826. Per AB 1826, businesses that generate 2 cubic yards or more of commercial solid waste per week are required to arrange for organic waste recycling services. Any hazardous wastes that are generated during construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws.

In addition to the City's requirements for recycling construction and demolition waste, the state has set a goal of 75% recycling, composting, and source reduction of solid waste by 2020. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill, and AB 1826 is mandatory organics recycling. Waste generated by the proposed Project would enter the City's waste stream but would not adversely affect the City's ability to meet AB 341 or AB 1826, because the proposed Project's waste generation would represent a nominal percentage of the waste created within the City and because the businesses and residents at the Project site would be subject to recycling and diversion requirements. In addition, waste diversion and reduction during Project construction and operations would be completed in accordance with CALGreen standards, CalRecycle standards, City requirements, and the County Integrated Waste Management Plan. As a result, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

4.15.5 Cumulative Impacts Analysis

Water

Implementation of the Project, in conjunction with cumulative projects would increase demand for water services provided in the City's water supply system. The Project area and each cumulative projects would incrementally increase the amount of water that is required in the area. However, as previously described, the existing water lines that serve the Project site have the capacity to convey the estimated peak flow generated from the Project. Similar to the Project, 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. Based on the analysis presented in the Utility Report (Appendix G), the proposed Project is not anticipated to contribute to a cumulative impact related to water infrastructure.

The City (through its UWMP) anticipates its projected water supplies will meet demand through the year 2035. In terms of the City's overall water supply condition, any cumulative project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. The City is currently preparing the 2020 UWMP, which is anticipated to be available in the Fall of 2021. The City's 2020 UWMP will account for anticipated growth within the City through 2040. Cumulative projects that propose changing the zoning or other characteristics beyond what is within the General Plan would be required to evaluate the change under necessary

CEQA approval. The CEQA analysis would compare the existing to the proposed uses and the ability of the City and water utility providers to provide a sufficient level of water service.

As discussed in Section 4.15.2, Relevant Plans, Policies, and Ordinances, for projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910–10915 of the State Water Code, a Water Supply Assessment demonstrating sufficient water availability is required on a project-by-project basis. Similar to the Project, each cumulative project would be required to comply with City and State Water Code and conservation programs for both water supply and infrastructure to partially offset the cumulative demand for water. As a result, no significant cumulative water supply impacts are anticipated from development of the Project and cumulative projects, and the Project's incremental effect would not be cumulatively considerable. No mitigation is required.

Wastewater

The Project area and each cumulative project would incrementally increase the amount of wastewater that is being generated in the area. However, as previously described, the existing sewer lines that serve the Project site have the capacity to convey the estimated peak flow generated from the Project. Similar to the Project, the capacity of receiving sewer lines associated with cumulative project development would be determined on a project-specific basis. 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. Based on the analysis presented in the Utility Report (Appendix G), the proposed Project is not anticipated to contribute to a cumulative impact related to sewer infrastructure.

Similarly, the proposed Project would generate 40,330 GPD (0.0403 MGD) of sewer demand. This wastewater flow would represent approximately 1.46% of the City's permitted average flow to HTP, as well as would represent approximately 0.024% of HTP's remaining capacity. As cumulative increases in wastewater treatment demand within the service area require facility upgrades, the City would continue to regulate public sewer facilities in accordance with Title 12 of the El Segundo Municipal Code and the HTP would continue to assess potential expansions to their treatment facilities in accordance with regulatory permit requirements. As such, impacts to wastewater services would not be cumulatively considerable. No mitigation is required.

Electric Power, Natural Gas, and Telecommunication

The City of El Segundo 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 the proposed Project. 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.

Solid Waste

Development of the Project in combination with cumulative projects would increase land-use intensities in the area, resulting in increased solid waste generation in the service area for the Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill. However, due to the built-out nature of the City, the Project and cumulative projects are considered urban infill and/or redevelopment projects. As such, solid waste is already being generated at the Project site and the majority, if not all, of the cumulative project sites. Further, AB 939, or the Integrated Waste Management Act of 1989, mandates that cities divert from landfills 50% of the total solid waste generated to recycling facilities. In order to satisfy CALGreen requirements of diverting 65% of solid waste and to offset impacts associated with solid waste, the proposed Project and all cumulative projects would be required to implement waste reduction, diversion, and recycling during both demolition/ construction and operation.

Through compliance with City and state solid waste diversion requirements, and due to the recycling collection process that would be part of the proposed Project design and the design of many typical urban infill projects, impacts to solid waste services would not be cumulatively considerable. Impacts would be less than significant, and no mitigation is required.

4.15.6 Mitigation Measures

No mitigation measures are required.

4.15.7 Level of Significance After Mitigation

Impacts would be less than significant without mitigation.

4.15.8 References

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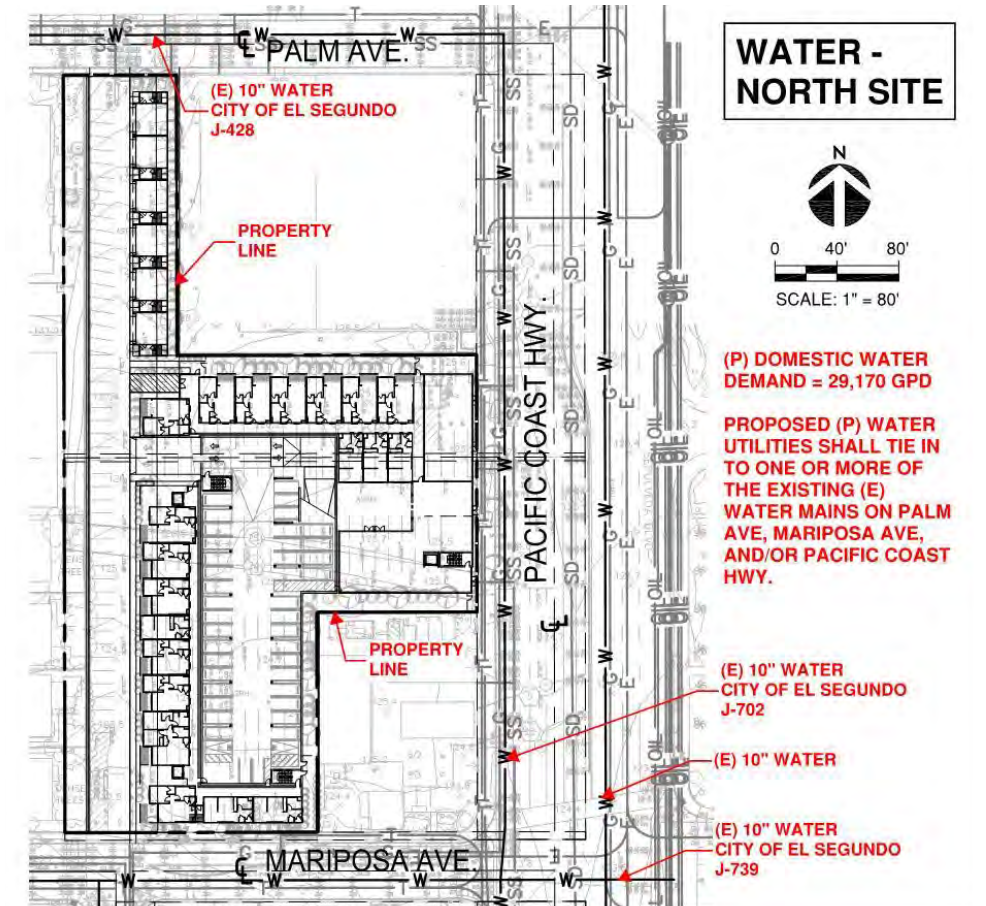
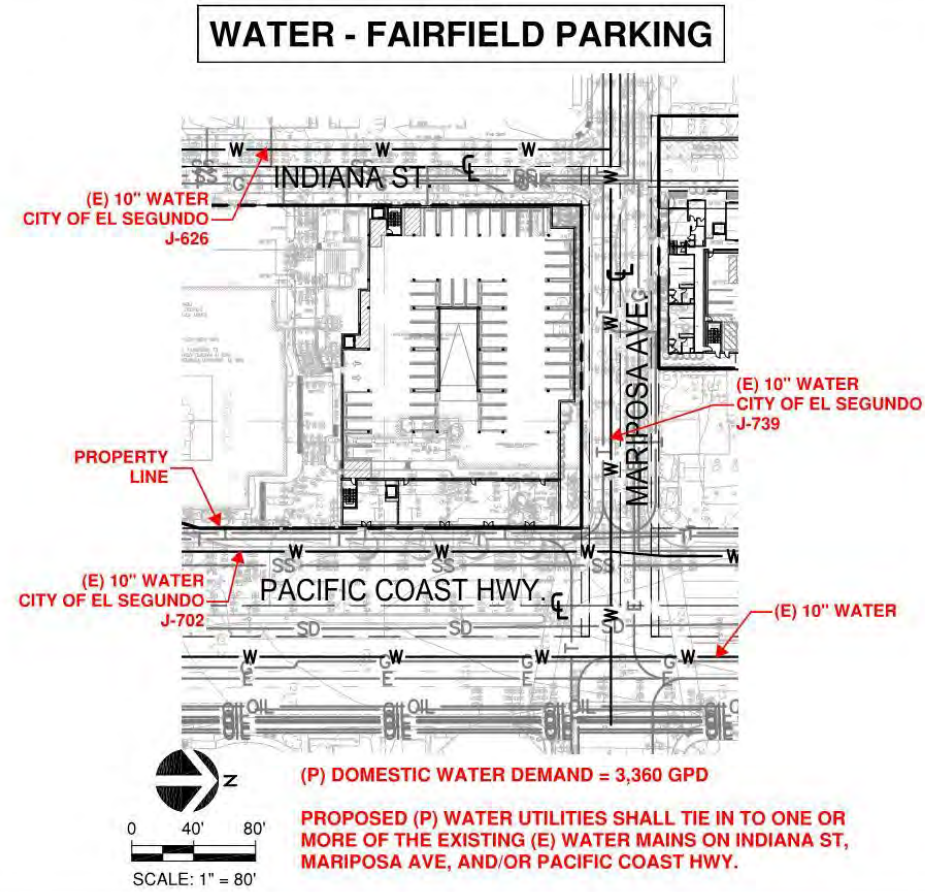
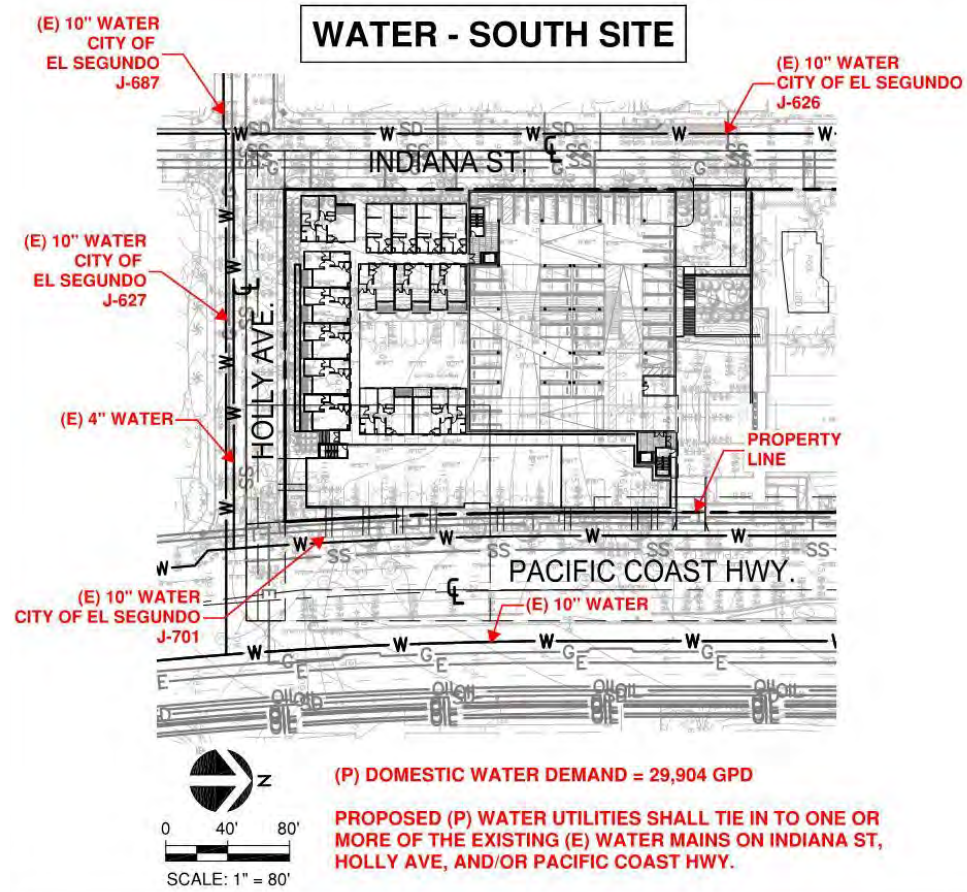
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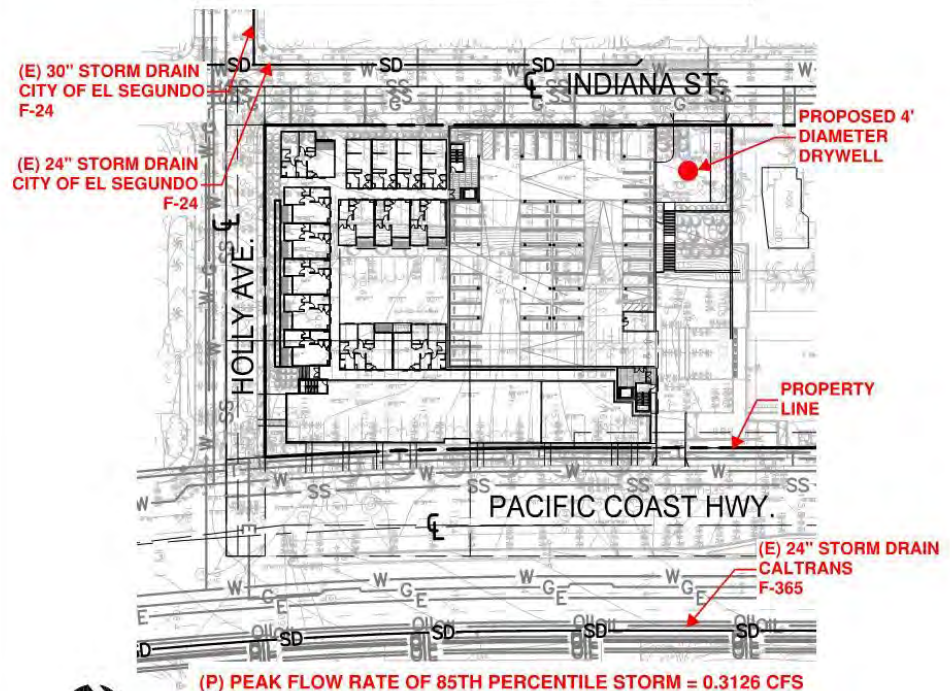
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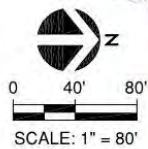
(P) STORM DRAIN - SOUTH SITE



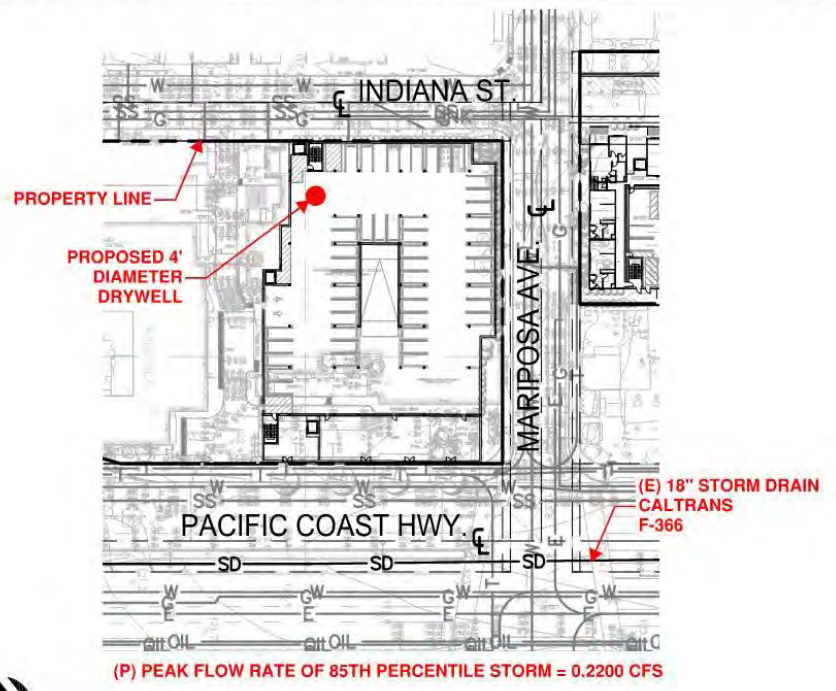
(P) PEAK FLOW RATE OF 85TH PERCENTILE STORM = 0.3126 CFS

CONCEPTUAL DRAINAGE PLAN:
 ONE 40-FT DRYWELL WITH A DISPOSAL RATE OF 0.514 CFS IS ADEQUATE TO INFILTRATE ENTIRE FLOW GENERATED BY 85TH PERCENTILE STORM

OVERFLOW WILL BE ROUTED TO CALTRANS STORM DRAIN VIA SURFACE FLOW



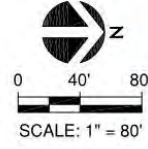
STORM DRAIN AND HYDROLOGY - FAIRFIELD PARKING (P)



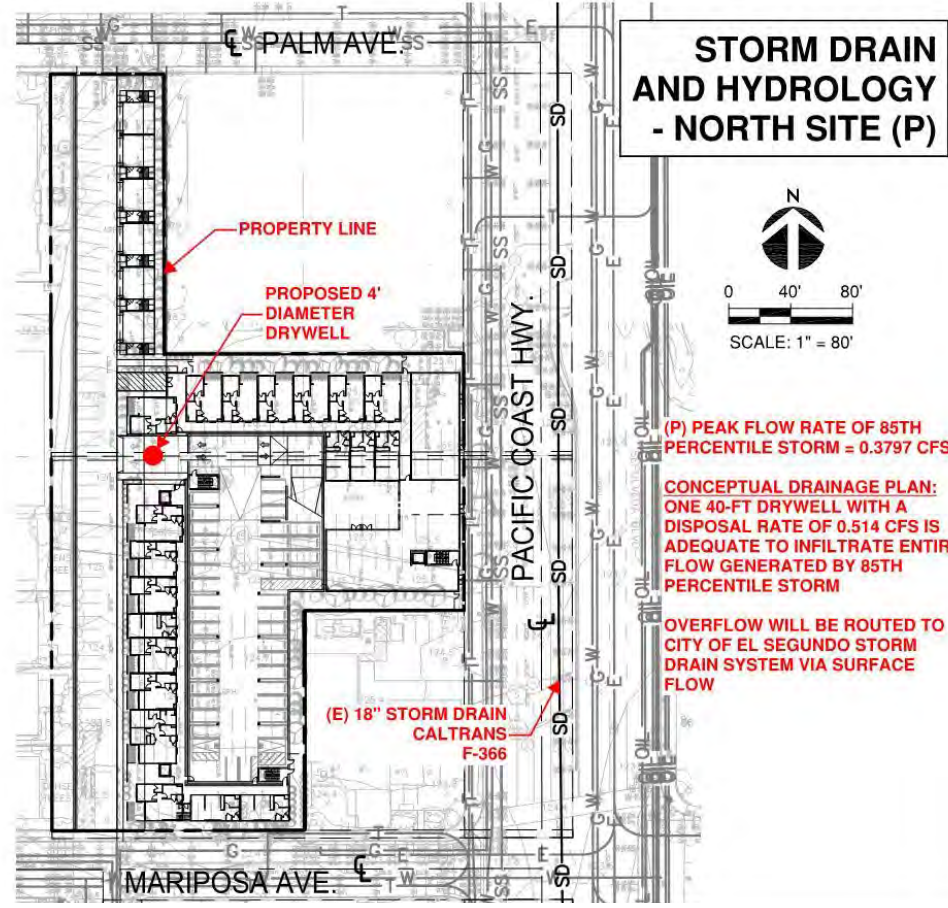
(P) PEAK FLOW RATE OF 85TH PERCENTILE STORM = 0.2200 CFS

CONCEPTUAL DRAINAGE PLAN:
 ONE 40-FT DRYWELL WITH A DISPOSAL RATE OF 0.514 CFS IS ADEQUATE TO INFILTRATE ENTIRE FLOW GENERATED BY 85TH PERCENTILE STORM

OVERFLOW WILL BE ROUTED TO CITY OF EL SEGUNDO STORM DRAIN SYSTEM VIA SURFACE FLOW



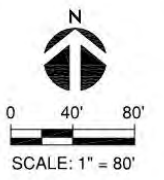
STORM DRAIN AND HYDROLOGY - NORTH SITE (P)



(P) PEAK FLOW RATE OF 85TH PERCENTILE STORM = 0.3797 CFS

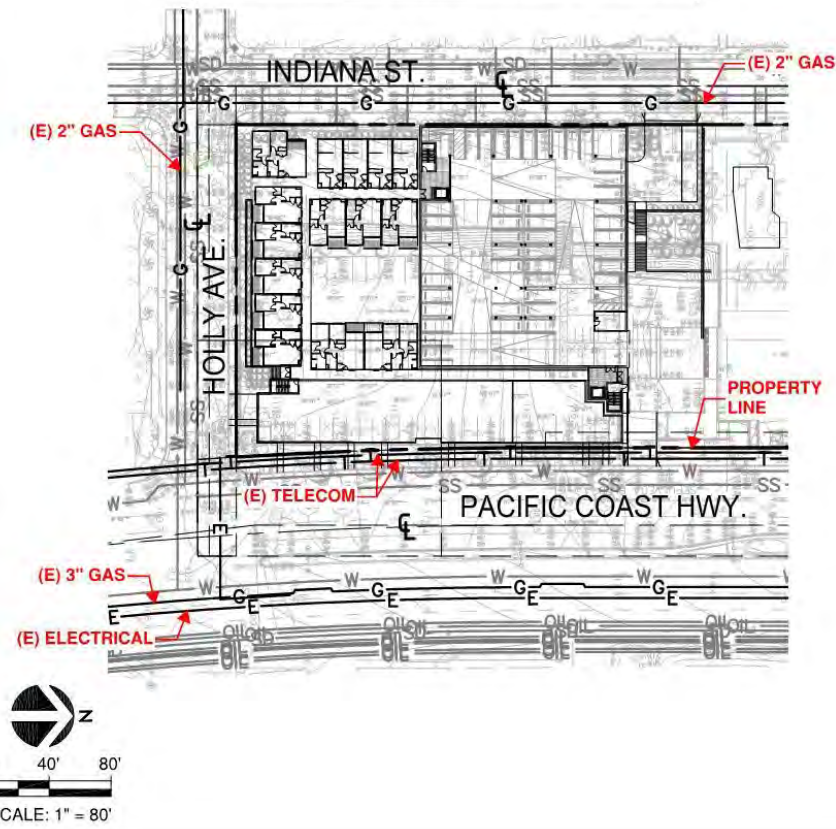
CONCEPTUAL DRAINAGE PLAN:
 ONE 40-FT DRYWELL WITH A DISPOSAL RATE OF 0.514 CFS IS ADEQUATE TO INFILTRATE ENTIRE FLOW GENERATED BY 85TH PERCENTILE STORM

OVERFLOW WILL BE ROUTED TO CITY OF EL SEGUNDO STORM DRAIN SYSTEM VIA SURFACE FLOW

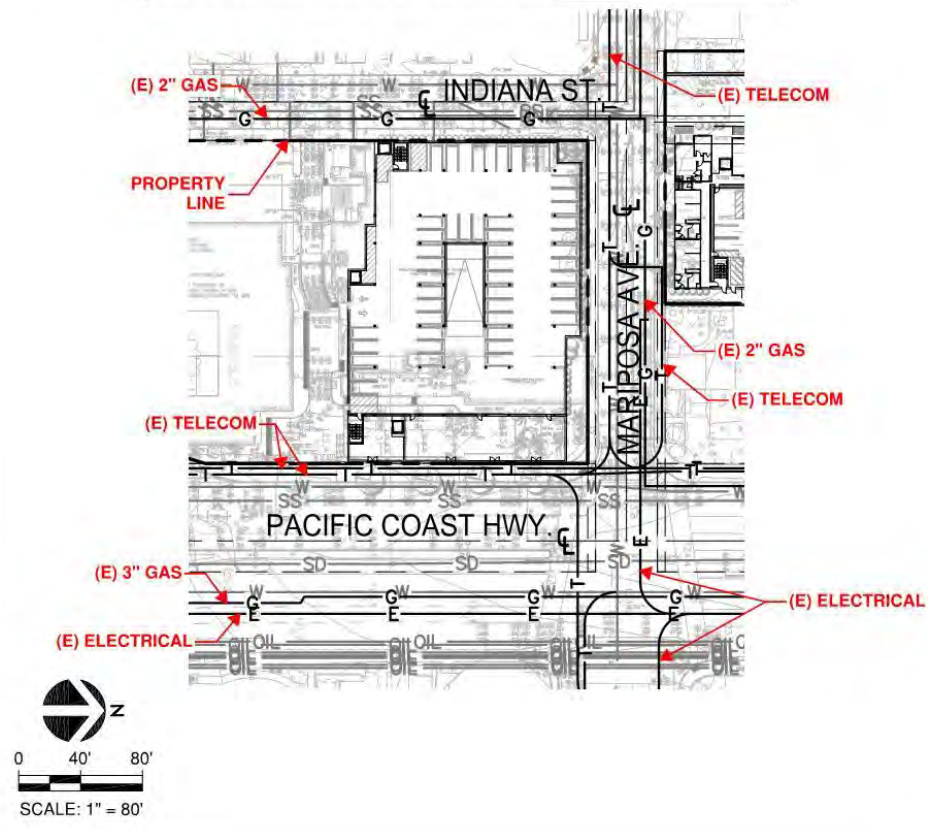


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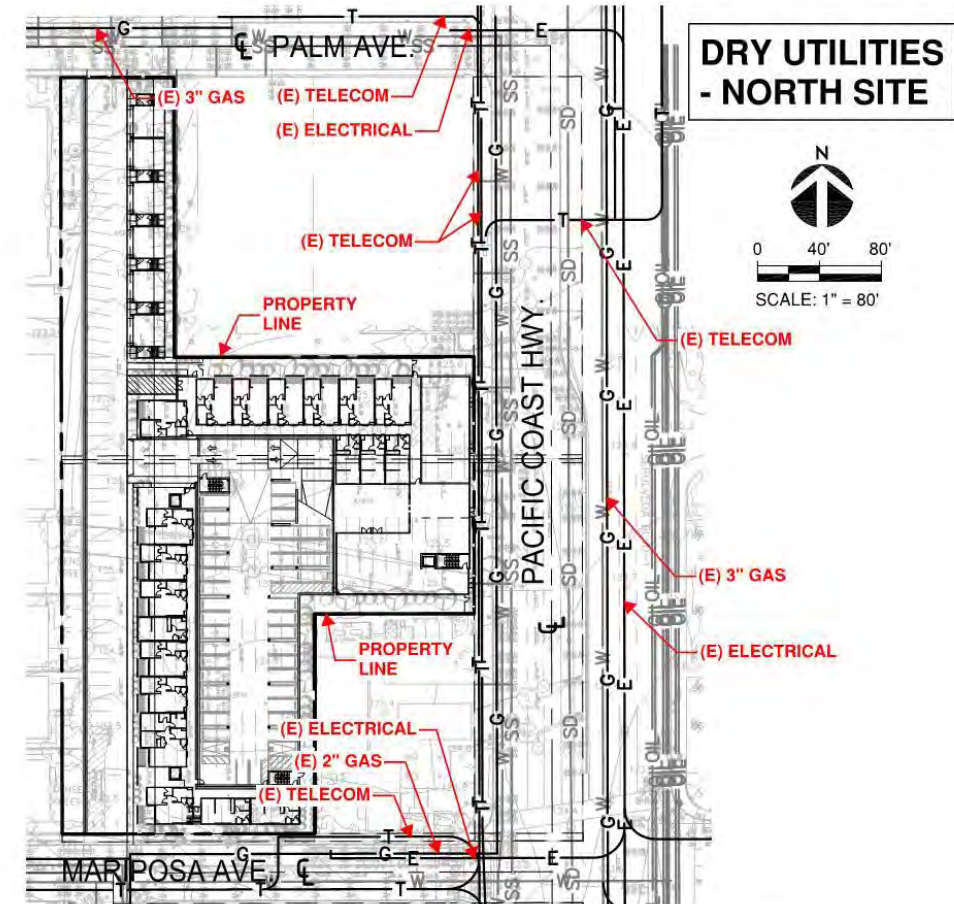
DRY UTILITIES - SOUTH SITE



DRY UTILITIES - FAIRFIELD PARKING



DRY UTILITIES - NORTH SITE



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5 Other CEQA Considerations

This chapter of the Environmental Impact Report (EIR) for the Pacific Coast Commons Specific Plan (Specific Plan or Project) has been prepared in furtherance of the content requirements set forth in the California Environmental Quality Act (CEQA) Guidelines Section 15126.2. As such, this chapter discusses the following:

- Significant and Unavoidable Environmental Impacts (Section 5.1)
- Significant and Irreversible Environmental Effects (Section 5.2)
- Growth Inducement (Section 5.3)
- Potential Secondary Effects of Mitigation (Section 5.4)
- Effects Found Not to Be Significant (Section 5.5)

5.1 Significant and Unavoidable Environmental Impacts

Section 15126.2(c) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(c) states the following:

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 Project-specific mitigation measures identified in Chapter 4, Environmental Analysis, of this Draft EIR would reduce all potentially significant impacts to below a level of significance, with the exception of the potential of the proposed Project to conflict with an Air Quality Management Plan (AQMP). As described in Section 4.2, Air Quality, the Project site is located within the South Coast Air Basin (SCAB), under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD administers the AQMP for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards and National Ambient Air Quality Standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP:

- Consistency Criterion No. 1: The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
- Consistency Criterion No. 2: The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

The proposed Project would not exceed the SCAQMD criteria air pollutant mass thresholds and would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations; thus, the proposed Project would not conflict with Consistency Criterion No. 1. However, the proposed Project would result in population growth that would exceed the population growth anticipated for the City in SCAG's regional growth forecast, and therefore would conflict with Consistency Criterion No. 2. Although the Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]) is the most recent RTP/SCS, the SCAQMD is still in the early stages of updating its AQMP (anticipated to be released in

2022). Therefore, the SCAG 2016 RTP/SCS and associated Regional Growth Forecast would be applicable in this analysis of the potential to conflict with the SCAQMD 2016 AQMP, as required in Section 4.2, Air Quality. In the 2016 RTP/SCS, SCAG estimated 16,700 residents in the City in 2012 and 17,300 residents by 2040. The proposed Project's residential units would accommodate 618 individuals upon its occupancy in 2025. Considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, the proposed Project would result in a population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP. The proposed Project would therefore conflict with the applicable AQMP, which would result in a significant and unavoidable impact. There is no feasible mitigation measure for population growth; therefore, this impact would be significant and unavoidable.

5.2 Significant and Irreversible Environmental Impacts

The CEQA Guidelines (14 CCR 15000 et seq.) require an EIR to address any significant irreversible environmental changes that would result from the proposed Project should it be implemented. Pursuant to Section 15126.2(d), significant irreversible environmental impacts could involve any of the following:

- 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;
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
- Irreversible damage from environmental accidents associated with the project;
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the 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.

Large Commitment of Non-Renewable Resources

Examples of irretrievable commitments provided in the State CEQA Guidelines include the use of nonrenewable resources (e.g., natural gas and other fossil fuels, lumber, and steel) during initial and continued phases of Project construction and operation. The proposed Project's potential energy consumption is discussed in greater detail in Section 4.4, Energy, of this Draft EIR.

As concluded in Section 4.8, Hydrology and Water Quality, water use during Project construction would be limited to minor amounts of water required for various uses, such as concrete mixing and dust suppression. Water use would be minor to negligible when compared to the operational demands of the Project, as well as the operational demands of the surrounding land uses. With regard to building materials, the Project 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% of all demolition and construction materials must be recycled. This regulation would ensure that portions of the existing materials on

site are reused. In the event that the proposed Project were to be demolished at a future time, this regulation would ensure that a majority of the materials are recycled.

Nonrenewable resources would also be consumed during Project operation. Resources used during operation would consist primarily of water, natural gas, and other fossil fuels required for off-site electrical generation and vehicles traveling to and from the Project site. While some building materials may be consumed for building maintenance purposes, such use would be limited and would be reduced by the Project's use of durable materials, as described above. While the existing site uses generate some demand for water, electricity, gasoline, diesel fuel, and natural gas, the proposed Project would increase this demand due to intensification of the land uses on the site. The Project's use of fossil fuels during operation is discussed in detail in Section 4.4, Energy, of this Draft EIR. As concluded in that section, although natural gas and electricity usage would increase due to the implementation of the Project, the proposed Project would not result in inefficient or wasteful use of electricity, natural gas, and petroleum, and would result in a less than significant impact. Although the Project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in vehicle miles traveled over time. Therefore, impacts to energy resources during operation would be less than significant.

The Project's water use is discussed in detail in Section 4.8, Hydrology and Water Quality, and Section 4.15, Utilities and Service Systems. As concluded in those sections, the proposed Project would require approximately 48,396 gallons of water per day upon operation. However, as described in Section 4.15, this anticipated Project-related increase in water demand can be met.

The proposed Project would also include the following sustainability features:

- All new development must have buildings designed to be energy efficient to meet or exceed Title 24 requirements.
- The Project parking lot areas must include storm water management practices that treat storm water runoff in compliance with the El Segundo Municipal Code (ESMC) and all applicable law.
- Bicycle parking must comply with the ESMC and CalGreen Code.
- Electric Vehicle parking must comply with CalGreen Code
- Exterior lighting must be energy efficient and designed to minimize light pollution.
- Low-emitting building materials must be utilized.
- Roof structures of new buildings must be designed to support solar panels.
- Reclaimed water must be utilized for all landscaped areas if available and feasible.

In addition to the above considerations, state and local laws and regulations would further reduce the Project's use of nonrenewable 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% 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% by December 31, 2027, and 60% by December 31, 2030. SB 100 also sets forth a state policy that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California and requires that achieving 100% 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 nonrenewable energy is anticipated to significantly decrease over time, as Senate Bill 100 is implemented statewide and overall nonrenewable energy consumption decreases.

Similarly, the vehicles that would travel to and from the Project would be subject to increasingly stringent emissions standards over time, which would reduce the amount of fossil fuel consumed per vehicle (see Section 4.4 for additional details). Furthermore, the City of El Segundo (City) and state 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 incentivized at the local level by the proposed Project's provision of alternative transportation amenities (e.g. pedestrian pathways and bicycle parking and lockers). As such policies are carried out, the number of vehicles traveling to and from the site may decrease over time.

The Project would be subject to compliance with the California Building Energy Efficiency Standards and CALGreen. In conclusion, while the proposed Project would result in the use of nonrenewable resources, such use would be limited primarily to building materials, fossil fuels, and water. During operation, use of such resources is expected to decrease, as increasingly stringent efficiency requirements are implemented at the local and state level. Therefore, although the proposed Project would require the use of nonrenewable resources, it would not require such a large commitment of nonrenewable resources during the initial and/or continued phases of the Project such that removal or nonuse thereafter would be unlikely. The proposed Project would not construct a new land use that required the commitment of a large amount of nonrenewable resources, such as a new fossil fuel consuming power plant. Land uses within urban centers 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 replacement of underutilized buildings and surface parking lots 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 4.9, Land Use and Planning) and with the City's Climate Action Plan (see Section 4.6, Greenhouse Gas Emission). Such development is commonplace and encouraged in areas near urban centers and transit nodes and would not result in a large commitment of nonrenewable resources such that removal or nonuse thereafter would be unlikely.

Commitment to Future Uses

The Pacific Coast Commons (PCC) South portion of Project site currently contains parking for the Aloft Hotel. The PCC-Fairfield Parking portion of the Project site is developed with the Fairfield Inn and Suites Hotel Food and Beverage Building (formerly the Hacienda Restaurant) which is no longer in operation, a Discovery Rent-A-Car business, and ballroom and meeting space area for the hotel, which is still periodically used. The PCC-North portion of the Project site is the surface parking area for the Fairfield Inn and Suites Hotel. Implementation of the proposed Specific Plan would bring the existing on-site hotels into conformance with the General Plan and would not eliminate these existing land uses. Redevelopment of surface parking lots and underutilized buildings into residential units and commercial spaces would be a change from the existing condition; however, because the proposed Specific Plan is a redevelopment project within a fully developed and urbanized portion of the City, it would not commit future generations to new urban land uses. Given the established hotel uses on the Project site, which would not be altered under the proposed Specific Plan, these properties would remain hotel use. The replacement of underutilized buildings and surface parking lots 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 4.9, Land Use and Planning) and with the City's Climate Action Plan (see Section 4.6, Greenhouse Gas Emission). Such development is commonplace and encouraged in areas near urban centers and transit nodes and would not result in primary and secondary impacts that would generally commit future generations of people to similar uses.

Irreversible Damage from Environmental Accidents

The proposed Project has the potential to expose the public and the environment to hazards associated with on-site releases of hazardous materials including asbestos-containing materials, lead-based paint, polychlorinated biphenyl (PCB)-containing items, universal wastes, and other hazardous materials and wastes present in the building scheduled for demolition. Management of hazardous materials and waste during pre-demolition surveys and abatement activities would be addressed by Mitigation Measure (MM) HAZ-1. Hazardous materials present in the hotels, including a 500-gallon diesel aboveground storage tank and various janitorial items, are not expected to be impacted by construction, as the hotels are not scheduled for demolition or renovation. Construction activities would not be conducted in areas where hazardous materials are stored. Therefore, Project construction impacts are not anticipated to result in irreversible damage due to environmental accidents.

Five hazardous material pipelines are located within close proximity to the Project site, three of which are located within the Pacific Coast Highway right-of-way. Construction of the proposed Project would require excavation into existing rights-of-way in order to connect to existing utilities. In accordance with California Government Code 4216, notification to the regional notification center is required prior to excavation work so that subsurface utilities can be located. Should the excavation occur within 10 feet of a subsurface high-pressure natural gas or petroleum pipeline, the owner of the pipeline is required to conduct an on-site meeting with the excavator prior to excavation activities. The onsite meeting would include protection measures to avoid damage or impacts to the subsurface pipelines.

As discussed in Section 4.7, Hazards and Hazardous Materials, the adjacent 76 gasoline service station has been in operation since the 1930s (under various owners), and recent inspections have identified operational violations associated with the underground storage tank. While there are no documented releases, the numerous violations suggest that there is a potential for soil contamination associated with gas station operations in this area. The proposed Project, specifically PCC-North, is located adjacent to the gas station, and excavation and grading of PCC-North would occur adjacent to the gas station. Therefore, there is a potential for petroleum-impacted soils to be present in excavations adjacent to the gas station. Excavation of petroleum-impacted soils could cause an upset or accident condition if contaminated soils are released to the environment. A Hazardous Materials Contingency Plan would be prepared in accordance with MM-HAZ-2, which would include procedures to identify, handle, and dispose of potential petroleum-impacted soils related to the gas station. With adherence to federal, state, and local laws and regulations, and implementation of MM-HAZ-1 and MM-HAZ-2, the potential for irreversible damage would be less than significant.

In addition, operation of the proposed Project would only require limited use of commercially available hazardous materials, including janitorial and landscaping products. 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 would be required under California Health and Safety Code Division 20, Chapter 6.11, Sections 25404–25404.9. The Hazardous Material Business Plan, which would be submitted to the El Segundo Fire Department (the local Certified Unified Program Agency) via the California Environmental Reporting System, would include emergency and spill prevention and response measures, thereby reducing the potential for an upset or accident condition. Use of extremely hazardous materials and accumulation of acutely hazardous wastes are not anticipated. Operation of the proposed Project is not anticipated to impact nearby hazardous liquid pipelines or the adjacent gasoline service station. Project operational impacts are not anticipated to result in irreversible damage due to environmental accidents.

Consumption of Resources Justified

While the Project would result in increased resource consumption during construction and operation, the Project would also result in some benefits related to long-term resource consumption in the region. As demonstrated in Section 4.11, 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. The proposed Project falls well within regional growth projections for population and housing and would locate this growth on an infill site within walking distance of a wide range of services, employment opportunities, commercial uses, and existing residential neighborhoods. Regarding population growth, the Southern California Associated of Governments (SCAG) estimates that Los Angeles County would have 10,407,000 residents by 2020 and 11,647,000 residents by 2045. The Project's 618 increase in population¹ would provide a nominal amount of population growth of Los Angeles County's estimated projections through 2045. Additionally, the proposed Project's population growth would represent nominal percentage of SCAG's projected 1,267,000 new residents anticipated in Los Angeles County between 2020 and 2045. 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 nonrenewable resources, it would also help accommodate growth in a manner that would reduce irreversible environmental changes in the region. Furthermore, 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. For these reasons, the irretrievable commitment of resources attributable to the Project would not be considered significant.

5.3 Growth-Inducing Impacts

CEQA requires a discussion of ways in which the proposed Project could be growth inducing. The CEQA Guidelines identify a project as growth inducing if it fosters economic or population growth or results in the construction of additional housing, either directly or indirectly, in the surrounding environment (14 CCR 15126.2[e]). 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. However, a project's potential to induce growth does not automatically result in growth. Growth can only happen through capital investment in new economic opportunities by the private or public sectors.

Direct growth-inducing impacts are commonly associated with the extension of new public services, utilities, and roads into areas that have previously been undeveloped. The extension of such infrastructure into a non-serviced area can represent the elimination of a growth-limiting factor, thereby inducing growth. Increases in the population may tax existing community service facilities, requiring construction of new facilities and ultimately resulting in an increase in the pace of development or the density of the existing surrounding development.

¹ 263 new housing units x 2.35 persons per household = 618 new residents generated by the proposed Project

Indirect growth-inducing impacts include an increased demand for housing, commodities, and services that new development causes or attracts by increasing the population or job growth in an area.

The proposed Project would directly result in building new housing where housing currently does not exist. In addition, the redevelopment of existing parking lots could result in population growth from an increase in employment opportunities within the City and could therefore increase population and housing through the movement of new labor force into the City. While the Project would result in an expected 56 new full-time employees, this employment growth would make up a small percentage of the overall expected growth in the City and would not exceed the SCAG or the City's General Plan employment projections.

Assuming of all the new residents generated by the Project were new to the City, then the Project's 618 new residents would exceed SCAG's estimated projections through 2045 by 118 persons. It is likely that the proposed residential units would accommodate a combination of existing residents and new residents that either currently work within the City and/or new residents that would be hired as a result of projected employment generation within the City. As shown in Section 2.5, Cumulative Projects, in Chapter 2, Environmental Setting, of this Draft EIR, with the exception of one proposed 15-unit project within the City of El Segundo, the totality of all planned/proposed projects within the City are employment uses rather than residential uses. Additionally, the City's 2020 housing vacancy rate of 4.7% is less than Los Angeles County's housing vacancy rate 6.1% (DOF 2020). As such, the proposed Project is anticipated to be growth-accommodating rather than growth-inducing.

The area surrounding the Project site is already developed with commercial, hotel, and residential uses which would not be removed or disturbed as a result of the Project. Thus, the Project would not remove impediments to growth, such as extending infrastructure into an area that has been undeveloped. Additionally, the Project would not require any major roadway developments, which could stimulate urban sprawl. The Project site is located within an urban area that is currently served by existing utilities and infrastructure. As stated in Section 4.15, Utilities and Service Systems, of this Draft EIR, construction of water, sewer, stormwater, electricity, natural gas, and telecommunications infrastructure, for the Project would be limited to the Project site boundaries and its immediate street frontages and would occur during the Project's construction phase. As such, impacts associated with installation of such facilities necessary for the Project are analyzed throughout this EIR as part of the Project. No additional impacts outside of those analyzed and disclosed throughout this Draft EIR would occur as a result of construction of infrastructure facilities. Therefore, the Project would not indirectly induce growth through extension of infrastructure.

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 vehicle miles traveled. In addition, the Project site is in a highly urbanized area and is surrounded by a mix of residential uses, commercial uses, and office uses. Given the developed nature of the surrounding area, the proposed utility connections, and utility infrastructure would not induce population growth by removal of impediments to growth (e.g., constructing utility infrastructure and service systems in a previously undeveloped region). Further, the proposed Project's infrastructure plan would support the development of the proposed Project and would not accommodate the growth beyond what is proposed. The Project would not require any major roadway improvements nor would the Project open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5.4 Potential Secondary Effects of Mitigation Measures

Section 15126.4(a)(1)(D) of the 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 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.

Air Quality

MM-AQ-1 would require that 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board certified Tier 4 Interim engines. This mitigation measure is a procedural action that would not result in physical changes in the environment that could result in secondary impacts. Implementation of this measure would have a beneficial impact on reducing air quality impacts and would not result in adverse secondary impacts.

Cultural Resources

MM-CUL-1 requires that prior to commencement of construction activities for all phases of Project implementation, the Project applicant shall retain a qualified archaeologist to prepare a Worker Environmental Awareness Program. MM-CUL-2 requires that in the event of an inadvertent discovery of an archaeological resource, all construction work occurring within 100 feet of the find immediately stop until a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. These mitigation measures are proposed to reduce potential impacts associated with archaeological resources and includes procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

Geology and Soils

MM-GEO-1 requires the applicant to retain a qualified paleontologist prior to commencement of grading activities, in the event paleontological resources are discovered during grading. This mitigation measure represents a procedural action and would be beneficial in protecting paleontological resources that could potentially be encountered on site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Hazards and Hazardous Materials

MM-HAZ-1 would require pre-demolition hazardous materials abatement to reduce construction-related impacts to a less than significant level. MM-HAZ-2 requires preparation of a Hazardous Materials Contingency Plan, which would put procedures in place to identify, manage, properly transport, and dispose of hazardous substances and materials identified on site as a result of environmental contamination. These mitigation measures are required to reduce potential impacts related to the transport, use, or disposal of hazardous materials during construction and are short-term in nature. These mitigation measures are procedural actions that would not result in physical changes in the environment. As such, implementation of these mitigation measures would not result in adverse long-term secondary impacts.

Noise

MM-NOI-1 would require development and implementation of a Construction Noise Mitigation Plan to reduce construction-related impacts to a less than significant level. Implementation of the Construction Noise Mitigation Plan would require (1) temporary noise barriers of sufficient height and extent along the Project's western site boundary to achieve at least 5 A-weighted decibels (dBA) and as much as 20 dBA of barrier noise insertion loss and it should resemble an outdoor-use vinyl-covered acoustical blanket; (2) some form of portable solid-walled partial enclosure, acoustical-blanket tent, or comparably performing shroud that can reliably deliver 10 dBA of noise reduction, or slotted low-noise saw blades may be used to yield some or all of this noise reduction; and (3) notification of residents within 200 feet of the Project site. These requirements to reduce potential impacts related to the noise during construction are short-term in nature. The equipment required, such as noise barriers and shrouds, would not result in environmental impacts or in physical changes in the environment. As such, implementation of this mitigation measure would not result in adverse long-term secondary impacts.

Transportation

MM-TRA-1 would require development and implementation of a construction traffic control plan to reduce construction-related impacts to less than significant. Implementation of the plan would require safe detours and protocols for implementing the following, if determined necessary and feasible: temporary traffic controls (e.g., a flag person) during construction to maintain smooth traffic flow; dedicated turn lanes for movement of construction trucks and equipment on and off site; scheduling of construction activities that affect traffic flow on the arterial system to off-peak hours; consolidation of truck deliveries; and/or rerouting of construction trucks away from congested streets or sensitive receptors. These requirements to reduce potential impacts related to ingress/egress and circulation during construction are short-term in nature. The measures required would not result in environmental impacts or in physical changes in the environment. As such, implementation of this mitigation measure would not result in adverse long-term secondary impacts.

Tribal Cultural Resources

MM-TCR-1 requires that should a potential tribal cultural resource (TCR) (as defined by PRC Section 21074) be inadvertently encountered, all construction work occurring within 100 feet of the find immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. This mitigation measures is proposed to reduce potential impacts associated with tribal cultural resources and includes procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

5.5 Effects Found Not to Be Significant

Section 15128 of the CEQA Guidelines requires that an EIR briefly describe potential environmental effects that were determined not to be significant and therefore were not discussed in detail in the EIR. As discussed in the Notice of Preparation, released on May 26, 2020, implementation of the Specific Plan is not expected to result in any significant impacts to agriculture and forestry resources; biological resources, mineral resources, and wildfire. A summary of the analysis provided in the Notice of Preparation, for these issue areas, is provided below.

One comment letter from the California Department of Fish and Wildlife received during the Scoping Period raised concern with regard to biological resources. The lead agency has determined that effects of the Project on

biological resources remains less than significant. In response to this comment, Section 5.5.2, Biological Resources, expands upon the analysis provided for biological resources in the Notice of Preparation to further substantiate the less than significant impact determination.

5.5.1 Agriculture and Forestry Resources

The Project site is located in an urban area on a site that is fully developed with buildings and asphalt paving and is included in the General Commercial (C-3) and Automobile Parking (P) zones. There are no existing agriculture or forestry activities on the site. No readily available opportunities for agricultural or forestry operations exist on site or in the surrounding area. According to the California Department of Conservation's California Important Farmland Finder, most of Los Angeles County, including the City of El Segundo, is not mapped as part of the state's Farmland Mapping and Monitoring Program; thus, the Project site does not contain Prime Farmland, Unique Farmland, or Farmland of State Importance (collectively "Important Farmland") (DOC 2020), nor does it contain any parcels under a Williamson Act contract (DOC 2018). Additionally, the Project site nor the surrounding area contain forestland or timberland. Therefore, impacts associated with agricultural and forestry resources would not occur.

5.5.2 Biological Resources

Under the existing conditions, the Project site is developed with paved surfaces and buildings, with no native or naturalized vegetation communities present (Google 2020). A limited amount of landscaped areas is located within the Project site and adjacent to the public rights-of-way, consisting of small areas of ornamental trees, shrubs, and turf. This vegetation is ornamental in nature, entirely surrounded by urban development, and does not form a cohesive plant community that would provide quality suitable habitat for candidate, sensitive or special status wildlife species, or would support wildlife movement. According to the City's General Plan, the native vegetative cover throughout the City has been displaced by urban structures, and the primary vegetation now consists of domesticated species, including lawn grasses, ground covers, shrubs, and trees, planted for their ornamental qualities (City of El Segundo 1992). Historic aerial imagery of the Project site indicates that the Specific Plan area and surrounding area has been developed from since at least 1963 (Nationwide Environmental Title Research 2020).

Special-Status Species

Relevant databases that contain information on candidate, sensitive, and/or special status species include the California Department of Fish and Wildlife's California Natural Diversity Database (CDFW 2020); the California Native Plant Society's Inventory of Rare and Endangered Plants (CNPS 2020); and the U.S. Fish and Wildlife Services Information for Planning and Consultation (IPaC) Database (USFWS 2020a). The results of these queries included 68 special-status plant species and 54 special-status wildlife species have recorded occurrences in the U.S. Geologic Survey's Venice, California 7.5-minute topographic quadrangle, which contains the Project site, and surrounding quadrangles. Appendix L, Biological Resources, includes a table of the special status plant and wildlife species with known occurrences within the Project region, as well as an assessment of their potential to occur on the Project site and the results of the California Natural Diversity Database, California Native Plant Society Inventory, and IPaC. As shown in the tables, the Project site does not have the potential to contain any special status plant or wildlife species since suitable habitat is not present on site or adjacent to the Project site. The buildings on site and in the vicinity are relatively new and maintained/occupied structures and would provide

little to no value to roosting bats. No critical habitat has been designated that contains the Project site or adjacent areas (USFWS 2020a). No impacts would occur.

Riparian Habitat/Sensitive Natural Communities

The Project site is developed with paved surfaces and buildings, with no native or naturalized vegetation communities present. No riparian or wetland features are present to support riparian habitat (USFWS 2020b). No impacts would occur.

Wetlands

No wetlands or other jurisdiction waters are within the Project site (USFWS 2020b). Water from rainfall flows across the impervious surfaces found on the Project site and enter the municipal stormwater system. No impacts would occur.

Wildlife Movement/Use of Nursery Sites

There are no on-site drainages or ponds that may serve as habitat for fish species. The Project site is developed and surrounded by developed area, and it does not reside within any designated wildlife corridors and/or habitat linkages identified in the South Coast Missing Linkages analysis project (South Coast Wildlands 2008) or California Essential Habitat Connectivity project (Spencer et al. 2010), so the Project would not affect the movement of any native resident or land-based wildlife species, nor would it affect established native resident or migratory wildlife corridors.

Ornamental vegetation located on the Project site could provide suitable nesting habitat for some urban-adapted bird species. All development activities are subject to the requirement to protect nesting birds, in compliance with the Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits the accidental or “incidental” taking or killing of migratory birds. The Project would be required to comply with the Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code by preventing the disturbance of nesting birds during Project construction activities. This would generally involve clearing the Project site of all vegetation outside the nesting season (from September 1 through January 31) or if construction would commence within the nesting season (which generally runs from February 1 through August 31 and as early as February 1 for raptors), conducting a pre-construction nesting bird survey to determine the presence of nesting birds or active nests at the Project site. Any active nests and nesting birds must be protected from disturbance by construction activities through buffers between nest sites and construction activities. The buffer areas may be removed only after the birds have fledged. No impacts would occur.

Conflict with Biological Resources Protection Policies and Ordinances

Any development activities conducted pursuant to the Specific Plan would be required to comply with all applicable requirements set forth by the City, including the City’s street tree regulations as set forth in Chapter 3, Street Trees (Section 9-3-6) of the City’s Municipal Code. Compliance with City policies related to trees and landscaping are discussed in Section 4.1, Aesthetics, of this Draft EIR. No impacts would occur.

Conflict with Habitat Conservation Plan/Natural Community Conservation Plan

The Project site is located in a highly urbanized area, and there is no adopted Habitat Conservation Plan or Natural Community Conservation Plan for the site or the surrounding area. No conflict with a Habitat Conservation Plan or Natural Community Conservation Plan would occur with the Project. No impacts would occur.

Therefore, impacts associated with biological resources would be less than significant and would not require further evaluation in the Draft EIR.

5.5.3 Mineral Resources

There are no oil wells or oil/mineral extraction activities on the Project site (CalGEM 2020). Current on-site land uses do not allow for oil/mineral extraction. According to the Department of Conservation's Mineral Lands Classification map, the City is within the Mineral Resources Zone-3, which is characterized as areas containing mineral deposits of significance, which cannot be evaluated from available data (DOC 1979). Ordinarily, classification of a mineral deposit as MRZ-2a or MRZ-2b by the State Geologist will constitute adequate evidence that an area contains significant mineral deposit; thus, the Project would not result in the loss of mineral resources of known importance to the state (DOC 2002). Although the El Segundo Oil Field underlies the City, production has declined since 1967 and only five wells continue to produce oil resources (City of El Segundo 1992). Therefore, the Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on the local general plan or other land use plan. Thus, impacts associated with mineral resources would not occur.

5.5.4 Wildfire

The Project site is in a highly urbanized area and is not within a Very High Fire Hazard Severity Zone and would not exacerbate or expose people or structures to wildfire risks or substantially impair an adopted emergency response plan. Based on the CAL FIRE's Fire Hazard Severity Zones maps (CAL FIRE 2020), the entire City, including the Project site, is not located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones. Therefore, impacts associated with wildland fire would not occur.

5.6 References

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6 Alternatives

This chapter describes and evaluates alternatives to the Pacific Coast Commons Specific Plan (Specific Plan or Project). This chapter 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 CEQA Guidelines Section 15126.6(e)(2).

6.1 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 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, with the exception of conflicts related to exceedance of population growth projections in the applicable Air Quality Management Plan (AQMP). Consistent with CEQA, the analysis presented in this chapter considers a reasonable range of alternatives to the proposed Project and evaluates their comparative environmental impacts. The selection of alternatives and their discussion must “foster informed decision making and public participation” (14 CCR 15126.6[a]). Therefore, this chapter identifies potential alternatives to the proposed 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 6.2, Project Objectives) or reduces the severity of significant environmental effects pursuant to CEQA (California Public Resources Code, Section 21081; see also 14 CCR 15091).

This Draft EIR includes the analysis of three alternatives to the proposed Project:

- Alternative A – No Project/Existing Development
- Alternative B – Reduced Development Alternative: Exclusion of PCC–North
- Alternative C – Reduced Development: Reduce 1 Level from PCC-South and PCC-North

6.2 Project Objectives

CEQA Guidelines Section 15124 requires an EIR to include a statement of objectives sought by the Project. The objectives assist the City of El Segundo (City) in developing a reasonable range of alternatives to be evaluated in the EIR. The Project's specific objectives are as follows:

1. Provide for comprehensive site planning that maintains the existing hotel uses while providing for a mixed-use multiple-family and commercial neighborhood that is compatible with the surrounding land uses.
2. Provide for additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City's General Plan.
3. Improve the jobs/housing balance in the City of El Segundo, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees.
4. Enhance vehicular circulation through intersection improvements and street widening.
5. Facilitate a safe and walkable community along Pacific Coast Highway by providing a mix of land uses, including commercial at the street-level with residential uses above.
6. Increase the efficient use of land by eliminating surface parking lots and providing parking garages that allow for sharing among hotel, commercial, and residential land uses.
7. Reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City's downtown.

6.3 Significant and Unavoidable Impacts

The proposed Project would result in a significant and unavoidable impact related to the potential for the proposed Project to conflict with an Air Quality Management Plan (AQMP). As described in Section 4.2, Air Quality, the Project site is located within the South Coast Air Basin (SCAB), under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD administers the AQMP for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards and National Ambient Air Quality Standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP:

- Consistency Criterion No. 1: The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
- Consistency Criterion No. 2: The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

The proposed Project would not exceed the SCAQMD criteria air pollutant mass thresholds and would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations; thus, the proposed Project would not conflict with Consistency Criterion No. 1. However, the proposed Project would result in population growth that would exceed the population growth anticipated for the City in SCAG's regional growth forecast, and therefore conflict with Consistency Criterion No. 2. Although the Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]) is the most recent RTP/SCS, the SCAQMD is still in the early stages of updating its AQMP (anticipated to be released in 2022). Therefore, the SCAG 2016 RTP/SCS and associated Regional Growth Forecast would be applicable in this analysis of the potential to

conflict with the SCAQMD 2016 AQMP, as required in Section 4.2, Air Quality. In the 2016 RTP/SCS, SCAG estimated 16,700 residents in the City in 2012 and 17,300 residents by 2040. The proposed Project's residential units would accommodate 618 individuals upon its occupancy in 2025. Considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, the proposed Project would result in a population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP. The proposed Project would therefore conflict with the applicable AQMP, which would result in a significant and unavoidable impact. There is no feasible mitigation measure for population growth; therefore, this impact would be significant and unavoidable.

6.4 Alternatives Considered and Eliminated During the Project Planning Process

CEQA Guidelines Section 15126.6(c) recommends that an EIR identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons for their rejection. Among the factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in an EIR are failure to meet most of the basic objectives of a project, infeasibility, or inability to avoid significant environmental impacts.

With respect to the feasibility of potential alternatives to a project, CEQA Guidelines Section 15126.6(t)(l) states the following:

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

In determining an appropriate range of Project alternatives to be evaluated in this EIR, a number of possible alternatives were initially considered and then rejected. One alternative for the Project was considered, but ultimately rejected from further analysis in the Draft EIR, consistent with Section 15126.6(c) of the CEQA Guidelines. A description of the potential alternative considered, but not carried forward, and the rationale for rejection is provided below.

Alternative Location

Pursuant to Section 15126.6(f)(2) of the CEQA Guidelines, the City considered the potential for alternative locations to the Project. As stated in Section 15126.6(f)(2)(A), the key question and first step in analyzing alternative sites is whether any of the significant effects of a project would be avoided or substantially lessened by putting that project in another location. Only locations that would avoid or substantially lessen any of the significant effects of a project need to be considered in the EIR. There are no significant and unavoidable impacts associated with the proposed Project that relate to the location of the Project site, and development of the Project on another site in the City is not likely to lessen or avoid the environmental impacts that required mitigation, as further explained below.

The Project's proposed location is in an area of the City surrounded by a variety of land uses, including residential, recreational, office, and commercial retail uses. The adoption of a Specific Plan would allow for the continued operation of the Fairfield Inn and Suites Hotel and Aloft Hotel, and the redevelopment of existing surface parking

lots, as well as the Fairfield Inn and Suites Hotel Food and Beverage Building (formerly the Hacienda Restaurant), for 263 residential units, 11,252 gross square feet of commercial/retail uses, and three new parking structures. The current General Plan designation for the Project site is General Commercial and Parking. The Project would result in a General Plan Amendment and Zone Text Amendment to allow for the proposed Specific Plan. Since the City is largely built-out, few available properties of similar size as the Project site exist for the proposed Project.

Development of the proposed Project on an alternate site would result in a similar construction scenario, similar quantities of criteria air pollutant emissions during construction, similar levels of construction noise, and similar levels of energy consumption. Due to the generally built-out nature of the City, it is likely that demolition of existing buildings and paved areas would be required. Additionally, because of the City's urban nature, mix of land uses, and the presence of a variety of sensitive receptors throughout the City, it is unlikely that an alternate site would be situated far enough from sensitive receptors to substantially lessen the air quality and noise impacts of the proposed Project during construction. Similarly, development at an alternate site would not necessarily reduce impacts to transportation and traffic, as the Project site is situated in an area surrounded by several transportation options and approximately 0.5 miles of the Metro C Line Mariposa Station.

Regardless of its location, the proposed Project would generally place similar demands on public services, utilities and services systems, and energy resources. With regard to the visibility and appearance of the Project, the aesthetic impact on the Project is largely related to its height and density, which would not substantially change at an alternative location. Additionally, the Project's commercial frontage intentionally fronts Pacific Coast Highway (PCH) while its residential uses are adjacent to existing residential uses along Indiana Street, which promotes a pedestrian-friendly interface on one of the City's most important thoroughfares.

Most sites within the City would be subject to similar geologic and geotechnical hazards. For these reasons, use of an alternative site would not likely result in a substantial reduction in the impacts of the Project. Additionally, the existing Fairfield Inn and Suites Hotel and Aloft Hotel would remain as non-conforming uses with the current General Plan and Zoning designations for the Project site if the Project is moved to an alternate location.

There are no known available sites within the City of an approximately equivalent size to the Project site that could be redeveloped with a mixed-use, hotel, commercial, and residential development. One of the factors for feasibility of an alternative is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." The Smoky Hollow Specific Plan area extends east to west and is bounded by Indiana Street and PCH to the east, downtown El Segundo to the west, the Chevron oil refinery to the south. In response to shrinking manufacturing demand, declining investment, and parking issues, the City adopted the first Smoky Hollow Specific Plan in 1986. The updated Smoky Hollow Specific Plan (City of El Segundo 2018) sets a regulatory and planning framework that focuses development efforts on revitalizing buildings for incubator industrial and office space. Although this Specific Plan area is intended to facilitate redevelopment, the land use regulations within the Smoky Hollow Specific Plan are focused on one- and two-story commercial and industrial development, the land parcels are small and land assemblage could be a major obstacle, and would generally be incompatible with the Project's residential uses. Additionally, slightly greater air quality, land use, and transportation (vehicle miles traveled) impacts could occur if the proposed Project was developed within the Smoky Hollow Specific Plan. For example, the proposed site is just over 0.5-mile from the Metro C Line, whereas the Smoky Hollow Specific Plan area is farther away, thereby reducing potential access to regional transit for the Project's 618 future residents (see Section 4.11, Population and Housing).

Furthermore, construction of the Project on an alternative site may not be consistent with the City's land use plans and policies. While the Project is requesting the approval of a General Plan Amendment (No. GPA 19-01) to change

the Land Use Designation from “General Commercial” and “Parking” to “Pacific Coast Commons Specific Plan (PCCSP)” with an accompanying Land Use map change, it is nevertheless located on a site where such changes are shown by City policy to be a desirable outcome. The Project is specifically being developed on a site where the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties are non-conforming uses. While the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties are allowed in the existing General Commercial (C-3) Zone, both have existing Conditional Use Permits, as the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. Through the implementation of the Specific Plan, these two hotels would be brought into full conformity with the land use designation and zoning for the Project site. As previously mentioned, the Project site is proposed with commercial uses fronting PCH, while its residential uses are adjacent to existing residential uses. This design appropriately places multi-family development in a manner that preserves existing residential neighborhoods and provides economic opportunity. Development of the Project on another site along PCH, which could provide a similar transition from the City’s offices to the east and residential uses to the west, would not be feasible because no sites are under control by the Project applicant. Additionally, other sites along PCH may not be considered by the City to be appropriate for increased height and density. The City did consider a parcel located near PCH and Rosecrans Avenue between The Pointe Shopping Center and Plaza El Segundo. However, the parcel is between two sets of railroad tracks and is contaminated due to historic heavy industrial uses. Further, the former owner, Chevron, recorded restrictions on most of the properties in this area to prohibit residential and hotel uses.

The proposed Project would not result in any significant unavoidable environmental impacts related to the Project’s location. As such, moving the Project to a different site would not avoid or substantially lessen the significant unavoidable impact of the Project as it relates to population growth that exceeds SCAG’s projections. As a result, the consideration to locate the Project in an alternate location, including within the Smoky Hollow Specific Plan and near the vicinity of The Pointe Shopping Center, was rejected and is not further analyzed in this Draft EIR.

6.5 Alternatives Selected for Further Analysis

This section discusses a reasonable range of alternatives to the proposed Project, including a no project alternative in compliance with CEQA Guidelines Section 15126.6(e). These alternatives include the following:

- Alternative A – No Project/Existing Development
- Alternative B – Reduced Development Alternative: Exclusion of PCC–North
- Alternative C – Reduced Development: Reduce 1 Level from PCC-South and PCC-North

Pursuant to Section 15126.6(d) of the CEQA Guidelines, each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Each alternative is also evaluated to determine whether the Project objectives would be substantially attained.

6.5.1 Alternative A – No Project/Existing Development

Alternative Description

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate the specific alternative of “no project” along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving a proposed project. As specified in Section 15126.6(e)(3)(A), when a project is the revision of an existing land use or regulatory plan or policy or an ongoing operation, the no project alternative will be the continuation of the plan, policy, or operation into the future. Therefore, the no project alternative, as required by the State CEQA Guidelines, would analyze the effects of development consistent with implementation of the City of El Segundo General Plan.

As shown in Figure 2-3, Project Site General Plan Designation, in Chapter 2, Environmental Setting, of this Draft EIR, the City’s General Plan identifies the portion of the site that is south of Mariposa Avenue as General Commercial and the portion to the north of Mariposa Avenue as Parking. As shown in Figure 2-4, Project Site Zoning, in Chapter 2, the zoning for the Project site corresponds to the designations of General Commercial (C-3) and Parking (P). According to the City’s General Plan, the General Commercial designation permits all retail uses, including hotel uses, and major medical facilities, at a maximum floor area ratio (FAR) of 1.0. Office uses are not permitted except for those providing personal services not exceeding 5,000 square feet such as travel and insurance agents (City of El Segundo 1992). The City’s General Plan parking designation permits areas for parking automobiles, motorcycles, and bicycles in surface or structured parking (City of El Segundo 1992). While the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties are allowed in the existing General Commercial (C-3) Zone, both have existing Conditional Use Permits, as the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. The Aloft Hotel is 98,741 net square feet in size with an existing 0.992 FAR based upon its current lot size and configuration where a maximum of 1.0 FAR is allowed. The three buildings that comprise the Fairfield Inn and Suites Hotel total 190,026 net square feet in size with an existing 1.94 FAR where 1.0 FAR is allowed (existing legal, non-conforming condition). Both properties are non-conforming in regard to many development standards as they were built prior to the current development standards of the General Commercial (C-3) Zone. Further, no further intensification of the land uses could occur with the current FAR standards. Therefore, the continuation of the City’s General Plan would not allow for additional development to occur.

Section 15126.6(e)(3)(B) further states that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, Alternative A assumes the proposed Project would not proceed, no new permanent development or land uses would be introduced within the Project site, and the existing environment would be maintained. The existing uses would continue to operate as they do currently. The existing hotel uses would remain in place and operational, the existing surface parking lots would be retained, no new buildings or parking garages would be constructed, no on-site landscaping improvements would occur, and no intersection improvements would occur.

Ability to Meet Project Objectives

1. Provide for comprehensive site planning that maintains the existing hotel uses while providing for a mixed-use multiple-family and commercial neighborhood that is compatible with the surrounding land uses.

Alternative A would not satisfy this Project Objective. Alternative A would maintain the existing hotel uses but would not provide comprehensive site planning that also provides for a mixed-use multiple-family and commercial neighborhood that is compatible with the surrounding land uses.

2. Provide for additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City's General Plan.

Alternative A would not satisfy this Project Objective. Alternative A would not provide for additional housing opportunities, and therefore, would not provide a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City's General Plan.

3. Improve the jobs/housing balance in the City of El Segundo, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees.

Alternative A would not satisfy this Project Objective. Alternative A would not provide new buildings for the Project site and thus, would not allow for the development on new housing. The existing hotel uses, and surface parking lots on-site would not achieve the objective of improving the jobs/housing balance in the City of El Segundo, helping address the regional housing shortage, and supporting and retaining existing businesses by providing needed housing for employees.

4. Enhance vehicular circulation through roadway intersection improvements and street widening.

Alternative A would not satisfy this Project Objective. Alternative A would not improve the eastbound lane of Mariposa Avenue at PCH from one left lane and one through-right lane to one left, one through, and one right-turn lane. Therefore, Alternative A would not enhance vehicular circulation through roadway intersection improvements and street widening.

5. Facilitate a safe and walkable community along Pacific Coast Highway by providing a mix of land uses, including commercial at the street-level with residential uses above.

Alternative A would not satisfy this Project Objective. Alternative A would not result in landscaping or streetscape improvements on-site, nor would introduce retail uses at the pedestrian-scale along PCH. Therefore, Alternative A would not facilitate a safe and walkable community along PCH.

6. Increase the efficient use of land by eliminating surface parking lots and providing parking garages that allow for sharing among hotel, commercial, and residential land uses.

Alternative A would not satisfy this Project Objective. Alternative A assumes the existing hotel uses and surface parking lots would remain. Therefore, no new buildings, which would allow for the efficient use of land by eliminating surface parking lots and providing parking garages that allow for sharing among hotel, commercial, and residential land uses, would be built.

7. Reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City's downtown.

Alternative A would not satisfy this Project Objective. Alternative A assumes the existing hotel uses and surface parking lots would remain; thus, Alternative A would not reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City's downtown.

Comparison of the Effects of Alternative A to the Project

Aesthetics

Alternative A analyzes the effects of continued operations of the Project site. Since no changes would occur under Alternative A, the existing hotel uses to the south of Mariposa Avenue would not be developed under Alternative A and would continue to be inconsistent with the zoning and General Plan designation. The surface parking lots to the north of Mariposa Avenue and to the south of the Aloft Hotel would not be developed and would continue to operate as they currently do.

Alternative A would not introduce new sources of shade/shadow to nearby residential uses; although the limited duration of shadows produced by the proposed Project would be less than significant. Alternative A would not introduce new sources of glare and light to the Project site and surrounding area. However, the City's Zoning Ordinance and the General Plan policies require new development to avoid glare impacts and be considerate of light trespass on adjacent residential neighborhoods. Thus, the proposed Project impacts related to light, and glare would be less than significant. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative A would result in no shade/shadow and light/glare impacts, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Air Quality

Short-Term Impacts: Alternative A would not alter the existing condition of the Project site or require any construction activities, and, therefore, would not result in any construction emissions associated with construction worker and construction truck traffic, or the use of heavy-duty construction equipment. As such, construction-related regional and localized air quality impacts would not occur and Mitigation Measure (MM-)AQ-1 related to construction-related emissions would not be required. Therefore, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative A, operations and operational emissions would remain in the current condition, whereas the proposed Project would generate additional emissions of criteria pollutants. With regard to operational cumulative impacts associated with nonattainment pollutants, in general, if a project is consistent with the community and/or general plans, it has been accounted for in the attainment demonstration contained within the state implementation plan and would therefore not cause a cumulatively significant impact on the ambient air quality. Under Alternative A, the existing hotel uses would continue and would not result in additional employees or residents to the Project site. Accordingly, the proposed Project would not result in a cumulatively considerable contribution to the nonattainment pollutants in the South Coast Air Basin. Nonetheless, Alternative A would result in fewer operational emissions as no new development would occur. Therefore, operational impacts on air quality under this alternative would be less than those anticipated from the proposed Project.

Because Alternative A would not result in the generation of new residences, and would therefore not result in population growth that would exceed regional projections included in SCAQMD's AQMP, Alternative A would **eliminate the significant and unavoidable** impact associated with the proposed Project's conflict with the applicable AQMP.

Cultural Resources

The buildings located at 525 Sepulveda Boulevard (Assessor's Parcel Number 4139-025-091) are not considered eligible for the National Register of Historic Places, California Register of Historical Resources, or City designation

due to a lack of significant historical associations, architectural merit, and physical integrity. Therefore, this property is not considered a historical resource for the purposes of CEQA. Under Alternative A, there would be no demolition of existing structures and no impact to historic resources, similar to the proposed Project.

Alternative A would not impact culturally significant resources because no ground disturbance would occur on the Project site. The Project site would remain as is and potential construction impacts (including ground-disturbing activities such as grading or other earthwork) that could result in disturbance of previously unknown resources, would not occur. Therefore, MM-CUL-1 would not be applicable to Alternative A for the unanticipated discovery of archaeological resources. 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. Although the proposed Project would comply with Section 7050.5 of the California Health and Safety Code, if human remains are found, Alternative A would result in no potential impacts to human remains because no construction would occur. Mitigation requirements set forth in Section 4.3, Cultural Resources, would not be required under Alternative A. Therefore, impacts under this alternative would be **less than** those anticipated from the proposed Project.

Energy

Short-Term Impacts: Under Alternative A, there would be no construction activity and no temporary use of electricity, natural gas, and petroleum. Therefore, short-term impacts under this alternative would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: The natural gas and electricity usage would not increase under Alternative A when compared to the existing condition. Although the proposed Project would be constructed in compliance with applicable regulations governing energy efficiency, Alternative A would not increase energy use at the Project site. Although the proposed Project would have no significant impacts on energy, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Geology and Soils

Alternative A would not result in erosion or loss of topsoil because no ground disturbance would occur on the Project site. The Project site would remain as is and potential construction impacts (including grading, excavations, and trenching) that could risk potential disturbance of paleontological resources, would not occur. Therefore, MM-GEO-1 would not be applicable under Alternative A. Alternative A would not introduce new development to the Project site, and therefore, would not introduce new structures to potential geologic hazards. Mitigation requirements set forth in Section 4.5, Geology and Soils, would not be required under Alternative A. Therefore, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Greenhouse Gas Emissions

Short-Term Impacts: Alternative A would not alter the existing condition of the Project site or require any construction activities, and, therefore, would not generate any short-term construction-related greenhouse gas (GHG) emissions. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative A would result in no short-term impacts to GHG emissions, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative A, operations and operational emissions would remain the same as in the current condition. Under the proposed Project, operational conditions would be greater than that of existing conditions. However, the proposed Project would be consistent with the City’s Climate Action Plan and no mitigation measures are required. Under Alternative A, the Project site would remain in its existing condition and the potential benefits of the proposed Project related to providing new living and working opportunities in close proximity to transit would not occur. No significant impacts would result and no mitigation was required for the proposed Project. Alternative A would have no long-term impact on GHG emissions; therefore, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Hazards and Hazardous Materials

Short-Term Impacts: Under Alternative A, there would be no construction activity and no potential use or release of hazards and hazardous materials resulting from demolition and construction would occur. Alternative A would not result in the demolition of the Fairfield Inn and Suites Hotel Food and Beverage Building, where asbestos-containing materials are present, and lead-based paint and universal wastes are likely present. Alternative A would not result in grading or trenching at Pacific Coast Commons – North (PCC-North), which has the potential for soil contamination due to the adjacent 76 gasoline service station. Therefore, Alternative A would not require implementation of MM-HAZ-1 and MM-HAZ-2 to reduce short-term construction impacts to less than significant. Further, Alternative A would not require partial right-of-way closures, and thus, a traffic control plan would be submitted in accordance with MM-TRA-1 would not be required to reduce impacts as would occur under the proposed Project. Mitigation requirements related to short-term construction set forth in Section 4.7, Hazards and Hazardous Materials, would not be required under Alternative A. Therefore, short-term impacts related to hazards and hazardous materials under this alternative would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative A, operations would remain the same as in the current condition. Although the proposed Project would not create a significant long-term hazard to the public or the environment, the proposed Project would increase routine transport, use, and disposal of hazardous materials and/or wastes on the Project site compared to the existing conditions under Alternative A. Therefore, operational impacts on hazards and hazardous materials under Alternative A would be **less than** those anticipated from the proposed Project.

Hydrology and Water Quality

Short-Term Impacts: Alternative A would not alter the existing condition of the Project site or require any construction activities, and, therefore, would not generate any short-term construction-related hydrology or water quality impacts. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative A would result in no short-term impacts to hydrology and water quality, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative A, the operational state would remain the same as in existing conditions and there would be no increase in water demand nor alterations to existing water drainage systems. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative A would result in no long-term impacts to hydrology or water quality, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Land Use and Planning

Alternative A would allow for the continued operations of the Project site, which currently contains non-conforming land uses. Since no changes would occur under Alternative A, the existing hotel uses to the south of Mariposa Avenue would not be developed in accordance with a Specific Plan under Alternative A and would continue to be inconsistent with the zoning and General Plan designation. The surface parking lot to the north of Mariposa Avenue would not be developed and would continue to operate as it currently does, which is consistent with the zoning and General Plan designation. Therefore, the continuation of existing development on the Project site, proposed as part of Alternative A, would result in the continuation of allowable non-conforming uses. The proposed Specific Plan would allow for the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties to be brought into compliance with Specific Plan by designating these uses as Commercial-1 (COM-1) and Commercial-2 (COM-2), respectively.

In addition, Alternative A would not redevelop underutilized areas and construct a mix of land uses including residential and commercial, which would help the City to achieve its goals and policies related to land use, circulation, economic development, and housing. As previously mentioned, the proposed Project provides a Specific Plan to guide development of the Project site in a manner that would be consistent with the proposed zoning and General Plan regulations. Under Alternative A, the Project site would remain in its existing condition and the potential benefits of the proposed Project related to providing new living and working opportunities in close proximity to transit would not occur. The Project site is just over 0.5 miles from the nearest Metro C Line station (Mariposa Station), which would encourage alternative modes of transportation to an automobile for the proposed residents of the Project. Further, the proposed Project would provide new housing construction in accordance with policies in the General Plan. Although Alternative A would not result in land use impacts, impacts under Alternative A would be **greater than** those anticipated from the proposed Project.

Noise

Short-Term Impacts: Alternative A would not involve construction that could result in noise from the temporary use of heavy-duty construction equipment or generation of construction traffic, including worker and haul truck trips to the Project site. The proposed Project would generate noise from construction that is anticipated to exceed the City's hourly threshold of 65 dBA L_{eq} at the existing nearest residential properties to the west, and impacts are potentially significant without mitigation; therefore, MM-NOI-1 would be required. Construction vibrations generated by the proposed Project would be less than significant, but would still be greater than would occur under Alternative A. Mitigation requirements set forth in Section 4.10, Noise, would not be required under Alternative A. Because Alternative A would result in no short-term impacts to noise, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative A, the operational state would remain the same as in existing conditions. Although the addition of proposed Project traffic to the roadway network would result in a discernable increase in noise and noise impacts from increase stationary operational noise would have less than significant impacts, there would be no additional on- or off-site noise resulting from Alternative A. Therefore, operational impacts on noise under this alternative would be **less than** those anticipated from the proposed Project.

Population and Housing

Alternative A would not generate part-time and full-time jobs associated with construction, because no construction would occur, whereas the proposed Project would require a temporary construction workforce. Under Alternative A, no change from the existing conditions would occur, and therefore, no population growth or new residential units

would result as part of implementing Alternative A. Comparatively, the proposed Project would result in population growth from the proposed 263 residential units and an increase in employment opportunities within the City. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative A would result in no impacts to population growth, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Public Services and Recreation

Alternative A would not alter the existing condition of the Project site or require any construction activities, and, therefore, would not generate increased demand for fire protection and emergency medical services and police protection services. The construction activities associated with the proposed Project have the potential to temporarily impact emergency vehicle access to the Project site. To ensure adequate safeguards for vehicular circulation and emergency vehicle access during short-term construction activities, MM-TRA-1 is required. Because Alternative A would not result in construction activities, MM-TRA-1 would not be required.

Alternative A would not result in changes to existing uses on the Project site. While the Project site currently places some demand on fire protection and emergency medical services and police protection services due to the occupied hotel uses, the proposed Project would increase demands relative to existing conditions. Additionally, Alternative A would not result in development, and therefore, it is not anticipated to generate demand for schools, parks, and other public services. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative A would result in no impacts to public services and recreation, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Transportation

Short-Term Impacts: Alternative A would not generate short-term traffic or transportation impacts because no construction would occur. Construction activities associated with the proposed Project have the potential to temporarily impact emergency vehicle access to the Project site. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, MM-TRA-1 is required. Because Alternative A would not generate construction traffic, MM-TRA-1 would not be required. Therefore, short-term impacts to transportation under this alternative would be **less than** those anticipated from the proposed Project. Mitigation measures set forth in Section 4.13, Transportation, would not be required under Alternative A.

Long-Term Impacts: Under Alternative A, the operational state would remain the same as in existing conditions, whereas the proposed Project characteristics (e.g., mixed land uses, infill development, its proximity of nearby destinations, pedestrian and bicycle connections) would encourage localized trips and trips made by walking, biking, carpool, or transit. Thus, the vehicle miles traveled (VMT) per capita would be reduced from 14.2 under the existing conditions to 10.9 with the proposed Project (see Table 4.13-3 in Section 4.13, Transportation).

Alternative A would not conflict with an existing program, plan, ordinance, or policy addressing the circulation system. However, Alternative A would not further the goals and policies of the General Plan, as summarized in Section 4.9, Land Use and Planning, or further the goals of the City's Climate Action Plan, as summarized in Section 4.6, Greenhouse Gas Emissions. The proposed Project would redevelop underutilized areas and construct a mix of land uses including residential and commercial, which would help the City to achieve its goals and policies to increase density, increase use of transit services, and creating a pedestrian-friendly environment along PCH with proposed retail.

Although the Alternative A would not result in new trip generation, it would not further the goals of the City's General Plan and Climate Action Plan related to the circulation system. Additionally, with the proposed Project, it would improve VMT within the City because the anticipated per capita VMT under the proposed Project is less than the existing conditions. Therefore, impacts under Alternative A would be **greater than** those anticipated from the proposed Project.

Additionally, under the level of service (LOS) analysis provided for informational purposes, four of the 16 study intersections currently operate at LOS E or worse during the AM or PM peak periods. These same four intersections are projected to continue to operate at LOS E or worse during the AM or PM peak period with the addition of Project traffic. Therefore, under both Alternative A and the proposed Project, these intersections would operate at LOS E or worse during AM or PM peak periods. Similarly, under future conditions, five study intersections projected to operate at LOS E or worse during the AM or PM peak periods under Future Base conditions would continue to operate at LOS E or worse during the AM or PM peak period with the addition of Project traffic. Therefore, the same five study intersections would operate at LOS E or worse during AM or PM peak period under Alternative A and the proposed Project. Additionally, Alternative A would not include the Project improvement to Mariposa Avenue and PCH, which would improve the LOS at Mariposa Avenue and PCH for both the Existing plus Project and Future plus Project scenario.

Tribal Cultural Resources

Alternative A would not impact culturally significant tribal cultural resources because there would be no ground-disturbing activities, therefore, MM-TCR-1 would not be required. Because this alternative would not affect tribal resources, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

Utilities and Service Systems

Alternative A would not result in changes to the existing condition, and therefore, would not result in an additional demand for potable water, generation of wastewater, or generation of solid waste. Alternative A would not require the construction of new water or sewer or stormwater distribution infrastructure (e.g., pipes, valves, meters) and as such, would not result in the expansion or construction, expansion, or relocation of water, wastewater, or stormwater. The proposed Project would result in an intensification of use on-site, which requires additional dry utilities including telecommunication and cable facilities, whereas development under Alternative A would not. Although no mitigation was required under the proposed Project, because Alternative A would not affect utilities and service systems, impacts under Alternative A would be **less than** those anticipated from the proposed Project.

6.5.2 Alternative B – Reduced Development Alternative: Exclusion of PCC – North

Alternative Description

CEQA requires that 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[a]). As presented in prior sections of this EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures, with the exception of conflicts related to exceedance of population growth projections in the applicable Air Quality Management Plan (AQMP). As such, Alternative B proposes a

reduction in the Project to eliminate the significant impacts related to population growth projections and the AQMP, as well as lessen the proposed development intensity by eliminating PCC-North from the Specific Plan boundaries.

As previously discussed in Section 4.11, Population and Housing, the Southern California Association of Government's (SCAG) forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. Assuming 2.35 persons per household, the proposed Project's 263 residential units would accommodate 618 individuals at full occupancy of all units. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG's estimated projections through 2045 by 118 persons. Alternative B would not exceed SCAG's estimated projection through 2045.

As previously described in Section 4.2, Air Quality, considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, the proposed Project would result in a population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP. Thus, Alternative B would eliminate an adequate amount of residential units to eliminate this significant and unavoidable impact.

All mitigation measures required under the proposed Project would be implemented prior to or during Project construction for all sites, with the exception of MM-HAZ-1, which is specifically related to PCC-North. Therefore, Alternative B is proposed as a reduced development alternative to exclude PCC-North.

Under Alternative B, there would be no development north of Mariposa Avenue, which is included in the proposed Specific Plan as PCC-North. The Specific Plan would be prepared under Alternative B, excluding PCC-Mixed Use 2 (PCC-North) from the land use district. The PCC-North property would remain surface parking lot and no changes to the general plan land use designation or zoning would occur for that area.

Under Alternative B, there would be two phases of Project construction, similar to the proposed Project; however, Phase 2 would only involve construction of PCC-South, rather than PCC-South and PCC-North overlapping. Alternative B would include development of one multi-level parking garage, 120 residential units, and 5,756 square feet of commercial at PCC-South, and one multi-level parking garage and 3,273 square feet of commercial at PCC-Fairfield Parking, for a total of 120 units and 9,029 square feet of commercial, in addition to the continuation of the existing two hotels, as under the proposed Project.

Phase 1 for PCC-Fairfield Parking would include a five-level parking garage (65 feet in height) with commercial/retail on a portion of the ground floor fronting PCH, as set forth in the proposed Project. During Phase 1, all hotel guests would continue to park at surface parking lots north of Mariposa Avenue (PCC-North), which includes 232 parking spaces, as well as the parking lot north of Holly Avenue, which includes 165 parking spaces, for a total of 397 spaces. This would accommodate the peak parking demand at full occupancy for both hotels of 352 parking spaces (see Appendix J-2). Once Phase 1 is completed, parking for the Fairfield Inn and Suites Hotel would move from PCC-North to the newly constructed garage at PCC-Fairfield Parking, which would include 215 replacement parking spaces for the Fairfield Inn and Suites Hotel and would be shared between the hotel and the commercial/retail uses. The 215 spaces from PCC-Fairfield Parking plus the 165 parking spaces at the surface parking lot for the Aloft Hotel, totaling 380 parking spaces, would provide adequate parking for the 352 hotel spaces and 28 spaces for the proposed 3,273 square feet of commercial at PCC-Fairfield Parking.

Phase 2 of development would include the construction of eight levels of parking garage (i.e., two levels of subterranean and six levels above ground) located behind the commercial/retail uses and adjacent to the existing Aloft Hotel and fronting PCH, as set forth in the proposed Project. During Phase 2, the Aloft Hotel would remain in

operation and hotel patrons would park at the PCC-North lot (232 parking spaces), which could more than accommodate the demand of 145 vehicles at full hotel occupancy (Appendix J-2). Once Phase 2 is completed, parking for the Aloft Hotel would move from PCC-North to the eight-level parking garage, which would provide a total of 336 parking spaces, including 165 spaces for the residential units, and 171 shared spaces. Based on the Shared Parking Analysis (Appendix J-2), the parking provided between the five-level parking garage at PCC-Fairfield Parking and the eight-level garage at PCC-South would be sufficient for the long-term operation of the proposed uses at both sites, in addition to the hotel parking.

Under Alternative B, the eastbound lane of Mariposa Avenue at PCH would be reconfigured in the same manner as the proposed Project, from one left lane and one through-right lane to one left, one through, and one right-turn lane.

Once operational, Alternative B would represent a reduction in proposed square footage, as well as a reduction in the overall footprint of Specific Plan area. As shown in Table 6-1, Alternative B would reduce the Specific Plan total development square footage from 622,398 square feet to 437,398 square feet, to be located only within PCC-South and PCC-Fairfield Parking.

Table 6-1. Alternative B – Specific Plan Land Use Summary

Proposed Land Use District	Location	Existing (Square Feet)		Proposed (Square Feet)				
		Hotel Rooms-	Hotel	Residential Units	Residential	Commercial	Lobby	Total
PCC Mixed-Use (PCC MU-1)	PCC-South	—	—	120	144,244	5,756	—	150,000
PCC Commercial (PCC COM-1)	Aloft Hotel	246	106,747	—	—	—	—	106,747
PCC Commercial (PCC COM-2)	Fairfield Inn and Suites Hotel	350	175,651	—	—	—	—	175,651
PCC Commercial (PCC COM-3)	PCC-Fairfield Parking	—	—	—	—	3,273	1,727	5,000
PCC Mixed-Use (PCC MU-2)	PCC-North	—	—	143	182,777	2,223	—	185,000
Proposed Project Totals		596	282,398	263	327,021	11,252	1,727	622,398
Alternative B (Minus PCC-North) Totals		596	282,398	120	144,244	9,029	1,727	437,398

The exclusion of the PCC-North property from the Specific Plan under Alternative B, and the fact that PCC-South and PCC-Fairfield Parking would provide for all parking requirements for the proposed Specific Plan land uses, would make the surface parking lot at PCC-North available for other potential future uses. Potential future uses, if any, would be based on market conditions would likely require a future General Plan Amendment and zone change; however, any future uses at PCC-North would be too speculative for evaluation in this Draft EIR (State CEQA

Guidelines Section 15145). Therefore, for the purposes of this analysis under Alternative B, it is assumed no changes to the PCC-North site would occur.

Ability to Meet Project Objectives

1. Provide for comprehensive site planning that maintains the existing hotel uses while providing for a mixed-use multiple-family and commercial neighborhood that is compatible with the surrounding land uses.

Alternative B would satisfy this Project Objective. Alternative B would maintain the existing hotel uses and would provide comprehensive site planning that provides for 120 residential units and 9,029 square feet of commercial development. Therefore, Alternative B would provide a mixed-use, multiple-family and commercial neighborhood that is compatible with the surrounding land uses through implementation of a Specific Plan.

2. Provide for additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City's General Plan.

Alternative B would satisfy this Project Objective. Alternative B would provide 144,244 square feet of residential uses, inclusive of studio apartments, one-bedroom units, and two-bedroom units, which would support the goals of the Housing Element to provide a variety of housing sizes, types, and densities.

3. Improve the jobs/housing balance in the City of El Segundo, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees.

Alternative B would satisfy this Project Objective. Alternative B would provide 120 residential units, which would aid in improving the jobs/housing balance in the City, helping to address the regional housing shortage, and providing needed housing for existing business employees.

4. Enhance vehicular circulation through intersection improvements and street widening.

Alternative B would satisfy this Project Objective. Alternative B would include Project improvements as Mariposa Avenue and PCH by reconfiguring the eastbound lane of Mariposa Avenue at PCH from one left lane and one through-right lane to one left, one through, and one right-turn lane. As described in Section 4.13, Transportation, this improvement would improve level of service at the Mariposa Avenue and PCH intersection. Therefore, Alternative B would enhance vehicular circulation through intersection improvements.

5. Facilitate a safe and walkable community along Pacific Coast Highway by providing a mix of land uses, including commercial at the street-level with residential uses above.

Alternative B would satisfy this Project Objective. Alternative B would include commercial/retail on the ground-floor of PCH, adjacent to the existing Aloft Hotel, which creates a mix of land uses that are within walking distance of one another. By locating retail along PCH, the Alternative B would facilitate a safe and walkable community.

6. Increase the efficient use of land by eliminating surface parking lots and providing parking garages that allow for sharing among hotel, commercial, and residential land uses.

Alternative B would partially satisfy this Project Objective. Alternative B would redevelop the surface parking lot associated with the Aloft Hotel (PCC-South) and would leave the PCC-North parking lot as is. The redevelopment of only one of the existing hotel surface parking lots under Alternative B would be less supportive of this objective than the proposed Project.

7. Reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City's downtown.

Alternative B would satisfy this Project Objective. Alternative B would reduce single-occupancy vehicle use by developing 120 units and 9,029 square feet of commercial development in close proximity to the Metro C Line and the City's downtown.

Comparison of the Effects of Alternative B to the Project

Aesthetics

Alternative B would result in similar impacts to aesthetics as analyzed in Section 4.1, Aesthetics; however, PCC-North would not be developed. Under Alternative B, the surface parking lots to the north of Mariposa Avenue would not be developed and would continue to operate as in the current condition. The existing hotel uses to the south of Mariposa Avenue would be brought into consistency with the zoning and General Plan designation through the Specific Plan described in Alternative B. Additionally, as with the proposed Project, Alternative B would require a Site Plan Review to allow the proposed site plan and architectural design for the implementation of new development. Therefore, Alternative B would not result in conflicts with applicable zoning and land use regulations governing scenic quality for the Project site. Potential impacts associated with light and glare would still occur, but would be slightly reduced due to the elimination of PCC-North and the associated reduction in the size of the Specific Plan as well as the elimination of the multi-level buildings under the proposed Project. However, the Specific Plan, City's Zoning Ordinance and the General Plan policies require new development to avoid glare impacts and be considerate of light trespass on adjacent residential neighborhoods. Therefore, similar to the proposed Project, impacts to aesthetics under Alternative B would be less than significant and no mitigation is required. Due to the reduction in the size of the Specific Plan as well as the reduction in development intensity, impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Air Quality

Short-Term Impacts: Because there would be less construction under Alternative B, there would be fewer construction emissions associated with construction truck traffic and the use of heavy-duty construction equipment. Under the proposed Project, MM-AQ-1 is required to reduce potentially significant impacts related to Toxic Air Contaminants during construction activities and it would continue to be required under Alternative B. Even though MM-AQ-1 would be required under Alternative B, because Alternative B would result in fewer short-term impacts to air quality due to the reduction in building construction, impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative B, the parcel north of Mariposa Avenue (PCC-North) would remain a surface parking lot, and thus, would result in no new operational emissions. The operational emissions associated with the PCC-South and PCC-Fairfield Parking under Alternative B would be the same as the proposed Project. With regard to operational emissions, Alternative B would result in fewer vehicle trips and would accordingly result in fewer pollutant emissions. Therefore, similar to the proposed Project, impacts to long-term air quality emissions under Alternative B would be less than significant and no mitigation is required. Alternative B would generate fewer vehicle trips and other operational emission from commercial activities, operational impacts on regional air quality under Alternative B would be less than those anticipated from the proposed Project.

In general, a project would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). Because Alternative B would result in less development when compared to the Project's 263 residential units and approximately 11,252 square feet of commercial use, Alternative B would generate less population growth. SCAG's forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. The proposed Project exceeds SCAG's estimated population projections through 2045 by 118 persons. The estimated 282 new residents under Alternative B would not exceed SCAG's population projections through 2045. The SCAQMD uses these growth forecasts for the development of the AQMP emissions inventory. Therefore, Alternative B would not exceed the population projections of 600 persons used in the development of the AQMP. Therefore, Alternative B would **eliminate the significant and unavoidable** impact associated with the proposed Project's conflict with the applicable AQMP.

Cultural Resources

Under Alternative B the earthwork associated with PCC-North would be avoided, while development of PCC-South and PCC-Fairfield Parking would continue to occur, including the excavations for the subterranean parking garage at PCC-South. Therefore, MM-CUL-1 related to the salvage and treatment requirements of potential archaeological resources would continue to be required under Alternative B. Similar to the proposed Project, there would be no impacts to historic resources, but potential impacts to archaeological resources could occur during construction of Alternative B. No prehistoric or historic burials were identified within the Project site as a result of the records searches. However, as with the proposed Project, Alternative B would comply with Section 7050.5 of the California Health and Safety Code, if human remains are found. As such, similar to the Project, impacts would be less than significant. Although Alternative B would avoid the removal of a parking lot, subsurface excavations into native soils and MM-CUL-1 would still be required. Therefore, impacts under Alternative B would be **the same as** those anticipated from the proposed Project.

Energy

Short-Term Impacts: Because there would be less construction activity under Alternative B due to the exclusion of PCC-North, there would be reduced demands for the temporary use of electricity and petroleum during construction. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative B would result in fewer short-term impacts related to energy, impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative B, development would not occur at PCC-North; therefore, the natural gas, electricity, and petroleum usage associated with Alternative B would be less than that of the proposed Project. Both Alternative B and the proposed Project buildings would be built in accordance with the current Building Energy Efficiency Standards (Title 24) at the time of construction, which include robust requirements for energy efficiency. Also, the provisions of the California Green Building Standards Code (CALGreen) apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure. Therefore, similar to the proposed Project, impacts to energy under Alternative B would be less than significant and no mitigation is required. Nonetheless, because Alternative B would generate reduced demands for energy resources, operational impacts under this alternative would be **less than** those anticipated from the proposed Project.

Geology and Soils

The 2019 edition of the California Building Code requires that all construction must be conducted in compliance with the structural design requirements governing seismically resistant construction, which would be applied under the proposed Project as well as Alternative B. With the incorporation of California Building Code procedures aimed at minimizing a project's contribution to geologic hazards, compliance with the City's Municipal Code requirements, and adherence to the measures set forth in the Project-specific geotechnical report, neither the proposed Project nor development under Alternative B would directly or indirectly cause substantial adverse effects involving strong seismic ground shaking, seismically-related ground failure, liquefaction, lateral spreading, subsidence, collapsible soils, or other geotechnical hazards.

Given the proximity of past fossil discoveries in the surrounding area and the potential for significant vertebrate fossils below any artificial fill present within the Project site, construction activities associated with Alternative B, such as the construction of a subterranean parking structure, could risk potential disturbance of paleontological resources. Therefore, MM-GEO-1 would be applicable to Alternative B for the preparation of a PRIMP, similar to the proposed Project. Therefore, impacts under this alternative would be **the same as** those anticipated from the proposed Project.

Greenhouse Gas Emissions

Short-Term Impacts: The reduction in new construction under Alternative B would result in less construction-related GHG emissions as compared to the proposed Project. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative B would result in fewer short-term GHG emissions, short-term impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: The operational emissions from PCC-South and PCC-Fairfield Parking would be the same under Alternative B as the proposed Project, although operational emissions from PCC-North would be eliminated. The proposed Project would be below the South Coast Air Quality Management District's GHG thresholds, and no mitigation measures are required, and the generation of GHGs under Alternative B would be further reduced. The residential and commercial uses associated with Alternative B would provide new living and working opportunities in close proximity to transit, and would meet all applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. Therefore, similar to the proposed Project, impacts to GHG emissions under Alternative B would be less than significant and no mitigation is required. However, Alternative B would result in fewer GHG emissions and meet similar goals related to constructing diverse land uses aimed at reducing single-occupancy vehicle use. Therefore, impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Hazards and Hazardous Materials

Short-Term Impacts: Alternative B would result in the demolition of the Fairfield Inn and Suites Hotel Food and Beverage Building, where asbestos-containing materials are present, and lead-based paint and universal wastes are likely present. Therefore, Alternative B would continue to require implementation of MM-HAZ-1 to reduce potential impacts from asbestos-containing materials, lead-based paint, universal wastes, and hazardous materials, similar to the proposed Project. Similarly, since construction would occur adjacent to PCH under Alternative B, construction could require partial right-of-way closures, and thus, a traffic control plan would be submitted in accordance with MM-TRA-1, as would occur under the proposed Project. However, Alternative B would not result in grading or trenching to PCC-North, which would have the potential for soil contamination due to the

adjacent 76 gasoline service station. Since no development would occur at PCC-North under Alternative B, MM-HAZ-2 would not be required to reduce potential soil contamination impacts to less than significant. Because Alternative B would reduce potential impacts associated with soil contamination without the need for mitigation measures, short-term impacts related to hazards and hazardous materials under this alternative would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Alternative B would develop PCC-South and PCC-Fairfield Parking, which could introduce new sources of hazardous materials to the Project site. However, both the proposed Project and Alternative B would be required to use and handle these substances in compliance with all applicable federal, state, and local health and safety laws and regulations, which would minimize health risk to the public associated with hazardous materials. Therefore, similar to the proposed Project, long-term impacts related to hazards and hazardous materials under Alternative B would be less than significant and no mitigation is required. Therefore, operational impacts related to hazards and hazardous materials under this alternative would be **the same as** those anticipated from the proposed Project.

Hydrology and Water Quality

Short-Term Impacts: During construction under Alternative B, water quality impacts could occur as a result of runoff over disturbed soils as well as leaks and spills from construction materials. Similar to the proposed Project, a Stormwater Pollution Prevention Plan would be prepared, which incorporates best management practices that protect stormwater runoff and ensure avoidance of substantial degradation of water quality. For both the proposed Project and Alternative B, compliance with existing regulations would prevent violation of water quality standards and minimize the potential for contributing sources of polluted runoff. Although no mitigation was required for short-term impacts to hydrology or water quality under the proposed Project, because there would be less construction under Alternative B, there would be less construction-related water quality impacts. Therefore, impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative B, the operational state of PCC-North would remain unchanged from current conditions. As such, no on-site landscaping or other low-impact-development features would be implemented to reduce run-off from the existing surface parking lot. Alternative B would develop PCC-South and PCC-Fairfield Parking and associated hydrologic features in the same manner as the proposed Project. Compliance with local and regional regulations, including requirements for implementation of low-impact-development features, would reduce the discharge of pollutants into receiving waters, during both Alternative B and Project operations. Similar to the Project, Alternative B is not located within an area identified for flood risk in the Federal Emergency Management Agency's Flood Insurance Rate Map. Alternative B is not expected to violate any water quality standards and measures would be taken throughout operation to prevent potential contaminants from being discharged from the site by runoff. Through compliance with low-impact-development features, Alternative B would not conflict with or obstruct implementation of the Los Angeles Regional Water Quality Control Board Basin Plan. Therefore, similar to the proposed Project, long-term impacts to hydrology and water quality under Alternative B would be less than significant and no mitigation is required. Because PCC-North would remain in a paved/developed condition under Alternative B, which would continue to contribute runoff and pollutants from urban uses into the storm system, impacts under Alternative B would be **the same as** those anticipated from the proposed Project.

Land Use and Planning

Alternative B would allow for the continued operations of the PCC-North site, which is consistent with the existing zoning and General Plan use. Alternative B would implement the Specific Plan to bring the currently legal non-conforming hotels into consistency with the zoning and General Plan designation. Therefore, the continuation of

existing development on PCC-North and redevelopment of PCC-South and PCC-Fairfield Parking, proposed as part of Alternative B, would not conflict with applicable zoning and land use regulations for the Project site.

In addition, Alternative B would redevelop underutilized areas and construct a mix of land uses including residential and commercial, which would help the City to achieve its goals and policies related to land use, circulation, economic development, and housing. As previously mentioned, the proposed Project provides a Specific Plan to guide development of the Project site in a manner that would be consistent with the zoning and General Plan regulations. Under Alternative B, the 120 residential units and 9,029 square feet of commercial use would be constructed instead of the 263 residential units and approximately 11,252 square feet of commercial use proposed as part of the Project. This would reduce the amount of residential and commercial uses associated that would provide new living and working opportunities in close proximity to transit, including the Metro C Line station (Mariposa Station). Nevertheless, Alternative B would provide new housing construction in accordance with the policies in the General Plan and the Specific Plan. Because both the proposed Project and Alternative B would achieve goals and policies of the City's General Plan in a manner that would reduce environmental impacts and no mitigation is required, impacts under Alternative B would be **the same as** those anticipated from the proposed Project.

Noise

Short-Term Impacts: Because there would be less construction under Alternative B, there would be less construction noise from the temporary use of heavy-duty construction equipment or generation of construction traffic, including worker and haul truck trips to the Project site. The proposed Project would generate noise from construction that is anticipated to exceed the City's hourly threshold of 65 dBA L_{eq} at the existing nearest residential properties to the west, and MM-NOI-1 would be required. Although development of PCC-North and PCC-South are expected to be concurrent under the proposed Project, Alternative B would not reduce noise impacts of concurrent construction because the acoustical centroids of PCC-South and PCC-North construction activities are at least 1,000 feet apart, and the potential for concurrent activities to result in increased impacts at sensitive receptors would be cumulatively negligible. Thus, MM-NOI-1 would still be required under Alternative B. Construction vibrations generated by the proposed Project and Alternative B would be less than significant. Because Alternative B would result in a reduced amount of construction noise near PCC-North, short-term impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative B, the operational state of PCC-North would remain unchanged from the current conditions, and the operational state of PCC-South and PCC-Fairfield Parking would be the same as the proposed Project. Although the addition of proposed Project traffic to the roadway network would not result in a discernable increase in noise and noise impacts from increased stationary operational noise would have less than significant impacts, there would be less on- or off-site noise resulting from Alternative B. Because Alternative B would result in reduced development, there would be fewer trips generated and fewer on-site noise sources. Therefore, operational impacts on noise under Alternative B would be **less than** those anticipated from the proposed Project.

Population and Housing

Similar to the proposed Project, Alternative B would generate part-time and full-time jobs associated with the construction of the Project between the start and end of construction. The construction employment generated by Alternative B and the proposed Project is not expected to increase the residential population of the City and would not induce population growth or require permanent housing. However, since no construction would occur at PCC-North there would be no concurrent construction activities, and therefore, fewer employees on-site during one time.

Alternative B would generate residents associated with the 120 units and part-time and full-time jobs associated with construction of the 9,026 square feet of commercial use. Because Alternative B would result in less development when compared to the Project's 263 residential units and approximately 11,252 square feet of commercial use, Alternative B would generate less growth. Using the same calculations used in Section 4.11, Population and Housing, with a persons per household rate of 2.35, Alternative B would generate approximately 282 permanent residents compared to the Project's 618 new residents. SCAG's forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. The proposed Project exceeds SCAG's estimated population projections through 2045 by 118 persons. The estimated 282 new residents under Alternative B would not exceed SCAG's population projections through 2045. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative B would result in fewer impacts to population growth, impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Public Services and Recreation

Because there would be reduced construction activity under Alternative B, there would be less short-term demand for fire protection and emergency medical services and police protection services, as compared to the proposed Project. The construction activities associated with the proposed Project have the potential to temporarily impact emergency vehicle access to the Project site. Similarly, construction under Alternative B would result in temporary sidewalk closures, specifically during Mariposa Avenue street improvements for approximately 1 to 2 months. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, MM-TRA-1 is required under Alternative B.

Alternative B would generate residents associated with the 120 residential units and part-time and full-time jobs associated with construction of the 9,026 square feet of commercial use. Because Alternative B would result in reduced development when compared to the Project's 263 residential units and approximately 11,252 square feet of commercial use, Alternative B would generate less demand on public services. Alternative B would increase demands relative to existing conditions, but to a lesser extent than the proposed Project. Additionally, Alternative B would result in 285 permanent residents compared to the Project's 618 permanent residents, thereby reducing long-term impacts to public services and recreation. Because Alternative B would result generate fewer residents and employees and impacts to public services and recreation, impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Transportation

Short-Term Impacts: As described in the parking evaluation (Appendix J-2), during the concurrent construction of Phase 2 and Phase 3, PCC-Fairfield Parking, PCC-North and PCC-South would demand 442 spaces and supply 215 spaces (because PCC-North and PCC-South would be constructed concurrently), resulting in a deficit of 227 parking spaces. Per the Conditions of Approval for the proposed Project, if the total parking demand would exceed the total parking supply during construction activities, the applicant/developer would be required to accommodate the excess parking demand at an off-site location and provide shuttle service to and from the Project site accordingly to ensure that parking is adequately provided during short-term construction activities (Appendix J-2). Nonetheless, there are no concurrent construction activities under Alternative B, and would not result in parking deficit during any phases of construction.

Alternative B would have reduced construction impacts due to the reduced amount of construction traffic from truck deliveries and construction employees. Under both Alternative B and the proposed Project, segments of PCH and Mariposa Avenue would have short-term impacts at locations where new curbs would be installed. To ensure

adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, MM-TRA-1 is required. Because Alternative B would not result in parking deficit during construction and would reduce the amount of short-term transportation impacts, impacts under Alternative B would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative B, 120 residential units would be constructed, as compared to the proposed Project's 263 residential units, and 2,223 fewer square feet of commercial would be constructed. Both the proposed Project and Alternative B characteristics (e.g., mixed land uses, infill development, its proximity of nearby destinations, pedestrian and bicycle connections, etc.) would encourage localized trips and trips made by walking, biking, carpool, or transit. Due to the continuing use of PCC-North as a surface parking lot and a reduced mix of uses within the area, it is likely Alternative B would have a higher VMT than the proposed Project, but still lower than the City's VMT per capita. Alternative B would adopt a Specific Plan to bring the existing hotel uses into conformance with the General Plan and would redevelop an underutilized surface parking lot and building with residential and commercial uses in proximity to the Metro C Line and several bus stops, similar to the proposed Project, thereby furthering the goals and policies of the City's General Plan and Climate Action Plan.

However, the reduction in new residential units and commercial development would also reduce the amount of progress made toward obtaining the City applicable General Plan policies. For example, policies related to providing areas where development has the flexibility to encourage mix uses, in an effort to provide synergistic relationships which have the potential to maximize economic benefit, reduce traffic impacts, and encourage pedestrian environments. Alternative B would redevelop one surface parking lot and construct a mix of land uses including residential and commercial, which would help the City to achieve its goals and policies to increase density, increase use of transit services, and creating a pedestrian-friendly environment along PCH with proposed retail. Thus, Alternative B would not conflict with any applicable land use plan, policy, or regulation of an agency adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant, as with the proposed Project.

Under the level of service analysis provided for informational purposes, the same four of the study intersections that currently operate at LOS E or worse during the AM or PM peak periods under the existing condition would continue to operate at LOS E or worse during the AM or PM peak period with the addition of Project traffic. Similarly, the same five intersections are projected to continue to operate at LOS E or worse during the AM or PM peak period under the Future baseline condition as with the addition of Project traffic. Therefore, LOS impacts under Alternative B would be similar to the proposed Project. Additionally, Alternative B would include the Project improvement to Mariposa Avenue and PCH, which would improve the LOS at Mariposa Avenue and PCH under existing and future conditions.

Although the proposed Project would have less than significant impacts related to operations, Alternative B would meet similar goals of the City's General Plan and Climate Action Plan related to the circulation system, and reduce the level of service impacts. Therefore, impacts under Alternative B would be **the same as** those anticipated from the proposed Project.

Tribal Cultural Resources

Under Alternative B the earthwork associated with PCC-North would be avoided, while development of PCC-South and PCC-Fairfield Parking would continue to occur, including the excavations for the subterranean parking garage at PCC-South. Therefore, MM-TCR-1 related to the salvage and treatment requirements of potential tribal resources would continue to be required under Alternative B. No prehistoric or historic burials were identified within the Project site as a result of the records searches. However, as with the proposed Project, Alternative B would comply with

Section 7050.5 of the California Health and Safety Code, if human remains are found. As such, similar to the Project, impacts would be less than significant. Although Alternative B would avoid the removal of a parking lot in PCC-North, subsurface excavations into native soils and MM-TCR-1 would still be required. Therefore, impacts under Alternative B would be **the same as** those anticipated from the proposed Project.

Utilities and Service Systems

The new development associated with Alternative B would result in new water service connections, sewer laterals, on-site stormwater infrastructure, and underground utility conduit systems for electricity and telecommunications, similar to the proposed Project. Minor alterations of existing on-site natural gas main/service branches may be required. Similar to the proposed Project, the construction of these new utility connections would be limited to the Project site and the immediately adjacent street frontages. As such, impacts associated with installation of utility facilities necessary for the PCC-South and PCC-Fairfield Parking would be less than significant. Due to the decrease in development footprint under Alternative B, the impacts related to construction of utilities and the demand for potable water, generation of wastewater, and generation of solid waste would be less than the proposed Project. Although the proposed Project's impacts to utilities was less than significant and no mitigation was required, impacts to utilities and service systems under Alternative B would be **less than** those anticipated from the proposed Project.

6.5.3 Alternative C – Reduced Development: Reduce 1 Level from PCC-South and PCC-North

Alternative Description

CEQA requires that 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[(a)]). 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, with the exception of conflicts related to exceedance of population growth projections in the applicable AQMP. As such, Alternative C proposes to implement a reduced unit count on PCC-South and PCC-North to eliminate the significant impacts related to population growth projections and the AQMP, as well as lessen aesthetic impacts related to building height. As previously discussed in Section 4.11, Population and Housing, the SCAG's forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. Assuming 2.35 persons per household, the proposed Project's 263 residential units would accommodate 618 individuals. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG's estimated projections through 2045 by 118 persons. Alternative C would not exceed SCAG's estimated projection through 2045.

As previously described in Section 4.2, Air Quality, considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, which was used in the development of the AQMP, the proposed Project would result in a population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP by 18 individuals. Alternative C would eliminate an adequate amount of residential units to eliminate this significant and unavoidable impact.

Alternative C would not include Level L-5 from PCC-South and PCC-North, which contain 25 units and 29 units, respectively (see Figure 3-4E, PCC-South Levels L-2 to L-5 and Figure 3-6D, PCC-North Levels L-2 to L-5). Therefore,

Alternative C would accommodate 491 individuals.¹ Level L-5 contains 34 spaces on PCC-South and 39 parking spaces on PCC-North. Thus, parking would be reduced from 336 to 302. Additionally, Alternative C would reduce of PCC-South from 85 feet to 75 feet in height from finished grade to the highest point of measurement and would reduce PCC-North from 83 feet to 73 feet in height from finished grade to the highest point of measurement.

Once operational, Alternative C would represent a reduction in proposed square footage; however, the Specific Plan footprint of the building area would remain the same. As shown in Table 6-2, Alternative C would reduce the Specific Plan total development square footage from 622,398 square feet to 584,686 square feet, excluding parking.

Table 6-2. Alternative C – Specific Plan Land Use Summary

Proposed Land Use District	Location	Existing (Square Feet)		Proposed (Square Feet)				
		Hotel Rooms-	Hotel	Residential Units	Residential	Commercial	Lobby	Total
PCC Mixed-Use (PCC MU-1)	PCC-South	–	–	120	144,244	5,756	–	150,000
PCC Commercial (PCC COM-1)	Aloft Hotel	246	106,747	–	–	–	–	106,747
PCC Commercial (PCC COM-2)	Fairfield Inn and Suites Hotel	350	175,651	–	–	–	–	175,651
PCC Commercial (PCC COM-3)	PCC-Fairfield Parking	–	–	–	–	3,273	1,727	5,000
PCC Mixed-Use (PCC MU-2)	PCC-North	–	–	143	182,777	2,223	–	185,000
Proposed Project Totals		596	282,398	263	327,021	11,252	1,727	622,398
Minus Level L-5 from PCC-South		–	–	25	17,631 ¹	–	–	17,631 ¹
Minus Level L-5 from PCC-North		–	–	29	20,081 ¹	–	–	20,081 ¹
Alternative C Totals		596	282,398	209	289,309	11,252	1,727	584,686

¹ The residential square footage for Alternative C was calculated by adding up the square footage of room types and number of room types on Level L-5 for both PCC-North and PCC-South minus the previously proposed residential square footage.

Ability to Meet Project Objectives

1. Provide for comprehensive site planning that maintains the existing hotel uses while providing for a mixed-use multiple-family and commercial neighborhood that is compatible with the surrounding land uses.

Alternative C would satisfy this Project Objective. Alternative C would maintain the existing hotel uses and would provide comprehensive site planning that provides for 209 residential units, 11,252 square feet of

¹ 263 -25-29 = 209 new housing units x 2.35 persons per household = 491 residents accommodated by the proposed Project.

commercial development, and 1,727 square feet of lobby area. Therefore, Alternative C would provide a mixed-use, multiple-family and commercial neighborhood that is compatible with the surrounding land uses through implementation of a Specific Plan.

2. Provide for additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City's General Plan.

Alternative C would satisfy this Project Objective. Alternative C would provide new residential uses, inclusive of studio apartments, one-bedroom units, and two-bedroom units, which would support the goals of the Housing Element to provide a variety of housing sizes, types, and densities.

3. Improve the jobs/housing balance in the City of El Segundo, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees.

Alternative C would satisfy this Project Objective. Alternative C would provide 209 residential units, which would aid in improving the jobs/housing balance in the City, helping to address the regional housing shortage, and providing needed housing for existing business employees.

4. Enhance vehicular circulation through intersection improvements and street widening.

Alternative C would satisfy this Project Objective. Alternative C would include Project improvements as Mariposa Avenue and PCH by reconfiguring the eastbound lane of Mariposa Avenue at PCH from one left lane and one through-right lane to one left, one through, and one right-turn lane. As described in Section 4.13, Transportation, this improvement would improve level of service at the Mariposa Avenue and PCH intersection. Therefore, Alternative C would enhance vehicular circulation through intersection improvements.

5. Facilitate a safe and walkable community along Pacific Coast Highway by providing a mix of land uses, including commercial at the street-level with residential uses above.

Alternative C would satisfy this Project Objective. Alternative C would include two mixed-use buildings with residential units located above commercial uses on the ground-floor adjacent to PCH. These buildings would be located adjacent to the existing Aloft Hotel and Fairfield Inn and Suites Hotel, which creates a mix of land uses that are within walking distance of one another. By locating retail along PCH, Alternative C would facilitate a safe and walkable community.

6. Increase the efficient use of land by eliminating surface parking lots and providing parking garages that allow for sharing among hotel, commercial, and residential land uses.

Alternative C would satisfy this Project Objective. Alternative C would redevelop the surface parking lot associated with the Aloft Hotel (PCC-South) and the existing surface parking lot north of Mariposa Avenue with PCC-North to develop mixed-use residential/commercial structures with associated parking garages. The parking garages would provide shared parking among the existing hotels and proposed residential/commercial uses.

7. Reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City's downtown.

Alternative C would satisfy this Project Objective. Alternative C would reduce single-occupancy vehicle use by developing 209 units and 11,252 square feet of commercial development in close proximity to the Metro C Line and the City's downtown.

Comparison of the Effects of Alternative C to the Project

Aesthetics

Alternative C would result in similar impacts to aesthetics as analyzed in Section 4.1, Aesthetics; however, with a reduced height for PCC-South and PCC-North. Alternative C would reduce PCC-South from 85 feet to 75 feet in height from lowest finished grade to the highest point of measurement and would reduce PCC-North from 83 feet to 73 feet in height from lowest finished grade to the highest point of measurement. Thus, Alternative C would have reduced shadow lengths on adjacent shade-sensitive uses when compared to the proposed Project. The existing hotel uses to the south of Mariposa Avenue would be brought into consistency with the zoning and General Plan designation through the Specific Plan described in Alternative C. Additionally, as with the proposed Project, Alternative C would require a Site Plan Review to allow the proposed site plan and architectural design for the implementation of new development. Therefore, Alternative C would not result in conflicts with applicable zoning and land use regulations governing scenic quality for the Project site. Potential impacts associated with light and glare would still occur, but would be slightly reduced due to reduced density of Alternative C compared to the proposed Project. However, the Specific Plan, City's Zoning Ordinance and the General Plan policies require new development to avoid glare impacts and be considerate of light trespass on adjacent residential neighborhoods. Therefore, similar to the proposed Project, impacts to aesthetics under Alternative C would be less than significant and no mitigation is required. Due to the reduction in development intensity and reduction in building heights, impacts under Alternative C would be **less than** those anticipated from the proposed Project.

Air Quality

Short-Term Impacts: There would be less construction under Alternative C, due to the reduction in overall building square footage. As shown in Table 6-2, Alternative C would construct 54 fewer units than would be constructed under the proposed Project. Therefore, there would be fewer construction emissions associated with construction truck traffic and the use of heavy-duty construction equipment. Under the proposed Project, MM-AQ-1 is required to reduce potentially significant impacts related to Toxic Air Contaminants during construction activities and it would continue to be required under Alternative C. Even though MM-AQ-1 would be required under Alternative C, because Alternative C would result in fewer short-term impacts to air quality due to the reduction in building construction, impacts under Alternative C would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative C, there would be fewer daily area, energy, and mobile source emissions due to the reduced number of residential units and parking. Alternative C would have 54 fewer residential units and parking would be reduced from 336 to 302 spaces. Therefore, Alternative C would result in fewer vehicle trips and would accordingly result in fewer pollutant emissions. Therefore, similar to the proposed Project, impacts to long-term air quality emissions under Alternative C would be less than significant and no mitigation is required.

In general, a project would not conflict with or obstruct implementation of the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). Because Alternative C would result in less development when compared to the Project's 263 residential units, Alternative B would generate less population growth. SCAG's forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. The proposed Project exceeds SCAG's estimated population projections through 2045 by 118 persons. The estimated 491 new residents under Alternative C would not exceed SCAG's population projections through 2045. The SCAQMD uses these growth forecasts for the development of the AQMP emissions inventory. Therefore, Alternative C would not

exceed the population projections used in the development of the AQMP. Therefore, Alternative C would **eliminate the significant and unavoidable** impact associated with the proposed Project's conflict with the applicable AQMP.

Cultural Resources

As with the proposed Project, Alternative C would redevelop the surface parking lots associated with the existing Aloft Hotel and Fairfield Inn and Suite Hotel, and demolish the existing Fairfield Inn and Suites Hotel Food and Beverage Building. No cultural resources were identified within the Project site as a result of the CHRIS records search, NAHC SLF search, extensive archival research, field survey, and property significance evaluation. Therefore, impacts under both Alternative C and the proposed Project would be less than significant. Under Alternative C, the same earthwork activities would occur for the development of PCC-South, PCC-Fairfield Parking, and PCC-North. Therefore, MM-CUL-1 related to the salvage and treatment requirements of potential archaeological resources would continue to be required under Alternative C. Similar to the proposed Project, no prehistoric or historic burials were identified within the Project site as a result of the records searches. However, as with the proposed Project, Alternative C would comply with Section 7050.5 of the California Health and Safety Code, if human remains are found. As such, similar to the Project, impacts would be less than significant. Although Alternative C would reduce the overall density of the proposed Project, Alternative C would result in the same amount of ground disturbance and MM-CUL-1 would still be required. Therefore, impacts under Alternative C would be **the same as** those anticipated from the proposed Project.

Energy

Short-Term Impacts: Because there would be less construction activity under Alternative C due to the reduction in overall building square footage, there would be reduced demands for the temporary use of electricity and petroleum during construction. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative C would result in fewer short-term impacts related to energy, impacts under Alternative C would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative C, there would be reduced natural gas, electricity, and petroleum usage due to the reduced number of units and parking. Both Alternative C and the proposed Project buildings would be built in accordance with the current Building Energy Efficiency Standards (Title 24) at the time of construction, which include robust requirements for energy efficiency. Also, the provisions of the California Green Building Standards Code (CALGreen) apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure. Therefore, similar to the proposed Project, impacts to energy under Alternative C would be less than significant and no mitigation is required. Nonetheless, because Alternative C would generate reduced demands for energy resources, operational impacts under Alternative C would be **less than** those anticipated from the proposed Project.

Geology and Soils

The 2019 edition of the California Building Code requires that all construction must be conducted in compliance with the structural design requirements governing seismically resistant construction, which would be applied under the proposed Project as well as Alternative C. With the incorporation of California Building Code procedures aimed at minimizing a project's contribution to geologic hazards, compliance with the City's Municipal Code requirements, and adherence to the measures set forth in the Project-specific geotechnical report, neither the proposed Project nor development under Alternative C would directly or indirectly cause substantial adverse effects involving strong

seismic ground shaking, seismically-related ground failure, liquefaction, lateral spreading, subsidence, collapsible soils, or other geotechnical hazards.

Given the proximity of past fossil discoveries in the surrounding area and the potential for significant vertebrate fossils below any artificial fill present within the Project site, construction activities associated with Alternative C, such as the construction of a subterranean parking structure, could risk potential disturbance of paleontological resources. Therefore, MM-GEO-1 would be applicable to Alternative C for the preparation of a PRIMP, similar to the proposed Project. Therefore, impacts under this alternative would be **the same as** those anticipated from the proposed Project.

Greenhouse Gas Emissions

Short-Term Impacts: There would be less construction under Alternative C, due to the reduction in overall building square footage. As shown in Table 6-2, Alternative C would construct 54 fewer units that would be constructed under the proposed Project. The reduction in new construction under Alternative C would result in less construction-related GHG emissions as compared to the proposed Project. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative C would result in fewer short-term GHG emissions, short-term impacts under Alternative C would be **less than** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative C, there would be fewer operational emissions due to the reduced number of units and parking. Alternative C would have 54 fewer residential units and parking would be reduced from 336 to 302 spaces. Therefore, Alternative C would result in a lower metric tons per carbon dioxide equivalent than the proposed Project. The proposed Project would be below the South Coast Air Quality Management District's GHG thresholds, and no mitigation measures are required. Additionally, as with the proposed Project, the residential and commercial uses associated with Alternative C would provide new living and working opportunities in close proximity to transit, and would meet all applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. Therefore, similar to the proposed Project, impacts to GHG emissions under Alternative C would be less than significant and no mitigation is required. However, Alternative C would result in fewer operational GHG emissions and meet similar goals related to constructing diverse land uses aimed at reducing single-occupancy vehicle use. Therefore, impacts under Alternative C would be **less than** those anticipated from the proposed Project.

Hazards and Hazardous Materials

Short-Term Impacts: Alternative C would result in the demolition of the Fairfield Inn and Suites Hotel Food and Beverage Building, where asbestos-containing materials are present, and lead-based paint and universal wastes are likely present. Therefore, Alternative C would continue to require implementation of MM-HAZ-1 to reduce potential impacts from asbestos-containing materials, lead-based paint, universal wastes, and hazardous materials, similar to the proposed Project. Similarly, since construction would occur adjacent to PCH under Alternative C, construction could require partial right-of-way closures, and thus, a traffic control plan would be submitted in accordance with MM-TRA-1, as would occur under the proposed Project. Additionally, Alternative C would result in grading and trenching to PCC-North, which would have the potential for soil contamination due to the adjacent 76 gasoline service station. As with the proposed Project, Alternative C would require MM-HAZ-2 to reduce potential soil contamination impacts to less than significant. Although Alternative C would reduce the overall density of the proposed Project, Alternative C would not reduce potentially significant impacts related to asbestos-containing materials, lead-based paint, and soil contamination, and all mitigation measures required for the proposed Project are required for Alternative C. Therefore, short-term impacts related to hazards and hazardous materials under this alternative would be **the same as** those anticipated from the proposed Project.

Long-Term Impacts: As with the proposed Project, Alternative C proposes the development of three building sites – PCC-South, PCC-Fairfield Parking, and PCC-North for commercial and residential uses. However, Alternative C would eliminate Level L-5 which would reduce the number of units from 263 to 209, and the parking spaces from 336 to 309. The existing hotels and the proposed commercial and residential uses would use hazardous materials limited to use of commercially available cleaning products, chlorine for swimming pools, landscaping chemicals and fertilizers, and various other commercially available substances. Such chemicals are currently in use on the Project site, in association with the hotels. Both the proposed Project and Alternative C would be required to use and handle potentially hazardous substances in compliance with all applicable federal, state, and local health and safety laws and regulations, which would minimize health risk to the public associated with hazardous materials. Therefore, similar to the proposed Project, long-term impacts related to hazards and hazardous materials under Alternative C would be less than significant and no mitigation is required. Therefore, operational impacts related to hazards and hazardous materials under this alternative would be **the same as** those anticipated from the proposed Project.

Hydrology and Water Quality

Short-Term Impacts: Alternative C would result in the same building footprint as the proposed Project. During construction under Alternative C, water quality impacts could occur as a result of runoff over disturbed soils as well as leaks and spills from construction materials. Similar to the proposed Project, a Stormwater Pollution Prevention Plan would be prepared, which incorporates best management practices that protect stormwater runoff and ensure avoidance of substantial degradation of water quality. For both the proposed Project and Alternative C, compliance with existing regulations would prevent violation of water quality standards and minimize the potential for contributing sources of polluted runoff. As with the proposed Project, impacts under Alternative C would be less than significant. Although Alternative C would reduce the overall density, it would not reduce the construction footprint. Therefore, impacts under Alternative C would be **the same as** those anticipated from the proposed Project.

Long-Term Impacts: As with the proposed Project, Alternative C proposes the development of three building sites – PCC-South, PCC-Fairfield Parking, and PCC-North and associated hydrologic features in the same manner as the proposed Project. Compliance with local and regional regulations, including requirements for implementation of low-impact-development features, would reduce the discharge of pollutants into receiving waters, during both Alternative C and Project operations. Similar to the proposed Project, Alternative C is not located within an area identified for flood risk in the Federal Emergency Management Agency’s Flood Insurance Rate Map. Alternative C is not expected to violate any water quality standards and measures would be taken throughout operation to prevent potential contaminants from being discharged from the site by runoff. Through compliance with low-impact-development features, Alternative C would not conflict with or obstruct implementation of the Los Angeles Regional Water Quality Control Board Basin Plan. Therefore, similar to the proposed Project, long-term impacts to hydrology and water quality under Alternative C would be less than significant and no mitigation is required. Because the building footprint would remain the same under Alternative C, impacts under Alternative C would be **the same as** those anticipated from the proposed Project.

Land Use and Planning

Alternative C introduce the proposed Specific Plan, with a reduction on residential units and square footage, as noted in Table 6-2. In addition, Alternative C would redevelop underutilized areas and construct a mix of land uses including residential and commercial, which would help the City to achieve its goals and policies related to land use, circulation, economic development, and housing. As previously mentioned, the proposed Project provides a Specific Plan to guide development of the Project site in a manner that would be consistent with the zoning and General Plan regulations. Under Alternative C, the 209 residential units and 11,252 square feet of commercial use

would be constructed instead of the 263 residential units as part of the Project. This would reduce the amount of residential uses associated that would provide new living and working opportunities in close proximity to transit, including the Metro C Line station (Mariposa Station). Nevertheless, Alternative C would provide new housing construction in accordance with the policies in the General Plan and the Specific Plan. Because both the proposed Project and Alternative C would achieve goals and policies of the City's General Plan in a manner that would reduce environmental impacts and no mitigation is required, impacts under Alternative C would be **the same as** those anticipated from the proposed Project.

Noise

Short-Term Impacts: Because there would be reduced development under Alternative C, the duration of construction noise from the temporary use of heavy-duty construction equipment or generation of construction traffic, including worker and haul truck trips to the Project site would be slightly less reduced from that of the proposed Project. The proposed Project would generate noise from construction that is anticipated to exceed the City's hourly threshold of 65 dBA L_{eq} at the existing nearest residential properties to the west, and MM-NOI-1 would be required. Alternative C would involve the same construction equipment at the same locations as the proposed Project. Thus, MM-NOI-1 would still be required under Alternative C. Construction vibrations generated by the proposed Project and Alternative C would be less than significant. Although Alternative C would reduce the development intensity of the proposed Project, the same amount of construction equipment would be required at the same distance from noise-sensitive receptors. Therefore, short-term impacts under Alternative C would be **the same as** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative C, there would be fewer residential units and fewer parking spaces on PCC-South and PCC-North. The roadway traffic noise associated with Alternative C would be less than the proposed Project's as this analysis took into account additional trips from the proposed dwelling units. As with the proposed Project, Alternative C would incorporate similar stationary operational sources. The City of El Segundo states that noise levels (from stationary, non-transportation sources such as these studied operating ACC units) shall be limited to a 5 dB increase over the ambient outdoor sound levels at the nearest off-site existing residential property. Therefore, the operation of these Project residential air-conditioning units would result in a less-than-significant noise impacts to the surrounding commercial properties. Because Alternative C would result in reduced development, there would be fewer trips generated and fewer on-site noise sources. Therefore, operational impacts on noise under Alternative C would be **less than** those anticipated from the proposed Project.

Population and Housing

Similar to the proposed Project, Alternative C would generate part-time and full-time jobs associated with the construction of the Project between the start and end of construction. The construction employment generated by Alternative C and the proposed Project is not expected to increase the residential population of the City and would not induce population growth or require permanent housing. Although the duration of construction would be reduced under Alternative C, it is likely the same number of construction workers would be employed.

The SCAG's forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. Assuming an occupancy rate of 2.35 persons per household, the proposed Project's 263 residential units would accommodate 618 individuals. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG's estimated projections through 2045 by 118 persons. Alternative C would not include Level L-5 from PCC-South and PCC-North, which contain 25 units and 29 units. Therefore, Alternative C would accommodate 491 individuals. Alternative C would not exceed the forecasted population growth for the City

between 2016 and 2045. Because the proposed Project would support SCAG's goals and strategies for growth in the region, and because the proposed Project would assist the development of new housing and improves the City's job/housing balance, impacts related to population growth would be less than significant. Even though no significant impacts would result and no mitigation was required for the proposed Project, because Alternative C would not exceed the forecasted population growth for the City, impacts under Alternative C would be **less than** those anticipated from the proposed Project.

Public Services and Recreation

Because there would be less development under Alternative C, there would be less short-term demand for fire protection and emergency medical services and police protection services, as compared to the proposed Project. The construction activities associated with the proposed Project have the potential to temporarily impact emergency vehicle access to the Project site. Similarly, construction under Alternative C would result in temporary sidewalk closures, specifically during Mariposa Avenue street improvements for approximately 1 to 2 months. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, MM-TRA-1 is required under Alternative C.

Alternative C would generate residents associated with the 209 residential units and part-time and full-time jobs associated with construction of the 11,252 square feet of commercial use. Because Alternative C would result in reduced development when compared to the Project's 263 residential units, Alternative C would generate less demand on public services. Alternative C would increase demands relative to existing conditions, but to a lesser extent than the proposed Project. Additionally, Alternative C would result in 491 permanent residents compared to the Project's 618 permanent residents, thereby reducing long-term impacts to public services and recreation. Because Alternative C would result generate fewer residents and impacts to public services and recreation, impacts under Alternative C would be **less than** those anticipated from the proposed Project.

Transportation

Short-Term Impacts: As described in the parking evaluation (Appendix J-2), during concurrent Phase 2 and Phase 3, PCC-Fairfield Parking, PCC-North and PCC-South would demand 442 spaces and supply 215 spaces (because PCC-North and PCC-South would be constructed concurrently), resulting in a deficit of 227 parking spaces. Per the Conditions of Approval for the proposed Project, if the total parking demand would exceed the total parking supply during construction activities, the applicant/developer would be required to accommodate the excess parking demand at an off-site location and provide shuttle service to and from the Project site accordingly to ensure that parking is adequately provided during short-term construction activities (Appendix J-2). Since concurrent construction of PCC-South and PCC-North would similarly occur in Alternative C, as with the proposed Project, there would be a parking deficit of 227 spaces.

Under both Alternative C and the proposed Project, segments of PCH and Mariposa Avenue would have short-term impacts at locations where new curbs would be installed. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, MM-TRA-1 is required. Additionally, Alternative C would likely result in the same number of equipment on-site and truck trips per peak period. Although the duration of construction under Alternative C would be reduced due to the removal of Level L-5 from both PCC-South and PCC-North, the construction trips on a daily basis would remain the same and Alternative C would not similarly result in a parking deficit during construction. Therefore, impacts under Alternative C would be **the same as** those anticipated from the proposed Project.

Long-Term Impacts: Under Alternative C, 209 residential units would be constructed, as compared to the proposed Project's 263 residential units. Therefore, Alternative C would generate a lower VMT per capita. Both the proposed Project and Alternative C characteristics (e.g., mixed land uses, infill development, its proximity of nearby destinations, pedestrian and bicycle connections, etc.) would encourage localized trips and trips made by walking, biking, carpool, or transit. Alternative C would adopt a Specific Plan to bring the existing hotel uses into conformance with the General Plan and would redevelop underutilized surface parking lots with mixed use buildings in proximity to the Metro C Line and several bus stops, similar to the proposed Project, thereby furthering the goals and policies of the City's General Plan and Climate Action Plan.

Although Alternative C would reduce the number of residential units, it would do so in a manner which is consistent with the SCAG's forecasted growth for the City. Alternative C would redevelop surface parking lots and construct a mix of land uses including residential and commercial, which would help the City to achieve its goals and policies to increase density, increase use of transit services, and creating a pedestrian-friendly environment along PCH with proposed retail. Thus, Alternative C would not conflict with any applicable land use plan, policy, or regulation of an agency adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant, as with the proposed Project.

Under the level of service analysis provided for informational purposes, the same four of the study intersections that currently operate at LOS E or worse during the AM or PM peak periods under the existing condition would continue to operate at LOS E or worse during the AM or PM peak period with the addition of Project traffic. Similarly, the same five intersections are projected to continue to operate at LOS E or worse during the AM or PM peak period under the Future baseline condition as with the addition of Project traffic. Therefore, LOS impacts under Alternative C would be similar to the proposed Project. Additionally, Alternative C would include the Project improvement to Mariposa Avenue and PCH, which would improve the LOS at Mariposa Avenue and PCH under existing and future conditions.

Although the proposed Project would have less than significant impacts related to operations, Alternative C would meet similar goals of the City's General Plan and Climate Action Plan related to the circulation system, generate a lower VMT per capita, and reduce the level of service impacts. Therefore, impacts under Alternative C would be **less than** those anticipated from the proposed Project.

Tribal Cultural Resources

As with the proposed Project, Alternative C would redevelop the surface parking lots associated with the existing Aloft Hotel and Fairfield Inn and Suite Hotel, and the demolish the existing Fairfield Inn and Suites Hotel Food and Beverage Building. Under Alternative C, the same earthwork activities would occur for the development of PCC-South, PCC-Fairfield Parking, and PCC-North. Therefore, MM-TCR-1 related to the salvage and treatment requirements of potential tribal resources would continue to be required under Alternative C. No prehistoric or historic burials were identified within the Project site as a result of the records searches. However, as with the proposed Project, Alternative C would comply with Section 7050.5 of the California Health and Safety Code, if human remains are found. As such, similar to the Project, impacts would be less than significant. Although Alternative C would reduce the overall density of the proposed Project, Alternative C would result in the same amount of ground disturbance and MM-TCR-1 would still be required. Therefore, impacts under Alternative C would be **the same as** those anticipated from the proposed Project.

Utilities and Service Systems

The new development associated with Alternative C would result in new water service connections, sewer laterals, on-site stormwater infrastructure, and underground utility conduit systems for electricity and telecommunications, similar to the proposed Project. Minor alterations of existing on-site natural gas main/service branches may be required. Similar to the proposed Project, the construction of these new utility connections would be limited to the Project site and the immediately adjacent street frontages. As such, impacts associated with installation of utility facilities necessary for the PCC-South, PCC-Fairfield Parking, and PCC-North would be less than significant. Due to the decrease in units under Alternative C, the impacts related to construction of utilities and the demand for potable water, generation of wastewater, and generation of solid waste would be less than the proposed Project. Although the proposed Project's impacts to utilities was less than significant and no mitigation was required, impacts to utilities and service systems under Alternative C would be **less than** those anticipated from the proposed Project.

6.6 Summary of Alternatives to the Proposed Project

Project are considered and evaluated in this Draft EIR. To summarize these 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 6-3).

Table 6-3. Comparison of Project and Alternatives Impacts

Environmental Issue Area	Proposed Project	Alternative A - No Project/Existing Development	Alternative B - Reduced Development Alternative: Exclusion of PCC – North	Alternative C - Reduced Development: Reduce 1 Level from PCC-South and PCC-North
Aesthetics	LTS	▼	▼	▼
Air Quality:				
AQMP Consistency	SU	▼	▼	▼
Short-Term	LTS-MM	▼	▼	▼
Long-Term	LTS	▼	▼	▼
Cultural Resources	LTS-MM	▼	—	—
Energy:				
Short-Term	LTS	▼	▼	▼
Long-Term	LTS	▼	▼	▼
Geology and Soils	LTS-MM	▼	—	—
Greenhouse Gas Emissions:				
Short-Term	LTS	▼	▼	▼
Long-Term	LTS	▼	▼	▼
Hazards and Hazardous Materials:				
Short-Term	LTS-MM	▼	▼	—
Long-Term	LTS	▼	—	—
Hydrology and Water Quality:				
Short-Term	LTS	▼	▼	—
Long-Term	LTS	▼	—	—
Land Use and Planning	LTS	▲	—	—

Table 6-3. Comparison of Project and Alternatives Impacts

Environmental Issue Area	Proposed Project	Alternative A - No Project/Existing Development	Alternative B - Reduced Development Alternative: Exclusion of PCC – North	Alternative C - Reduced Development: Reduce 1 Level from PCC-South and PCC-North
Noise: Short-Term Long-Term	LTS-MM LTS	▼ ▼	▼ ▼	— ▼
Population and Housing	LTS	▼	▼	▼
Public Services and Recreation	LTS-MM	▼	▼	▼
Transportation: Short-Term Long-Term	LTS-MM LTS	▼ ▲	▼ —	— ▼
Tribal Cultural Resources	LTS	▼	—	—
Utilities and Service Systems	LTS	▼	▼	▼

- Alternative is likely to result in similar impacts when compared to Project.
 ▼ Alternative is likely to result in reduced impacts when compared to Project.
 ▲ Alternative is likely to result in greater impacts when compared to Project.
 + Alternative is likely to result in greater environmental benefits when compared to Project.
 LTS = less than significant impact; LTS-MM= less than significant impact with mitigation

Table 6-4 compares the alternatives in terms of whether they meet the Project objectives.

Table 6-4. Comparison of Alternatives – Meeting the Project Objectives

Does the Project Meet the Following Project Objectives?	Alternative A	Alternative B	Alternative C
Provide for comprehensive site planning that maintains the existing hotel uses while providing for a mixed-use multiple-family and commercial neighborhood that is compatible with the surrounding land uses.	No	Yes	Yes
Provide for additional housing opportunities in a variety of housing sizes, types, and densities that support the goals of the Housing Element of the City's General Plan.	No	Yes	Yes
Improve the jobs/housing balance in the City of El Segundo, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees.	No	Yes	Yes
Enhance vehicular circulation through intersection improvements and street widening.	No	Yes	Yes
Facilitate a safe and walkable community along Pacific Coast Highway by providing a mix of land uses, including commercial at the street-level with residential uses above.	No	Partially	Yes

Table 6-4. Comparison of Alternatives – Meeting the Project Objectives

Does the Project Meet the Following Project Objectives?	Alternative A	Alternative B	Alternative C
Increase the efficient use of land by eliminating surface parking lots and providing parking garages that allow for sharing among hotel, commercial, and residential land uses.	No	Yes	Yes
Reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City's downtown.	No	Yes	Yes
How many project objectives are met?	0	6	7

6.7 Environmental Superior Alternative

An EIR must identify an “environmentally superior” alternative; and, where the no project alternative is environmentally superior, the EIR is then required to identify an alternative from among the others evaluated as environmentally superior (14 CCR 15126.6[e](2)).

As shown in Table 6-3, Alternative A would result in reduced environmental impacts to all environmental topics in the short-term because construction activity would not occur. Similarly, Alternative A would result in reduced environmental impacts to all environmental topics in the long-term, including elimination of the significant unavoidable impact related to conflicts with the AQMP, because no operational changes would occur. Although, no mitigation measures would be required for Alternative A, the two hotels would continue to be inconsistent with applicable zoning and land use regulations for the Project site. Under Alternative A, the Project site would remain in its existing condition and potential benefits of the proposed Project related to providing new living and working opportunities in close proximity to transit would not occur. Additionally, the proposed Project would redevelop surface parking lots and construct a mix of land uses including residential and commercial, which would help the City to achieve its goals and policies related to land use, circulation, economic development, and housing, which would not occur under Alternative A. Nevertheless, the elimination of all construction and operational impacts associated with the proposed Project would result in a more environmentally superior alternative when compared to the proposed Project, Alternative B, or Alternative C.

As required under CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the “no project” alternative, the EIR must also identify an environmentally superior alternative among the other alternatives

Alternative B would reduce short-term construction-related impacts when compared to the proposed Project for all environmental topics. Alternative B would eliminate the necessity of MM-HAZ-2 since no development would occur at PCC-North. For long-term operational impacts, most environmental factors would have similar, albeit reduced, impacts under Alternative B to the proposed Project. Alternative B would have similar impacts to the proposed Project in the six areas: cultural resources, geology and soils, long-term hazards and hazardous materials, long-term hydrology and water quality, land use and planning, short-term transportation and tribal cultural resources. Alternative B would eliminate the significant unavoidable impact related to conflicts with the AQMP.

Alternative C would not eliminate any mitigation measures required under the proposed Project. Additionally, Alternative C would have similar impacts to the proposed Project in ten areas: cultural resources, geology and soils,

short- and long-term hazards and hazardous materials, short- and long-term hydrology and water quality, land use and planning, short-term noise, short-term transportation, and tribal cultural resources. Alternative C would eliminate the significant unavoidable impact related to conflicts with the AQMP.

Because Alternative B would eliminate the need for MM-HAZ-2, and would reduce the intensity of development and the population growth when compared to both the proposed Project and Alternative C, Alternative B would be the environmentally superior alternative.

6.8 References

City of El Segundo. 1992. *City of El Segundo General Plan*. Adopted December 1, 1992. <https://www.elsegundo.org/Home/ShowDocument?id=360>.

City of El Segundo. 2018. *Smoky Hollow Specific Plan*. Adopted October 2018. <https://www.elsegundo.org/Home/ShowDocument?id=358>.

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