6.0 Other CEQA Considerations

6.0 OTHER CEQA CONSIDERATIONS

6.1 LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT

Pursuant to CEQA Guidelines § 15126.2, this Section analyzes short-term uses of the environment and the maintenance and enhancement of long-term productivity. If the proposed Project is approved and constructed, a variety of short- and long-term impacts would occur on a local level. During Project grading and construction, portions of surrounding uses may be temporarily impacted by dust and noise. Short-term soil erosion may also occur during grading. There may also be an increase in vehicle pollutant emissions caused by grading and construction activities. However, these disruptions would be temporary and may be avoided or lessened to a large degree through mitigation cited in this EIR and through compliance with the *El Segundo Municipal Code* (ESMC); refer to Section 5.0, *Environmental Analysis*.

Ultimate development of the Project site would create long-term environmental consequences associated with a transition in land use. Development of the proposed Project and the subsequent long-term effects may impact the physical, aesthetic, and human environments. Long-term physical consequences of development include increased traffic volumes, increased noise from Project-related mobile (traffic) and stationary (mechanical and landscaping) sources, hydrology and water quality impacts, and increased energy and natural resource consumption. Incremental degradation of local and regional air quality would also occur as a result of mobile source emissions generated from Project-related traffic, and stationary source emissions generated from the consumption of natural gas and electricity.

6.2 IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

According to CEQA Guidelines §§ 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Project be implemented. As stated in CEQA Guidelines § 15126.2(c):

> *"…..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 likely, Primary impacts and, particularly, secondary impacts [such as highway improvement which provides access to a previously inaccessible area] generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*"

The Project would consume limited, slowly renewable and non-renewable resources. This consumption would occur during the Project's construction phase and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/ resources, and (3) the transportation of goods and people to and from the Project site. Project construction would require the consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: lumber and other forest products; aggregate materials used in concrete and asphalt; metals; and water. Fossil fuels such as gasoline and oil would also be consumed to power construction vehicles and equipment.

The resources that would be committed during Project operation would be similar to those currently consumed within the City of El Segundo. These would include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced. Project operation would occur in accordance with Title 24, Part 6 of the California Code of Regulations, which sets forth conservation practices that would limit the amount of energy consumed by the Project. However, the Project's energy requirements would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

Limited use of potentially hazardous materials typical of commercial and office uses, including vehicle maintenance materials, would be used and stored on the Project site. The use of these materials would be in small quantities and used, handled, stored, and disposed of in accordance with the manufacturer's instructions and applicable government regulations and standards. Compliance with these regulations and standards would serve to protect against significant and irreversible environmental change resulting from the accidental release of hazardous materials. In addition, demolition activities would comply with regulatory requirements to ensure that asbestos and lead-based paints are not released into the environment. Compliance with such regulations would serve to protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials.

In summary, Project construction and operation would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses during the life of the Project. However, continued use of such resources would be on a relatively small scale in a regional context. Although irreversible environmental changes would result from Project implementation, such changes would not be considered significant.

6.3 GROWTH-INDUCING IMPACTS

CEQA Guidelines § 15126(d), *Growth Inducing Impact of the Proposed Project*, requires that an EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. This section analyzes potential growth-inducing impacts, based on the criteria outlined below, as suggested in the CEQA Guidelines. In general terms, a project may foster spatial, economic, or population growth in a geographic area, if it meets any one of the following criteria:

- Removal of an impediment to growth (e.g., establishment of an essential public service and provision of new access to an area);

- Fostering of economic expansion or growth (e.g., changes in revenue base and employment expansion);

- Fostering of population growth (e.g., construction of additional housing or employment-generating land uses), either directly or indirectly;

- Establishment of a precedent-setting action (e.g., an innovation, a change in zoning and general plan amendment approval); or

- Development of or encroachment on an isolated or adjacent area of open space (being distinct from an in-fill project).

Should a project meet any one of the above-listed criteria, it may be considered growth inducing. The Project's potential growth-inducing impacts are evaluated below against these criteria.

The CEQA Guidelines require an EIR to "discuss the ways" a project could be growth-inducing and to "discuss the characteristics of some projects that may encourage…activities that could significantly affect the environment." However, the CEQA Guidelines do not require that an EIR predict (or speculate) specifically where such growth would occur, in what form it would occur, or when it would occur. The answers to such questions require speculation, which CEQA discourages; refer to CEQA Guidelines § 15145, *Speculation*.

IMPACT ANALYSIS

The Project includes a request for approval of the El Segundo South Campus Specific Plan (ESSCSP), which would establish a maximum allowable development within the ESSCSP area of 4,231,547 gross square feet, or an additional 2,142,457 gross square feet over existing conditions, and including office, warehousing, light industrial, and retail/restaurant uses. Additionally, the Project involves the following entitlements: Environmental Assessment No. EA-905; General Plan/General Plan Map Amendment No. GPA 11-01; Zone Change No. ZC 11-02) and Zone Text Amendment No. ZTA 11-01; Subdivision No. SUB 11-02 for Vesting Tentative Map No. 71551; and a Development Agreement No. DA 11-02; refer to Section 3.0, *Project Characteristics*, for detailed descriptions. The potential growth-inducing impacts resulting from Project implementation are evaluated below.

Removal of an Impediment to Growth. The new land uses anticipated by the Project would occur as in-fill development on a fully improved property. The Project does not involve development that would establish a new essential public service or utility/service system. The proposed ESSCSP area is already served by: essential public services (i.e., fire and police protection, parks and recreational facilities, schools, and solid waste disposal); an extensive network of utility/service systems (i.e., water, wastewater, electricity, and natural gas); and other infrastructure necessary to accommodate or allow the existing conditions and planned growth. The existing public services and utility/service systems can be readily upgraded and/or extended onto the ESSCSP area. The increased demands for public services and utility/service systems would not reduce or impair any existing or future levels of services, either locally or regionally, as concluded in Sections 5.10 and 5.11. Project implementation would not require substantial development of unplanned or unforeseen public services and utility/service systems.

Therefore, Project implementation would not remove an impediment to growth/foster spatial growth through establishment of an essential public service or expansion to a new area.

Although, Project implementation would facilitate the installation and construction of transportation improvements necessary to carry out the ESSCSP, as discussed in detail in Section 5.2, *Traffic and Circulation*, these improvements would not provide new access to an area, since access is already provided by an existing roadway network. Therefore, Project implementation would not remove an impediment to growth/foster spatial growth through the provision of new access to an area.

Economic Expansion/Growth. As indicated in Table 5.9-8, *Project Compared to Existing Conditions*, the Project could increase the City's existing population by approximately 4.6 percent or 773 persons. The projected population growth is anticipated to increase sales taxes, with resultant increases in the City's revenue base. Additionally, the Project would increase the City's existing non-residential floor area by approximately 2.1 million square feet and employment by approximately 5.1 percent (4,598 new jobs); refer to Tables 5.2-8 and 5.2-9. The projected growth in non-residential floor area and employment would foster economic expansion and increase the City's revenue base through increases the City's business license tax, utility user taxes, property taxes, and sales taxes. Therefore, the Project is considered growth inducing with respect to economic expansion.

Population, Housing, and Employment Growth. Section 5.9, *Population and Housing*, identifies the existing population, housing, and employment for the County of Los Angeles (County) and City of El Segundo (City), and provides an analysis of potential housing and population impacts that may result from Project implementation.

A project could induce population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). The Project's employment growth could result in population growth within the City, as the potential exists that future employees (and their families) would choose to relocate to the City. As concluded in Section 5.9, Project implementation could increase the City's population by approximately 773 persons through new employment, or approximately 4.6 percent over existing conditions; refer to Table 5.9-8, *Project Compared to Existing Conditions*. This potential population growth is considered less than significant in a local context, since it is anticipated that significantly fewer than 326 of the Project's future employees would chose to relocate to El Segundo, based upon: the numerous housing opportunities (approximately 8,658 vacant housing units) that exist in surrounding communities that would be available to the future employees; the approximately 20,200 unemployed persons who already reside locally and who can (in part) fill the jobs created by the Project; and 100 percent occupancy of the City's housing is not likely; refer to Section 5.9 for a detailed discussion. The forecast population growth would occur over an approximately 11-year period, allowing for development of necessary services and infrastructure commensurate with the anticipated growth. Finally, as concluded above, the substantial development of unplanned or unforeseen public services and utility/service systems would not be required.

Potential growth inducing impacts are also assessed based on a Project's consistency with regional growth forecasts. The Southern California Association of Governments (SCAG) is the responsible agency for developing and adopting regional growth forecasts for Los Angeles County governments, among others. SCAG provides forecasts for 2020 and 2035. Table 6-1, *Project Compared to SCAG Growth Forecasts*, includes SCAG's population, household, and employment forecasts for the City. Because the Project's buildout horizon year is 2022,

SCAG's forecasts for 2020 and 2035 were used to extrapolate SCAG's forecasts for the City for 2022.

Table 6-1
Project Compared to SCAG Growth Forecasts

Description	Housing (Dwelling Units)	Households (Occupied Dwelling Units)	Population (Persons)	Employment (Jobs)
Project				
Existing + Project Conditions[1]	7,412	7,412	17,483	53,131
SCAG Growth Forecasts For El Segundo				
2022 Forecasts[2]	7,530	7,200	16,913	54,187
2022 / Existing + Project Implemented Difference	*-117*	*+214*	*+757*	*-687*
2022 / Existing + Project Implemented % Difference	*-1.6%*	*+2.9%*	*+4.3%*	*-1.3%*

Note:
1. Refer to Table 5.9-8, *Project Compared to Existing Conditions*.
2. Extrapolated based upon SCAG 2020 and 2035 growth forecasts for the City (Southern California Association of Governments Website, *Adopted 2012 RTP Growth Forecast*, http://www.scag.ca.gov/forecast/index.htm, Accessed March 21, 2013).

As indicated in Table 6-1, the City's households are forecast to total 7,200 by 2022, with a resultant population of approximately 16,913 persons. Table 6-1 also compares the population and households for year 2022 under City plus Project conditions with SCAG's growth forecasts for the City. Project implementation could potentially cause SCAG's 2022 household and population forecasts for the City to be exceeded by approximately 2.9 and 4.3 percent, respectively. Thus, the Project could conflict with SCAG's population and household forecasts for the City. However, the forecast population and household growth attributed to the Project is considered less than significant, since the growth within the City is considered unlikely, as concluded in Section 5.9. Additionally, estimating the number of future employees who would choose to relocate to the area would be highly speculative- the future employees may already reside in the area.

As indicated in Table 6-1, the City's employment is forecast to total 54,187 by 2022. Table 6-1 also compares the employment for year 2022 under City plus Project conditions with SCAG's growth forecasts for the City. Project implementation would not cause SCAG's 2022 employment forecast for the City to be exceeded or conflict with SCAG's employment forecasts. Therefore, a less than significant impact would occur in this regard.

At the regional level, the emphasis has been placed primarily on achieving a balance of employment and housing opportunities within the subregions. This regional concept, referred to as jobs/housing balance, encourages the designation and zoning of sufficient vacant land for residential uses with appropriate standards to ensure adequate housing is available to serve the needs derived from the local employment base. The jobs/housing ratio can be used as the general measure of balance between a community's employment opportunities and the housing needs of its residents. A rate of 1.0 or greater generally indicates that a City provides adequate employment opportunities, potentially allowing its residents to work within the City. A desirable jobs/housing balance improves regional mobility (traffic), reduces vehicle miles traveled, and improves air quality. Conversely, imbalance between a City's jobs and housing increases

commutes, with resultant increases in traffic volumes and air emissions, and overall reduces the quality of life.

The City's current jobs/housing ratio is approximately 6.87,[1] indicating the City is currently job rich with sufficient employment opportunities for its residents to potentially work within the City. With Project implementation, the City's jobs/housing ratio would be approximately 7.22. Therefore, with Project implementation, the City would continue to be job rich with sufficient employment opportunities for its residents to potentially work within the City. The City's job/housing balance, along with the creation of 4,598 jobs, is considered beneficial impacts in a regional context.

Precedent-Setting Action. As previously noted, the Project would require General Plan and General Plan Map Amendments, and a Zone Change and Zone Text Amendment, in order to allow implementation of the proposed ESSCSP. However, given that the ESSCSP's proposed Land Use Plan and development regulations would apply only within the ESSCSP area, the Project would not be considered growth inducing with respect to a precedent-setting action.

Development or Encroachment of Open Space. The Project is considered an infill development, as the site has been previously disturbed and is surrounded by urbanized uses. Therefore, the Project would not be growth-inducing with respect to development or encroachment into an isolated or adjacent area of open space.

Overall, Project implementation would not be considered growth inducing, inasmuch as it would not: remove an impediment to growth; foster substantial population or housing growth; establish a precedent-setting action; or develop or encroach on an isolated or adjacent area of open space. The Project would be considered growth inducing with respect to fostering employment growth through construction of additional employment-generating land uses. However, Project implementation would not cause SCAG's 2022 employment forecast for the City to be exceeded, therefore, the Project would not conflict with SCAG's employment forecasts. Therefore, the employment growth attributed to the Project is considered less than significant in a regional context. Additionally, the employment growth attributed to the Project is considered beneficial to both the City and region, given the current unemployment in the area (between 3.0 and 11.4 percent) and in Los Angeles County (8.7 percent).[2]

6.4 ENERGY CONSERVATION

Public Resources Code § 21100(b)(3) and *CEQA Guidelines* Appendix F requires a description (where relevant) of the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Appendix F of the State CEQA Guidelines provides guidance for assessing potential impacts that a project could have on energy supplies, focusing on the goal of conserving energy by ensuring that projects use energy wisely and efficiently. Because Appendix F does not include specific significance criteria, this threshold is based on the goal of Appendix F. Therefore, an energy impact is considered significant if the proposed project would:

[1] Based on 50,902 jobs and 7,413 dwelling units.
[2] State of California, Employment Development Department Labor Market Information Division, Monthly Labor Force Data for Cities and Census Designated Places (CDP) March 2014 - Preliminary, Data Not Seasonally Adjusted, April 18, 2014.

Develop land uses and patterns that cause wasteful, inefficient, and unnecessary consumption of energy or construct new or retrofitted buildings that would have excessive energy requirements for daily operation.

6.4.1 PROJECT ENERGY CONSUMPTION

SHORT-TERM CONSTRUCTION

In 1994, the U.S. Environmental Protection Agency (EPA) adopted the first set of emission standards (Tier 1) for all new off-road diesel engines greater than 37 kilowatts (kW). The Tier 1 standards were phased in for different engine sizes between 1996 and 2000, reducing NO_X emissions from these engines by 30 percent. The EPA Tier 2 and Tier 3 standards for off-road diesel engines are projected to further reduce emissions by 60 percent for NO_X and 40 percent for particulate matter from Tier 1 emission levels. In 2004, the EPA issued the Clean Air Non-road Diesel Rule. This rule will cut emissions from off-road diesel engines by more than 90 percent, and will be fully phased in by 2014.

Depending on market conditions, the project is expected to be constructed in phases generally over a period of several years. As described in Section 5.3, *Air Quality*, the project would incorporate Mitigation Measure AQ-4 to ensure that the development associated with proposed ESSCSP utilizes diesel construction equipment that complies with at least Tier 3-level emissions standards during all construction phases. The use of Tier-3 off-road engines would not only reduce exhaust emissions, but would also improve the fuel economy of the equipment fleet. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, it is expected that construction fuel consumption associated with the proposed Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

LONG TERM OPERATIONS

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing additional vehicle standards and for revising existing standards. In April 2010, the EPA and NHTSA finalized a joint rule to establish a national program consisting of new fuel economy standards of 35.5 miles per gallon (mpg) for model years 2012 through 2016 passenger cars, light-duty trucks, and medium-duty passenger vehicles that will reduce GHG emissions and improve fuel economy. The EPA and NHTSA extended the National Program to further reduce GHG emissions and improve fuel economy for model years 2017 through 2025 light-duty vehicles with final standards resulting in an average industry fleetwide of 54.5 mpg. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States.

The proposed Project would not result in any unusual characteristics that would result in excessive long-term operational fuel consumption. The Project is located in close proximity to existing transit (within 0.25 miles of the Los Angeles County Metropolitan Transportation Authority [Metro] Green Line). All future development within the ESSCSP area would be subject

to compliance with ESMC Chapter 15-16, which sets forth requirements for major new developments to provide facilities that encourage and accommodate the use of ridesharing, transit, pedestrian, and bicycle commuting as alternatives to single occupant motor vehicle trips. The Project also includes bicycle network improvements in compliance with the South Bay Bicycle Plan goals that would contribute to the viability of bicycle commuting as an alternative to single occupant motor vehicle trips. Before approval of any development project, the Applicant would be required to provide, at a minimum, all of the applicable transportation demand management (TDM) and trip reduction measures specified in ESMC § 15-16-3. Compliance with ESMC § 15-16-3 would reduce fuel consumption. Fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Other Public Transportation Options

In addition to being located within 0.25 miles of the Metro Green Line El Segundo Station and the implementation of TDM measures, the Project site is also served by Metro, Los Angeles Department of Transit (LADOT), and Torrance Transit bus transit lines along various roadways surrounding the Project site including El Segundo Boulevard, Sepulveda Boulevard, Nash Street and Grand Avenue. The proximity of the Project site to Metro, LADOT, and Torrance Transit routes would reduce the number of trips to and from the Project. The proposed Project would not result in the inefficient, wasteful, or unnecessary consumption of transportation energy.

Building Energy Demand

With implementation of Mitigation Measure GHG-1, the proposed Project would be expected to demand approximately 29.5 million kilowatt hours (kWh) of electricity per year and approximately 18 million British Thermal units (BTU) of natural gas per year. These figures were obtained from Appendix 10.4, *Air Quality and Greenhouse Gas Data*. The Project would involve operations typical of industrial, office, and retail uses, requiring electricity and natural gas for typical lighting, climate control, and day-to-day activities. Additionally, as stated in Section 5.4, *Greenhouse Gas Emissions*, the proposed Project would incorporate several energy efficiency measures, including exceeding Title 24 requirements set forth in the California Code of Regulations, high efficiency lighting, shade trees, and high efficiency heating and cooling systems. Therefore, the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Energy Efficiency Measures

In 2013, Title 24 standards, which include the California Building Code, Energy Code, Mechanical Code, Fire Code, and Green Building Standards Code, were updated with more stringent requirements. Title 24 of the California Code of Regulations establishes uniform building codes to, among other things, reduce California's energy consumption, and provide energy efficiency standards for new construction of, and additions and alterations to, residential and non-residential buildings. The 2013 Building Energy Efficiency Standards are expected to substantially reduce the growth in electricity and natural gas use. The 2013 Standards would continue to improve upon the current standards by improving lighting, insulation, and ventilation requirements for residential buildings while simplifying compliance documentation requirements and rules for small additions and alteration projects. For example, allowing smart vents and night breeze as alternative night ventilation, adding radiant barrier requirements, and increasing wall insulation are expected to save additional electricity. The 2013 Standards would also add

requirements for building envelope, lighting control, mechanical, process loads, commissioning, solar systems, and electrical power distribution systems to decrease energy use for nonresidential buildings. Requirements such as increased low-slope cool roofs, increased fenestration, occupancy sensor controls and increased cooling tower energy efficiency would further reduce energy use. These savings are cumulative, improving energy efficiency of homes and making nonresidential buildings more efficient.

Implementation of the Project design features and Mitigation Measure GHG-1 would result in reduced Project-related GHG emissions. For example, Mitigation Measure GHG-1 would require the Project to comply with the Tier 1 requirements of Title 24, Part 11 (California Green Building Standards Code) of the California Code of Regulations. Tier 1 requires projects to exceed Title 24 by 15 percent. Additionally, the Project would implement the following efficiency measures required by Mitigation Measure GHG-1:

- Install light colored “cool” roofs and cool pavements, and strategically placed shade trees
- Install high efficiency lighting, and energy efficient heating and cooling systems.
- Reduce unnecessary outdoor lighting.
- Install water- efficient fixtures.

The Project would adhere to all Federal, State, and local requirements for energy efficiency. The proposed Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

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