

12.0 Comments and Responses



12.0 COMMENTS AND RESPONSES

12.1 CEQA REQUIREMENTS

Before approving a project, the *California Environmental Quality Act (CEQA)* requires the Lead Agency to prepare and certify a Final Environmental Impact Report (Final EIR).

In accordance with *CEQA Guidelines* Sections 15120 through 15132 and Section 15161, the City of El Segundo prepared a Draft EIR for the El Segundo South Campus Specific Plan (EA 905) (SCH #2012101081). This Comments and Responses section, combined with the Draft EIR, Mitigation Monitoring and Reporting Program, and errata sheet comprise the Final EIR.

This Comments and Responses section includes all components required by CEQA Guidelines § 15120 and is included in the Final EIR.

12.2 PUBLIC REVIEW PROCESS – DRAFT EIR

The Draft EIR was circulated for review and comment to the public, agencies, and organizations. The Draft EIR was also circulated to State agencies for review through the State Clearinghouse, Office of Planning and Research. The 45-day public review period ran from July 14, 2014 to August 27, 2014. Comments received in writing during the 45-day public review period from the public, local, and State agencies on the Draft EIR have been incorporated into this section.

12.3 FINAL EIR

The Final EIR allows the public and Lead Agency an opportunity to review revisions to the Draft EIR, the comments and response, and other components of the EIR, such as the Mitigation Monitoring and Reporting Program, before Project approval. The Final EIR serves as the environmental document to support a decision on the proposed Project.

After completing the Final EIR, and before approving the Project, the Lead Agency must make the following three certifications as required by CEQA Guidelines Section 15090:

- That the Final EIR has been completed in compliance with CEQA;
- That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the Project; and
- That the Final EIR reflects the Lead Agency's independent judgment and analysis.

These certifications, the Findings of Fact, are included in a separate Findings document. Both the Final EIR and the Findings will be submitted to the Lead Agency for consideration of the proposed Project.



12.4 WRITTEN COMMENT LETTERS AND RESPONSES

All written correspondence from those agencies or individuals commenting on the Draft EIR is reproduced on the following pages. The individual comments on each letter have been consecutively numbered for ease of reference. Following each comment letter are responses to each numbered comment. A response is provided for each comment raising substantive environmental issues. Added or modified text is underlined, while deleted text will have a ~~strike out through the text~~, and is included in a box, as the following example shows:

Text from EIR ~~Text from EIR~~

COMMENT LETTERS

A total of eight comment letters were received: seven during the public review period; and one (Number 8) after close of the public review period (August 27, 2014).

1. Scott Morgan, Director, State Clearinghouse, State of California Governor's Office of Planning and Research, State Clearinghouse, August 28, 2014.
2. Xin Tong, Development Review Coordinator, Los Angeles County Metropolitan Transportation Authority, July 30, 2014.
3. Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, August 3, 2014.
4. Carmen Sainz, Supervising Regional Planner, County of Los Angeles Airport Land Use Commission, August 13, 2014.
5. Dianna Watson, IGR/CEQA Branch Chief, State of California Department of Transportation, August 15, 2014.
6. Ruben Cruz, Land Development Division, Los Angeles County Department of Public Works, August 27, 2014.
7. Adriana Raza, Customer Service Specialist, Facilities Planning Department, County Sanitation Districts of Los Angeles County, August 27, 2014.
8. Karen Cadavona, Senior Corporate Representative, Third Party Environmental Reviews, Southern California Edison Company.¹

¹ This comment letter was received November 14, 2014, 124 days after the close of the public review period.



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

August 28, 2014

RECEIVED
SEP 02 2014

Kimberly Christensen
City of El Segundo
350 Main Street
El Segundo, CA 90245

Planning and Building Safety Dept.

Subject: El Segundo South Campus Specific Plan EIR
SCH#: 2012101081

Dear Kimberly Christensen:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on August 27, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Morgan".

Scott Morgan
Director, State Clearinghouse

1-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 2012101081
Project Title El Segundo South Campus Specific Plan EIR
Lead Agency El Segundo, City of

Type EIR Draft EIR
Description The El Segundo South Campus Specific plan project proposes to establish a maximum allowable development within the Specific plan area boundaries of 4,231,547 net square feet, or an additional 2,142,457 gsf over existing conditions and including office, warehousing, light industrial, and retail/restaurant uses. In addition to the Specific Plan, the proposed project entitlements include a General Plan Amendment, a General Plan Map Amendment, Zone Change, Zone Map Amendment, Zone Text Amendment, a Vesting Tentative Map, and a Development Agreement.

Lead Agency Contact

Name Kimberly Christensen
Agency City of El Segundo
Phone 310 524 2312 **Fax**
email
Address 350 Main Street
City El Segundo **State** CA **Zip** 90245

Project Location

County Los Angeles
City El Segundo
Region
Lat / Long 33° 54' 54" N / 118° 23' 21" W
Cross Streets E. El Segundo Blvd./So. Sepulveda Blvd./So. Douglas Street
Parcel No. 4138-014-013,-047
Township 3S **Range** 14W **Section** 18 **Base** SBB&M

Proximity to:

Highways I-405;I-105; Hwy 1
Airports LA International
Railways A,T,SF; Metro Green Line
Waterways
Schools
Land Use Z: Light Industrial (M-1); Open Space (O-S); and Public Facilities (P-F).
GP: Light Industrial, Open Space and Public Facilities.

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Document Details Report
State Clearinghouse Data Base

Date Received 07/14/2014

Start of Review 07/14/2014

End of Review 08/27/2014



RESPONSE TO COMMENT LETTER NO. 1

Scott Morgan, Director, State Clearinghouse

State of California Governor's Office of Planning and Research, State Clearinghouse

August 28, 2014

- 1-1 This procedural letter received from the State Clearinghouse acknowledges the close of the public review period for the EIR and verifies that the City of El Segundo has complied with State Clearinghouse review requirements under CEQA. The letter also states that no state agencies submitted comments to the Clearinghouse by the close of the 45-day public review period.



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

July 30, 2014

Masa Alkire
Principle Planner
City of El Segundo
Planning and Building Safety Department
350 Main Street
El Segundo, CA 90254

RE: El Segundo South Campus Specific Plan Project – Draft Environmental Impact Report

Dear Ms. Alkire,

Thank you for the opportunity to comment on the proposed El Segundo South Campus Specific Plan Project, 2000 – 2100 East El Segundo Boulevard. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues in relation to our facilities and services that may be affected by the proposed project.

We previously commented on the Notice of Preparation (NOP) for this project in November of 2012. The comments from that letter still stand. We appreciate the careful Traffic Impact Analysis (TIA) that was completed as part of the Draft Environmental Impact Report (DEIR) in accordance with the Congestion Management Program (CMP). In addition to the comments submitted in November of 2012, we would like to include the following additional comments in response to the DEIR.

2-1

It is noted that the northern boundary of the site at East El Segundo Boulevard and North Nash Street, is in close proximity to the Metro Green Line El Segundo Station. The following concerns related to the project's proximity to the Right of Way should be addressed:

1. The project sponsor is advised that the Metro Green Line light rail currently operates weekday peak service as often as every six to seven minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW proximate to the proposed project. Also, the Crenshaw Line between the Redondo Beach Station (Green Line) and Crenshaw/Expo Station (Expo Line) is a new line that is scheduled for implementation in 2019; trains passing El Segundo Station may operate as often as every three minutes considering the future ridership needs.
2. Considering the proximity of the proposed project to the railroad ROW, the Metro Green Line will produce noise, vibration and visual impacts. A recorded Noise Easement Deed in favor of LACMTA is required, a form of which is attached. In addition, any noise mitigation required for the project must be borne by the developers of the project and not LACMTA. The easement recorded in the Deed will extend to successors and tenants as well.
3. The project sponsor should notify LACMTA of any changes to the construction/building plans that may impact the use of the ROW.
4. There shall be no encroachment onto the railroad ROW. If access is necessary for the applicant or its contractor to enter the ROW during construction, a temporary right-of entry

2-2

2-3

2-4

2-5

agreement must be obtained from LACMTA. Contact Velma Marshall, Deputy Executive Officer of Real Estate, at 213-922-2415 for right-of-entry permits.	2-5
5. Prior to the City issuing a building permit within 100 feet of the Metro Rail construction area, clearance shall be obtained from LACMTA. LACMTA will need to review engineering drawings and calculations. Please refer to the attached LACMTA “Design Criteria and Standards, Volume III - Adjacent Construction Design Manual” (attached) for more details regarding submitting drawings and calculations to LACMTA for review. Please note that LACMTA requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to the Metro existing structures. For more information, please contact Aspet Davidian at 213-922-5258 / DavidianA@metro.net or Than Win at 213-922-1405 / WinT@metro.net .	2-6
6. It is noted that there are a number of aerial railway support structures on the Project site and in the public right-of-way proximate to the Project site. Considering the proposed Project’s proximity to LACMTA infrastructure, the Project sponsor should be advised that construction activities cannot impact LACMTA property and equipment. Permits for special operations including the use of a pile driver or any other equipment that could come into close proximity to the aerial support structure must be obtained at least one week prior to the start of construction. In addition, any future work affecting the northwest corner of the proposed Project within ten feet of the support structure will require a track allocation permit. Permits allowing for single tracking or a power shutdown must be obtained at least two weeks prior to the start of construction. The contractor should contact the following people at LACMTA regarding track allocation and/or special operation permits: Kim Chol, Rail Operations Assistant Manager at 323-563-5277 or, the On-Duty Rail Operations Control Center Floor Manager at 323-563-5022.	2-7
7. LACMTA staff shall be permitted to monitor construction activity to ascertain any impact to the ROW.	2-8
8. The project sponsor should be advised that LACMTA may request reimbursement for costs incurred as a result of project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure.	2-9
Considering the proximity to the El Segundo Station, LACMTA would like to identify the potential synergies associated with transit-oriented development:	
1. LACMTA supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. LACMTA encourages the City and Project sponsor to be mindful of the Project’s proximity to the El Segundo Station, including orienting pedestrian pathways toward the station. Please consider adding the wayfinding signage in addition to the pedestrian pathways, too.	2-10
2. LACMTA would like to inform the Project Sponsor of Metro’s employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Business Transit Access Pass (B-TAP) programs which offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Sarah Zadok, at 213-922-4110 or zadoks@metro.net .	2-11

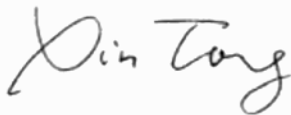
3. LACMTA encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities or parking benefit districts. These strategies could be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand. **2-12**

4. The Project should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting stations with housing and employment concentrations. For reference, we would like to direct City staff to view the First Last Mile Strategic Plan, authored by LACMTA and the Southern California Association of Governments (SCAG), available on line at:
http://media.metro.net/docs/sustainability_path_design_guidelines.pdf **2-13**

If you have any questions regarding this response, please contact Xin Tong at 213-922-8804 or by email at tongx@metro.net. LACMTA looks forward to reviewing the Final EIR. Please send it to the following address:

LACMTA Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,



Xin Tong
Development Review Coordinator, Metro Planning Department

Attachment: Noise Easement Deed **2-14**

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
Real Estate Department
Deputy Executive Officer - Real Estate
P: 213-922-2415
F: 213-922-2400
One Gateway Plaza, Mail Stop 99-18-4
Los Angeles, CA 90012-2932

Space Above Line for Recorder's Use

[Recordation of this Public Document is Exempt from all Recording Fees and Taxes Pursuant to Government Code Section 6103]

Public Agency - No Tax Statement

NOISE EASEMENT DEED

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a _____, ("Grantor") for themselves, their heirs, administrators, executors, successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("Grantee"), its successors and assigns, for the use and benefit of the public and its employees, a perpetual, assignable easement in that certain real property in the City of Los Angeles, County of Los Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property having the same boundaries as the described Property and extending from the sub-surface upwards to the limits of the atmosphere of the earth, the right to cause in said easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic disturbances, and all other effects that may be caused or may have been caused by the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit or action of any purpose, including or not limited to, property damage or personal injuries, against Grantee, its successors and assigns, for any necessary operating and maintenance activities and changes related to the Project which may conflict with Grantors' use of Grantors' property for residential and other purposes, and Grantors hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or develop the Property for any permitted use. However, Grantor's rights of development shall not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of, 2013.

By: _____
Name

By: _____
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

ACKNOWLEDGEMENT

State of California
County of _____)

On _____ before me, _____
(insert name and title of the officer)

personally appeared _____, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to be that he/she/they executed the same in his/her/ their authorized capacity(ies), and that by his/her/ their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____ (Seal)

CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Noise Easement Deed from _____ to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

2-15

Dated this ____ day of _____, 20__

By: _____

Deputy Executive Officer - Real Estate



RESPONSE TO COMMENT LETTER NO. 2

Xin Tong, Development Review Coordinator
Los Angeles County Metropolitan Transportation Authority
July 30, 2014

- 2-1 This is an introductory comment and does not address the adequacy of the Draft EIR.
- 2-2 Comment noted. Operations associated with the Metro Green light rail located to the north of the Project site are discussed throughout the Draft EIR.
- 2-3 As noted by the commenter, noise, vibration, and visual impacts could occur at the Project site due to the close proximity of the Metro Green light rail. As concluded in Draft EIR Section 5.5, *Noise*, noise from Metro Green Line train operations would be most noticeable at the uses in the northeast portion of the Project site (i.e., commercial/office mixed-use, office/industrial mixed-use, a parking structure, and open space/recreational). However, these uses are not noise sensitive and would not be significantly impacted by train noise from the Metro Green light rail. The Los Angeles County Metropolitan Transportation Authority (LACMTA) requests that Noise Easement Deeds in favor of LACMTA be recorded on all property within the Specific Plan area. The DEIR analysis completed for this Project does not identify a significant impact from Metro Green Line operation on parcels within the Project area and no mitigation is identified in the DEIR. Project impacts related to visual resources, character, and light and glare were determined to be less than significant; refer to Draft EIR Section 8.0, *Effects Found Not to Be Significant*.

According to the *Transit Noise and Vibration Impact Assessment* document (Federal Transit Administration [FTA], May 2006), land uses sensitive to vibration from ground-borne vibration include concert halls and other special-use facilities (e.g., vibration-sensitive research and manufacturing, hospitals with vibration-sensitive equipment, and university research operations); residential land uses and any buildings where people sleep (e.g., hotels and hospitals); and schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference. The proposed uses in the northeast portion of the Project site do not fall under any of the aforementioned vibration-sensitive uses. The retail uses and parking structures that are proposed adjacent to the Metro Green Line light rail are not considered vibration-sensitive uses. Additionally, using the Flow Chart of Vibration Screening Process in the FTA *Transit Noise and Vibration Impact Assessment* (Figure 9-1), impacts to future onsite uses (commercial/office mixed-use, office/industrial mixed-use, a parking structure, and open space/recreational) near the Metro Green Line light rail would not occur, as these uses are not considered vibration-sensitive, and office uses would be outside of the impact screening distance. Consequently, vibration impacts would not occur at the Project site from the Metro Green Line light rail; the impact is less than significant.

- 2-4 As noted in Draft EIR Section 5.10, *Public Services and Recreation*, an improved enclosed bicycle parking station is proposed at either the Metro Green Line Station or on the Project site. It is possible, therefore, that the Project could encroach onto LACMTA right-of-way both during Project construction and operations. Any Project improvements that may involve encroachment onto LACMTA right-of-way would require coordination by the Project Applicant and LACMTA. The requirement for a Temporary Right-of-Entry



- Agreement and Pedestrian Easement will be included as a Project Condition of Approval.
- 2-5 Refer to Response to Comment 2-4 above.
- 2-6 This comment pertains to the request for review and approval of Project construction plans, drawings, and calculations by LACMTA before the City issues a building permit. This requirement will be included as a Project Condition of Approval.
- 2-7 Refer to Response 2-3 above. The commenter's request for a Special Operation Permit for pile driver/other equipment use in close proximity to LACMTA railway aerial support structures during Project construction activities is noted. The commenter notes that future development on the Project site within ten feet of a railway support structure would require a Track Allocation Permit at least two weeks before the start of construction. The requirements for a Special Operation Permit and Track Allocation Permit will be included as Project Conditions of Approval.
- 2-8 Refer to Response 2-3 above. The commenter's request for a LACMTA staff monitor at the Project site during construction activities is a requirement that will be included as a Project Condition of Approval.
- 2-9 Any costs associated with Project construction/operations that may cause delay or harm to LACMTA service or infrastructure would be negotiated by LACMTA and the Project Applicant/responsible party; this comment does not address the adequacy of the Draft EIR.
- 2-10 Comment noted. The ESSCSP has identified as a design objective (ESSCSP Section V) to "ensure functional pedestrian, bicycle, and motor vehicle circulation within the Project and convenient pedestrian and bicycle linkages to and from adjacent residential, commercial, industrial, and school areas." To this end, the Project includes as a development guideline to provide "appropriate linkages between internal Project components and buildings, as well as between the Project and the surrounding development.... including pedestrian walkways, and plaza areas." The Project proposes various design features that encourage non-motorized transportation and provide connectivity within the Project area and with adjacent areas, such as the Metro Rail Station. Namely, the Project proposes a Class I Bicycle Path within El Segundo Boulevard, two Class II Bicycle Lanes within the Nash Street extension, and an enclosed bicycle parking station at (or onsite near to) the Metro Rail Station; refer to Exhibit 3-6, *Conceptual Site Plan*.
- The commenter's request for wayfinding signage at the Project site in congruence with LACMTA's transit-oriented development (TOD) principles may be included as a Project Condition of Approval that conform with the El Segundo Municipal Code (ESMC).
- 2-11 Comment noted. This comment is informational and does not address the adequacy of the Draft EIR. Notification of Employer Transit Pass Programs will be included as a Project Condition of Approval.
- 2-12 Comment noted. Refer to Response 2-7. Additionally, the Project is subject to compliance with ESMC Chapter 15-16, which sets forth the requirements for new developments to provide facilities that encourage and accommodate the use of



pedestrian and bicycle commuting (among other modes). As discussed in detail in Section 5.2, the Project includes various TDM measures that encourage and accommodate non-motorized transportation (i.e., pedestrian and bicycle commuting), in compliance with ESMC Chapter 15-16 requirements. As specified in ESMC § 15-16-2, before approval of any development project, the Applicant is, at a minimum, required to provide all of the applicable TDM and trip reduction measures. Specifically, nonresidential developments of 50,000 square feet or more must display transportation information and provide the following measures: preferential parking; HOV loading area; vanpool access; on-site amenities; and bicycle facilities. Additionally, optional measures include showers/lockers and transit support facilities. The TDM and trip reduction measures in ESMC Chapter 15-16 will be required as a Condition of Approval. The reduction in vehicle trips achieved through the Project's proposed pedestrian/bicycle design features and TDM measures can be expected to lessen the Project's traffic/circulation, air quality, greenhouse gasses, and noise impacts.

- 2-13 The Project involves transit accessible development; refer to Responses 2-7 and 2-9 above. This comment does not address the adequacy of the Draft EIR.
- 2-14 This comment is a closing statement and does not address the adequacy of the Draft EIR.
- 2-15 Refer to Response 2-2 above.



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

RECEIVED
AUG 06 2014
PLANNING DIVISION

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

August 4, 2014

Masa Alkire, Principal Planner
City of El Segundo
Planning and Building Safety Department
360 Main Street
El Segundo, CA 90245

Dear Masa Alkire:

COMPLETION/DRAFT ENVIRONMENTAL IMPACT REPORT, "EL SEGUNDO SOUTH CAMPUS SPECIFIC PLAN PROJECT," REQUESTING, SPECIFIC PLAN, ENVIRONMENTAL ASSESSMENT, ZONE CHANGE, SUBDIVISION, DEVELOPMENT AGREEMENT FOR AN OFFICE, WAREHOUSING, LIGHT INDUSTRIAL AND COMMERCIAL RETAIL/RESTAURANT, 2000-2001 ELSEGUNDO BOULEVARD, EL SEGUNDO (FFER #201400120)

3-1

The Completion/Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. The subject property is entirely within the City of El Segundo, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

3-2

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- | | | | | | | | |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | DIAMOND BAR | HIDDEN HILLS | LA MIRADA | MALIBU | POMONA | SIGNAL HILL |
| ARTESIA | CARSON | DUARTE | HUNTINGTON PARK | LA PUENTE | MAYWOOD | RANCHO PALOS VERDES | SOUTH EL MONTE |
| AZUSA | CERRITOS | EL MONTE | INDUSTRY | LAKEWOOD | NORWALK | ROLLING HILLS | SOUTH GATE |
| BALDWIN PARK | CLAREMONT | GARDENA | INGLEWOOD | LANCASTER | PALMDALE | ROLLING HILLS ESTATES | TEMPLE CITY |
| BELL | COMMERCE | GLENDORA | IRWINDALE | LAWNDALE | PALOS VERDES ESTATES | ROSEMEAD | WALNUT |
| BELL GARDENS | COVINA | HAWAIIAN GARDENS | LA CANADA FLINTRIDGE | LOMITA | PARAMOUNT | SAN DIMAS | WEST HOLLYWOOD |
| BELLFLOWER | CUDAHY | HAWTHORNE | LA HABRA | LYNWOOD | PICO RIVERA | SANTA CLARITA | WESTLAKE VILLAGE |
| BRADBURY | | | | | | | WHITTIER |

LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
2. This project is located entirely in the City of El Segundo. Therefore, the City of El Segundo Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.
3. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Nancy Rodeheffer, at (323) 890-4243 or at nrodeheffer@fire.lacounty.gov.
4. The County of Los Angeles Fire Department, Land Development Unit, appreciates the opportunity to comment on this project.

3-3

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

3-4

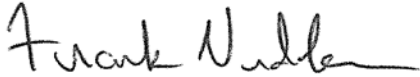
HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no additional comments than those already provided.

Masa Alkire
August 4, 2014
Page 3

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:jl

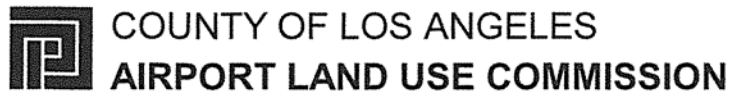
3-5



RESPONSE TO COMMENT LETTER NO. 3

Frank Vidales, Chief, Forestry Division
County of Los Angeles Fire Department, Prevention Services Bureau
August 4, 2014

- 3-1 This is an introductory comment and does not address the adequacy of the Draft EIR.
- 3-2 As noted by the commenter, the Project site is located entirely within the jurisdiction of the City of El Segundo. Since the El Segundo Fire Department (ESFD) is responsible for fire prevention services, the Project would not result in any impacts to the Consolidated Fire Protection District of Los Angeles County (LACFD).
- 3-3 The Commenter suggests that the proposed Project comply with all LACFD codes, requirements, and standards such as ingress/egress, fire hydrants, roadway widths, turning radii, fire sprinkler systems, and any other related design requirements. As noted on Draft EIR page 5.10-8, the Project would be required to comply with all applicable laws for fire and safety protection. The El Segundo Fire Department (ESFD) would review the Project's design details pertaining to architectural, structural, mechanical, plumbing, and electrical systems. Through implementation of the standard ESFD fire plan check process, impacts in this regard would be less than significant.
- 3-4 Comment noted. The comment is informational, and pertains to the statutory responsibilities of LACFD Forestry Division. The comment also indicates that the Health Hazardous Materials Division has no comments. No further response is required.
- 3-5 This comment is a closing statement that provides contact information and it does not address the adequacy of the Draft EIR.



COUNTY OF LOS ANGELES
AIRPORT LAND USE COMMISSION

RECEIVED
AUG 19 2014
PLANNING DIVISION

August 13, 2014

City of El Segundo
Planning and Building Safety Department
350 Main Street
El Segundo, CA 90245
Attention: Masa Alkire

**SUBJECT: PROJECT NO. R2014-02363/RALU201400007
DRAFT ENVIRONMENTAL IMPACT REPORT FOR PROPOSED
EL SEGUNDO SOUTH CAMPUS SPECIFIC PLAN PROJECT**

Dear Masa Alkire:

Thank you for the opportunity to comment on the above referenced project. Staff of the Los Angeles County Airport Land Use Commission (ALUC) has reviewed the submitted documents and has the following comments:

The proposed project is not located within an Airport Influence Area (AIA). The nearest AIA is Los Angeles International Airport's AIA, which is located 1600 yards north of the project site. Therefore, the proposed project is not subject to ALUC review in accordance with the Public Utilities Code (PUC), Section 21676(a).

If you have questions regarding this matter, please contact **Jonathan Bell** at (213) 974-6425 or via email at jpbell@planning.lacounty.gov, between 7:30 am and 5:30 PM, Monday through Thursday. Our office is closed on Fridays.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Richard J. Bruckner



Carmen Sainz
Supervising Regional Planner
Community Studies East / Airport Land Use Section

CS:JPB

4-1



RESPONSE TO COMMENT LETTER NO. 4

Carmen Sainz, Supervising Regional Planner
County of Los Angeles, Airport Land Use Commission
August 13, 2014

- 4-1 As noted by the commenter and concluded in Draft EIR Section 8.0, *Effects Found to Not Be Significant*, the Project is not located within an Airport Influence Area (AIA). Therefore, the Project would not result in an airport-related safety hazard, and would not be subject to the County of Los Angeles Airport Land Use Commission (ALUC) review.

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 897-9140
 FAX (213) 897-1337
 www.dot.ca.gov



*Serious drought.
 Help save water!*

August 15, 2014

RECEIVED
 AUG 21 2014

Planning and Building Safety Dept.

Kimberly Christensen, AICP
 City of El Segundo
 350 Main St.
 El Segundo, CA. 90245

RE: IGR/CEQA No. 140727/NY
 DEIR/El Segundo South Campus Specific Plan
 SCH# 2012101081
 Vicinity: LA/I-105, PM 0.00-0.50/I-405, PM 20.22

Dear Ms. Christensen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the El Segundo South Campus Specific Plan in the City of El Segundo.

Caltrans reviewed the Traffic Impact Analysis and have the following comments:

The intersections listed below will be significantly impacted by the project and mitigation is not possible due to right of way constraints. Since physical improvements cannot be implemented, Caltrans requests that the project make a fair share contribution toward future improvements along the State Highway in the immediate vicinity of the project.

- Intersection #7----Sepulveda Blvd. / Lincoln Blvd.
- Intersection #15----Sepulveda Blvd. / El Segundo Blvd.
- Intersection #18----Sepulveda Blvd. / Rosecrans Ave.
- Intersection # 68----Lincoln Blvd. / Manchester Ave.
- Intersection #69---- Sepulveda Blvd. / Manchester Ave.
- Intersection #70----Sepulveda Blvd. / Artesia Blvd.
- Intersection #71----Sepulveda Blvd. / Torrance Blvd.

Caltrans requests that the City to direct the traffic consultant to calculate the fair share amounts and submit the calculations to Caltrans for approval and further processing of the traffic impact fees.

5-1

If you have any questions regarding this response, please call Mr. Nerses Yerjanian, the Project Engineer/Coordinator, at (213) 897-6536 and refer to IGR/CEQA # 140727/NY.

Sincerely,

A handwritten signature in black ink that reads "Nerses A. Yerjanian". The signature is written in a cursive style with a long horizontal stroke at the end.

5-2

For: DIANNA WATSON
IGR/CEQA Branch Chief
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse



RESPONSE TO COMMENT LETTER NO. 5

Dianna Watson, IGR/CEQA Branch Chief
State of California Department of Transportation
August 15, 2014

- 5-1 This commenter identifies the impacted State facilities and requests that the City direct the traffic consultant to calculate fair share amounts and submit calculations to Caltrans for further processing of traffic impact fees. This comment does not address the adequacy of the Draft EIR. All required fees, adopted by agencies with jurisdiction over intersections and roadways affected by this Project, must be calculated and collected by affected agencies before Certificates of Occupancy are issued on any development in the Project area.
- 5-2 Comment noted. This is a closing statement and does not address the adequacy of the Draft EIR.

August 27, 2014

Mr. Mesa Alkire,
City of El Segundo
Planning and Building Safety Department
350 Main Street
El Segundo, California 90245

Dear Mr. Alkire:

**DRAFT ENVIRONMENTAL IMPACTS REPORT (DEIR)
EL SEGUNDO SOUTH CAMPUS SPECIFIC PLAN PROJECT
2000-2100 EAST EL SEGUNDO BOULEVARD
CITY OF EL SEGUNDO**

Thank you for the opportunity to review the DEIR for the El Segundo South Campus Specific Plan Project in the City of El Segundo. The Specific Plan (SP) will establish a maximum allowable development within the SP area boundaries of 4,231,547 gross square feet, or an additional 2,142,457 gross square feet over the existing conditions. The proposed uses within the SP include office, warehousing, light industrial and commercial (retail/restaurant) uses. All future development proposals within the project area must comply with the SP.

The following Los Angeles County, Department of Public Works comments are for your consideration and relate to the environmental document only:

Traffic

1. The DEIR identifies a significant and unavoidable impact at the intersections of La Cienega Boulevard and El Segundo Boulevard which is jurisdictionally shared between the Los Angeles County and the City of Hawthorne. The lead Agency should prepare a Statement of Overriding Considerations (SOC) outlining the specific plan benefits despite the significant traffic impacts and submit the SOC to Los Angeles County, Department of Public Works for review.

If you have any questions regarding the traffic comment please contact Mr. Andrew Ngumba of Traffic & Lighting Division at (626) 300-4851 or anugmba@dpw.lacounty.gov.

Mr. Mesa Alkire,
August 27, 2014
Page 2

If you have any other questions regarding the Los Angeles County, Department of Public Works comments please contact Mr. Ruben Cruz of Land Development Division at (626) 458-4910 or rcruz@dpw.lacounty.gov.

6-1

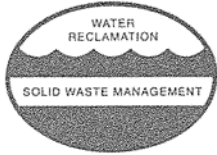
P:\dpub\SUBPCHECK\Plan Checking Files\Zoning Permits\Projects submitted by Other Agencies\EI Segundo South Campus Specific Plan - City of El Segundo\CEQA\2014-08-14\EI Segundo South Camopus Specific Plans City of El Segundo.docx



RESPONSE TO COMMENT LETTER NO. 6

Ruben Cruz, Land Development Division
Los Angeles County Department of Public Works
August 27, 2014

- 6-1 Comment noted. As noted by the commenter, the Project would require the City Council to adopt a Statement of Overriding Considerations (SOC) due to Significant and Unavoidable impacts. A copy of the Planning Commission and City Council packet for the Final EIR hearing would include a copy of a proposed SOC, and would be publicly available and distributed to the County of Los Angeles before the final hearing.



**COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY**

1955 Workman Mill Road, Whittier, CA 90601-1400
 Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
 Telephone: (562) 699-7411, FAX: (562) 699-5422
 www.lacsd.org

GRACE ROBINSON HYDE
 Chief Engineer and General Manager

August 27, 2014

Ref File No.: 3033325

RECEIVED
 SEP 03 2014
 PLANNING DIVISION

Ms. Masa Alkire, AICP, Principal Planner
 Planning and Building Safety Department
 City of El Segundo
 350 Main Street
 El Segundo, CA 90245

Dear Ms. Alkire:

El Segundo South Campus Specific Plan Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on July 14, 2014. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

1. Previous comments submitted by the Districts in correspondence dated November 28, 2012 (copy enclosed) still apply to the subject project with the following updated information and comments.
2. The proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at extension 2900, in order to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to http://www.lacsd.org/wastewater/industrial_waste/permit.asp.
3. **UTILITIES AND SERVICE SYSTEMS**, Wastewater Facilities Section, *page 5.11-15*, under Wastewater Treatment – The JWPCP currently processes an average flow of 264.1 mgd.
4. **UTILITIES AND SERVICE SYSTEMS**, Wastewater Facilities Section, *page 5.11-15*, under Exhibit 5.11-3, Existing Sewer System – This section discusses local sewer connections labeled by the analysis as the “southerly trunk” and the “northerly trunk”. The following is a list of Districts' trunk sewers that serve the project area conveyed through these local sewer lines.

7-1

7-2

7-3

Name	Location	Size (dia.)*	Design Capacity (mgd)**	Peak Flow (mgd)	Last Measured
Aviation Boulevard Trunk Sewer	In Aviation Boulevard at El Segundo Boulevard	18"	2.2	1.6	2011
Aviation Boulevard Trunk Sewer	In Aviation Boulevard at Utah Avenue	21"	4.5	1.1	2011

Name	Location	Size (dia.)*	Design Capacity (mgd)**	Peak Flow (mgd)	Last Measured
Aviation Boulevard Relief Trunk Sewer	In Aviation Boulevard at Hawaii Street	24"	4.6	0.6	2011

*diameter in inches
 **million gallons per day

7-3

5. **UTILITIES AND SERVICE SYSTEMS**, Wastewater Facilities Section, *page 5.11-32*, Table 5.11-8 Project Wastewater Generation - The Districts' average wastewater generation factors can now be found in www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

7-4

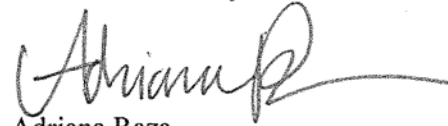
6. All other information concerning Districts' facilities and sewerage service contained in the document is current.

7-5

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Hyde

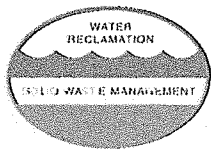


Adriana Raza
 Customer Service Specialist
 Facilities Planning Department

AR:ar

Enclosure

cc: M. Tremblay
 J. Ganz
 L. Shadler



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON CHAN
Chief Engineer and General Manager

November 28, 2012

Ref. File No: 2393825

Ms. Masa Alkire, AICP, Principal Planner
Planning and Building Safety Department
City of El Segundo
350 Main Street
El Segundo, CA 90245

Dear Ms. Alkire:

El Segundo South Campus Specific Plan Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on October 29, 2012. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

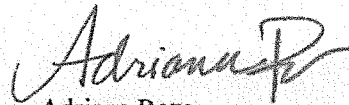
1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Aviation Boulevard Trunk Sewer, located in Aviation Boulevard at El Segundo Boulevard. This 18-inch diameter trunk sewer has a design capacity of 2.2 million gallons per day (mgd) and conveyed a peak flow of 1.6 mgd when last measured in 2011.
2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 265.4 mgd.
3. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.
4. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Chan



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR: ar

c: M. Tremblay
J. Ganz



RESPONSE TO COMMENT LETTER NO. 7

Adriana Raza, Customer Service Specialist, Facilities Planning Department
County Sanitation Districts of Los Angeles County
August 27, 2014

7-1 The commenter provides introductory comments. The commenter notes that future development projects within the Project site may require a County Sanitation District of Los Angeles permit for Industrial Wastewater Discharge. As discussed in Section 5.8, Hydrology and Water Quality, all future development within the ESSCSP area must comply with NPDES requirements for any commercial and light industrial uses that plan to discharge wastewater to the City's sewage system, which ultimately flows to the JWPCP. This requirement will be added as a Project Condition of Approval.

7-2 Comment noted. Paragraph two on Draft EIR page 5.11-15 has been revised as follows:

The facility, which has a design capacity of 400 MGD, provides both primary and secondary treatment of approximately ~~265.4~~ 264.1 MGD of wastewater.

7-3 Comment noted. This comment is informational and does not address the adequacy of the Draft EIR.

7-4 The commenter identifies that the District's average wastewater generation factors are available on the Los Angeles County Sanitation District's website in a table identified as "Table 1 – Loadings for Each Class of Land Use." The Flow factors used in the DEIR analysis are consistent with this table with the exception of the flow factor for the "Shopping Center" land use. The flow factor used in the DEIR for the 148,960-square foot commercial retail portion of the Project is 150 gallons per day per thousand square feet (gpd/kfs). The flow factor identified in "Table 1 – Loadings for Each Class of Land Use" is 325 gpd/kfs. Using the County's flow factor, the estimated flow amount for the Project's commercial portion would increase by 26,068 gpd. Using the County's flow factor, the overall estimate for the Project's wastewater generation would increase from 408,168 gpd to 434,236 gpd. The Planning Division and Public Works Department staff reviewed the incremental change in wastewater flow that would result from using the County's recommended flow factor and compared this modified wastewater estimate amount against the DEIR analysis for wastewater. The increase in flow resulting from the use of the County's wastewater flow factor for a shopping center is small compared to the Project's overall daily flow estimate. Therefore this small increase in wastewater flow estimate would not significantly modify the analysis or the conclusions for wastewater facilities included in the DEIR.

7-5 Comment noted. This is a closing statement and does not address the adequacy of the Draft EIR.

November 14, 2014

Masa Alkire, AICP, Principal Planner
City of El Segundo—Planning and Building Safety Department
350 Main Street
El Segundo, CA 90245
malkire@elsegundo.org

RE: El Segundo South Campus Specific Plan Project

Dear Mr. Alkire:

Southern California Edison (SCE) appreciates the opportunity to review and provide comments on the Draft Environmental Impact Report (EIR) for the El Segundo South Campus Specific Plan Project. The proposed Specific Plan includes a conceptual development scenario that presents a potential implementation of land uses and standards. This conceptual development scenario includes 1,752,800 gross square-feet of new single tenant office, 148,960 gross square-feet of new retail/restaurant development, 91,840 gross square-feet of new warehouse space, 168,000 gross square-feet of new light industrial development, and demolition of 19,142 square-feet of existing development and the existing 2,089,090 gross square-foot Raytheon Company facility. The proposed project would also widen El Segundo Boulevard and require the construction of a second customer dedicated substation located immediately northwest of the existing substation.

8-1

SCE's Electrical System

SCE operates electrical transmission and distribution facilities, as well as substations and supporting appurtenances within the City of El Segundo. The proposed project area contains an existing SCE 66/12 kilovolt (kV) substation, as well as a 66 kV transmission line on the south side of El Segundo Boulevard. SCE also has an existing utility corridor adjacent to the project area to the southwest, which contains 66 kV transmission lines.

Potential Impacts to SCE's Facilities

The proposed project has the potential to impact SCE's existing subtransmission lines. Section 5.11 Utilities and Service Systems of the Draft EIR, Page 5.11-39, discussed the need for a second customer dedicated substation; however, the developer has not submitted a Study Application Package to SCE, which is attached and may be submitted to MOS-AF@sce.com. The proposed project's road widening along El Segundo Boulevard would encroach on SCE's 66 kV transmission line. The Draft EIR did not address whether road widening would require modification or relocation of SCE's existing transmission lines. Also, the Traffic and Transportation Section contains mitigation measures that would widen or improve specific intersections (including Nash Street/Maple Avenue, Nash Street/El Segundo Boulevard, Aviation Boulevard/Marine Avenue, and Sepulveda Boulevard /Mariposa Avenue). SCE has existing 66 kV transmission lines within these intersections and the proposed project may require modification or relocation of the existing transmission lines.

8-2

Regulatory Requirements (General Order 131-D)

Construction, modification, and relocation of transmission lines or electrical facilities that are designed to operate at or above 50 kV may be subject to the California Public Utilities Commission's (CPUC) General Order 131-D¹. The Draft EIR should be revised to include any potentially significant impacts that would result from the modification or relocation of SCE's existing transmission lines. For example, will the proposed project require modification or relocation of transmission lines within the existing utility corridor to the south west of the project site? If significant impacts resulting from SCE's scope of work are not adequately addressed in the Final EIR, SCE may be required to pursue a separate, mandatory California Environmental Quality Act (CEQA) review through the CPUC, which could delay approval of the SCE transmission line portion of the project for several years.

8-3

¹ <http://docs.cpuc.ca.gov/PUBLISHED/Graphics/589.PDF>

Real Properties Site Plan Review

The proposed development should not impose constraints on SCE's ability to access, maintain, and operate its current and future facilities. SCE's rights-of-way and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. SCE is requesting six (6) sets of project plans depicting SCE's facilities and associated land rights to the location listed below. The plans should include the El Segundo Boulevard road widening, as well as plans for intersection improvements and widening that would impact SCE's existing facilities. Any proposed use will be reviewed on a case-by-case basis by SCE. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. The impacts will need to be consented to and addressed by SCE prior to finalizing the plan of development.

8-4

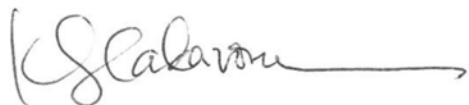
Real Properties Department
Southern California Edison Company
2131 Walnut Grove Avenue, G.O.3 – Second Floor
Rosemead, CA 91770

Coordination with SCE

SCE is requesting a meeting with the City and developer to discuss the proposed project's impacts to SCE's existing facilities, including the need for a second customer dedicated substation, existing transmission line along El Segundo Boulevard and intersection improvements. Please contact me at Karen.Cadavona@sce.com or (626) 302-2481 to schedule a meeting.

8-5

Regards,



Karen Cadavona, Senior Corporate Representative
Third Party Environmental Reviews
Local Public Affairs
Southern California Edison Company

cc: Robert Quintero, SCE Metro Region Director
Mark Olson, SCE Region Manager

Enclosure: Request for Method-of-Service Study



RESPONSE TO COMMENT LETTER NO. 8

Karen Cadavona, Senior Corporate Representative, Third Party Environmental Reviews
Southern California Edison Company
November 14, 2014

8-1 The commenter provides introductory comments regarding the proposed Project and identifies the existing Southern California Edison (SCE) facilities: 66/12 kilovolt (kV) substation at the southwestern portion of the Project site; a 66 kV power line² on the south side of El Segundo Boulevard; and a utility corridor (66 kV power lines) adjacent and southwest of the Project site. It is noted, SCE's existing facilities are specified on Draft EIR page 5.11-21 and illustrated on Draft EIR Exhibit 5.11-5, Existing Dry Utilities. The comments do not address the adequacy of the Draft EIR. No response is necessary.

8-2 The commenter notes that the Project Applicant has not submitted a Study Applicant Package to SCE for a second customer dedication substation on the Project site. This SCE requirement will be added as a Project Condition of Approval.

The commenter also notes that the Project's proposed El Segundo Boulevard widening would encroach on the 66 kV power line and states the Draft EIR did not address whether road widening would require modification or relocation of these power lines.

As noted on Draft EIR Page 5.11-23, Appendix G of the CEQA Guidelines does not include a threshold for impacts resulting from dry utilities. For purposes of the EIR analysis, the Project would result in a significant environmental impact if the following would occur:

- Require or result in the construction of new dry utilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

The Project's proposed electrical facilities are illustrated on Draft EIR Exhibit 5.11-10, Proposed Dry Utilities, and addressed on Draft EIR pages 5.11-39 through 5.11-40. To further clarify the discussion concerning the Project's proposed electrical facilities, these pages of the Draft EIR have been revised as follows:

SCE maintains and operates the transmission and distribution infrastructure located in the Project area. According to SCE, it anticipates being able to provide electrical service to the Project site, sufficient to meet the electrical demands of the proposed uses. Electrical service to the Project would be provided via the existing customer dedicated substation located in the southwestern portion of the site and electrical 66 kV power line located within the El Segundo Boulevard ROW (south side). Extension of this existing power distribution system, along with a proposed second customer dedicated substation (of between 50 and 200 kV)³ would be required to provide electrical service to the proposed development. The utility corridor adjacent and southwest of the Project site

² A power line is a line designed to operate between 50 and 200 kV (Public Utilities Commission of the State of California, General Order No. 131-D).

³ Written Correspondence: Alkire, Masa, City of El Segundo Principal Planner, December 5, 2014.



would not be used to provide electrical service to or impacted by the Project. The Project does not include modification of the power lines in the utility corridor adjacent and southwest of the Project site.

The Project proposes dedication and construction of roadway for an approximately 10 to 22-foot wide (depending upon the location) portion of Project frontage along El Segundo Boulevard, in order to widen the ROW; see ESSCSP Exhibit 13. Therefore, the Project would require relocation of the existing power line along the south side of El Segundo Boulevard. The new substation would be located immediately northwest of the existing substation and would be adequately sized to meet the demands of the proposed development, with an anticipated electrical load of approximately 68,240 kWh/yr. As illustrated on Exhibit 5.11-10, the site's electrical system is proposed to have two connection points to this power line to serve the Project: one connection point to the north in El Segundo Boulevard at the Nash Street Project driveway; and one connection point to the proposed substation. Additionally, as discussed in Section 5.2, Mitigation Measures (TRA-1 through TRA-6, TRA-8, and TRA-9) would widen the approaches of various intersections (Nash Street/Maple Avenue, Nash Street/El Segundo Boulevard, Aviation Boulevard/Marine Avenue, and Sepulveda Boulevard/Mariposa Avenue), where there are power lines. The Project would require relocation of the existing power lines at these intersections. The new substation would be located immediately northwest of the existing substation and would be sized to meet the demands of the proposed development, with an anticipated electrical load of approximately 68,240 kWh/yr.⁴ The financial responsibility for upgrades or additional facilities, if necessary, would be in accordance with SCE's rules and tariffs. As part of the substation's review and approval process, SCE must submit a Permit to Construct application to the California Public Utilities Commission (CPUC) for approval. The CPUC is the state regulatory agency that grants permits for substations. The CPUC would review the application to ensure the substation's compliance with all applicable laws.

As part of the Project's approval process, all plans involving the widening of El Segundo Boulevard and intersection improvements would be submitted to SCE for its review and approval before final City approval of ROW improvements to El Segundo Boulevard. The Project Applicant and SCE, in consultation with City Department of Public Works and Department of Planning and Building Safety staff, would review the Project plans and determine the appropriate methods for SCE facility construction and relocation. Further, the environmental impacts resulting from construction of the electrical facilities are analyzed in Sections 5.1 through Sections 5.11 of this EIR. There would be no significant unavoidable environmental impacts caused by construction of the substation or relocation of the power lines.

The financial responsibility for upgrades or additional facilities, if necessary, must comply with the CPUC's rules and tariffs. The Applicant would be required to pay the applicable fees assessed by SCE to extend electricity construct the substation and relocate the power lines to serve the proposed uses. SCE would not provide service to new developments if there were not adequate electricity supplies and infrastructure to maintain existing service levels and meet the anticipated electricity demands of the specific development requesting service. Before the City issues any grading permit, the Applicant would be required to coordinate with SCE to determine the exact location of

⁴ Written Correspondence: Alkire, Masa, Principal Planner, City of El Segundo, August 12, 2013.



the electrical facilities. Therefore, the Project would not have a significant impact on SCE's capacity to provide electrical power services to the service area.

General Order No. 131-D (Order 131-D) was adopted by the California Public Utilities Commission (CPUC) to be responsive to CEQA requirements, among other objectives. According to Order 131-D, no electric public utility is allowed to begin construction on power line facilities or substations, which are designed for immediate or eventual operation at any voltage between 50 kV and 200 kV, without the CPUC having first issued a Permit to Construct, in accordance with the provisions of Sections IX.B, X, and XI.B (see Order 131-D Section III.B). As described above, the Project proposes construction of a customer dedicated substation (between 50 and 200 kV) and to relocate 66 kV power lines. According to Order 131-D Section III.B.1.c, the new substation and relocated power lines would be exempt from Section IX.B (which requires filing a Permit to Construct), given they satisfy the following criteria for exemption:

- Power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document finds no significant unavoidable environmental impacts caused by the proposed line or substation.

According to Order 131-D Section X.A, the new substation and relocated power lines would be exempt from Section X.A (which addresses electric and magnetic fields (EMFs)), given an application for Permit to Construct would not required. According to Order 131-D Section XI.B, the new substation and relocated power lines would be subject to compliance with Section XI.B, which requires that SCE give notice of the construction of power line facilities or substations between 50 kV and 200 kV deemed exempt from Section III (see discussion above).

8-3 The commenter notes that transmission lines or electrical facilities that are designed to operate at or above 50 kV may be subject to Order 131-D. Refer to Response to Comment 8-2 above.

8-4 The commenter states that the Project should not impose constraints on SCE's ability to access, maintain, and operate its current and future facilities. This comment does not specifically state how the Project would pose such constraints and further does not address the adequacy of the Draft EIR. No response is necessary.

The commenter also requests six sets of Project plans depicting SCE's facilities and associated land rights (including the proposed El Segundo Boulevard widening, intersection improvements, and any other widening that may impact SCE's existing facilities). The requirement to provide SCE with the requested plans will be added as a Project Condition of Approval.

8-5 Commenter requests a meeting with the City and Project Applicant. Coordination of this meeting will occur outside the scope of this EIR. This comment does not address the adequacy of the Draft EIR. No further response is necessary.