

# Exhibit No. 5

## FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

### Pacific Coast Commons Specific Plan EIR (SCH No. 2020050508)

*Prepared for:*

**City of El Segundo**

350 Main Street

El Segundo, California 90245

*Contact: Paul Samaras, AICP, Principal Planner*

*Prepared by:*

**DUDEK**

38 North Marengo Avenue

Pasadena, California 91101

*Contact: Kristin Starbird, Senior Project Manager*

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# Table of Contents

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<b><u>SECTION</u></b>	<b><u>PAGE NO.</u></b>
<b>1 INTRODUCTION .....</b>	<b>1</b>
1.1 Purpose .....	1
1.1.1 Record of Proceedings .....	2
1.1.2 Custodian and Location of Records.....	3
<b>2 CEQA FINDINGS OF INDEPENDENT JUDGEMENT .....</b>	<b>5</b>
2.1 Independent Review and Analysis.....	5
2.2 Impacts Determined to Be Significant and Unavoidable .....	5
2.2.1 Air Quality .....	5
2.3 Impacts Determined to Be Less Than Significant with Mitigation.....	9
2.3.1 Air Quality .....	10
2.3.2 Cultural Resources .....	11
2.3.3 Geology and Soils .....	14
2.3.4 Hazards and Hazardous Materials .....	15
2.3.5 Noise.....	19
2.3.6 Transportation.....	21
2.3.7 Tribal Cultural Resources .....	22
2.4 Impacts Determined to Be Less Than Significant .....	25
2.4.1 Aesthetics.....	25
2.4.2 Agriculture and Forestry Resources.....	31
2.4.3 Air Quality .....	31
2.4.4 Biological Resources .....	35
2.4.5 Cultural Resources .....	35
2.4.6 Energy.....	38
2.4.7 Geology and Soils .....	41
2.4.8 Greenhouse Gas Emissions .....	46
2.4.9 Hazards and Hazardous Materials .....	48
2.4.10 Hydrology and Water Quality .....	51
2.4.11 Land Use .....	56
2.4.12 Mineral Resources.....	58
2.4.13 Noise.....	59
2.4.14 Population and Housing .....	62
2.4.15 Public Services and Recreation .....	65
2.4.16 Transportation.....	69
2.4.17 Utilities and Service Systems .....	75
2.4.18 Wildfire .....	82

**3 FINDINGS ON PROJECT ALTERNATIVES ..... 84**

3.1 Alternatives Carried Forward for Consideration ..... 84

3.1.1 Alternative A - No Project/Existing Development..... 84

3.1.2 Alternative B - Reduced Development Alternative: Exclusion of PCC–North ..... 86

3.1.3 Alternative C - Reduced Development: Reduce 1 Level from PCC-South and PCC-North . 88

3.2.4 Environmentally Superior Alternative ..... 89

**4 GENERAL CEQA FINDINGS ..... 92**

4.1 Findings Regarding Recirculation..... 92

4.2 Legal Effects of Findings..... 93

**5 STATEMENT OF OVERRIDING CONSIDERATIONS..... 94**

**6 CONCLUSION ..... 96**

**7 REFERENCES CITED..... 98**

# 1 Introduction

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This statement of Findings of Fact (Findings) addresses the environmental effects associated with the proposed Pacific Coast Commons Specific Plan (Specific Plan or proposed Project), as described in the Draft Environmental Impact Report (EIR). These Findings are made pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.), specifically California Public Resources Code, Sections 21081, 21081.5, and 21081.6, and the CEQA Guidelines (14 CCR 15000 et seq.), specifically Sections 15091 and 15093. The Draft EIR examines the full range of potential effects of construction and operation of the Project and identifies standard mitigation practices that could be employed to reduce, minimize, or avoid those potential effects.

## 1.1 Purpose

California Public Resources Code, Section 21081, and CEQA Guidelines Section 15091 require that the lead agency, in this case the City of El Segundo (City), prepare written findings for identified significant effects, accompanied by a brief explanation of the rationale for each finding. Specifically, CEQA Guidelines Section 15091 states, in part, that:

- a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
  - 1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
  - 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
  - 3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

In accordance with California Public Resource Code, Section 21081, and CEQA Guidelines Section 15093, whenever significant effects cannot be mitigated to below a level of significance, the decision-making agency is required to balance, as applicable, the benefits of the project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." In that case, the decision-making agency may prepare and adopt a Statement of Overriding Considerations (SOC), pursuant to the CEQA Guidelines.

Section 15093 of the CEQA Guidelines state that:

- a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

- b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

The EIR identified potentially significant effects that could result from the Project. The City finds that the inclusion of certain mitigation measures as part of the approval of the Project will reduce most, but not all, of those effects to less-than-significant levels. Those impacts that are not reduced to less-than-significant levels are identified and overridden due to specific Project benefits (see Section 5, Statement of Overriding Considerations).

As required by CEQA, the City, in adopting these Findings, also adopts a Mitigation Monitoring and Reporting Program (MMRP) for the Project. The City finds that the MMRP, which is incorporated by reference and made a part of these Findings, meets the requirements of California Public Resources Code, Section 21081.6, by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the Project.

In accordance with the CEQA Statutes and Guidelines, the City adopts these Findings for the Project. Pursuant to California Public Resources Code, Section 21082.1(c)(3), the City also finds that these Findings reflect the City's independent judgment as the lead agency for the Project.

### 1.1.1 Record of Proceedings

For the purposes of CEQA and the Findings herein set forth, the record of proceedings for the Project consists of those items listed in CEQA Section 21167.6(e). The record of proceedings for the City's decision on the Project consists of the following documents, at a minimum and without limitation, which are incorporated by reference and made part of the record supporting these Findings:

- (a) The Notice of Preparation, Notice of Availability, and all other public notices issued by the City in conjunction with the Project
- (b) The Draft EIR for the Project and all technical appendices and documents relied upon or incorporated by reference
- (c) All written comments submitted by agencies, organizations, or members of the public during the public review comment period on the Draft EIR and the City's responses to those comments as well as letters from the Southwest Carpenters and SAFER received by the City after the close of the public review period and responses to those comments
- (d) The Final EIR for the Project
- (e) The Responses to Additional Comments received dated February 2022
- (f) The MMRP for the Project

- (g) All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the City or consultants to the City with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the Project
- (h) All documents submitted to the City by other public agencies or members of the public in connection with the Draft EIR
- (i) Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the City in connection with the Project
- (j) Any documentary or other evidence submitted to the City at such information sessions, public meetings, and public hearings
- (k) All resolutions adopted by the City regarding the Project, and all staff reports, analyses, and summaries related to the adoption of those resolutions
- (l) Matters of common knowledge to the City, including, but not limited to federal, state, and local laws and regulations
- (m) Any documents expressly cited in these Findings, in addition to those cited above; and any other materials required for the record of proceedings by CEQA Section 21167.6(e)

## 1.1.2 Custodian and Location of Records

The documents and other materials that constitute the Record of Proceedings for the City's actions related to the Project are located at the City of El Segundo, 350 Main Street, California 90245. The City Clerk is the custodian of the Record of Proceedings for the Project.

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# 2 CEQA Findings of Independent Judgement

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## 2.1 Independent Review and Analysis

Under CEQA, the lead agency must (1) independently review and analyze the EIR; (2) circulate draft documents that reflect its independent judgment; (3) as part of the certification of an EIR, find that the report or declaration reflects the independent judgment of the lead agency; and (4) submit copies of the documents to the State Clearinghouse if there is state agency involvement or if the project is of statewide, regional, or area-wide significance (California Public Resources Code, Section 21082.1(c)).

These Findings reflect the City's independent judgment. The City has exercised independent judgment in accordance with CEQA Section 21082.1(c)(3) in retaining its own environmental consultant in the preparation of the EIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

Having received, reviewed, and considered the information in the Final EIR, as well as any and all other information in the record, the City hereby makes findings pursuant to and in accordance with CEQA Sections 21081, 21081.5, and 21081.6.

## 2.2 Impacts Determined to Be Significant and Unavoidable

This section identifies the significant unavoidable impacts that require a statement of overriding considerations to be issued by the City, pursuant to Section 15093 of the CEQA Guidelines, if the Project is approved. Based on the analysis contained in the EIR, the following impacts have been determined to fall within the "significant unavoidable impacts" category:

### Air Quality

- Conflict with an Applicable Air Quality Plan

### 2.2.1 Air Quality

#### 2.2.1.1 Potentially Significant Impacts to Air Quality

##### **Conflict with an Applicable Air Quality Plan**

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

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

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

*Consistency Criterion No. 1*

The proposed Project would not result in construction or operational criteria air pollutant emissions that would exceed the SCAQMD mass daily thresholds. Because it would not exceed the SCAQMD criteria air pollutant mass thresholds, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and thus, the proposed Project would not conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993).

*Consistency Criterion No. 2*

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

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

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

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

Although the Project would exceed the population growth assumptions in the SCAG 2016 RTP/SCS, it's important to note that the Project is consistent with the City's housing strategy to direct growth in regional centers and areas near transit stations, major bus centers, and bus stops along a major bus routes. The Project is also a mixed-use development that would generate fewer vehicle trips than traditional single-use and subdivision development and would take advantage of existing infrastructure systems serving the area. Additionally, the Project would implement the majority of the proposed measures by the California Air Pollution Control Officers Association (CAPCOA) to reduce GHG emissions, which also reduce criteria pollutants, related transportation-related design features as outlined in its 2010 Quantifying Greenhouse Gas Mitigation Measures guidance document.

The Project would provide housing in a jobs-rich area and would consist of a mixed-use, transit-oriented development that would reduce the need for vehicle use for residents due to the Project site's proximity to local destinations and regional transportation opportunities. Therefore, while the Project would provide needed housing within the City and would result in development that would result in low VMT and associated mobile source emissions, because the proposed Project would not be consistent with the City's current General Plan land use designation and would result in population growth that would exceed the population growth anticipated for the City in SCAG's regional growth forecast, the proposed Project would conflict with Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook.

However, it should be noted that the impact is temporary until the Project is appropriately included in the City's population estimates and eventually, the SCAQMD AQMP. Since SCAG's forecasts are based on input from individual jurisdictions in accordance with their General Plans and local development trends and these are updated regularly as part of SCAG's regional planning programs, adjustments to these projections will continue to be made by the different cities and counties and SCAG as part of the regional planning process. This established regular update process will capture changes in development trends and capacities that occur over time. If approved, the Project would be included in future City projections that would be provided to and used by SCAG and SCAQMD to update the RTP/SCS and AQMP, and the potential impact is reduced to less than significant in the future.

Nevertheless, the proposed Project would result in population growth that would exceed the population growth anticipated for the City in SCAG's regional growth forecast, and therefore conflict with Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook. There is no feasible mitigation measure for population growth; therefore, this impact would be significant and unavoidable.

### **Cumulative Effect**

#### *Operation-Related Cumulative Impacts*

The Project would result in less-than-significant long-term operational air quality impacts for all criteria pollutants. Impacts related to the proposed Project's potential to conflict with or obstruct implementation of the SCAQMD 2016 AQMP would be significant and unavoidable due to the exceedance of population projections assumed within SCAG's RTP/SCS. No feasible mitigation can be implemented for population growth.

#### 2.2.1.2 Mitigation Measures

There is no feasible mitigation measure for population growth.

#### 2.2.1.3 Findings per CEQA Guidelines

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

Pursuant to Section 21081(a)(3) of the California Public Resources Code, as described in the Statement of Overriding Considerations, the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the EIR, and the identified air quality impacts are thereby acceptable because of specific overriding considerations (see Section 5).

#### 2.2.1.4 Facts in Support of the Findings Related to Air Quality

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

## 2.3 Impacts Determined to Be Less Than Significant with Mitigation

This section identifies significant adverse impacts of the Project that require findings to be made under CEQA Section 21081(a) and CEQA Guidelines Section 15091(a)(1). Based on substantial evidence, the City finds that adoption of the mitigation measures set forth in this section will reduce the identified significant impacts to less than significant levels:

### Air Quality

- Expose Sensitive Receptors to Substantial Pollutant Concentrations
- Cumulative Effect

### Cultural Resources

- Archaeological Resources
- Cumulative Effect

### Geology and Soils

- Paleontological Resources
- Cumulative Effect

### Hazards and Hazardous Materials

- Routine Transport, Use, or Disposal of Hazardous Materials/Release of Hazardous Materials and the Potential for Upset Conditions
- Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials
- Cortese List
- Emergency Response Plan

### Noise

- Generation of Substantial Temporary or Permanent Increase in Ambient Noise Levels
- Cumulative Effect

### Transportation

- Inadequate Emergency Access

### Tribal Cultural Resources

- Historical Resources Register
- California Public Resource Code, Section 5024.1
- Cumulative Effect

Other impacts addressed under Air Quality, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, and Transportation are addressed under Section 2.4, Impacts Determined to Be Less Than Significant.

## 2.3.1 Air Quality

### 2.3.1.1 Potentially Significant Impacts to Air Quality

#### **Expose Sensitive Receptors to Substantial Pollutant Concentrations**

##### *Toxic Air Contaminants*

##### Health Impacts of Toxic Air Contaminants

“Incremental cancer risk” is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period would contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk assessment methodology (OEHHA 2015). TACs that would potentially be emitted during construction activities would be DPM emitted from heavy-duty construction equipment and heavy-duty trucks. Heavy-duty construction equipment and diesel trucks are subject to CARB Airborne Toxic Control Measures to reduce DPM emissions. According to the OEHHA, HRAs should be based on a 30-year exposure duration based on typical residency period; however, such assessments should be limited to the period/duration of activities associated with a project (OEHHA 2015). The results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in an on-site cancer risk above the 10 in 1 million threshold for the proposed Project. The Chronic Hazard Index for the proposed Project would be less than 1. Therefore, TAC emissions from construction activities associated with the proposed Project may expose sensitive receptors to substantial pollutant concentrations of TACs and would result in a potentially significant impact; therefore, mitigation measure MM-AQ-1 is required. The HRA results from the mitigated scenario show cancer risks less than the 10 in 1 million threshold and chronic hazard index less than the 1.0 threshold. Impacts would be less than significant with mitigation incorporated.

#### **Cumulative Effect**

##### *Construction-Related Cumulative Impacts*

Construction of the Project is not expected to exceed the SCAQMD mass daily emission-based construction thresholds. In addition, construction of the Project would not exceed the SCAQMD’s LST and would not result in impacts to potential nearby sensitive receptors. The Project’s short-term construction-related TAC emissions would not result in a significant health risk and would not substantially contribute to health risk in the Project area with implementation of MM-AQ-1, which would reduce Project-related health risk on nearby sensitive receptors by substantially reducing exhaust diesel particulate matter (DPM). MM-AQ-1 would also reduce potentially significant construction-related cumulative impacts. Because of the minimal amount of Project-related emissions relative to significance thresholds, and because of compliance with SCAQMD rules, Project-generated construction emissions would not be cumulatively considerable.

### 2.3.1.2 Mitigation Measures

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

Prior to the start of construction activities, the Construction Contractor shall ensure that all 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines. An exemption from this requirement may be granted if equipment with Tier 4 Interim engines are not reasonably available and the required corresponding reductions in criteria air pollutant emissions can be achieved from other combinations of construction equipment, such as using equipment with Tier 4 Final engines. Before an exemption may be granted, the City's Construction Contractor shall: (1) demonstrate that at least two construction fleet owners/operators in Los Angeles County were contacted and that those owners/operators confirmed Tier 4 Interim equipment could not be located within Los Angeles County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using CalEEMod and documentation provided to the City to confirm that Project-generated emissions do not exceed applicable localized significance thresholds (LST) for nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM<sub>10</sub>), and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM<sub>2.5</sub>), and the SCAQMD carcinogenic (cancer) risk threshold. If these requirements cannot be met, construction activities at the Project site shall be postponed until CARB-certified Tier 4 Interim engines are available for use.

### 2.3.1.3 Findings per CEQA Guidelines

Consistent with CEQA Guidelines Section 15126.4(a)(1), a feasible measure that can minimize significant adverse impacts was developed for the potentially significant impacts described in Section 2.3.1.1. This feasible measure, MM-AQ-1, is listed in Section 2.3.1.2.

The City finds that this mitigation measure is feasible, is adopted, and will reduce the potential air quality impacts of the Project to less than significant levels. Accordingly, the City finds that, pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid potentially significant air quality impacts of the Project identified in the EIR.

### 2.3.1.4 Facts in Support of the Findings Related to Air Quality

The construction of the proposed Project would result in a potentially significant pollutant concentration of TACs prior to mitigation. With the implementation of MM-AQ-1, the emissions of DPM would be significantly reduced compared to the unmitigated scenario, impacts would be less than significant after mitigation. There would be no significant, unavoidable impacts related to air quality after implementation of this mitigation measure.

## 2.3.2 Cultural Resources

### 2.3.2.1 Potentially Significant Impacts to Cultural Resources

#### **Archaeological Resources**

The CHRIS records search identified 33 previously conducted cultural resources technical investigations within the 1-mile radius records search area. Of these, one study overlaps the Project site; however, individual sites were not identified within the current Project site as a result of this study. Additionally, the SCCIC records indicate that 12 previously recorded cultural resources exist within the surrounding 1-mile search radius. All of the resource

identified are built environment resources. No previously recorded prehistoric or historic-era archaeological resources were identified within the Project site or 1-mile records search radius. Additionally, the NAHC was contacted to request a search of its SLF, which were negative. The NAHC also suggested contacting five Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project site.

Based on the results provided above, the potential of encountering and impacting unknown archaeological resources during Project implementation is low given the level of disturbance from the mid-twentieth century; however, it is always possible that unanticipated discoveries could be encountered during ground-disturbing activities associated with the proposed Project. If such unanticipated discoveries were encountered, impacts to encountered resources could be potentially significant. However, with implementation of Mitigation Measure (MM-) CUL-1, which includes preparation and implementation of a Worker Environmental Awareness Program (WEAP), all construction personnel will be appropriately informed of required responses to unanticipated cultural resources, should these be encountered. Additionally, MM-CUL-2, requires that all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find. Thus, potentially significant impacts to archaeological resources would be reduced to less-than-significant levels with mitigation incorporated.

### **Cumulative Effect**

For archaeological resources, cumulative projects may require extensive excavation in culturally sensitive areas, and thus, may result in adverse effects to known or previously unknown, inadvertently discovered archaeological resources. There is the potential for accidental discovery of other archaeological resources by the proposed Project as well as by cumulative projects. Because all significant cultural resources are unique and non-renewable, all adverse effects or negative impacts contribute to a dwindling resource base. Through implementation of MM-CUL-2, which would require investigation and handling by a qualified archaeologist in the event that an unknown resource is encountered, the project-level impact to archeological resources would be reduced to less than significant.

Other individual projects occurring in the vicinity of the Project site would also be subject to the same requirements of CEQA as the proposed Project and any impacts to archaeological resources would be mitigated, as applicable. These determinations would be made on a case-by-case basis, and the effects of cumulative development on historical and archaeological resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Therefore, impacts on archaeological resources would not be cumulatively considerable with mitigation incorporated (MM-CUL-2).

### 2.3.2.2 Mitigation Measures

**MM-CUL-1** Prior to commencement of construction activities for all phases of Project implementation, the Project applicant shall retain a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City of El Segundo for review and approval. All construction personnel and monitors shall be presented the WEAP training prior to the start of construction activities. The WEAP shall be prepared to inform all personnel working on the proposed Project about the archaeological sensitivity of the area, to provide specific details on the kinds of archaeological materials that may be identified during construction, to explain the importance of and legal basis for the protection of significant archaeological resources, and to outline the actions to be

taken in the event of a discovery of cultural resources. The WEAP shall define “tribal cultural resources” and include appropriate management requirements relating to inadvertent discovery of a potential tribal cultural resource. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.

**MM-CUL-2** If potential archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities for the proposed Project, the City shall be notified and all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology, can evaluate the significance of the find and determine whether or not additional study is warranted. The archaeologist shall be empowered to temporarily stop or redirect grading activities to allow removal of abundant or large artifacts. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC, Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, may be warranted. The archaeologist shall also be required to curate any discovered specimens in a repository with permanent retrievable storage and submit a written report to the City of El Segundo for review and approval prior to occupancy of the first building on the site. Once approved, the final report shall be filed with the South Central Coastal Information Center (SCCIC).

### 2.3.2.3 Findings per CEQA Guidelines

Consistent with CEQA Guidelines Section 15126.4(a)(1), feasible measures that can minimize significant adverse impacts were developed for the potentially significant impacts described in Section 2.3.2.1. These feasible measures, MM-CUL-1 and MM-CUL-2, are listed in Section 2.3.2.2.

The City finds that these mitigation measures are feasible, are adopted, and will reduce the potential cultural resources impacts of the Project to less than significant levels. Accordingly, the City finds that, pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in or incorporated into the Project that will mitigate or avoid potentially significant impacts on cultural resources.

### 2.3.2.4 Facts in Support of the Findings Related to Cultural Resources

Implementation of MM-CUL-1 and MM-CUL-2 would reduce potentially significant impacts to archaeological resources by addressing the inadvertent discovery of archeological resources. There would be no significant, unavoidable impacts related to cultural resources after implementation of this mitigation measure.

## 2.3.3 Geology and Soils

### 2.3.3.1 Potentially Significant Impacts to Geology and Soils

#### **Paleontological Resource**

The Project site is underlain late Pleistocene Sand Dune deposits as indicated by surficial geological mapping at a 1:24,000 scale and is not anticipated to be underlain by unique geological features. The LACM did not report any paleontological localities from within the Project site, but they did report localities nearby from Pleistocene Sand Dune deposits. In addition to the LACM localities, desktop research for the Project area indicated there are additional paleontological localities from Pleistocene Sand Dune deposits close to the Project site. Given the proximity of past fossil discoveries in the surrounding area and the potential for significant vertebrate fossils below any artificial fill present within the Project site, the proposed Project is highly sensitive for supporting paleontological resources and is considered to have high paleontological sensitivity. In the event that intact paleontological resources are located on the Project site, ground-disturbing activities associated with construction of the Project, such as grading during site preparation, excavations for the subterranean parking structure, and trenching for pipelines or utilities, have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. However, upon implementation of Mitigation Measure (MM)-GEO-1, impacts would be reduced to below a level of significance. MM-GEO-1 requires a preparation of a Paleontological Resources Impact Mitigation Program that requires preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the Project site below a depth of 5 feet below the existing ground surface or depth of documented artificial fill (based on construction plans and/or geotechnical reports), procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. With incorporation of MM-GEO-1, impacts would be less than significant.

#### **Cumulative Effect**

Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards, including unstable geologic conditions, or contribute substantially to erosion. The majority of impacts from geologic hazards, such as rupture of a fault line, liquefaction, landslides, expansive soils, and unstable soils, are site-specific and are therefore generally mitigated on a project-by-project basis. Each cumulative project would be required to adhere to required building engineering design per the most recent version of the CBC in order to ensure the safety of building occupants and avoid a cumulative geologic hazard. Additionally, as needed, projects would incorporate individual mitigation or geotechnical requirements for site-specific geologic hazards present on each individual cumulative project site. Similarly, MM-GEO-1 would ensure that potential impacts to paleontological resources would be less than significant and other cumulative projects that would have a potential to impact soils that are sensitive for significant fossils would also require mitigation. Therefore, a potential cumulative impact related to site-specific geologic hazards, such as seismically induced ground failure, subsidence, soil collapse, and expansive soils, as well as paleontological resources, would not occur. Therefore, the proposed Project, in combination with other cumulative projects, would not contribute to a significant cumulative impact associated with geology and soils.

### 2.3.3.2 Mitigation Measures

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

### 2.3.3.3 Findings per CEQA Guidelines

Consistent with CEQA Guidelines Section 15126.4(a)(1), a feasible measure that can minimize significant adverse impacts was developed for the potentially significant impacts described in Section 2.3.3.1. This feasible measure, MM-GEO-1, is listed in Section 2.3.3.2.

The City finds that this mitigation measure is feasible, is adopted, and will reduce the potential paleontological resources impacts of the Project to less than significant levels. Accordingly, the City finds that, pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid potentially significant paleontological -related impacts of the Project identified in the EIR.

### 2.3.3.4 Facts in Support of the Findings Related to Geology and Soils

Potential impacts to geology and soils would be less than significant. Incorporation of MM-GEO-1 would reduce construction-related impacts to paleontological resources to a less-than-significant level. There would be no significant, unavoidable impacts related to geology and soils after implementation of these mitigation measures.

## 2.3.4 Hazards and Hazardous Materials

### 2.3.4.1 Potentially Significant Impacts to Hazards and Hazardous Materials

#### **Routine Transport, Use, or Disposal of Hazardous Materials/Release of Hazardous Materials and the Potential for Upset Conditions**

##### *Short-Term Construction Impacts*

Construction would require the use of heavy equipment and machinery. Hazardous materials would be stored in designated construction staging areas within the boundaries of the Project site and the construction contractor must ensure that they would be transported, handled, used, stored, and disposed of in accordance with all applicable federal, state, and local laws and regulations.

The Food and Beverage Building is scheduled for demolition as part of the proposed Project. Based on information provided in the Phase I ESA, ACM is present, and LBP and universal wastes are likely present in the Food and Beverage Building. Universal wastes that may be present would require collection and off-site disposal prior to demolition. Hazardous wastes, such as spent chemicals or petroleum, may also require collection and off-site disposal prior to demolition and rehabilitation. Additionally, materials that contain PCBs would require proper management prior to demolition. Should remaining hazardous materials and hazardous wastes associated with site maintenance be present, including petroleum products and cleaning supplies, these would be disturbed during the demolition process if not removed. These materials, if not properly removed, could be transported offsite with demolition debris, and therefore the proposed Project has the potential to create a significant hazard to the public or the environment through the routine transport or disposal of hazardous materials associated with demolition activities. In accordance with mitigation measure (MM-)HAZ-1, demolition must include abatement of the Food and Beverage Building of any asbestos- and lead-containing materials, PCB-containing items, universal wastes, and/or other hazardous materials. Abatement must be conducted by licensed contractors, and materials must be transported offsite for recycling and/or disposal by licensed transporters in accordance with federal, state, and local laws. Hazardous materials are also present in the hotels, including a diesel AST and various janitorial items. As these hotels are not scheduled for demolition or renovation for the proposed Project, it is not anticipated that the presence of these materials would impact construction of the proposed Project. With implementation of MM-HAZ-1, impacts associated with the routine transport of ACM, LBP, universal wastes, and hazardous materials for offsite disposal during construction would be less than significant with mitigation incorporated.

### **Reasonably Foreseeable Upset and Accident Conditions**

#### *Short-Term Construction Impacts*

The proposed Project has the potential to expose the public and the environment to hazards associated with on-site releases of hazardous materials including ACM, LBP, PCB-containing items, universal wastes, and other hazardous materials and wastes present in the building scheduled for demolition. Management of hazardous materials and waste during pre-demolition surveys and abatement activities would be addressed by MM-HAZ-1.

Five hazardous material pipelines are located within close proximity to the Project site, three of which are located within the PCH right-of-way. Construction of the proposed Project would require excavation into existing rights-of-way to connect to existing utilities. In accordance with California Government Code 4216, notification to the Regional Notification Center is required prior to excavation work so that subsurface utilities can be located.

Excavation, grading, and offsite export of soils is anticipated for construction of the proposed Project. The adjacent 76 gasoline service station suggest that there is a potential for soil contamination associated with gas station operations in this area. Excavation of petroleum-impacted soils could cause an upset or accident condition if contaminated soils are released to the environment. Therefore, MM-HAZ-2 requires preparation of a Hazardous Materials Contingency Plan, which would include procedures to identify, handle, and dispose of potential petroleum-impacted soils related to the gas station.

With adherence to federal, state, and local laws and regulations, and implementation of MM-HAZ-1 and MM-HAZ-2, short-term construction impacts associated with potential upset and accident conditions involving the release of hazardous materials to the environment would be less than significant with mitigation incorporated.

**Cortese List**

*Short-Term Construction Impacts*

A search of the Cortese List databases was conducted, as well as other online environmental regulatory databases that provide information on hazardous material release sites in the State of California. Multiple LUST sites were identified within 0.5-mile of the Project site. These LUST sites have all received regulatory closure. However, as discussed above in Off-Site Hazardous Materials, one of these sites still has potential remaining contamination which could impact the Project site. No additional sites were identified on the Cortese List databases within 1 mile of the Project site. Additionally, 3 hazardous material release sites were identified that were not previously identified in the Phase I ESA; upon review these sites are at such a distance or gradient and/or have limited environmental contamination such that they do not likely impact the environmental condition of the Project site.

There are three sites within 0.5-mile of the Project site that have documented contamination: (1) 76 Station at 603 N Pacific Coast Highway (Sepulveda Boulevard), (2) the West Basin groundwater, and (3) a regional PCE and TCE groundwater contamination plume. Excavation and grading of PCC-North would occur adjacent to the gas station. Therefore, there is a potential for petroleum-impacted soils to be present in excavations adjacent to the gas station. A Hazardous Materials Contingency Plan would be prepared in accordance with MM-HAZ-2, which would include procedures to identify, handle, and dispose of potential petroleum-impacted soils related to the gas station. The other two listings are associated with groundwater contamination. Groundwater is not expected to be encountered during construction activities. Therefore, construction of the proposed Project in areas of potentially impacted groundwater is not anticipated to create a significant hazard to the public or the environment. With implementation of MM-HAZ-2, short-term construction related impacts associated with nearby hazardous materials sites would be less than significant with mitigation incorporated.

**Impair or Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan**

*Short-Term Construction Impacts*

PCH is a designated emergency evacuation route and runs north/south adjacent to the Project site. Construction of the proposed Project is not anticipated to impact traffic routes on PCH or other adjacent streets. However, should construction of the proposed Project require partial right-of-way closures, such as when tying into existing utilities, a traffic control plan would be submitted in accordance with MM-TRA-1. The traffic control plan would provide alternative routes for emergency evacuation and would be submitted to and approved by the City of El Segundo and/or California Department of Transportation. With implementation of MM-TRA-1, impacts would be less than significant with mitigation incorporated.

2.3.4.2 Mitigation Measures

**MM-HAZ-1** The Project applicant/developer shall ensure that the demolition contractor's contract specifications incorporate abatement procedures for the removal of materials containing asbestos, lead, polychlorinated biphenyls, hazardous material, hazardous wastes, and universal waste items. Confirmation of adequate removal of such materials shall be provided to the City prior to the issuance

of a building permit for PCC-Fairfield Parking. All abatement work shall be done in accordance with federal, state, and local regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), and the South Coast Air Quality Management District.

**MM-HAZ-2** Prior to commencement of any earthwork or construction activities at PCC-North, a Hazardous Materials Contingency Plan (HMCP) shall be developed that addresses potential impacts in soil and soil vapor associated with the 76 Station adjacent to PCC-North. The HMCP shall include training procedures for identification of contamination, and shall describe procedures for assessment, characterization, management, and disposal of hazardous constituents, materials, and wastes, and notification in accordance with all applicable state and local regulations. Contaminated soils shall be managed and disposed of in accordance with local and state regulations. The HMCP shall include health and safety measures, which may include but are not limited to periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities. The applicant or its designee shall implement the HMCP during construction activities for the proposed Project.

### 2.3.4.3 Findings per CEQA Guidelines

Consistent with CEQA Guidelines Section 15126.4(a)(1), feasible measures that can minimize significant adverse impacts were developed for the potentially significant impacts described in Section 2.3.4.1. These feasible measures, MM-HAZ-1 and MM-HAZ-2, are listed in Section 2.3.4.2.

The City finds that these mitigation measures are feasible, are adopted, and will reduce the Project's potential impacts related to hazards and hazardous materials to less than significant levels. Accordingly, the City finds that, pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in or incorporated into the Project that will mitigate or avoid potentially significant impacts related to hazards and hazardous materials.

### 2.3.4.4 Facts in Support of the Findings Related to Hazards and Hazardous Materials

The abatement of hazardous materials identified on the Project site would remove the potential for exposure of the public and the environment to accidental release of hazardous materials, as required by MM-HAZ-1. Construction and demolition activities on PCC-North adjacent to the adjacent 76 Station would be completed in accordance with the Hazardous Materials Contingency Plan, as required by MM-HAZ-2. Therefore, impacts related to foreseeable upset and accident conditions involving a release of hazardous materials to the environment would be mitigated to a less-than-significant level. All other impacts would be less than significant. There would be no significant, unavoidable impacts related to hazards and hazardous materials after implementation of these mitigation measures.

## 2.3.5 Noise

### 2.3.5.1 Potentially Significant Impacts to Noise

#### **Generation of a Substantial Temporary or Permanent Increase in Ambient Noise Levels**

##### *Construction Noise (Short-Term Impacts)*

Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor. The estimated construction noise levels are predicted to be as high as 85 dBA hourly  $L_{eq}$  at the nearest existing residences when Project Buildout Phase 2 (PCC-North) grading activities take place. Aside from operation of an air compressor at the acoustical center of buildout Phases 1 and 3, noise from construction for all phases is anticipated to exceed the City's hourly threshold of 65 dBA  $L_{eq}$  at the existing nearest residential properties to the west. Thus, under these conditions construction noise would result in a temporary but significant noise impact at these receptors and require mitigation measures that—if designed and implemented properly by the Project applicant and its construction contractors—would need to demonstrate at least 5 dBA and as high as 20 dBA of sound abatement in order to yield Project-attributed construction noise levels that are compliant with this City standard. Typical construction “sound blankets”, such as those offered by local suppliers, are capable of providing this 5 to 20 dBA range of acoustical insertion loss (i.e., the difference in measured sound level at a receiver after a sound-occluding element is placed in the direct path between the receiver and the noise source of interest). Thus, with application of MM-NOI-1, construction noise impacts at the nearest multi-family residential properties on the west side of Indiana Street and west side of Phase 2 (PCC-North) would be reduced to a less than significant level.

#### **Cumulative Effect**

##### *Noise in Excess of Standards*

Implementation of the Project and its component site-specific development, as well as unrelated development projects within its vicinity would all be subject to applicable noise standards. The Project would not contribute to cumulative exceedances of noise standards, and its incremental effect would be a less-than-significant impact with mitigation incorporated.

### 2.3.5.2 Mitigation Measures

**MM-NOI-1** Prior to issuance of a demolition or grading permit, whichever occurs first, the Project Applicant/Developer or its approved construction contractor shall develop and submit to the City of El Segundo a Construction Noise Mitigation Plan (CNMP) for review and approval. The CNMP shall include, at a minimum, the following noise reduction means and related measures:

- a. To protect the existing occupied residences on the west side of Indiana Street (and west of the PCC North (Phase 2) portion of the Project, between E. Mariposa Avenue and E. Palm Avenue) from excessive Project construction-related noise attributed to demolition, site preparation, grading, building construction, and paving activities during PCC-Fairfield Parking (Phase 1) and PCC-South (Phase 3), and those same five activities plus architectural coating activities during

Phase 2, temporary noise barriers of sufficient height and extent along the Project's western site boundary shall be installed and shall be confirmed to achieve (depending on construction phase activity and involved equipment) at least 5 dBA and as much as 20 dBA of barrier noise insertion loss. The temporary barrier elements should resemble an outdoor-use vinyl-covered acoustical blanket comprising one or more materials that demonstrate a sound transmission class (STC) of 30 or better. The Project Applicant/Developer shall retain the services of a qualified acoustical consultant or noise control engineer to advise on or review the design, installation, and expected performance of such temporary barriers when used during Project construction. Anticipated locations, horizontal extents, heights, and durations of installation of the temporary sound barriers over the course of Project phased buildout shall be part of the CNMP submitted to the City for review.

- b. Operation of a concrete saw during the demolition phase shall include some form of proximate and portable solid-walled partial enclosure, acoustical-blanket tent, or comparably-performing shroud that can reliably deliver 10 dBA of noise reduction—separate from the temporary barrier insertion loss need described in MM-NOI-1(a) above. Alternately, slotted low-noise saw blades may be used to yield some or all of this noise reduction, so that operation of the concrete saw at a distance of 50 feet does not exceed 80 dBA. If this limit cannot be wholly achieved due to saw operation noise control or localized sound abatement (i.e., partial enclosure), then the balance of needed attenuation shall be provided by either the temporary noise barrier per MM-NOI-1(a) or by limiting duration of saw operation within an hour: each halving of duration should yield a 3 dB reduction to the hourly noise level produced by the saw.
- c. Residents within 200 feet of the Project shall be informed at least two (2) weeks in advance when construction phase activities will occur. An information telephone hotline and/or website shall be established and managed to receive resident complaints, and the Applicant and its contractors shall respond to received complaints and document their investigations and any complaint resolutions in regular reports to the City Building Safety division.

### 2.3.5.3 Findings per CEQA Guidelines

Consistent with CEQA Guidelines Section 15126.4(a)(1), a feasible measure that can minimize significant adverse impacts was developed for the potentially significant impacts described in Section 2.3.5.1. This feasible measure, MM-NOI-1, is listed in Section 2.3.5.2.

The City finds that this mitigation measure is feasible, is adopted, and will reduce potential noise impacts of the Project to less than significant levels. Accordingly, the City finds that, pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in or incorporated into the Project that will mitigate or avoid potentially significant noise impacts.

### 2.3.5.4 Facts in Support of the Findings Related to Noise

With implementation of MM-NOI-1 prior to and during construction of the Project, potential construction noise impacts as received at the nearest residential properties would be reduced to less-than-significant levels. There would be no significant, unavoidable impacts related to noise after implementation of this mitigation measure.

## 2.3.6 Transportation

### 2.3.6.1 Potentially Significant Impacts to Transportation

#### **Inadequate Emergency Access.**

##### *Construction*

##### Short-Term Site Access

Short-term adverse traffic and parking impacts could occur in the Project vicinity during construction of the Project. Additional trips generated by the truck deliveries and construction employees could affect traffic flow in the study area; construction activity could impact traffic near the Project site; and pedestrian traffic flow near the Project site could also be altered as a result of construction.

Based on the construction period trip generation analysis conducted for the proposed Project, the peak construction activity is estimated to generate fewer total daily trips and peak-hour trips than are projected for the Project once it is completed and occupied. Although the influx of equipment and materials to the Project site could create temporary adverse effects to the adjacent roadway, potential impacts associated with construction of the Project would be limited to those locations immediately adjacent to the Project site. Segments of PCH and Mariposa Avenue would have short-term impacts at locations where new curbs are installed. Temporary lane closures around the Project site may be expected. The existing hotels on the Project site would remain open during the duration of construction. Pedestrian access to the existing hotel uses on the Project site would be open, although temporary sidewalk closures around the portions of the Project site may be expected, specifically during Mariposa Avenue street improvements for approximately 1 to 2 months.

These construction activities have the potential to temporarily impact emergency vehicle access to the Project site. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, MM-TRA-1 is required. MM-TRA-1 requires preparation of a Construction Traffic Control Plan. With implementation of MM-TRA-1 to address pedestrian, bicycle, and vehicular circulation during construction activities, would reduce potential impacts related to emergency access to less than significant.

### 2.3.6.2 Mitigation Measures

**MM-TRA-1** Prior to the issuance of demolition or grading permits, the Project applicant/developer shall develop and implement a City-approved Construction Traffic Control Plan. The Plan shall be prepared in accordance with applicable City and Manual on Uniform Traffic Control Devices guidelines and shall address the potential for construction-related vehicular traffic, as well as pedestrian and bicycle circulation disruption in the public right-of-way. The Plan shall describe safe detours and shall include protocols for implementing the following, if determined necessary and feasible: temporary traffic controls (e.g., a flag person) during construction to maintain smooth traffic flow; dedicated turn lanes for movement of construction trucks and equipment on and off site; scheduling of construction activities that affect traffic flow on the arterial system to off-peak hours; consolidation of truck deliveries; and/or rerouting of construction trucks away from congested streets or sensitive receptors.

### 2.3.6.3 Findings per CEQA Guidelines

Consistent with CEQA Guidelines Section 15126.4(a)(1), a feasible measure that can minimize significant adverse impacts was developed for the potentially significant impacts described in Section 2.3.6.1. This feasible measure, MM-TRA-1, is listed in Section 2.3.6.2.

The City finds that this mitigation measure is feasible, is adopted, and will reduce the potential transportation-related impacts of the Project to less than significant levels. Accordingly, the City finds that, pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in or incorporated into the Project that will mitigate or avoid potentially significant impacts related to transportation.

### 2.3.6.4 Facts in Support of the Findings Related to Transportation

With incorporation of MM-TRA-1, potential significant impacts related to short-term access to the Project site would be reduced to less than significant. All other potential environmental impacts to Transportation would be less than significant. There would be no significant, unavoidable impacts related to transportation after implementation of this mitigation measure.

## 2.3.7 Tribal Cultural Resources

### 2.3.7.1 Potentially Significant Impacts to Tribal Cultural Resources

#### **Register of Historical Resources and Public Resource Code Section 5024.1**

Observation of the present conditions within the proposed Project site indicate that all areas have been disturbed from urban development. Neither a California Historical Resources Information System records search nor survey were able to identify any archaeological resources within the Project site. An NAHC Sacred Lands File search did not identify Native American resources within the search area, which included the proposed Project site and a surrounding 1-mile buffer. The NAHC recommended contacting five Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project site.

- Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians, Kizh Nation
- Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Sandonne Goad, Chairperson, Gabrielino/Tongva Nation
- Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal Council
- Charles Alvarez, Gabrielino-Tongva Tribe

Pursuant to California Assembly Bill (AB) 52 and Senate Bill (SB) 18, the City of El Segundo contacted the five NAHC Native American individuals and/or tribal organizations provided on May 18, 2020. The Gabrieleno Band of Mission Indians, Kizh Nation, responded on May 29, 2020, affirming the Project lies within their Ancestral Tribal Territory and requested formal consultation with the City of El Segundo. During a subsequent consultation meeting on August 13, 2020 between the Kizh Nation and City, the Kizh Nation provided information including historical maps showing the limits early Spanish-Mexican era ranchos, the distribution of early travel routes, and approximate locations of mapped Native American village locations in the region. The City received email correspondence from the Kizh Nation on August 13<sup>th</sup> and August 27<sup>th</sup> in 2020 that further provided information relating to traditional use of the

area and documented villages located in what is now known as Playa Del Rey and Redondo Beach. Recommended mitigation was additionally provided by the Kizh Nation for City review. No Tribal Cultural Resources were identified within the proposed Project site by the Kizh Nation as a result of their formal consultation with the City. The City sent a follow-up email on September 10, 2020 acknowledging receipt of information provided by the Kizh Nation and noting the provided information along with the proposed mitigation measures would be considered during preparation of the Draft EIR. No further communication was received by the Kizh Nation. The City sent an email to Kizh Nation on October 1, 2020 to state consultation is considered complete.

No known tribal cultural resources or cultural resources were identified by the tribe that have potential to be impacted by project activities. Government to government tribal consultation pursuant to SB 18 and AB 52 has not resulted in the identification of a TCR within the Project site. Given that no TCR has been identified, no resource-specific mitigation measures pertaining to known TCRs have been developed. Based on this information, the City has determined that the Project would not cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

MM-CUL-1 requires preparation and implementation of a Worker Environmental Awareness Program (WEAP), wherein all construction personnel must be trained to respond appropriately to inadvertent discovery of cultural resources. Additionally, MM-CUL-2, requires that all construction work occurring within 100 feet of any potential archaeological discovery shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, evaluates the significance of the find, and any potentially significant impacts to resources. In consideration of the information provided by the Gabrieleno Band of Mission Indians, Kizh Nation, measures for appropriate management requirements in the event that unknown tribal cultural resources are inadvertently encountered during Project construction-related earthwork activities are outlined in the following MM-TCR-1. MM-TCR-1 requires that if potential tribal cultural resources are discovered through earthwork activities, the City shall be notified and coordination with Native American tribes that have been identified by the NAHC to be traditionally and culturally affiliated with the geographic area of the Project must be conducted. Any affected tribe would be provided a reasonable period of time to conduct a site visit and make recommendations regarding future ground disturbance activities as well as the treatment and disposition of any discovered tribal cultural resources. With incorporation of MM-TCR-1, as well as MM-CUL-1, and MM-CUL-2, impacts to tribal cultural resources would be less than significant.

### **Cumulative Tribal Cultural Resources Impacts**

Cumulative impacts on tribal cultural resources consider whether impacts of the proposed Project together with other related projects identified within the vicinity of the Project site, when taken as a whole, substantially diminish the number of such resources within the same or similar context or property type. There are no known tribal cultural resources on the Project site and the area is considered to be of low potential to contain unanticipated cultural or tribal cultural resources. No archaeological resources have been documented by the SCCIC within the Project site or a surrounding one-mile records search area.

Other individual projects occurring in the vicinity of the Project site would also be subject to the same requirements of CEQA as the proposed Project and any impacts to tribal cultural resources would be mitigated, as applicable. These determinations would be made on a case-by-case basis, and the effects of cumulative development on historical and archaeological resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. Therefore, impacts on archaeological resources would not be cumulatively considerable with mitigation incorporated as MM-TCR-1, MM-CUL-1, and MM-CUL-2.

### 2.3.7.2 Mitigation Measures

- MM-TCR-1** Should a potential tribal cultural resource (TCR) (as defined by PRC Section 21074) be inadvertently encountered during construction activities, consistent with the process required by MM-CUL-2, all construction work occurring within 100 feet of the find shall immediately stop and the City shall be notified of the discovery. The City shall notify Native American tribes that have been identified by the Native American Heritage Commission to be traditionally and culturally affiliated with the geographic area of the Project. Any affected tribe shall be provided a reasonable period of time to conduct a site visit and make recommendations regarding future ground disturbance activities as well as the treatment and disposition of any discovered TCRs. Depending on the nature of the potential resource and Tribal recommendations, review by a qualified archaeologist may be required. Implementation of proposed recommendations shall be made based on the determination of the City that the approach is reasonable and feasible.
- MM-CUL-1** Prior to commencement of construction activities for all phases of Project implementation, the Project applicant shall retain a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City of El Segundo for review and approval. All construction personnel and monitors shall be presented the WEAP training prior to the start of construction activities. The WEAP shall be prepared to inform all personnel working on the proposed Project about the archaeological sensitivity of the area, to provide specific details on the kinds of archaeological materials that may be identified during construction, to explain the importance of and legal basis for the protection of significant archaeological resources, and to outline the actions to be taken in the event of a discovery of cultural resources. The WEAP shall define “tribal cultural resources” and include appropriate management requirements relating to inadvertent discovery of a potential tribal cultural resource. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.
- MM-CUL-2** If potential archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities for the proposed Project, the City shall be notified and all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology, can evaluate the significance of the find and determine whether or not additional study is warranted. The archaeologist shall be empowered to temporarily stop or redirect grading activities to allow removal of abundant or large artifacts. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC, Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, may be warranted. The archaeologist shall also be required to curate any discovered specimens in a repository with permanent retrievable storage and submit a written report to the City of El Segundo for review and approval prior to occupancy of the first building on the site. Once approved, the final report shall be filed with the South Central Coastal Information Center (SCCIC).

### 2.3.7.3 Findings per CEQA Guidelines

Consistent with CEQA Guidelines Section 15126.4(a)(1), feasible measures that can minimize significant adverse impacts were developed for the potentially significant impacts described in Section 2.3.7.1. These feasible measures, MM-TCR-1, as well as MM-CUL-1 and MM-CUL-2, are listed in Section 2.3.7.2.

The City finds that these mitigation measures are feasible, are adopted, and will reduce the potential tribal cultural resource impacts of the Project to less than significant levels. Accordingly, the City finds that, pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in or incorporated into the Project that will mitigate or avoid potentially significant impacts on tribal cultural resources.

### 2.3.7.4 Facts in Support of the Findings Related to Tribal Cultural Resources

With the implementation of MM-TCR-1, as well as MM-CUL-1 and MM-CUL-2, would reduce potential impacts to tribal resources to less than significant levels. There would be no significant, unavoidable impacts related to tribal cultural resources after implementation of these mitigation measures.

## 2.4 Impacts Determined to Be Less Than Significant

Based on the analysis contained in the EIR, the following issue areas have been determined to fall within the “less than significant impact” category for all thresholds: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, mineral resources, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire.

Other impacts under air quality, cultural resources, geology and soils, hazards and hazardous materials, noise, transportation, and tribal cultural resources not addressed below are addressed in Section 2.2 and Section 2.3.

### 2.4.1 Aesthetics

#### **Scenic Vistas**

The Project site is currently developed and located within a highly urbanized, relatively flat portion of the City. As such, views from the Project site and in the vicinity of the Project site are not particularly scenic. The City’s General Plan does not identify any officially designated scenic vistas within City boundaries (City of El Segundo 1992). Further, the County of Los Angeles’s General Plan does not identify any officially designated scenic vistas for conservation purposes (County of Los Angeles 2014). The western boundary of the City includes 0.8 miles of Pacific Ocean shoreline; however, this area is not visible from the Project site. The views from the Project site are limited to existing urban development. Scenic resources visible from the regional Project area include the elevated terrain of the Santa Monica Mountains to the north, San Gabriel Mountains to the north/northeast, the Lakes at El Segundo Golf Course to the southeast, and the coastline and beaches to the west. However, these scenic resources are not visible from the Project site due to the distance and intervening development. Although open space at Washington Park and Freedom Park provide some valued viewshed within the proximity of the Project, the intervening residential uses prevent extensive views of the Project site from these parks. As such, although the Project would result in visual changes on the Project site due to increased intensity of use, these changes would not adversely affect a

scenic vista. In summary, due to the urban, developed character of the existing viewshed, the presence and proximity of existing nine- to 20-story developments along PCH, as well as existing topography in the area, the proposed Project would not have a substantial adverse effect to existing scenic views of the Santa Monica Mountains, San Gabriel Mountains, the coastline, or beaches, and no mitigation is required.

### **Scenic Resource Damage within a State Scenic Highway**

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

### **Regulations Governing Scenic Quality**

California Public Resources Code Section 21071 defines an “urbanized area” as “(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.” The combined population of the City of El Segundo and any combination of not more than two of these adjacent cities is well over 100,000 persons.

With regards to local plans and policies, under existing conditions, the Project site is subject to the El Segundo General Plan and the ESMC. The Project would involve adoption of the proposed Specific Plan, which would establish a new regulatory framework within the Specific Plan area. Implementation of the Project would require approval of a General Plan Amendment (No. GPA 19-01) to change the Land Use Designation from “General Commercial” and “Parking” to “Pacific Coast Commons Specific Plan (PCCSP)” with an accompanying General Plan Amendment Land Use map change (No. GPA 19-01), a Zone Text Amendment (No. ZTA 19-08) to add a new ESMC §15-3-2(A)(12) “Pacific Coast Commons Specific Plan (PCCSP)”, and Zone Change (No. ZC-19-01).

The proposed Specific Plan would allow for the existing Aloft Hotel and Fairfield Inn and Suites Hotel properties to be in compliance with the Specific Plan as the hotels would be consistent with the newly established development standards in the Commercial-1 (COM-1) and Commercial-2 (COM-2), respectively. The COM-1 and COM-2 designations would allow hotels and several other commercial uses that are either accessory to hotel uses or complementary uses. Additionally, there would be no additional floor area added to the hotel properties.

Upon Project approval, the Specific Plan would constitute the zoning for the Project site, and the land use and development standards identified in the Specific Plan document would supersede all zoning regulations to the extent that they would be in conflict with the sections of this Specific Plan.

It is anticipated that Project implementation would eliminate all landscaped areas, including all trees, within the development areas that contain landscaping (PCC-South and PCC-Fairfield Parking), and no changes to landscaping are anticipated at the two hotel properties. As required by ESMC Section 9-3-6 all tree removals located on public property must obtain a tree permit from the City. Permits may be granted if the proposed tree removal would occur under the direction of a certified arborist and completed by a licensed contractor, and tree removal or maintenance

must adhere to standards issued by the International Society of Arboriculture. The City may require that the permittee plant another tree in the place of the one removed or destroyed and that a particular species of tree, as determined by the city's approved street tree list, be used as a replacement (and the director will select the species of tree that may be planted).

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

Although the Project would require a General Plan Amendment to allow for greater density on the Project site, as well as changes to the allowable land use mix and land use recommendations for the site, the Project would comply with all other applicable goals and policies related to aesthetics and scenic resources of the City's General Plan.

The Project site would be brought into consistency with the ESMC upon approval of the Specific Plan and would comply with other applicable provisions of the ESMC. Additionally, the proposed Project is subject to the City's Site Plan Review, which would evaluate the proposal for architectural design. Therefore, the proposed Project would be consistent with applicable regulations governing scenic quality. Impacts would be less than significant, and no mitigation is required.

#### *Shade/Shadow Effects*

The Conceptual Site Plan proposes development that does not exceed the maximum allowable development capacity for each land use district as required by the Specific Plan. As such, the maximum allowable height as defined by the Specific Plan is more conservative for its potential shade/shadow impacts. The maximum allowable height for each of the Specific Plan land use districts are listed in Section 4.1.2, Relevant Plans, Policies, and Ordinances. No development changes are proposed to PCC-COM-1 and PCC-COM-2. The development standards in the Specific Plan identify the maximum height for PCC-MU-1 (PCC-South) as 90 feet, PCC-COM-3 (PCC-Fairfield Parking) as 68 feet, and PCC-MU-2 (PCC-North) as 85 feet.

The existing residential across Indiana Street to the west, are considered shadow-sensitive uses. A shade/shadow analysis was prepared for the proposed Project to consider the potential for shadow-sensitive uses to be placed in shadow by the Project. To approximate shade and shadow conditions in the surrounding area created by implementation of the proposed Project, shadows cast by the proposed Project were simulated for the winter solstice (December 21), spring equinox (March 20), summer solstice (June 21), and fall equinox (September 23) Shadow projections from the proposed Project during spring, summer, winter, and fall.

The City does not have existing zoning or other regulations governing the effects of shade/shadow. Nonetheless, the City has utilized the City of Los Angeles thresholds of significance to determine whether the proposed Project would result in a significant to shade/shadow impacts onto adjacent residential uses. Based on the City of Los Angeles' thresholds, the proposed Project would have a shade/shadow impact if shadow-sensitive uses would be

shaded by Project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. (Winter Solstice and Spring Equinox), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. (Summer Solstice and Fall Equinox).

#### Winter Solstice

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

#### Spring Equinox

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

#### Summer Solstice

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

#### Fall Equinox

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

## **Lighting and Glare**

### *Nighttime Lighting*

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

The Specific Plan sets forth specific requirements for neon signage. Neon signage is not permitted on any building façades facing west in the PCC Mixed-Use 1 land use district. Neon Signage is not permitted on any building façade facing west in the PCC Commercial-3 land use district. Neon signage is not permitted on the Palm Avenue street frontage or on any building facades facing west in the PCC Mixed-Use 2 land use district between Mariposa and Palm Avenues or along the Palm Avenue. Electronic signage for the proposed Project must be in conformance with the signage regulations of ESMC Chapter 15-18 except as established and approved in a Master Sign Program for each land use district in the Specific Plan.

While the new structures on the Project site would result in greater general illumination on the Project site over the existing uses. The Project would be required to comply with existing California Building Code regulations pertaining to lighting, as adopted by reference pursuant to Chapter 13-1-1 of the ESMC. The development standards in the California Building Code provide requirements to limit light and glare to the extent feasible while providing sufficient light for safety and practicality.

Further, the Specific Plan would implement design guidelines to promote and enforce the City's lighting regulations. The Specific Plan requires the submittal of photometric studies as part of any site plan review submittal, which includes parking lots, and parking structures in the Specific Plan area. The Project represents an intensification of use over existing development on the Project site and would create a new source of substantial light on the Project site. Nonetheless, the Project and Project lighting elements would comply with ESMC and Specific Plan requirements, as well as the Site Plan Review. In addition, due to the presence of comparable multi-story office development along PCH, and the general urban character of the corridor and surrounding area, the proposed Project would not adversely affect existing nighttime views in the area due to new sources of nighttime lighting or glare. No mitigation is required.

### *Daytime Glare*

Consistent with the California Vehicle Code, "no person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway" and "limits to

the location of light sources that may cause glare and impair the vision of drivers.” Additionally, the Specific Plan would require that “the type and location of parking structure, parking area and building lighting must prevent direct glare on to adjacent residential properties”. Furthermore, the Project is subject to Site Plan Review to ensure materials that could create adverse light or glare effects are not included in the design. Per the Specific Plan, lighting must be adequate throughout the Specific Plan area and shielded to minimize off-site illumination, and the submittal of photometric studies is required as part of any Site Plan Review submittal, which includes parking lots and parking structures in the Specific Plan area. Therefore, the proposed Project would not create a new source of substantial daytime glare and less than significant impacts would occur. No mitigation is required.

### **Cumulative Aesthetics Impacts**

#### *Scenic Vistas/Scenic Quality*

Due to the urban, developed character of the City and surrounding area, cumulative projects would not have a substantial adverse effect to existing scenic views of the Santa Monica Mountains, San Gabriel Mountains, the coastline, or beaches. The Project site, along with cumulative projects, are located in a highly developed urban environment. In general, visual resource impacts of the cumulative projects would be site-specific and would not be expected to combine with other projects in separate viewsheds to create a cumulative impact. However, other projects in close proximity to the Project site could cumulatively change the scenic character of the area in combination with the proposed Project. There are no identified cumulative projects within close proximity to the Project site or within the PCH view corridor. Cumulative projects would be required to comply with the development standards of the ESMC that include setbacks and height limits, and may similarly be subject to Site Plan Review.

Similar to the Project, future projects in the cumulative study area would be required to demonstrate compliance with applicable scenic quality regulations. If non-compliance with a particular regulation would result in a significant impact, mitigation would be required to reduce impacts to the extent feasible. Therefore, impacts would be less than significant and the Project would not result in a cumulatively considerable impact related to scenic vistas or conflicts with scenic quality regulations. No mitigation is required.

#### *Shade/Shadow Effects*

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

#### *Light or Glare*

The urbanized Project setting supports numerous nighttime lighting sources and contains buildings and facilities constructed of potentially reflective materials, including metal paneling and glass. The Project would have the potential to result in an incremental increase in light and glare associated with the new development. However, the California Vehicle Code requires new development to avoid glare impacts. In addition, all lighting installed on the Project site would comply with applicable guidelines included in the Specific Plan that would be comparable to ESMC regulations concerning lighting and glare. Lastly, the surrounding area is largely developed in nature and

located in an urban environment. Thus, the area currently includes sources of interior and exterior lighting. Therefore, impacts would be less than significant and the Project would not result in a cumulatively considerable impact related to light and glare. No mitigation is required.

**Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on aesthetics as it relates to scenic vistas, scenic resource damage within a state scenic highway, regulations governing scenic quality, lighting and glare, and cumulative aesthetic impacts; therefore, no mitigation is required and no significant, unavoidable adverse impacts would occur.

## 2.4.2 Agriculture and Forestry Resources

The Project site is located in an urban area on a site that is fully developed with buildings and asphalt paving and is included in the General Commercial (C-3) and Parking (P) zones. There are no existing agriculture or forestry activities on the site. No readily available opportunities for agricultural or forestry operations exist on site or in the surrounding area. According to the California Department of Conservation’s California Important Farmland Finder, most of Los Angeles County, including the City of El Segundo, is not mapped as part of the state’s Farmland Mapping and Monitoring Program; thus, the Project site does not contain Prime Farmland, Unique Farmland, or Farmland of State Importance (collectively “Important Farmland”) (DOC 2020), nor does it contain any parcels under a Williamson Act contract (DOC 2018). Additionally, the Project site nor the surrounding area contain forestland or timberland. Therefore, impacts associated with agricultural and forestry resources would not occur.

**Finding**

Appendix B of the Notice of Preparation for the Project found no potential for significant impacts to agriculture and forestry resources; therefore, agriculture and forestry resources was not addressed in the Draft EIR. No mitigation would be required and no significant, unavoidable adverse impacts would occur.

## 2.4.3 Air Quality

### **Cumulatively Considerable Net Increase of Criteria Pollutants**

#### *Construction Emissions*

Construction of the proposed Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (e.g., on-road haul trucks, vendor trucks, and worker vehicle trips).

Implementation of the proposed Project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The proposed Project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOCs, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The application of architectural coatings, such as exterior application/interior paint and other finishes, and

application of asphalt pavement would also produce VOC emissions; however, the contractor would be required to procure architectural coatings from a supplier in compliance with SCAQMD Rule 1113.

Criteria air pollutant emissions associated with temporary construction activity were quantified using CalEEMod. Daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> during construction in all construction years. Construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions. As such, impacts would be less than significant.

#### *Operational Emissions*

Operation of the proposed Project would generate VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, natural gas hearths, and landscape maintenance equipment; and energy sources. Pollutant emissions associated with long-term operations were quantified using CalEEMod. The combined daily area, energy, mobile, vehicle testing, and off-road emissions would not exceed the SCAQMD operational thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Impacts associated with Project-generated operational criteria air pollutant emissions would be less than significant.

Air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. The maximum daily PM<sub>10</sub> and PM<sub>2.5</sub> emissions would not exceed the significance thresholds during proposed Project construction activities. Fugitive dust, as well as vehicle and equipment exhaust, generated during Project construction would contribute to the SCAB's nonattainment designation for PM<sub>10</sub> and PM<sub>2.5</sub>; however, this contribution would not be considered cumulatively considerable.

With regard to operational cumulative impacts associated with nonattainment pollutants, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. Projects that exceed the SCAQMD project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. The proposed Project's operational emissions would not exceed the SCAQMD significance thresholds. Accordingly, the proposed Project would not result in a cumulatively considerable contribution to the nonattainment pollutants in the SCAB. The proposed Project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during construction and operation.

#### **Expose Sensitive Receptors to Substantial Pollutant Concentrations**

##### *Localized Significance Threshold*

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

An LST analysis was prepared to determine potential impacts to nearby sensitive receptors during construction of the Project. SCAQMD also recommends the evaluation of localized NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> impacts as a result of construction activities to sensitive receptors in the immediate vicinity of the Project site. Construction

activities associated with the proposed Project would result in temporary sources of on-site fugitive dust and construction equipment emissions. Off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis. Construction activities would not generate emissions in excess of site-specific LSTs; therefore, site-specific impacts during construction and operation of the proposed Project would be less than significant.

#### *Carbon Monoxide Hotspots*

The SCAQMD 1993 Handbook and the 2003 AQMP were used to determine CO attainment under the CAAQS and NAAQS to calculate CO hotspots. The Draft EIR determined potential operational impacts, from future development allowed by the proposed Project, would result in less than significant impacts associated with CO hotspots.

#### *Health Impacts of Other Criteria Air Pollutants*

Construction and operation of the proposed Project would result in emissions that would not exceed the SCAQMD thresholds for any criteria air pollutants, including VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. VOCs would be associated with motor vehicles, construction equipment, and architectural coatings; however, Project-generated VOC emissions would not result in the exceedances of the SCAQMD thresholds. Additionally, compliance with SCAQMD Rule 1113 would restrict the VOC content of coatings for construction applications. VOC and NO<sub>x</sub> emissions associated with Project construction and operation could minimally contribute to regional O<sub>3</sub> concentrations and the associated health impacts. Because of the minimal contribution during construction and operation, health impacts would be considered less than significant.

Construction and operation of the proposed Project would also not exceed thresholds for PM<sub>10</sub> or PM<sub>2.5</sub> and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or obstruct SCAB from coming into attainment for these pollutants. The proposed Project would also not result in substantial DPM emissions during construction and operation, and therefore would not result in significant health effects related to DPM exposure. Additionally, the proposed Project would be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction and operation, health impacts would be considered less than significant.

Construction and operation of the proposed Project would not contribute to exceedances of the NAAQS and CAAQS for NO<sub>2</sub>. Project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the site at any one time. In addition, existing NO<sub>2</sub> concentrations in the area are well below the NAAQS and CAAQS standards. Construction and operation of the proposed Project would not create substantial, localized NO<sub>x</sub> impacts. Therefore, potential health impacts associated with NO<sub>2</sub> and NO<sub>x</sub> would be less than significant.

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

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

## **Other Emissions**

### *Construction Impacts*

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

### *Operational Impacts*

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

Because the SCAQMD air quality plans are regularly updated and consider the cumulative emissions of existing and projected development, it may be concluded that a project that does not have a direct air quality impact would not have a cumulative regional air quality impact. Therefore, the Project would have a less than significant cumulative air quality impact related to long-term regional emissions of all criteria pollutants because direct impacts would be less than significant. As such, the Project potential to result in a cumulatively considerable increase of any criteria pollutant for which the Los Angeles portion of the SCAB is in nonattainment under an applicable NAAQS or CAAQS would be less than significant, including O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

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

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

## **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on air quality as it relates to criteria pollutants, sensitive receptors, and other emissions; therefore, no mitigation is required and no significant, unavoidable adverse impacts would occur.

## 2.4.4 Biological Resources

Under the existing conditions, the Project site is almost entirely developed with paved surfaces and buildings. A limited amount of landscaped areas is located within the Project site and along the public rights-of-way, consisting of small areas of ornamental trees, shrubs, and turf. This vegetation is ornamental in nature, entirely surrounded by urban development, and does not form a cohesive plant community that would provide quality suitable habitat for candidate, sensitive or special status wildlife species, or would support wildlife movement. According to the City's General Plan, the native vegetative cover throughout the City has been displaced by urban structures, and the primary vegetation now consists of domesticated species, including lawn grasses, ground covers, shrubs, and trees, planted for their ornamental qualities (City of El Segundo 1992). No wetlands or other jurisdiction waters are within the Project site (USFWS 2020). Further, any development activities conducted pursuant to the Specific Plan would be required to comply with all applicable requirements set forth by the City, including the City's street tree regulations (El Segundo 2021). All development activities are subject to the requirement to protect nesting birds, in compliance with the Migratory Bird Treaty Act, which prohibits the accidental or "incidental" taking or killing of migratory birds (U.S.C. 2021). Therefore, impacts associated with biological resources would not occur.

### Finding

Appendix B of the Notice of Preparation for the Project found no potential for significant impacts to biological resources; therefore, biological resources were not addressed in the Draft EIR. No mitigation would be required and no significant, unavoidable adverse impacts would occur.

## 2.4.5 Cultural Resources

### Historical Resources

The Fairfield Inn and Suites Hotel property (525 Sepulveda Boulevard; Assessor's Parcel Number [APN] 4139-025-091) was evaluated for historical significance and integrity in consideration of NRHP, CRHR, and City of El Segundo designation criteria and integrity requirements.

#### *NRHP/CRHR Statement of Significance*

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

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

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

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

Criterion C/3: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

The Fairfield Inn and Suites Hotel was constructed in 1959 and received two major additions in 1961 and 1979. The original 1959 hotel volume, 1959 conference room and restaurant wing, and 1961 addition at the time of these construction were excellent examples of the highly artistic Mid-Century Modern-style buildings designed by local Southern California-practicing architects Raymond Stockdale and Maxwell Starkham & Associates. The now-lost character-defining features would have been the curtain wall construction, colored spandrel paneling, cantilevered porches, rectangular and boxy proportions, and decorative concrete and metal screens on the main elevation. Although neither architect could be considered a master architect, the buildings were good examples of their work. However, due to major exterior alterations in 1987, none of the original decorative elements or character-defining features of the Mid-Century Modern buildings remain. The property as a whole has been altered beyond recognition, diminishing its once high artistic value. Finally, due to extensive exterior alterations, the property may no longer be considered representative of a significant and distinguishable entity whose components lack individual distinction. For these reasons, the Fairfield Inn and Suites Hotel property at 525 N. Sepulveda Boulevard does not appear eligible for listing in the NRHP under Criterion C or CRHR under Criterion 3.

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

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

*City of El Segundo Statement of Significance*

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

Integrity Discussion

The Fairfield Inn and Suites Hotel property maintains integrity of location, as it remains in its original location. The Fairfield Inn and Suites Hotel property, including all three wings have had major exterior renovations since 1987. While the buildings maintain much of their original plan and structure, key-character defining features of the Mid-Century Modern style building were removed and replaced with ordinary modern materials. Therefore, the Fairfield Inn and Suites Hotel property does not maintain integrity of design. The property does not retain integrity of setting, as the setting in all directions has been altered into parking lots, high-rise office or hotels, or strip malls with anchoring grocery and retail stores, in the late 1980s and 1990s. The size, scale, and density of this modern setting would be unrecognizable to a person from the late 1950s or early 1960s. Similar to integrity of design, the Fairfield Inn and Suites Hotel property does not maintain integrity of materials and workmanship, due to the loss of the

highly artistic concrete and metal screens and introduction of modern materials on the main and side elevations. Key original elements such as the cladding, signage, porte-cochere, decorative elements, windows, and doors have all been removed and replaced. The Fairfield Inn and Suites Hotel property does not retain integrity of feeling, as the property no longer retains the ability to express itself as a hotel building constructed in the 1950s, built in the early years of LAX's "jet-age" modernistic expansion. Finally, the property no longer retains integrity of association either with original owners Allen E. and Marc Siegal, or with the original companies: Thunderbird Hotel Corporation or Hacienda Hotels. In summary, Fairfield Inn and Suites Hotel property does not retain the requisite integrity for designation, and does not rise to the level of significance required for designation at the national, state, or local levels.

#### *Summary of Findings*

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

#### **Disturbance of Human Remains**

No prehistoric or historic burials were identified within the Project site as a result of the records searches. Additionally, the Project site is located within an urbanized area that has been subject to disturbance in the past as a result multiple construction projects and development. Moreover, the Project is not part of a dedicated cemetery and as such, the likelihood of disturbing human remains is low. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the Los Angeles County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, they shall notify the NAHC in Sacramento within 24 hours. In accordance with California PRC Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descended from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. Therefore, compliance with applicable state regulations related to the potential disturbance of human remains would be adequate to address any potential impacts, and no mitigation is required.

#### **Cumulative Effect**

The CHRIS record search identified twelve previously identified historic built environment resources within a 1-mile record search radius and no cultural resources immediately adjacent to the Project site. Only one of these, Hangar One at 5701 West Imperial Highway (P-19-174101), has been previously listed in the NRHP, and none of the Project addresses listed appear to be close enough in location to affect this historical resource. All other resources have

been determined ineligible and are not considered historic resources for the purposes of CEQA. The proposed Project was determined to have less than significant direct and indirect impacts on historic resources. Therefore, the proposed Project would not result in any cumulatively considerable impacts to historic resources.

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

### **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on cultural resources as it relates to historical resources and disturbance of human remains, therefore, no mitigation is required and no significant, unavoidable adverse impacts would occur.

## 2.4.6 Energy

### **Wasteful, Inefficient, or Unnecessary Consumption of Energy**

#### *Electricity*

#### Construction

Temporary electric power for lighting, heating/cooling, and electronic equipment, such as computers inside temporary construction trailers, as well as lighting for construction activities, would be required during short-term construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. All sources of electricity would be from existing power lines that serve the site and no new infrastructure would be required. There is nothing unusual about the proposed Project that would result in a wasteful, inefficient, and unnecessary use of electrical energy. The electricity used for construction activities would be temporary and would have a negligible contribution to the proposed Project's overall energy consumption. Impacts to electricity during construction would be less than significant, and no mitigation is required.

#### Operations

The operational phase would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. It was assumed that multi-family residential savings are 2% of electricity from the 2016 standards. For non-residential buildings, the savings are 10.7% of electricity.

Buildout of the proposed Project is estimated to have a total electrical demand of 3,143,911 kWh per year (or 3 million kWh per year) for proposed Project usage. The proposed Project's electrical consumption would be a small percentage (0.005%) of the County's annual use. SCE forecasts that its total energy consumption in 2024 (the Project buildout year) will be approximately 120,000 gigawatt hours of electricity (CEC 2018b). Based on the

Project's estimated electrical consumption of 3,143,911 kWh/year, the Project would account for approximately 0.0026% of SCE's total projected consumption during 2024 for the Project's buildout year.

In addition, the proposed Project would be built in accordance with the current Building Energy Efficiency Standards (Title 24) at the time of construction, which include robust requirements for energy efficiency. Also, the provisions of the CALGreen code apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure. In mixed occupancy buildings, such as the proposed Project, each portion of a building must comply with the specific green building measures applicable to each specific occupancy. Therefore, due to the inherent increase in efficiency of building code regulations, the proposed Project would not result in a wasteful, inefficient, or unnecessary use of energy. Impacts related to operational electricity use would be less than significant.

#### *Natural Gas*

##### Construction

Natural gas is not anticipated to be required during construction of the proposed Project. Any minor amounts of natural gas that may be consumed as a result of proposed Project construction would be substantially less than that required for proposed Project's operation and would have a negligible contribution to the proposed Project's overall energy consumption.

##### Operations

Natural gas consumption during proposed Project operation would be required for various purposes, including building heating and cooling. Buildout of the proposed Project would consume approximately 3,898,778 kBtu per year. SoCalGas customers annual natural gas consumption is estimated to be 7,876 million therms per year. Therefore, the proposed Project's estimated natural gas consumption of 3,898,778 kBtu (or 38,988 therms) per year would be a small percentage (0.0005%) of SoCalGas' annual supply to customers. The proposed Project would be required to meet Title 24 requirements applicable at that time, as required by state regulations through the plan review process. Therefore, due to the inherent increase in efficiency of building code regulations, the proposed Project would not result in a wasteful, inefficient, or unnecessary use of natural gas. Impacts related to operational natural gas use would be less than significant.

#### *Petroleum*

##### Construction

Petroleum would be consumed throughout construction of the proposed Project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities, vendor trucks, and haul trucks would rely on diesel fuel. Construction workers would travel to and from the Project site throughout the duration of construction. It was assumed that construction workers would travel in gasoline-powered vehicles.

Fuel consumption from construction equipment was estimated by converting the total CO<sub>2</sub> emissions from each construction phase to gallons using conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton CO<sub>2</sub> per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO<sub>2</sub> per gallon (The Climate Registry 2020).

The proposed Project is estimated to consume approximately 202,913 gallons of petroleum during the construction phase. The total expected petroleum use from the proposed Project's construction represents approximately 0.0003% of California's consumption of petroleum over the construction duration. In accordance CARB's Airborne Toxics Control Measure, the proposed Project would be required to restrict heavy-duty diesel vehicle idling time to 5 minutes, which would reduce petroleum usage. Overall, because petroleum use during construction would be temporary, and would not be wasteful or inefficient, impacts would be less than significant.

### *Operations*

The fuel consumption resulting from the proposed Project's operational phase would be attributable to various vehicles associated with each land use. Petroleum fuel consumption associated with motor vehicles traveling within the City during operation is a function of VMT. Mobile sources from buildout of the proposed Project would result in approximately 199,110 gallons of petroleum fuel usage per year. The proposed Project would consume (at buildout), approximately 0.005% of the gasoline and 0.062% of the diesel sold within the County (in 2017). The SCAG region has household 15.3 VMT per capita and the City of El Segundo has a household 14.2 VMT per capita. The proposed Project is estimated to generate an average daily household VMT per resident of 10.9 miles, which is more than 15% less than the City's VMT. Therefore, the Project would not result in a significant transportation impact related to VMT. Over the lifetime of the proposed Project, the fuel efficiency of vehicles is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the Project site during operation would decrease over time. Operation of the proposed Project is expected to use decreasing amounts of petroleum over time due to advances in vehicle fuel economy standards.

### **Conflict or Obstruct Plan for Renewable Energy**

The proposed Project would comply with all applicable regulatory requirements for the design of new buildings. Title 24 of the California Code of Regulations contains energy efficiency standards for residential and nonresidential buildings based on a state mandate to reduce California's energy demand.

Additionally, the proposed Project would receive electricity from SCE, which has the mandate to comply with SB 100. This policy requires that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California by 2045, and that the zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling. Thus, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts during construction and operation of the proposed Project would be less than significant.

### **Cumulative Energy Impact**

Buildout of the Project, related projects, and additional forecasted growth in SCE's service area and SoCalGas' service area would cumulatively increase the demand for electricity and natural gas supplies and infrastructure capacity. Although Project development would result in the use of renewable and non-renewable resources during construction and operation, which could limit future availability of non-renewable energy sources, the use of such resources would be on a relatively small scale, would be reduced by measures making the Project more energy-efficient, and would be consistent with growth expectations for the service areas. Furthermore, as with the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary.

As with the proposed Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions. Furthermore, as described above, the Project would be consistent with the energy efficiency policies emphasized by the 2020 RTP/SCS. Since the Project is consistent with the Connect SoCal (2020 RTP/SCS), its contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of transportation fuel would not be cumulatively considerable and, thus, would be less than significant.

As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.

**Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on energy as it relates to consumption of energy, conflict or obstruction of a plan for renewable energy, and cumulative impacts to energy, therefore, no mitigation is required and no significant, unavoidable adverse impacts would occur.

## 2.4.7 Geology and Soils

**Expose People or Structures to Fault Rupture**

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone (CGS 2020). According to the Geotechnical Evaluation, the closest such zone is located along the Newport-Inglewood Fault, located approximately 3.6 miles to the east/northeast of the Project site (Appendix E-1). In addition, as shown in Figure 4.5-1, no known faults traverse the Project site. Furthermore, the Project site would not directly or indirectly cause or exacerbate existing fault rupture risks from the construction of new buildings and associated infrastructure on the Project site. As a result, no impact related to surface rupture of a known earthquake fault would occur.

**Expose People or Structures to Strong Seismic Ground Shaking**

The Project site is located in the seismically active region of Southern California. The Newport-Inglewood Fault has been mapped in the vicinity of the Project site. This fault, as well as numerous other regional faults (e.g., Palos Verde Fault, Puente Hills Thrust Fault, Santa Monica Fault, Verdugo Fault, Raymond Fault, Whittier Fault, Sierra Madre, San Fernando, and San Andreas Fault), are capable of producing moderate to large earthquakes that could affect the City, including the Project site. The severity of ground shaking would depend on the magnitude of the earthquake, the distance to the Project site, and on-site geologic conditions. Ground shaking could lead to damage to structures and infrastructure, personal injury and death, utility service disruption, fire, explosion, and hazardous material spills.

The soils underlying the Project site fall within the characteristics of Class D (i.e., "Stiff Soil" profile), as defined in Chapter 20 of the American Society of Civil Engineers (ASCE) 7-10. This information was used to calculate the ground motions on the Project site, using the U.S. Geological Survey U.S. Seismic Design Maps tool (Appendix E-1). According to the Geotechnical Evaluation, the site has potential ground acceleration of 0.598. The Geotechnical Evaluation (Appendix E-1) provides the seismic parameters to be used in the structural design of the Project, based on the typical site materials encountered during subsurface exploration at nearby sites and are provides for preliminary design and estimating purposes. These parameters include the mapped spectral acceleration at short periods; the mapped spectral acceleration at a one-second period; the maximum considered earthquake spectral

response for short periods; the maximum considered earthquake spectral response at a one-second period; the design spectral response acceleration for short periods; and the design spectral response acceleration at a one-second period. The Geotechnical Evaluation recommends these parameters be verified by a site-specific geotechnical investigation, in accordance with the requirements set forth in Section J104.2.3, Engineered Grading Requirements, of the ESMC. Furthermore, the Project geotechnical consultant would provide final design parameters following observation and testing of site materials during grading. Depending on actual materials encountered during site grading and actual foundation loads, the design parameters presented in the Geotechnical Evaluation may require modification (Appendix E-1). Per Section J104.2.3, Engineered Grading Requirements, of the ESMC, recommendations in the geotechnical engineering report and the engineering geology report shall be incorporated into the grading plans or specifications.

Project construction would be completed in accordance with the CBC. As with all development within the City of El Segundo, development within the Project site would be required to comply with the seismic safety requirements of the CBC. The CBC provides procedures for earthquake resistant structural design that includes considerations for onsite soil conditions, occupancy, and the configuration of the structure, including the structural system and height. Although substantial damage to structures may be unavoidable during large earthquakes, the proposed structures would be designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage, and loss of life.

As previously discussed, the 2019 edition of the CBC is based on the 2018 International Building Code, and all construction must be conducted in compliance with the CBC. Chapters 16 and 16A of the 2019 CBC include structural design requirements governing seismically resistant construction, including factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Therefore, upon Project compliance with the CBC and City policies aimed at minimizing geologic hazards, and the recommendations set forth in the site-specific geotechnical reports, the Project site would not directly or indirectly cause substantial adverse effects involving strong seismic ground shaking, and impacts would be less than significant.

#### **Expose People or Structures to Liquefaction**

As previously discussed, the depth to historic high groundwater in the Project vicinity is greater than 50 feet below the ground surface; therefore, the potential for liquefaction to occur beneath the Project site is considered to be very low. Furthermore, as shown in Figure 4.5-2, the site is not located within a mapped California Geologic Survey liquefaction hazard zone (Appendix E-1; CGS 2020). As such, seismic-related ground failure due to liquefaction would not be expected to occur on the Project site. The potential for collapsible soils is discussed under Threshold 4.5c below, and impacts would be less than significant.

#### **Expose People or Structures to Landslides**

As previously discussed, the Project site is not located within an earthquake-induced landslide zone. Because the Project site is not located within an area identified by the CGS as having potential for seismic slope instability, geologic hazards associated with landsliding are not anticipated at the site (Appendix E-1). Additionally, the Project would not exacerbate the potential for on- or off-site landslides. As such, implementation of the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts would be less than significant.

## Soil Erosion or Loss of Topsoil

### *Construction*

Project construction would entail demolition and grading of portions of the Project site, followed by construction of the proposed structures. Construction activities would include site preparation, grading/earthwork, building construction, paving, and architectural coating. PCC-South includes excavations required for the subterranean parking structure. As discussed under Threshold 4.5c below, the Project site has the potential for collapsible soils and would require removal and recompaction of artificial fill soils and the upper 2 to 3 feet of the Dune Sand deposits. As recommended in the Geotechnical Evaluation, the undocumented fills underlying the Project site would be removed and replaced with compacted fill (Appendix E-1). These construction activities could result in temporary, short-term impacts related to a potential for erosion and loss of topsoil during the development of the Project site.

As previously discussed, Section J104.2.3 of the ESMC requires that all grading plans and permits must comply with the provisions of this section for NPDES compliance and that BMPs must be installed before grading begins to prevent erosion and related pollutants from discharging from the site. No grading permit would be issued unless the plans for such work include a SWPPP with details of BMPs, including desilting basins or other temporary drainage or control measures, or both, as may be necessary to control structures-related pollutants which originate from the site as a result of structures related activities. In addition to the SWPPP, a Wet-Weather Erosion-Control Plan may be required (depending on the season of construction), which includes specific BMPs to minimize the transport of sediment and protect public and private property from the effects of erosion. The required SWPPP would establish erosion and sediment control BMPs for construction activities. Typical examples of erosion-related construction BMPs include the following:

- Silt fences and/or fiber rolls installed along with the limits of work and/or the Project construction site
- Stockpile containment and exposed soil stabilization structures (e.g., Visqueen plastic sheeting, fiber rolls, gravel bags and/or hydroseed)
- Runoff control devices (e.g., fiber rolls, gravel bag barriers/chevrons, etc.) used during construction phases conducted during the rainy season
- Wind erosion (dust) controls
- Tracking controls at the site entrance, including regular street sweeping and tire washes for equipment
- Regular inspections and maintenance of BMPs

These BMPs would be refined and/or added to as necessary by a qualified SWPPP professional to meet the performance standards in the Construction General Permit. Compliance with the Construction General Permit would ensure that soil erosion would be minimized.

Although the Project would require excavation of soils related to construction of the subterranean parking structure and related to removal and recompaction of collapsible soils, this would not result in a substantial loss of topsoil. The Project site is currently developed and paved and does not contain available topsoil, with the exception of minimal landscaped areas adjacent to surface parking lots and buildings. The Project site is not used, and is not zoned for, agricultural uses or other activities that require the use of topsoil. Therefore, potential impacts associated with soil erosion and/or loss of topsoil would be less than significant.

*Operations*

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project site would be covered by the structures and paving, while the remaining portions of the site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Project. In addition, the majority of the area surrounding the Project site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. With the implementation of applicable construction BMPs, impacts related to erosion or loss of topsoil would be less than significant.

**Located on or Would Cause Unstable Soil**

*Landslides*

As previously discussed, topographic relief across the site is from approximately 19 feet directed to the southwest toward Indiana Street and East Holly Avenue for PCC-South and PCC-Fairfield Parking, and approximately 11 feet directed toward the east toward PCH and south toward Mariposa Avenue for PCC-North (Appendix E-1). Additionally, the Project site is not within an area identified as having a potential for seismic slope instability. Because the Project site is not located within an area identified by the CGS as having potential for seismic slope instability, geologic hazards associated with landsliding are not anticipated at the site (Appendix E-1). No impacts would occur.

*Liquefaction/Lateral Spreading*

Potential impacts concerning liquefaction are evaluated under Threshold a(iii) above. Lateral spreading is the finite, lateral movement of gently sloping, saturated soil deposits caused by earthquake-induced liquefaction. Impacts associated with lateral spreading would be similar to those associated with liquefaction and would therefore be less than significant.

*Subsidence*

According to the Geotechnical Evaluation, once existing artificial fill and the upper 2 to 3 feet of the Dune Sands are removed, they are anticipated to be suitable for reuse as compacted fill (Appendix E-1). Volumetric changes in earth quantities would occur when excavated onsite soil materials are replaced as properly compacted fill. The Geotechnical Evaluation the existing artificial fills and upper collapsible Dune Sand deposits would shrink approximately 10% to 20%. The reprocessing of removed soils are anticipated to result in negligible subsidence; however, the ultimate earthwork quantities based on actual shrinkage and subsidence that occurs during the grading process would be determined in accordance with the requirements set forth in Section J104.2.3 of the ESMC.

In accordance with the CBC Section 1804A, the compacted fill shall comply with the provisions of an approved geotechnical report, which is required by the CBC and the ESMC. The proposed Project would be required to meet the most recent building safety criteria and construction design recommendations of the site-specific final geotechnical reports that would be prepared for the construction of Project buildings, including removal of existing artificial fills. As such, impacts related to subsidence would be less than significant.

*Collapsible Soils*

The Geotechnical Evaluation indicated that artificial fill soils in the upper 2 to 3 feet of the Dune Sand deposits exhibit collapsible potential upon wetting. If such materials are left in the current condition, excessive settlement of structures and site improvements could result due to the weight of new foundations and the introduction of water from rain or irrigation. Excessive settlement from such materials would be adequately addressed if they are removed and recompacted, as recommended by the Geotechnical Evaluation. Materials anticipated to exhibit this condition consist of the artificial fill soils and upper 2 to 3 feet of the Dune Sand deposits. Soils below the collapsible soil zone are anticipated to exhibit low compressibility characteristics in their current state (Appendix E-1).

The Geotechnical Evaluation concluded that that total settlement of foundations would be less than about 1 inch and bearing pressure is limited to about 4,500 to 5,000 pounds per square foot. Associated differential settlement should be less than 0.5 inches over 30 feet. Such settlement is anticipated to be tolerable for Project site development. The Geotechnical Evaluation recommends that the existing artificial fill be removed and recompacted at depths of about 3 to 6 feet (Appendix E-1).

Design-level geotechnical investigations are required in accordance with existing regulations. The proposed Project must be designed and constructed in accordance with Section J104.2.3, Engineered Grading Requirements, of the ESMC. All new building construction, alteration, or rehabilitation must comply with all applicable building and seismic codes of the City. In accordance with Section 1803A of the CBC, a geotechnical investigation is required that includes soil testing, laboratory testing or engineering calculations to evaluate soil types, soil expansion, depth of groundwater, deep foundations, rock strata, excavation, compacted fill, soil strength, seismic design criteria and other soil characteristics that need to be considered in the structural design and construction of buildings and infrastructure. Geotechnical investigations must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations from geotechnical investigations must be incorporated into the design and construction of the Project, as reviewed and approved by the City's Department of Planning and Building Safety. As such, impacts related to collapsible soils would be less than significant.

In summary, upon Project compliance with the CBC and City policies aimed at minimizing geologic hazards, and the recommendations set forth in the site-specific geotechnical reports, the Project site would not directly or indirectly exacerbate existing conditions related to on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, and impacts would be less than significant.

#### **Located on Expansive Soil**

As previously discussed, based on soil testing at the site, the near surface soils have a very low to low expansion potential. According to the Geotechnical Evaluation, testing for soil expansion would be required subsequent to rough grading and prior to construction of foundations and other concrete work to confirm these conditions (Appendix E-1). Expansive soils can undergo volume changes when they become wetted or dried, which could affect overlying structures. Given the expansion potential anticipated at the site, only nominal steps will be needed to mitigate adverse effects such as minor steel reinforcing of foundations and slabs, and moisture preparation and jointing details for flatwork. Typical mitigation measures described in Chapter 18 of the CBC to alleviate expansive soils include the following:

- Excavation of expansive soils until such a depth that competent material is encountered
- Installation of foundations designed to resist forces exerted on the foundation due by expansive soils
- Stabilization of the soils by chemical, dewatering, pre-saturation, or equivalent techniques

Such requirements would be set forth in the subsequent design-level geotechnical investigations prepared in accordance with Section J104.2.3, Engineered Grading Requirements, of the ESMC and the CBC. Potential impacts associated with expansive soils would be less than significant.

### **Soils Incapable of Supporting Septic Tanks**

The Project site is currently served by sewer infrastructure, and any new development would require sewer connections. The Project site is located in an urbanized area that is currently connected to sewer lines. No septic tanks or alternative wastewater disposal is proposed; therefore, implementation of the Project would result in no impact.

### **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on fault rupture, strong seismic ground shaking, liquefaction, landslides, erosion, unstable soil, expansive soil, and septic tanks; therefore, no mitigation is required and no significant, unavoidable adverse impacts would occur.

## 2.4.8 Greenhouse Gas Emissions

### **Greenhouse Gas Emissions**

#### *Construction Emissions*

Construction of the proposed Project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. The total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 MT CO<sub>2</sub>e per year. Construction of the proposed Project is anticipated to last a total of 34 months. On-site sources of GHG emissions include off-road equipment and off-site sources including haul trucks, vendor trucks, and worker vehicles. The estimated total GHG emissions during construction of would be approximately 1,977 MT CO<sub>2</sub>e over the construction period.

#### *Operational Emissions*

Long-term operations of the proposed Project would result in GHG emissions through mobile sources and area sources (landscape maintenance equipment); energy use (natural gas and generation of electricity consumed by the proposed Project); water supply, treatment, and distribution and wastewater treatment; and solid waste disposal. Annual GHG emissions from these sources were estimated using CalEEMod.

The net GHG emissions associated with development of the proposed Project would be below the SCAQMD GHG threshold of 3,000 MT CO<sub>2</sub>e per year. Therefore, the proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and this would represent a cumulatively less than significant impact.

### **Conflict with an Applicable Plan, Policy, or Regulation**

#### *Consistency with the City of El Segundo CAP Measures*

The City of El Segundo CAP identifies a variety of measures, which new projects must adhere with to with respect to renewable energy, conservation of energy and water, solid waste, global warming, urban design, transportation, and human health within the City. The proposed project would be consistent with these measures.

*Consistency with the Connect SoCal (2020–2045 RTP/SCS)*

SCAG’s Connect SoCal is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The Connect SoCal incorporates local land use projections and circulation networks in city and county general plans. Typically, a project would be consistent with the RTP/SCS if the project does not exceed the underlying growth assumptions within the RTP/SCS. The proposed Project would provide a minor amount of growth, estimated at 3.7% of the 2020 estimate and 3.6% in 2040 of the City’s projected total population, the proposed 263 residential units could generate 618 persons upon its completion in 2024. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG’s estimated projections through 2045 by 118 persons. The proposed Project would accommodate an expected 618 residents which exceed the overall population growth projections included in the Connect SoCal. As stated in the Connect SoCal 2020–2045 RTP/SCS, there is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with the RTP/SCS, and lead agencies have the sole discretion in determining a local project’s consistency with the RTP/SCS (SCAG 2020a). Because there is no wholly reliable population, housing, or employment data after 2010, as the U.S. Census is conducted every ten years, all data for years prior to the 2020 Census should be viewed as projections or estimates. The proposed Project would implement the guiding principles, goals and policies of SCAG’s 2020–2045 RTP/SCS as they relate to livability, economic prosperity, and sustainability through the development of walkable, mixed use communities along major transportation corridors. The development of a mix of housing and job opportunities within 0.5 miles of transit, thereby alleviating pressure on suburban and open space areas to develop, is fully supportive of SCAG’s strategies. Because the proposed Project would support SCAG’s goals and strategies for growth in the region, and because the proposed Project would assist the development of new housing and improve the City’s job/housing balance, impacts related to population growth assumed in Connect SoCal would be less than significant. The proposed Project would not conflict with any of the goals within SCAG’s Connect SoCal. Therefore, the proposed Project would not conflict with the goal to improve GHG emissions in the region.

*Consistency with the CALGreen*

2019 CALGreen requirements are comprehensive and applicable to the proposed Project. The provisions of the CALGreen code apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure. In mixed occupancy buildings, such as the proposed Project, each portion of a building must comply with the specific green building measures applicable to each specific occupancy (CEC 2019).

The proposed Project must comply with all relevant measures applicable to the types of structures to be built, including non-residential, low-rise residential, and high-rise residential. As such, the proposed Project would be consistent with the regulations set forth in CALGreen. The City approved Ordinance No. 1606, which adopted the 2019 edition of the CALGreen with amendments. Therefore, the proposed Project would be implemented consistent with the City’s Municipal Code requirements and CALGreen.

*Consistency with CARB’s Scoping Plan*

The Scoping Plan provides a framework for actions to reduce California’s GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan recommends

strategies for implementation at the statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. The proposed Project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the proposed Project.

*Consistency with EO S-3-05 and SB 32*

EO S-3-05 establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. SB 32 establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, EO B-30-15, and EO S-3-05.

*Consistency with General Plan's Air Quality Element*

The City of El Segundo General Plan (City of El Segundo 1992) includes various policies related to reducing GHGs (both directly and indirectly) because strategies that reduce criteria air pollutant emissions may also reduce GHG emissions. Total proposed Project emissions, including operation and amortized construction, would be approximately 2,921 MT CO<sub>2e</sub> per year, which is less than the SCAQMD significant threshold of 3,000 MT CO<sub>2e</sub> per year. Furthermore, based on the considerations previously outlined, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and no mitigation is required. Therefore, this impact would be less than significant.

**Cumulative Effect**

GHG emissions inherently contribute to cumulative impacts. The proposed Project would not result in GHG emissions in exceedance of the SCAQMD significance threshold. Therefore, cumulatively, Project greenhouse gas (GHG) emissions would be less than significant.

**Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on emissions generated, consistency with applicable regulations, and cumulative GHG effects; therefore, no mitigation is required and no significant, unavoidable adverse impacts would occur.

## 2.4.9 Hazards and Hazardous Materials

### **Routine Transport, Use, or Disposal of Hazardous Materials/Release of Hazardous Materials and the Potential for Upset Conditions**

*Long-Term Operational Impacts*

The operational phase of the proposed Project would not be expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Hazardous materials would be limited to use of commercially available cleaning products, chlorine for swimming pools, landscaping chemicals and fertilizers, and various other commercially available substances. Such chemicals are currently in use on the Project site, in association with the hotels. Although the Project would introduce additional amounts of commercially

available potentially hazardous materials, such as cleaning supplies and landscaping products, to the Project site, the routine transport, use, and/or disposal of these substances would be subject to applicable federal, state, and local health and safety laws and regulations, which would minimize health risk to the public associated with hazardous materials. Therefore, impacts would be less than significant and no mitigation is required.

### **Reasonably Foreseeable Upset and Accident Conditions**

#### *Long-Term Operational Impacts*

According to the Los Angeles County Department of Public Works (LADPW 2020), the Project site is not located within 300 feet of an oil or gas well or 1,000 feet of a methane-producing site; therefore, methane impacts are not anticipated. Operation of the proposed Project would only require limited use of commercially available hazardous materials, including janitorial and landscaping products. Should the amount of onsite hazardous materials, including hazardous wastes, be greater than reporting thresholds (55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of compressed gas), a Hazardous Materials Business Plan (HMBP) would be required under California HSC, Division 20, Chapter 6.11, Sections 25404–25404.9. The HMBP, which would be submitted to the El Segundo Fire Department (the local CUPA) via the California Environmental Reporting System, would include emergency and spill prevention and response measures, thereby reducing the potential for an upset or accident condition. Use of extremely hazardous materials and accumulation of acutely hazardous wastes are not anticipated. Operation of the proposed Project is not anticipated to impact nearby hazardous liquid pipelines or the adjacent gasoline service station. Project operational impacts are not anticipated to create a foreseeable upset or accident condition that would release hazardous materials to the environment, and impacts are less than significant.

### **Hazardous Materials within One-Quarter mile of an Existing or Proposed School**

There are no public or private K–12 schools located within 0.25-mile of the Project site, therefore, impacts would be less than significant and no mitigation is required.

### **Cortese List**

#### *Long-Term Operational Impacts*

Once operational, the PCC-North portion of the Project would be covered with buildings and minimal landscaping. Should potentially petroleum-contaminated soils be present at the gas station, they would be beneath the surface and covered. Therefore, operation of the proposed Project would not expose the public or environment to any potentially contaminated soils. Additionally, should contaminated soils be encountered during construction, the local regulatory agency, El Segundo Fire Department would be notified in accordance with state and local regulation. Under local agency oversight, contaminated soils would be excavated and/or remediated in accordance with state and local laws and regulations to minimize potential impacts to the public or environment, including potential vapor intrusion. With adherence to applicable laws and regulations, no impacts to operation of the proposed Project would occur.

Water is supplied to the Project by the City of El Segundo; therefore, direct use of groundwater is not required during operation of the proposed Project. The groundwater contaminated by volatile organic compounds identified to the southeast of the Project site is expected to flow south-southwest, away from the Project site. Therefore, the potential for vapor intrusion associated with this contamination is low. Impacts associated with potentially contaminated groundwater are not anticipated and no mitigation is required.

### **Near an Airport or within an Airport Land Use Plan**

#### *Short-Term Construction Impacts*

The Project site is not located within the boundaries of the LAX Airport Influence area, and is therefore not subject to the ALUP requirements, including those for safety and noise. The Project site is located within 0.5-mile of LAX and is therefore regulated under 14 CFR 77.9 – Construction or Alteration Requiring Notice. In accordance with 14 CFR 77.9, the Project applicant or their contractor must file FAA Form 7460-1, Notice of Proposed Construction or Alteration at least 45 days before the start date of the proposed construction. The FAA will review the proposed construction and approve, deny, or require alterations to the construction in order to avoid impacts to navigational equipment and prevent safety hazards. With adherence to FAA regulations, the Project would not result in safety hazards for people residing or working in the Project area, and impacts would be less than significant.

#### *Long-Term Operational Impacts*

The Project would adhere to FAA regulations, and therefore safety hazards associated with airport navigation would be less than significant. Additionally, the Project site is not located within the LAX ALUP noise boundaries, therefore there are no anticipated impacts associated with excessive noise for people residing or working in the Project area. Therefore, impacts would be less than significant.

### **Impair or Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan**

#### *Long-Term Operational Impacts*

The eastbound lane of Mariposa Avenue at PCH would be reconfigured as a part of the proposed Project, from one left lane and one through-right lane to one left, one through, and one right-turn lane. The proposed right-turn lane would be approximately 69 feet in length from stop bar or crosswalk with a 60-foot taper with an overall length of approximately 90 feet, including the taper, which would accommodate peak hour 95th percentile queues. Therefore, the proposed Project improvement would improve the queue length on Mariposa Avenue, thereby improving Project access and circulation. Access to PCH and I-105 for emergency evacuation would not be impacted by Project implementation and no mitigation is required.

### **Wildland Fires**

The proposed Project site is located in a highly urbanized area and is not located within an area of high wildfire hazard. Therefore, people and structures would not be subject to significant risks related to wildland fires, and impacts would be less than significant.

### **Cumulative Effect**

For cumulative analysis, the hazardous materials geographic scope is generally restricted to the area immediately surrounding the Project site as the potential for risk is limited to the area immediately surrounding an affected hazardous material site or risk generator.

Cumulative projects would also be subject to federal, state, and local regulations related to hazardous materials and other public health and safety issues. In a manner similar to the proposed Project, adherence to these regulatory requirements would reduce incremental impacts associated with public exposure to health and safety hazards in each of the affected project areas. Additionally, most hazardous material and safety-related risks are

localized, generally affecting a specific site and immediate surrounding area, thus minimizing the potential for an impact to combine with another project to create a cumulative scenario.

Because cumulative projects would be fully regulated, thus reducing potential for public safety risks, cumulative impacts associated with exposure to hazards and hazardous materials would be less than significant. Through mitigation and compliance with regulatory requirements, the construction or operation of the proposed Project itself would not create significant human or environmental health or safety risks that could combine with other project impacts to create a significant and cumulatively considerable impact. For these reasons, the proposed Project would not result in cumulatively considerable impacts related to hazards and hazardous materials.

### **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on hazards and hazardous materials as it relates to the proximity of an existing or proposed school; the proximity of the project to an airport or an airport land use plan; wildland fires; and cumulative impacts to hazards and hazardous materials; therefore, no mitigation is required and no significant, unavoidable adverse impacts would occur.

## 2.4.10 Hydrology and Water Quality

### **Violate Water Quality Standards or Waste Discharge Requirements**

#### *Short-Term Construction Impacts*

Grading and construction would potentially result in short-term erosion and associated siltation that could lead to adjacent storm drain infrastructure. Erosion-induced sedimentation affects water quality and interferes with photosynthesis; oxygen exchange; and the respiration, growth, and reproduction of aquatic species. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported to downstream drainages leading to the Pacific Ocean which could contribute to the degradation of water quality. Other pollutants that could affect surface-water quality during the construction phase include petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, construction equipment leaks, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, and rodenticides).

In accordance with the State NPDES General Construction Permit and WDR Permit, as established by the Porter-Cologne Water Quality Act, the development of an acre or more of land must file a notice of intent with the SWRCB, followed by development of a site-specific SWPPP for construction activities. The property owner/developer must comply with the Construction General Permit applicable at the time a grading permit is issued. The SWPPP must include erosion- and sediment-control BMPs that will meet or exceed measures required by the determined risk level of the Construction General Permit, as well as BMPs that control the other potential construction-related pollutants. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. The SWPPP is required to identify BMPs that protect stormwater runoff and ensure avoidance of substantial degradation of water quality.

Incorporation of required BMPs for temporary materials and waste storage and handling during construction, and equipment and vehicle maintenance and fueling would reduce the potential discharge of polluted runoff from

construction sites, consistent with the State NPDES General Construction Permit and the ESMC requirements for construction activities.

The Project site is not located in an area with high groundwater levels, and excavation activities associated with the PCC-South parking garage are not expected to encounter groundwater. However, perched groundwater conditions are dependent on seasonal precipitation, land use, among other factors, and may vary as a result through time. Additionally, the proposed drywells are anticipated to reach depths between 30 feet and 52 feet; therefore, it is possible that the construction of the drywells could encounter perched groundwater. In the event that groundwater is encountered during excavations, potentially polluted groundwater could be released to adjacent storm drains during dewatering activities, resulting in adverse impacts to downstream surface waters.

In the event that groundwater is encountered during excavations, the Project applicant/developer would be required by existing regulatory requirements to procure a dewatering permit from the Los Angeles RWQCB for pumping and disposal of groundwater. Groundwater dewatering would be controlled in compliance with the Waste Discharge Requirements for the Discharge of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994004). This permit requires permittees to conduct monitoring of dewatering discharges and adhere to effluent and receiving water limitations contained within the permit so that the water quality of surface waters is protected.

Compliance with existing regulations would prevent violation of water quality standards and minimize the potential for contributing sources of polluted runoff. Therefore, compliance with existing regulations would ensure that the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface quality from demolition and construction activities. Impacts would be less than significant and no mitigation is required.

#### *Long-Term Operational Impacts*

The Project site falls within the Santa Monica Bay (SMB) Enhanced Watershed Management Program (EWMP), which includes numerous existing regional BMPs. Existing distributed BMPs were identified through the data request that included a total 2,212 BMPs in the SMB EWMP Group area. Of these distributed BMPs, 340 exist within the City of Los Angeles and 1,872 exist within the City of Santa Monica; however, there are no reported regional BMPs within the City of El Segundo. Therefore, LID BMPs would be implemented at the Project site to meet the local MS4 Permit requirements and remain consistent with the objectives of the SMB EWMP.

Project design, construction, and operation would be completed consistent with the SMB EWMP, and in accordance with the City Stormwater and Urban Runoff Pollution Control Ordinance, Municipal NPDES Permit, and the City's LID Manual, with the goal of reducing the amount of pollutants in stormwater and urban runoff. The LID Manual requires that post-construction stormwater runoff from new developments be infiltrated, evapotranspired, captured and reused, and/or treated through a high efficiency BMP onsite for the 85th percentile storm event, or 0.75 inches of precipitation, whichever is greater. The LID Manual states that BMPs are to be designed to manage and capture stormwater runoff. Infiltration systems are the first priority type of BMP improvements, as such systems provide percolation and infiltration of stormwater into the ground, which not only reduces the volume of stormwater runoff entering the MS4, but also contributes to groundwater recharge in some areas. The second priority BMP is capturing and reusing stormwater onsite for either landscape irrigation or toilet flushing. Proposed drainage for the proposed Project would include stormwater treatment features on all three development sites, in accordance with the City of El Segundo LID requirements.

Based on the Geotechnical Due-Diligence Evaluation, prepared by Albus-Keefe & Associates (see Appendix E-1 of the Draft EIR), the Utility Report determined that infiltration is feasible for stormwater treatment. One drywell at each proposed development site (PCC-South, PCC-Fairfield Parking, PCC-North) would be able to capture the required volume and treat that volume as quickly as it enters the drywell system. The infiltration rate for the site is 0.00186 feet per second, and a drywell with a diameter of 4 feet and an infiltration depth of 22 feet would provide a disposal rate of 0.514 cubic feet per second and would dispose of 88,819 cubic feet in 48 hours. Drywells are proposed below structure or on grade, with 20 feet of separation between the bottom of the sublevel or grade and infiltration zone.

The drywells would include overflow piping to convey stormwater to Indiana Street or Mariposa Avenue. Thus, stormwater in the proposed condition would flow only to the City of El Segundo storm drains. The proposed peak flow rate that would be used to design the overflow piping is the reduced peak flow rate generated after infiltration. Because the peak flow rate would be reduced in the proposed condition, it is assumed that the City of El Segundo storm drains will have more than enough capacity to handle the flow rate generated by the proposed Project.

Once the water quality volume is met through the drywells, the “higher flows” would enter overflow pipes, which would discharge stormwater to the local storm drain systems. Therefore, capture and re-use BMPs to be constructed as part of the Project would result in the treatment of the entire required volume for the Project site and the elimination of pollutant runoff up to the 25-year storm event. In the post-Project condition, all stormwater overflow would be conveyed into the City’s storm drain system and would not be conveyed to Caltrans facilities.

The implementation of LID features would, to the maximum extent practicable, reduce the discharge of pollutants into receiving waters, including inadvertent release of pollutants (e.g., hydraulic fluids and petroleum); improper management of hazardous materials; and trash and debris during Project operations. In accordance with the all applicable state and local regulations, Project source controls to improve water quality would be provided for outdoor trash storage/waste areas and outdoor loading/unloading areas. As a result of compliance with existing regulations, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during the long-term Project operations. Impacts would be less than significant and no mitigation is required.

### **Deplete Groundwater Supplies or Interfere with Groundwater Recharge**

Implementation of the proposed Project would decrease the amount of impervious area within each of the three development areas. PCC-South would decrease from 88.6% to 86.3% impervious; PCC-Fairfield Parking would decrease from 100% to 96.3% impervious, and PCC-North would decrease from 100% to 88.4% impervious. The proposed Project would incorporate drywells to facilitate infiltration in compliance with applicable LID requirements. The Project site is not currently used for groundwater infiltration, either by spreading or by groundwater injection. Upon construction and operation of the drywells, groundwater recharge at the site would increase in comparison to existing conditions, resulting in beneficial impacts. The West Coast Basin Barrier Project, which consists of groundwater injection wells that prevent seawater from intruding into the underlying aquifers of the West Coast Groundwater Basin, is near the Project site. However, development of the Specific Plan would not interfere with the operation of this barrier system.

The proposed Project is not anticipated to encounter groundwater during excavation for the subterranean parking garage on PCC-South. However, perched groundwater conditions may vary over time, and in the unlikely event that groundwater is encountered during excavations, the Project applicant/developer would be required by existing regulatory requirements to procure a dewatering permit from the Los Angeles RWQCB for pumping and disposal of groundwater. Groundwater dewatering would be controlled in compliance with the Waste Discharge Requirements for the Discharge

of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994004). Temporary dewatering, if required, would be short-term and would not substantially interfere with groundwater supplies.

Additionally, the Project site is within the Coastal Plain of Los Angeles-West Coast (Groundwater Basin 4-011.03), which has been designated as Very Low Priority with respect to establishment of a GSA and completion of a Groundwater Sustainability Plan (SGMA 2020). Therefore, the proposed Project would not substantially decrease groundwater supplies and no mitigation is required.

**Alter Existing Drainage Pattern (Erosion, Surface Runoff, Exceed Capacity Drainage System, Impede or Redirect Flood Flows)**

The proposed Project site is fully developed in the existing condition and is located in a highly urbanized portion of El Segundo, surrounded by developed properties. Implementation of the proposed Project would not alter the existing drainage patterns on the site such that downstream streams or rivers would be affected. The Project would infiltrate stormwater in accordance with all applicable LID regulations and would continue to outflow into the existing storm drain system. No naturalized drainages or creeks would be affected. Additionally, post-Project runoff is anticipated to be less than in the existing condition and the amount of impervious surfaces would also be reduced. Therefore, the Project would not substantially alter the existing drainage pattern of the site, including through the alteration of the course of a stream or river or through the addition of impervious surfaces. Impacts would be less than significant and no mitigation is required.

**Flood Hazard, Tsunami, or Seiche Zones**

As stated in the City’s General Plan Public Safety Element, along the City’s coastal areas, tsunamis and seiches associated with seismic events could cause devastating damage. The coastal portion of the City and adjacent portions of the City of Los Angeles are identified by the State as tsunami hazard areas, and as a result, there is the potential for damage to Southern California Edison and Chevron facilities, and the Hyperion Treatment Plant located along the coast. Residential portions of the City are located above the potential hazard area and are not at high risk. The Project site is not located within a tsunami inundation map for emergency planning, as delineated by the California Emergency Management Agency, California Geologic Survey (CGS 2009).

The Project site is located in FEMA Zone X, which is an area of minimal flood hazard, and an area determined to be outside the 0.2% annual chance floodplain (i.e., 500-year floodplain) (FEMA 2020). Therefore, the Project would not be located in an area with any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. In addition, the Project site is not located adjacent to or immediately downstream of any large body of water susceptible to seiches (i.e., oscillations in a body of water due to earthquake shaking).

The main document addressing emergency preparedness in the City is the Emergency Operations Plan. The Emergency Operations Plan provides a basis for operations and for managing critical resources during emergencies, delineation of lines of authority and responsibility, and procedures for requesting interagency and private assistance. The General Plan determined that the level of risk associated with a tsunami and seiche are “low” (City of El Segundo 1992). Therefore, existing state, regional and local regulations related to emergency preparedness would be sufficient to address potential hazards associated with floods, tsunamis, or seiches, which have not been identified as hazards for the Project site. Impacts would be less than significant and no mitigation is required.

### **Conflict with Water Quality Control Plan or Sustainable Groundwater Management Plan**

The proposed Project would comply with applicable water quality regulatory requirements, including implementation of a SWPPP, stormwater BMPs, and LID design, which would minimize potential off-site surface water quality impacts and contribute to a reduction in water quality impacts within the Dockweiler Subwatershed and the overall South Santa Monica Bay Watershed. In addition, with compliance with these regulatory requirements, the Project would reduce potential water quality impairment of surface waters such that existing and potential beneficial uses of key surface water drainages throughout the jurisdiction of the Los Angeles RWQCB Basin Plan would not be adversely impacted. As a result, the Project would not conflict with or obstruct the Los Angeles RWQCB Basin Plan.

With respect to groundwater management, SGMA empowers local agencies to form GSAs to manage basins sustainably, and requires those GSAs to adopt Groundwater Sustainability Plans for crucial groundwater basins in California. A GSA has not been established for the West Coast Basin, as it is not considered a high priority basin. Further, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. As a result, the Project would not conflict with or obstruct this sustainable groundwater management plan. Impacts would be less than significant and no mitigation is required.

### **Cumulative Effect**

#### *Water Quality*

The geographic context for the analysis of cumulative impacts associated with water quality is the South Santa Monica Bay Watershed, which is already largely urbanized with impervious surfaces. The cumulative effect of past projects—both point sources of pollution and non-point sources caused by urbanization—have resulted in substantial water quality problems in the region’s major waterways. Cumulative development could add new sources of stormwater runoff. Construction activities associated with development could temporarily increase the amount of exposed surfaces that could contribute to sediments in stormwater runoff. Additionally, materials associated with construction activities could be deposited on surfaces and carried to receiving waters in stormwater runoff.

Although the land surrounding the Project site is largely developed with impervious surfaces, continued redevelopment within the Project area could slightly increase the amount of impervious surfaces that could increase stormwater runoff rates and amounts, as well as changes in land use that may increase the amount of pollutants in stormwater runoff. The release of such pollutants, however, would be minimized through compliance with terms and conditions of the NPDES permit, CALGreen Code, California Building Code, ESMC, and the ordinance codes of other authorities in the region—which all require implementation of a SWPPP for development and redevelopment projects. In summary, all cumulative development would be subject to existing regulatory requirements to protect water quality and minimize increases in stormwater runoff. All development within the South Santa Monica Bay Watershed would be subject to the water quality standards outlined in the Basin Plan and would comply with any established TMDLs. The continuing review process would ensure that cumulative development within the watershed would not substantially degrade water quality.

In addition, the Project would comply with existing and future regulations to protect water quality, including the Construction General Permit. Compliance with existing regulations would prevent violation of water quality standards and minimize the potential for contributing additional sources of polluted runoff. Therefore, Project

impacts associated with water quality standards and polluted runoff would be less than significant, and the Project would not contribute considerably to cumulative impacts.

### *Drainage*

The South Santa Monica Bay Watershed is already largely urbanized with impervious surfaces. Cumulative development within the City could potentially increase the amount of impervious surfaces that could cause or contribute to storm drain system capacity exceedance, alter the existing storm drain system, and/or require construction of new or expanded facilities. However, new development within the watershed would be subject to the same requirements for LID infrastructure and BMPs to address the potential for increased runoff from development sites. All projects must comply with current state and local environmental regulations, such as the ESMC mandates. Potential impacts to drainage associated with the Project would be less than significant, and the Project would not contribute considerably to cumulative impacts.

### **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on hydrology and water quality. Therefore, no mitigation is required, and no significant, unavoidable adverse impacts would occur.

## 2.4.11 Land Use

### **Physically Divide an Established Community**

The physical division of an established community typically refers to the construction of a linear feature (e.g., a major highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying area.

The proposed Project involves the implementation of the proposed Specific Plan, which would redevelop the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the old Hacienda Restaurant, through the adoption of a Specific Plan that allows for the development of 263 new housing units and approximately 11,252 square feet of commercial/retail uses. Under the existing condition, the Project site is developed land and is not used as a connection or thoroughfare between established communities. Instead, connectivity within the area surrounding the Project site is facilitated via local roadways. The proposed Project would not result in the construction of new driveways; rather, the Project would allow for access via existing driveways on PCH and Indiana Street. Further, the eastbound lane of Mariposa Avenue at PCH would be reconfigured as a part of the proposed Project, from one left lane and one through-right lane to one left, one through, and one right-turn lane. Therefore, the Project does not include the construction of a new roadway, which would impair mobility within the existing Project site or the surrounding area. Rather, the Project would increase access at existing driveways and provide improved level of service at Mariposa Avenue and PCH through improvements at Mariposa Avenue. As such, the Project would not impede movement within the Project site, within an established community, or from one established community to another. In addition, the Project has specific objectives which focus on access and mobility: Enhance vehicular circulation through intersection improvements and street widening. Therefore, impacts associated with the division of an established community would be less than significant. No mitigation is required.

### **Conflict with an Applicable Land Use Plan, Policy, or Regulation**

#### *Consistency with the Connect SoCal (SCAG 2020–2045 RTP/SCS)*

The proposed Project would not conflict with the applicable goals in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. The Project would redevelop the Project site's existing conditions and would produce approximately 56 new employees within the Specific Plan area within the City of El Segundo. In addition, the Project site's vicinity is served by existing public transit such as various bus routes (Metro Line 232, Metro Line 625, Beach Cities Line 109, Los Angeles Department of Transportation [LADOT] Commuter Express 438, and LADOT Commuter Express 574) as well as the Metro C Line. The Metro C Line is a light rail line, which runs between Redondo Beach and Norwalk. The nearest station is the Mariposa Station, which is just over 0.5-mile from the Project site. The Project site would bring residential development to nearby major employers, including LAX, energy/gas/oil and aerospace companies and near the City's "super block" development, which contains a mixture of office and research and development uses, thereby reducing travel demands by developing a mix of residential housing opportunities in proximity to employment centers. For these reasons, the Project would not conflict with the applicable goals in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

#### *City of El Segundo General Plan Consistency*

A review of the General Plan shows that the Specific Plan is compatible and consistent with the goals and policies outlined in the General Plan. The Specific Plan was prepared to provide the essential relationship between the policies of the General Plan and actual development of the Project site. By functioning as a regulatory document, the Pacific Coast Commons Specific Plan provides a means of implementing the City's General Plan. All future development plans and entitlements within the Specific Plan boundaries must be consistent with the standards set forth in the Specific Plan. The Specific Plan would be consistent with applicable goals and policies of the General Plan. While hotel uses are allowed in the existing General Commercial (C-3) Zone, and the Fairfield Inn and Suites and the Aloft Hotels both have existing Conditional Use Permits, the two existing hotels do not comply with some of the development standards of the General Commercial (C-3) Zone because they were built prior to the current development standards. Thus, they are legal non-conforming as to building height, floor area ratio, and certain setback requirements. Through the implementation of the Specific Plan, these two hotels would be brought into full conformity with the land use designation and zoning for the Project site. COM-1 and COM-2 allows hotels and several other commercial uses that are either accessory to hotel uses or complementary uses. The existing hotel properties are consistent with this definition, and thus, would no longer be considered non-conforming uses within the Specific Plan area. Additionally, it should be noted there will be no additional floor area added to the hotel properties.

The Project requests the approval of a General Plan Amendment (No. GTA 19-01) to change the Land Use Designation from "General Commercial" and "Parking" to "Pacific Coast Commons Specific Plan (PCCSP)" with an accompanying Land Use map change. Upon approval of the proposed amendment, the Project would be brought into compliance with the General Plan Land Use Designation.

#### *City of El Segundo Municipal Code*

#### Amendments to the Zoning Code

The Project requests a Zone Text Amendment No. ZTA 19-08 to add a new ESMC Section 15-3-2(A)(12) "Pacific Coast Commons Specific Plan (PCCSP)". Approval of the proposed Project, in accordance with the provisions outlined in Title 15 of the ESMC, would ensure compliance with applicable zoning standards. Additionally, through the application

process, the City would thoroughly review all plans for the proposed Project to ensure compliance with the ESMC, and other relevant plans, policies, and regulations.

### Specific Plan

When a specific plan is adopted in accordance with the procedure outlined above, the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area, and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted, and may define other types of design and permitting criteria. The proposed Specific Plan is adopted by ordinance and serves as the primary zoning document for the Plan Area. Where the Specific Plan is silent, the relevant sections and requirements of the zoning regulations shall apply. The development standards would be regulated by the Specific Plan and administered and enforced by the City in accordance with the ESMC. The Specific Plan supersedes any conflicts with ESMC zoning regulations. Therefore, upon approval of the proposed Project, the Project would be consistent with the El Segundo Zoning Code for the purposes of avoiding or mitigating environmental effect.

### **Cumulative Land Use and Planning Impacts**

Cumulative land use impacts could occur if any of the related projects would result in incompatible land uses, or result in land uses that are inconsistent with adopted land use plans when combined with the impacts of the Project. Given the built-out conditions of the greater Los Angeles Metropolitan region, including the Project site, cumulative development would likely convert existing underutilized properties in the Project site's area to revitalized higher-density developments to respond to the need for housing, sources of employment, and associated retail land uses. The Project would benefit the surrounding community by replacing underutilized properties; add residential uses to a job-rich community; and improve local and regional access to the regional transportation network. Furthermore, by providing additional housing and employment in close proximity to transit, the Project would assist the City in achieving short- and long-term planning goals and objectives related to reducing urban sprawl, efficiently using existing infrastructure, reducing regional congestion, and improving air quality through the reduction of vehicle miles traveled. This is consistent with SCAG and other regional policies for promoting more intense land uses adjacent to transit stations and job centers.

Land use conflicts are also typically site-specific and not cumulative in nature; in other words, despite the number of cumulative projects in a given area, they would not necessarily compound to create cumulative land use conflicts. Cumulative incompatibility issues associated with surrounding developments or projects are anticipated to be addressed and mitigated for on a project-by-project basis. Further, all related projects in the City would be subject to the same local development standards, such as those identified in the ESMC, as the proposed Project. Therefore, cumulative impacts related to land use and planning would be less than significant. No mitigation is required.

### **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on land use and planning; therefore, no mitigation is required, and no significant, unavoidable adverse impacts would occur.

## 2.4.12 Mineral Resources

There are no oil wells or oil/mineral extraction activities on the Project site (CalGEM 2020). Current on-site land uses do not allow for oil/mineral extraction. According to the Department of Conservation's Mineral Lands Classification map, the City is within the Mineral Resources Zone-3, which is characterized as areas containing

mineral deposits of significance of which cannot be evaluated from available data (DOC 1979). Ordinarily, classification of a mineral deposit as MRZ-2a or MRZ-2b by the State Geologist will constitute adequate evidence that an area contains significant mineral deposit; thus, the Project would not result in the loss of mineral resources of known importance to the state (DOC 2002). Although the El Segundo Oil Field underlies the City, production has declined since 1967 and only five wells continue to produce oil resources (City of El Segundo 1992). Therefore, the Project is not expected to result in the loss of availability of a locally-important mineral resource recovery site delineated on the local general plan or other land use plan. Thus, impacts associated with mineral resources would not occur and will not require further evaluation in the Draft EIR.

### **Finding**

Appendix B of the Notice of Preparation for the Project found no potential for significant impacts to mineral resources; therefore, mineral resources were not addressed in the Draft EIR. No mitigation would be required and no significant, unavoidable adverse impacts would occur.

## 2.4.13 Noise

### **Generation of a Substantial Temporary or Permanent Increase in Ambient Noise Levels**

#### *Traffic Noise Exposure to Future Project Occupants*

Aside from exposure to aviation traffic noise, current CEQA noise-related guidelines do not require an assessment of exterior-to-interior noise intrusion, environmental noise exposure to occupants of newly created Project residences, or environmental noise exposure to exterior non-residential uses attributed to the development of the proposed Project. Nevertheless, the California Building Code requires that interior background noise levels not exceed a CNEL of 45 dB within habitable rooms. Traffic noise exposure analysis at the exteriors of occupied residences and outdoor living areas is provided for informational purposes. Additionally, this analysis of outdoor environmental noise to the newly created Project residences would be consistent with the “post-construction acoustical analysis” per Program N1-1.9A from the City’s General Plan Noise Element.

An open window or an open sliding door to an adjoining patio or balcony greatly compromises the overall sound insulation performance of the studied wall assemblies. However, when such windows and doors are closed, all studied sample facades are anticipated to exhibit a predicted STC rating of at least 35, and thus would provide sufficient exterior-to-interior sound insulation from outdoor traffic noise to yield interior background sound levels that are less than 45 dBA CNEL and thus compliant with the City and state standards. Recall that none of the predicted exterior traffic noise levels at the studied receptor locations exceeded 72 dBA CNEL; thus, the STC rating value (for closed windows and doors) subtracted from these exterior noise values must result in interior noise levels of less than 45 dBA CNEL (e.g.,  $72 - 36 = 36$  dBA CNEL, which is less than 45). The apparent requirement for

closed windows and doors means that the design of these habitable rooms should feature mechanical ventilation or an air-conditioning system to provide interior comfort for the occupants.

#### Stationary Operations Noise

The incorporation of new multi-family homes and a mix of commercial uses attributed to development of the proposed Project would add a variety of noise-producing mechanical equipment.

Residential Unit Heating, Ventilation, and Air Conditioning Noise: Each of the new occupied residential units would be expected to feature a split-system type air-conditioning unit. For the PCC-South buildout, 34 ACC units were modeled on rooftops. Each ACC unit has an SPL of 71 dBA at 3.28 feet based on available data from the manufacturer (Goodman 2020). The predicted sound emission level from the combination of all operating condenser units at off-site single-family receptors would be as high as 57 dBA  $L_{eq}$  to the west of the PCC-South and 61 dBA  $L_{eq}$  to the west of PCC-North. The effect of building structure occlusion (i.e., rooftop mass and parapet blocks the direct sound path between noise-producing equipment and the off-site residential receptors) on the predicted HVAC sound exposure levels at nearest existing off-site residences is expected to be at least 10 dB of noise reduction. The operation of these Project residential air-conditioning units would result in a less-than-significant noise impact to the surrounding residential community.

At the outdoor area (i.e., pool and outdoor amenities) of the existing Aloft hotel that is north of the PCC-South area and its collection of operating rooftop ACC units, application of the aforementioned 10 dB structural occlusion to predicted operation noise results yield a Project-attributed aggregate ACC noise level no greater than 47 dBA, which is below the estimated existing nighttime sound level of 61.5 dBA  $L_{eq}$  for this offsite commercial property location. The operation of these Project residential air-conditioning units would result in a less-than-significant noise impact to the surrounding commercial properties.

#### **Excessive Groundborne Vibration or Groundborne Noise Levels**

Under the right conditions, construction activities may expose persons to excessive groundborne vibration or groundborne noise, causing a potentially significant impact.

Groundborne vibration attenuates rapidly, even over short distances. The attenuation of groundborne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance. The impact of vibration-induced annoyance to occupants of nearby existing homes would be less than significant. No mitigation is required.

Construction vibration, at sufficiently high levels, can also present a building damage risk. However, the predicted 0.035 ips PPV at the nearest residential receiver 46 feet away from on-site operation of the bulldozer during grading would not surpass the guidance limit of 0.3 ips PPV for preventing damage to residential structures (Caltrans 2013b). Because the predicted vibration level at 46 feet is less than both the annoyance and building damage risk thresholds, vibration from conventional construction activities would be less than significant. No mitigation is required.

Once operational, the Project would not be expected to feature major onsite producers of groundborne vibration. Anticipated onsite mechanical systems like pumps, compressors, and fans are designed and manufactured to feature rotating or reciprocating components (e.g., impellers, rotors, and pistons) that are well-balanced with

isolated vibration within or external to the equipment casings. On this basis, potential vibration impacts due to Project operation would be less than significant. No mitigation is required.

### **Expose People Residing or Working in Airport Land Use Plan to Excessive Noise Levels**

There are no private airstrips within the vicinity of the Project site. The closest airport to the Project site is the Los Angeles International Airport approximately 0.66-mile north of the site. According to the Final LAX Part 150 Noise Exposure Map Update Report (ESA 2016), the Project site is outside of the 65 dBA CNEL aviation operation noise contour predicted in the report for 2020, and therefore would not expose workers or new occupants of the proposed Project residences or exterior uses to aviation overflight noise levels greater than 65 dBA CNEL. Hence, on this basis the potential impact with respect to aviation traffic noise would be less than significant.

### **Cumulative Noise Impacts**

#### *Temporary/Periodic Increases in Ambient Noise Levels*

The Project would result in temporary noise increases during construction activities. The construction period of future developments under the Project has the potential to overlap with the construction of other development projects in the City; however, none of the anticipated cumulative projects are in close enough proximity to the Project site. Noise due to construction of other projects would not meaningfully combine with future development under the Project to produce a cumulative noise effect during construction.

In sum, cumulative construction noise is likely to be dominated by the closest or loudest activity to the receptor, and the combination will be no more than a barely perceptible difference (i.e., up to a 3 dB change).

Additionally, all future development under implementation of the Project, as well as unrelated construction projects within City limits, would be required to comply with limits on allowable construction hours per relevant portions of the City's noise ordinance. Cumulative impacts due to cumulative construction noise would be less than significant.

#### *Vibration*

Other foreseeable projects within the vicinity of the Project site would not be close enough to create a combined excessive generation of groundborne vibration; therefore, cumulative impacts associated with excessive groundborne vibration would be less than significant.

#### *Permanent Increase in Ambient Noise Levels*

#### Off-Site Traffic

Future development from implementation of the Project along with other unrelated projects would generate off-site traffic noise. When calculating future traffic impacts, the traffic study included traffic attributed to both the Project and unrelated projects. Thus, future traffic noise prediction results with and without the Project already account for the cumulative impacts from unrelated projects contributing to traffic increases. Since the noise impacts are generated directly from the traffic analysis results, the Existing and Year 2025 traffic with and without Project predicted increases in traffic noise levels described herein already reflect cumulative impacts. The noise level increases associated with both of these scenarios would generate a noise level increase of less than 3 dBA along the studied sample roadways in the vicinity of the Project. As such, anticipated increases would be below the

significance threshold of 3 dBA; hence, the incremental effect of the Project on off-site traffic noise is not cumulatively considerable. Cumulative off-site traffic noise impacts would be less than significant.

#### Stationary Sources

Noise from operation of stationary electro-mechanical equipment added to the outdoor ambient sound environment as a result of Project implementation would include permanent on-site noise sources (e.g., rooftop HVAC equipment). A cumulative impact could occur if noise produced from such sources due to implementation of the Project were to combine with noise produced from the operation of other unrelated projects in the vicinity to create a cumulatively significant permanent increase in ambient noise levels. However, noise emission from HVAC equipment attenuates with distance and can be occluded by structures and terrain. Additionally, the operation of future projects under the Project, along with the operation of other unrelated projects, would be subject to applicable requirements from the City's noise ordinance, which limits the exterior noise levels at residences. Hence, for these two reasons, cumulative impacts to outdoor ambient noise levels resulting from Project stationary sources would be less than significant.

#### **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on noise as it relates to groundborne vibration, exposing people residing or working within an airport land use plan to excessive noise levels, and cumulative noise impacts; therefore, no mitigation is required and no significant, unavoidable adverse impacts would occur.

## 2.4.14 Population and Housing

### **Induce Substantial Population Growth**

#### *Short-Term Construction Impacts*

Construction activities at the Project site would lead to the temporary need for construction workers, which may come from the City, other areas of Los Angeles County, or elsewhere within the SCAG region. The proposed Project involves fairly common construction requirements that would not require a highly specialized labor force to permanently relocate from other regions. Construction of the Project is anticipated to last approximately 34 months. The different construction activities require specific skill sets for a much shorter duration than the overall construction schedule. Because construction workers would not be needed continuously and only for varying portions of the Project phases, it is reasonable to assume that workers/crews would work at the Project site on a temporary basis only, and thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Because the demand for construction workers would be short-term, and because the Project site within an urban metropolitan region with a high diversity of skilled labor, a permanent need for new workers to relocate in order to accommodate the proposed Project's temporary construction workforce is not anticipated. Any changes in the City or regional population, housing, or employment due to short-term construction activities would be less than significant.

#### *Long-Term Operational Impacts*

The proposed Project would redevelop the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties through the adoption of the Specific Plan to allow for the development of 263 residential units

and 11,252 square feet of commercial space. The Specific Plan's three development areas are Pacific Coast Commons – South (PCC-South); Pacific Coast Commons – Fairfield Parking (PCC-Fairfield Parking); and Pacific Coast Commons – North (PCC-North). PCC-North would be developed with 143 residential units and 2,223 gross square feet of commercial space. PCC-Fairfield Parking would be developed with approximately 3,273 gross square feet of ground-floor commercial and a parking structure for the Fairfield Inn and Suites Hotel. PCC-South would be redeveloped with 120 residential units and 5,756 gross square feet of commercial space. Up to 3,700 square feet of the commercial space across all three sites could be fast casual restaurant space and the remainder would be other commercial uses allowed in the Pacific Coast Commons Specific Plan area. The Project would replace the existing General Commercial (C-3) and Automobile Parking (P) zones with the proposed Specific Plan, thereby enabling future development within the Specific Plan area. As such, the proposed Project would directly result in the building new housing where housing currently does not exist. The redevelopment of existing parking lots could result in new and unplanned population growth within the City.

### Population Projections

SCAG estimates that Los Angeles County would have 10,407,000 residents by 2020 and 11,647,000 residents by 2045. SCAG and the Department of Finance estimate that the City would have 16,777 residents by 2020 and 17,200 residents by 2045. SCAG's forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045.

Using population and housing estimates from the California Department of Finance, the City has an occupancy rate of 2.35 persons per household (DOF 2020). It is likely that the proposed residential units would accommodate a combination of existing residents and new residents that either currently work within the City and/or new residents that would be hired as a result of projected employment generation within the City. Additionally, the City's 2020 housing vacancy rate of 4.7% is less than Los Angeles County's housing vacancy rate 6.1% (DOF 2020). As such, the proposed Project is anticipated to be growth-accommodating rather than growth-inducing.

Because the proposed Project would support SCAG's goals and strategies for growth in the region and because the proposed Project would assist the development of new housing and improves the City's job/housing balance, impacts related to population growth would be less than significant. Although the proposed Project would provide a resident population that exceeds SCAG's projections, this growth is not considered substantial and it would further attainment of local and regional goals, as described above.

### Employment Projections

The proposed Project would introduce 11,252 gross square feet of commercial uses to the Project site. Based on the assumption that up to 3,700 square feet of the commercial development would be fast-casual restaurant use, the proposed Project is estimated to generate approximately 56 new employees within the Specific Plan area. With the occupancy of the proposed Project, the number of jobs in the City would increase by approximately 56 positions, which could be filled by unemployed persons in the City or by unemployed persons in Los Angeles County. The proposed Project's anticipated employment would represent a nominal percent (0.009%) of SCAG's projected 639,000 new jobs in Los Angeles County between 2016 and 2045. SCAG estimates that the City would have 52,400 jobs by 2045. The proposed Project's anticipated employment would represent a nominal percent (1.36%) of SCAG's projected 4,100 new jobs in the City between 2016 and 2045. The estimated 56 new full-time employees resulting from the proposed Project would make up a small percentage of the overall expected growth in the City and would not exceed the SCAG employment projections.

### Housing Projections Analysis

SCAG projects that Los Angeles County will have an increase of 800,000 housing units between 2016 and 2045, and that the City will have an increase of 300 units during this same period. The proposed Project's 263 residential units would represent 0.03% of SCAG's projected housing for Los Angeles County and 87.7% of the projected housing for the City. Therefore, the proposed Project's housing units would not exceed the projections for housing within the City, as set forth in the 2020–2045 RTP/SCS.

California's housing element law requires that each city and county develop local housing programs designed to meet its fair share of existing and future housing needs for all income groups. This effort is coordinated when preparing the state-mandated Housing Element of the City's General Plan. The 5th Cycle RHNA allocation for 2013 to 2021 sets forth the City's fair share allocation for the planning period is 69 units for the City's Housing Element. The proposed Project would create new housing and would include affordable housing in accordance with the negotiated Development Agreement. The specific allocation between the types of low income housing has yet to be determined; however, the proposed low-income units would satisfy a portion of the City's mandated 29 low income units, and a portion of the City's requirement for 40 moderate/above income units, as set forth in the Housing Element.

Because the proposed Project will be occupied within the timeframe of the 6th Cycle (2021 to 2029), it is most relevant to the analysis. The City's fair share allocation for the planning period is 492 units. The proposed Project would create new housing and would include affordable housing in accordance with the negotiated Development Agreement. The specific allocation between the types of low-income housing has yet to be determined; however, the proposed low-income units would satisfy a portion of the City's mandated 6<sup>th</sup> Cycle RHNA allocation. As such, the proposed Project's 263 new residential units would assist the City in meeting the mandated RHNA allocation and would be consistent with and supportive of the City's Housing Element projections for new residential units within the City.

### Jobs/Housing Balance

As previously described, the City is considered to be a very jobs-rich community. The proposed Project would generate additional housing available for the community, as the jobs-housing balance of the proposed Project would be 0.3:1, which is a very housing-rich project. Therefore, the proposed Project would facilitate a more balanced jobs-housing profile for the City, which currently maintains an approximately 6.9:1 jobs/housing balance.

### **Displace Substantial Numbers of Existing Housing or People**

The Project site consists of surface parking areas of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the underutilized commercial space associated with the hotel. No housing uses are located on the Project site, and Project implementation would not require demolition of existing housing or displace people or housing. The proposed Project would include the construction of a mixed-use development that would add approximately 263 housing units to the City. Impacts would be less than significant.

### **Cumulative Effect**

Assuming 2.35 persons per household, the proposed Project's residential units would accommodate 618 individuals. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG's estimated projections through 2045 by 118 persons. Other than the proposed Project, only the proposed

540 E. Imperial Avenue and 1225 Mariposa Avenue proposals, are anticipated to include residential development in the City. Therefore, the remaining cumulative projects would be primarily increasing employment in the City and potentially further exacerbating the jobs-rich profile of the City, which could increase the vehicle miles traveled between employment centers and residential land uses. While the proposed Project would provide employment opportunities to the local and regional area, the employment growth caused by the Project falls well within current projections for employment growth in the City and Los Angeles County. The proposed housing growth generated by the Project would further the goals and strategies of SCAG and the City's General Plan by providing housing in an urban setting in close proximity to transit, while contributing to a more balanced jobs-housing community. Although, the proposed Project's residential population would exceed SCAG's population projections, it can be assumed that many of the residential units would accommodate workers within the City and could reduce vehicle miles traveled by providing housing in proximity to employment centers. Therefore, the unplanned population growth is not considered to be substantial and impacts would be less than significant. Therefore, in combination with other future foreseeable projects, it is not anticipated that the proposed Project would create a cumulatively considerable impact to population, housing or employment.

### **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on population and housing related to inducing growth during construction and displacing a substantial number of people or housing; therefore, no mitigation is required, and no significant, unavoidable adverse impacts would occur.

## 2.4.15 Public Services and Recreation

### **Fire Protection**

#### *Construction*

Construction activities associated with the proposed Project may temporarily (i.e., 48 months during proposed construction) increase demand for fire protection and emergency medical services. Construction activities may involve the operation of construction equipment and machinery, storage, handling, and disposal of combustible materials, and the use of flammable or toxic materials. To comply with California Department of Industrial Relations, Division of Occupational Safety and Health and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on site. Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Thus, compliance with regulatory requirements would reduce the potential for construction activities to expose people to the risk of fire explosion related to hazardous materials.

Due to compliance with applicable codes and fire safety standards, Project construction would not adversely impact firefighting and emergency services to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, impacts would be less than significant, and no mitigation is required.

#### *Operation*

The need for new or expanded public services (such as fire protection facilities) is typically associated with a population increase. Project employment and new residential uses would result in approximately 56 new employees and 618 residents on the Project site. In the context of the City's population projections, the proposed Project would

exceed the forecasted population growth. The proposed Project would accommodate an expected 618 residents which from the implementation of the Specific Plan exceed the overall population growth projections included in the Connect SoCal. ESFD has reviewed the proposed Project and has determined existing protection facilities were sufficient for the proposed Project (Carver 2020). Therefore, it is expected that the population and employment growth associated with the Project would not outpace the existing or future service capacity of the ESFD.

The Project site is currently served by two existing fire stations. No expansion of these facilities is currently contemplated. Payment of development fees by the Project applicant/developer would be used to offset the costs of increased personnel or equipment that could be required to maintain acceptable service ratios, response times, or other performance objectives.

Furthermore, the proposed Project would be designed and constructed in accordance with all applicable provisions of the fire code, which includes requirements for adequate fire flows, width of emergency access routes, turning radii, automatic sprinkler systems, fire alarms, and floor to sky height limits along emergency access routes.

The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. Impacts would therefore be less than significant. No mitigation is required.

## **Police Protection**

### *Construction*

There is the potential for Project construction activities to create an increase in demand for police protection services, as construction sites can be sources of attractive nuisances, can provide hazards, and can invite theft and vandalism when not properly secured. This could result in an increase in the demand for police protection services. Consequently, developers and construction contractors typically take precautions to prevent trespassing through construction sites. During construction, the Project applicant/developer or its construction contractor would implement temporary security features including security fencing, lighting, and locked entry. These features would reduce the need for police protection services during the Project's construction phase. Potential short-term construction impacts to police services would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, and impacts would be less than significant.

### *Operation*

The increased use of the Project site attributable to the proposed Project would be expected to increase the frequency of emergency and non-emergency calls to the ESPD. While the Project site currently places some demand on the ESPD due to the occupied hotel uses, the proposed Project would increase demands relative to existing conditions. The ESPD has stated that the existing police station facilities are sufficient to provide service to the proposed Project and that the development of the proposed Project would not result in the need for new facilities and/or physically altered facilities to maintain acceptable service ratios, response times, or other performance objectives (McDaniel 2020).

The Project site is currently served by the ESPD at 348 Main Street. No expansion of this facility is currently contemplated (McDaniel 2020). Payment of development fees by the Project applicant/developer would be used to offset the costs of increased personnel or equipment that could be required to maintain acceptable service ratios, response times, and other performance objectives. The proposed Project would incorporate operational practices and design elements to increase safety and to reduce the potential for crime to occur, which could lessen the demand for police protection

services at the Project site. The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities and potential impacts would be less than significant.

### **Schools**

The proposed Project's approximately 56 new employees and 618 residents would generate students that would attend ESUSD schools. Using the student generation rates from ESUSD, at 263 dwelling units, the Project could generate approximately 35 elementary school students, 20 middle school students, and 28 high school students (Farris 2020).

All the schools with the exception of Center Street Elementary School continue to have capacity with the addition of proposed Project enrollment. However, communication with EUSD indicates the existing schools are sufficient to support the proposed Project (Farris 2020). Education Code Section 17620 allows school districts to assess fees on new residential and commercial construction within their respective boundaries. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels. Sections 65996(a) and (b) state that such fees collected by school districts provide full and complete school facilities mitigation under CEQA. These fees can be collected without special city or county approval, to fund the construction of school facilities necessitated by the impact of residential and commercial development activity.

Therefore, with the payment of the applicable school fees, the operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, or other performance objectives for schools. Such impacts on schools are considered less than significant. No mitigation is required.

### **Parks**

The Project would include 56 new employees and 618 residents. At least a portion of these residents are anticipated to patronize the various public parks and recreation facilities located in proximity to the Project site. Since the City's Parks are within the State of California Parks Department standard of park space at about 3.5 acres of park space per 1,000 residents (Petit 2020), the additional 618 residents would not exceed existing standards of service for parks.

Additionally, the Project would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support park improvements as well as fund capital costs for other new and existing infrastructures. Pursuant to the Development Impact Fee Program, the Project applicant/developer would pay its fair share of impact fees based on the fee category and adopted Development Impact Fee rates. The Project would contribute funds to the El Segundo Recreation and Parks Department through Development Impact Fees. Further, the Project would include common open space areas, including rooftop pools and community rooms. These on-site amenities would provide an alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project site while incrementally reducing impacts to off-site public parks and recreational facilities. Therefore, impacts associated with the need for new or expanded park facilities would be less than significant. No mitigation is required.

### **Other Public Facilities**

Other public facilities and services provided within the City include library services and City administrative services. Library services are provided at ESPL located at 111 West Mariposa Street, approximately 1.8 miles west of the Project site. The proposed Project would generate approximately 56 new employees and 618 residents. Pursuant to the Development Impact Fee Program, the Project applicant/developer would pay its fair share of impact fees based on the fee category and adopted Development Impact Fee rates. The ESPL indicated that no new facilities would be required as part of the proposed Project; although the digital library needs to be enhanced. Therefore, impacts to other public facilities in the area resulting from the proposed Project would be less than significant. No mitigation is required.

### **Increase in the Use of an Existing Neighborhood, Regional Park, or Recreational Facility**

The Project would include 56 new employees and 618 residents. The City's Recreation and Parks Department is responsible for developed park land that provides a wide variety of attractions and amenities including more than 15 parks, athletic fields, recreational water amenities, a skate park, dog park and community garden. In addition, the City also offers recreational programs and activities for residents, including adult sports, swimming classes, a teen center with a variety of activities and programs, and the Senior Club of El Segundo hosts a wide variety of activities and socials at the Joslyn Center. At least a portion of these residents are anticipated to patronize the various public parks and recreation facilities located in proximity to the Project site. The Project would include common open space areas, which would consist of a central community space with a variety of recreational amenities, as well as landscaped areas around the Project site. These on-site amenities would provide an alternative to off-site public parks and recreational facilities, allowing the Project's residents to recreate on the Project site while incrementally reducing impacts to off-site public parks and recreational facilities. The El Segundo Recreation and Parks Department indicated no new facilities would be required as part of the proposed (Petit 2020). Additionally, the Project would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support park improvements as well as fund capital costs for other new and existing infrastructures. Pursuant to the Development Impact Fee Program, the Project applicant/developer would pay its fair share of impact fees based on the fee category and adopted Development Impact Fee rates.

As such, with payment of the required development impact fees related to parks and recreation in combination with provision of on-site recreational facilities, the Project would meet the anticipated demand for neighborhood and regional parks or other recreational facilities. Project residents and the public would have access to adequate on-site recreational facilities, which would offset increased use of existing parks and recreational facilities in the City. Therefore, implementation of the Project would not result in a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur. Impacts to neighborhood and regional parks would be less than significant. No mitigation is required.

### **Inclusion of or Requirement for Construction/Expansion of Recreational Facilities**

The Project would include common open space areas, which would consist of a central community space with a variety of recreational amenities, as well as landscaped areas around the Project site. The construction of these common open space areas and associated recreational amenities is analyzed throughout the Draft EIR. Additionally, the Project would be subject to the City's Development Impact Fee, which requires new development projects to pay impact fees, which would support park improvements as well as fund capital costs for other new and existing

infrastructures. Pursuant to the Development Impact Fee Program, the property owner/developer would pay its fair share of impact fees based on the fee category and adopted Development Impact Fee rates. As such, Project implementation would not require the construction or expansion of recreational facilities, and impacts would be less than significant.

### **Cumulative Effect**

As defined in the State CEQA Guidelines Section 15130, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, present, and probable future projects within the cumulative impact area for population, housing, and employment. The cumulative study area used to assess potential cumulative population and housing impacts includes the City of El Segundo, ESFD and ESPD service areas, and ESUSD. Cumulative impacts on public services including fire and police protection, parks, and schools would result when projects collectively increase demand on services such that additional facilities or services must be constructed or provided. Cumulative projects would likely result in an incremental increase in the demand for fire protection, police protection, parks, schools (for cumulative projects that have a residential component), and other public services. Because the City is nearly built out, the proposed Project and all cumulative projects are located in areas currently served by ESFD, EPSD, and ESUSD. Therefore, in combination with other past, present, and future foreseeable projects, it is not anticipated that the proposed Project would create a cumulatively considerable impact on public facilities or recreational facilities.

### **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on police and fire protection services, parks, schools, and other public facilities as well as impacts related to recreation; therefore, no mitigation is required, and no significant, unavoidable adverse impacts would occur.

## 2.4.16 Transportation

### **Conflict with Circulation System Plan, Ordinance, or Policy**

#### *RTP/SCS Consistency Analysis*

The Project would redevelop the Project site's existing conditions and would produce approximately 56 jobs in operation within the City of El Segundo. In addition, the Project site's vicinity is served by existing public transit such as various bus routes (Metro Line 232, Metro Line 625, Beach Cities Line 109, LADOT Commuter Express 438, and LADOT Commuter Express 574) as well as the Metro C Line. The Metro C Line is a light rail line, which runs between Redondo Beach and Norwalk. The nearest station is the Mariposa Station, which is just over 0.5-mile from the Project site. The proposed Project would not conflict with the applicable goals in the RTP/SCS.

#### *City of El Segundo General Plan Consistency*

The Project requests the approval of a General Plan Amendment (No. GPA 19-01) to change the Land Use Designation from "General Commercial" and "Parking" to "Pacific Coast Commons Specific Plan (PCCSP)" with an accompanying Land Use map change. Upon approval of the proposed amendment, the Project would be brought into compliance with the General Plan Land Use Designation.

#### *General Plan Buildout Comparison*

Because the adoption of the proposed Specific Plan would change the overall framework development for the Project site established in the General Plan, a comparison of trip generation estimates of the proposed Project with the currently designated General Plan land uses was conducted. The City's General Plan identifies the portion of the site that is south of Mariposa Avenue as General Commercial, with a maximum floor area ratio of 1.0 for PCC-Fairfield Parking and PCC-South, and the portion to the north of Mariposa Avenue as Parking. The General Plan land uses are projected to generate an estimated 4,026 daily trips, including 203 trips (112 inbound/91 outbound) during the AM peak hour and 262 trips (145 inbound/117 outbound) during the PM peak hour. The Project is projected to generate an estimated net increase of 2,517 daily trips, including 132 trips (47 inbound/85 outbound) during the AM peak hour and 178 trips (103 inbound/75 outbound) during the PM peak hour. The General Plan land uses are projected to generate 1,509 more daily trips than the proposed Project, including 71 more trips during the AM peak hour and 84 more trips during the PM peak hour. The proposed Project would generate fewer trips compared to the General Plan land uses.

#### *Level of Service Analysis for General Plan Consistency*

Although the City's LOS policy would not be applicable as a transportation impact under CEQA per SB 743, the study area intersection operations analysis results are summarized below for the following scenarios:

#### Existing Plus Project Traffic Conditions

CEQA Guidelines Section 15064.3(b) focuses on newly adopted criteria (VMT) pursuant to SB 743 for determining the significance of transportation impacts. Pursuant to SB 743, the focus of transportation analysis changed from vehicle delay to VMT. As stated in CEQA Guidelines Section 15064.3(c), the provisions of Section 15064.3 shall apply prospectively, and a lead agency may elect to be governed by the provision of Section 15064.3 immediately. However, the information below related to LOS is provided for information purposes and for assessment of consistency with General Plan policies.

The Existing plus Project scenario of the impact analysis at Mariposa Avenue and PCH has also been analyzed without the Project improvement to show its potential benefit when compared to the Existing Base and Existing plus Project with improvement conditions. The analysis shows that LOS at Mariposa Avenue and PCH is better with the addition of the Project-related improvement than without. A queuing analysis was conducted for the eastbound approach with and without Project improvement to show the potential improvement in queue length.

#### Future Plus Project Traffic Conditions

The Future plus Project scenario of the impact analysis at Mariposa Avenue and PCH has also been analyzed without the Project improvement to show its potential benefit when compared to the Future Base and Future plus Project with improvement conditions at Mariposa Avenue. The analysis shows that LOS at Mariposa Avenue and PCH is better with the addition of the Project-related improvement than without. A queuing analysis was conducted for the eastbound approach with and without Project improvement to show the potential improvement in queue length.

#### *City of El Segundo Climate Action Plan*

The City's CAP includes measures related to the circulation, including parking, multi-modal streets, pedestrian/bicycle networks, and transit accessibility. The Project would provide a combination of electric vehicle charging and alternative fuel vehicles and carpooling parking in compliance with El Segundo Municipal Code and CALGreen requirements. The proposed Project would include shared parking, which would provide a more efficient use of land. As such, a shared parking analysis for the Project has been prepared to assess the potential parking demand and determine if adequate parking supply would be available on the site.

Bicycle parking and storage would be provided in compliance with CALGreen and the City's Municipal Code. The proposed Project would provide new living and working opportunities in close proximity to transit, thereby increasing ridership. Public transit that operates in the vicinity of the Project site includes the Metro C Line and multiple bus lines. Additionally, the proposed Project would reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line and the City's downtown. The Project would not conflict with the applicable measures related to the circulation system in the City's CAP.

*Transit, Bicycle, and Pedestrian Facilities*

The Project would not conflict with any plans or policies regarding existing or proposed transit, bicycle, and pedestrian facilities in the study area. During construction, sidewalk closures around the perimeter may be expected during street improvements. During this time, pedestrians would generally be routed to the other side of the street, but temporary covered pedestrian routes would be provided for access to the existing hotels. There are no identified Safe Routes to School along streets fronting the Project site; therefore, the construction of the Project would not temporarily affect such routes. During long-term operations of the Project site, when residences are occupied with families, it is expected that some students would walk from the site to the local schools. Local public schools that would serve the Project site are located to the west and would not require students to cross the PCH or other major roadways.

There are no existing bicycle facilities that would be temporarily impacted by Project construction. The South Bay Bicycle Master Plan indicates that additional Class II and III bicycle facilities are planned along Mariposa Avenue. No plans for the completion of the additional Class II and II bicycle facilities are anticipated to occur during Project construction. Bus stops are located east of the Project site, on Mariposa Avenue and on PCH. Construction is not anticipated to affect bus operations as construction and staging would not be immediately adjacent to these bus stops. The Metro C Line and Mariposa Station are located over 0.5 miles from the Project site and would not be impacted by Project construction. Therefore, the Project construction would not require relocation of bus stops and the construction impacts on transit, bicycle, and pedestrian facilities would be less than significant.

Once operational, bicycle and pedestrian access to the Project site would not be affected as no new driveways are being added. Bicycle access to the Project site would continue to be available on Indiana Street, Mariposa Avenue, and PCH. Further, the Project would not preclude implementation of the South Bay Bicycle Master Plan, including any future plans to complete the additional Class II and II bicycle facilities on Mariposa Avenue. The bus stops and other transit facilities would not be affected by Project operations. Due to the distance between the Project site and the Metro C Line, and because the Project would not impact right of way currently used or planned to be used for bus or light rail activities, the Project would not conflict with any plans or policies related to transit. Given the various transit facilities available near the Project site, sufficient transit capacity in the study area is available. Therefore, the Project's impact on transit, bicycle, and pedestrian facilities would be less than significant.

**Conflict with CEQA Guidelines Section 15064.3 (b)**

State CEQA Guidelines Section 15064.3(b) focuses on newly adopted criteria (VMT) adopted pursuant to SB 743 for determining the significance of transportation impacts. The VMT per capita assumed for the Project site was therefore based on the vehicle trips and average trip lengths for the TAZ in which the Project is located from the SCAG model, which indicates a daily household VMT per capita of 10.9 for all home-based production trips within the TAZ.

For residential projects, OPR recommends that a project exceeding a level of 15% below existing daily household VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as

regional VMT per capita or as city VMT per capita. The SCAG regional daily household VMT per capita (15.3) is higher than the City's daily household VMT per capita (14.2). Therefore, to be conservative, existing daily household VMT per capita is measured against the City's daily household VMT per capita for this analysis.

Per the SCAG model, the existing City daily household VMT per capita for residential land uses are 14.2 per resident. The threshold of 15% below the City average is 12.1 daily household VMT per capita (i.e., per resident). The proposed Project is estimated to generate 10.9 daily household VMT per capita, which is lower than 15% below the existing City daily household VMT per capita. Therefore, proposed Project would not conflict with State CEQA Guidelines Section 15064.3(b) and impacts would be less than significant.

### **Hazards Due to Geometric Design Feature**

Project access would not substantially increase hazards due to design features or incompatible uses. The Project would not result in the construction of new driveways; rather, the Project would allow for full access onto Mariposa Avenue, Palm Avenue, and Indiana Street, where access is currently limited to in-only/out-only. The proposed driveways at PCC-North would allow for full access in/out via Mariposa Avenue and Palm Avenue, and the existing curb cut on PCH would be removed. The residential access from Indiana Street at PCC-South would allow for full access in/out rather than access out-only, as under the existing conditions. No changes are proposed to access for the PCC-Fairfield Parking site. Additionally, as part of the Project, the eastbound leg of Mariposa Avenue at PCH would be reconfigured from one left lane and one through-right lane to one left, one through, and one right-turn lane.

All new driveways and internal access points would be designed and constructed to ensure appropriate line of sight and appropriate turning radii. Additionally, to ensure the Project would not result in driveway queueing onto PCH, a major corridor in the Project vicinity, which could create hazards to oncoming traffic, a queuing analysis was conducted for the PCH/Pacific Coast Commons South Driveway.

A queuing analysis, from within the Project site, was conducted for the driveway approach at the PCH/PCC-South driveway to show the estimated length of queues for vehicles exiting the Project site. Queues at the driveway are anticipated to be minimal given the volume of outbound Project trips at this driveway. Future plus Project Conditions, queues are anticipated to be minimal given the volume of outbound Project trips at this driveway. Therefore, the unsignalized and stop-controlled PCC-South driveway on PCH would not substantially increase hazards for vehicles using this Project access.

A signal warrant analysis conducted for the two unsignalized intersections at PCH and Palm Avenue and PCH and Holly Avenue, determined neither intersection trigger a signal warrant for both Existing plus Project and Future plus Project. Therefore, Project traffic at these intersections would not create increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant.

### **Inadequate Emergency Access**

#### *Construction*

#### Short-Term Construction Parking

An analysis of parking availability is not a requirement pursuant to CEQA. Vehicle access would be accommodated for the existing hotel uses on the Project site throughout the duration of construction. It is possible that the construction of PCC-Fairfield Parking, PCC-South, and PCC-North would occur sequentially. During Phase 1

construction, Fairfield Inn and Suites Hotel guests would continue to park at the existing surface lot at PCC-North. Once Phase 1 is completed, parking for the Fairfield Inn and Suites Hotel guests could be moved into the newly constructed garage. During Phase 2 construction, Aloft Hotel parking would be accommodated via the existing surface lot at PCC-North. Once Phase 2 is completed, PCC-South and its respective land uses would park on-site at the new garage. Phase 3, the North site, would begin construction and during this buildout no vehicles would need special parking accommodations. It is possible that Phase 2 and Phase 3 would be constructed at the same time. Under a concurrent timeline, Phase 1 would construct the replacement parking and new retail for the Fairfield Inn and Suites Hotel site adjacent to the existing hotel. During Phase 1, the Aloft Hotel and Fairfield Inn and Suites Hotel would continue to be in operation. During the construction of Phase 2 and Phase 3, both hotels would continue to operate, and new retail built in Phase 1 would be occupied. During Phase 1 of construction, Fairfield Inn and Suites Hotel and Aloft Hotel guests would continue to park at the existing surface lots at their respective sites. The existing Fairfield Inn and Suites Hotel surface lot has 232 parking spaces and the existing Aloft Hotel surface lot has 165 parking spaces, for a total of 397 parking spaces. During construction hours, a peak demand of 171 parking spaces for the Fairfield Inn and Suites Hotel and 119 parking spaces for the Aloft Hotel would need to be accommodated, along with a peak demand of 60 construction employee parking spaces. The total demand of 350 spaces would be entirely accommodated by the existing 397 spaces. However, only the newly-constructed PCC-Fairfield Parking structure (215 parking spaces) would be available for parking during PCC-South and PCC-North construction. Construction of Phases 2 and 3 would require 442 spaces, resulting in a deficit of 227 parking spaces.

As described under Development Agreements/Conditions of Approval above, if the total parking demand would exceed the total parking supply during construction activities, the Project applicant/developer would be required to accommodate the excess parking demand at an off-site location and provide shuttle service to and from the Project site accordingly to ensure that that parking is adequately provided during short-term construction activities.

### *Operation*

All areas of the Project site would be accessible to emergency responders for the long-term operation of the proposed Project. Local access to the Project site would be provided via PCH, Indiana Street, Mariposa Avenue, and Palm Avenue. All of the Project access points would be confirmed to be designed according to applicable design standards. The proposed Project would provide adequate access to the Project site, including access for emergency vehicles. The internal drive aisles and loading and parking areas would be designed to comply with City's width, clearance, and turning radius requirements of the Fire Department. A fire access driveway would be constructed within PCC-North to provide access to the development.

The Specific Plan requires structures, roadways, and facilities to comply with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation plans. The Project would require approval of a Site Plan Review No. 19-01 to allow the site plan and architectural design to construct the mixed-use commercial and residential development. Thus, all development proposed under the Specific Plan, including the proposed Site Plan, would be reviewed and approved during plan check review to ensure appropriate emergency access. Adherence to these requirements would ensure that impacts due to inadequate emergency access are below a level of significance. Therefore, potential impacts associated with inadequate emergency access would be less than significant.

### Long-Term Shared Parking

An analysis of parking availability is not a requirement pursuant to CEQA.

The Shared Parking Analysis was conducted to determine the minimum amount of parking needed to adequately park the Project's proposed and existing land uses. This analysis assumes that a number of parking spaces on site can be shared between the residential guests, hotel guests, and patrons of the on-site retail and restaurant uses. Because a shared parking supply is proposed, the Project would not be providing excess parking spaces that could encourage the driving of non-residents to/from the site. In fact, the Project would be providing a parking supply lower than the City's Municipal Code requirements, but would adequately support the Project's parking demand through shared parking.

The PCC-North site plan proposes 253 parking spaces (with 12 of those spaces in individual garages), with 189 parking spaces reserved for residential tenant use. The remaining 51 spaces would be shared between the residential guest parking, commercial uses, and for overflow if needed from the other sites. PCC-North is projected to have a peak residential parking demand of 160 parking spaces and a peak shared parking demand of 49 spaces. As such, the PCC-North is projected to have a surplus of three shared parking spaces during the peak demand period.

The PCC-Fairfield Parking peak parking demand is estimated to be 191 spaces. The site plan proposes 215 parking spaces, indicating sufficient supply for the anticipated demand with a surplus of 24 spaces during the peak demand period.

The PCC-South site plan proposes 336 parking spaces, with 165 parking spaces reserved for residential tenant use. The remaining 171 spaces would be shared between the residential guest parking, hotel, commercial uses, and for overflow if needed from the other sites. The PCC-South is estimated to have a peak residential parking demand of 144 parking spaces and a peak shared parking demand of 192 spaces. As such, PCC-South would have a deficit of 21 shared parking spaces during the peak demand period. The excess demand can be accommodated by the surplus of spaces at the PCC-North and PCC-Fairfield Parking garages, which have a combined surplus of 26 spaces.

It is noted that the Specific Plan allows an adjustment to the parking requirements of Development Standard D1 if a separate parking study can justify the need for adjustments to parking. The shared parking analysis demonstrates that sufficient parking would be provided to meet the demand of the various uses on-site, as proposed by the site plan. The shared parking would serve to efficiently use available developable land and would avoid an "over-parked" Project that could inadvertently encourage single-occupancy vehicle use.

### **Cumulative Transportation Impacts**

#### *Plan, Program, Ordinance, or Policy Addressing Circulation*

The proposed Project is consistent with the following plans addressing the circulation system and would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities under cumulative conditions. Therefore, cumulative impacts related to a program, plan, ordinance, or policy related to addressing the circulation system would be less than significant.

#### *CEQA Guidelines Section 15064.3(b)*

The long-term cumulative impacts related to VMT have been reviewed per the SCAG VMT thresholds. The Project is located within an urbanized area served by public transit. The Project would not exceed the SCAG threshold for

VMT; therefore, the Project's contribution to cumulative VMT would not be cumulatively considerable and would be a less-than-significant impact.

#### *Hazardous Design Features*

The Project would not result in the construction of new driveways; rather, the Project would allow for full access onto Mariposa Avenue, Palm Avenue, and Indiana Street, where access is currently limited to in-only/out-only. The proposed Project has a completed circulation analysis using a LOS methodology that indicates that the trips generated by the proposed Project would not result in adverse circulation conditions. Because the impacts related to Project access points and circulation are site specific, and would be less than significant, the Project would not contribute to cumulative impacts with respect to hazardous design features.

#### *Emergency Access*

The Project would not result in inadequate emergency access and Project impacts to emergency access would be less than significant. As with the proposed Project, driveways and/or circulation modifications proposed in the surrounding area would comply with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation plans. Further, since modification to access are largely confined to the Project site and the immediately surrounding area, Project-specific emergency access impacts would likely not impact other cumulative projects. Therefore, the Project's contributions to cumulative impacts would be less than significant.

#### **Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on transportation as it relates to conflict with circulation system plan, ordinance, or policy; conflict with CEQA Guidelines Section 15064.3 (b); inadequate emergency access; and cumulative impacts. Therefore, no mitigation is required, and no significant, unavoidable adverse impacts would occur.

## 2.4.17 Utilities and Service Systems

### **Require or Result in the Construction of New Water, Wastewater Treatment, Stormwater Drainage, Electric Power, Natural Gas, or Telecommunications Facilities**

#### *Water Service*

The water service connection for domestic water and fire protection would be made to one or more of the existing City water lines surrounding each development area. The specific location of these connections and pipe sizing would be based upon the City's approval. The system would provide adequate water supply for operation of the building's domestic requirements, automatic sprinkler systems and on-site fire hydrants, if required by the state or City Fire Marshal. Fire flows for the proposed Project would be based on the requirements listed in the version of the California Fire Code that is in effect at the time of plan submission, as amended by the City. Impacts within the Project site as part of construction of the proposed Project have been evaluated throughout the Draft EIR. Thus, the construction of new fire hydrants within the Project site would not cause a significant environmental effect.

The proposed Project is located in the high pressure zone of the City. The results of the modeling identified the service size necessary for the Project as less than-inches for each of the sites. Because the modeled flows are much higher than the estimated flows and the results of the analysis for the higher modeled flows prove that the

City main does not need to be upsized, it can be concluded that the City main would have more than enough capacity for the lower estimated flows and will not need to be upsized. Therefore, impacts to water facilities would be less than significant.

*Sanitary Sewer*

The City's sanitary sewer lines are located on all sides of the proposed Project. New sewer laterals are proposed for all the new buildings. It is anticipated that the new sewer laterals would connect to several of the existing gravity lines surrounding the Project. The proposed Project does not currently impact the existing pressure lines. Both the existing and proposed project sewer flows are considered in the average dry weather flow. It was assumed that all commercial spaces would consist of restaurants, which generates the highest flow compared to other commercial uses. The total flow from the Project is estimated to be 40,330 GPD or 0.0403 MGD. It appears that all sewer systems analyzed would still flow less than 50% full with the additional flows from the Project and that the sewer systems have capacity to serve the new developments. Therefore, no upgrades to the existing sewer pipeline infrastructure would be required as a result of Project implementation. Impacts would be less than significant.

*Stormwater Drainage*

There are two existing storm drains near the Project site that are owned by Caltrans and the City. Infiltration is feasible for stormwater treatment, in compliance with City of El Segundo low-impact development requirements. Because the peak flow rate would be reduced in the proposed condition, it is assumed that the City of El Segundo storm drains will have more than enough capacity to handle the flow rate generated by the proposed Project. Therefore, no upgrades to the existing storm water drainage infrastructure would be required as a result of Project implementation. Impacts would be less than significant.

*Dry Utilities*

Natural gas is provided to the Project area by the SoCal Gas, and gas utility infrastructure is located in all streets adjacent to the Project site, including PCH, Palm Avenue, Mariposa Avenue, Indiana Street, and Holly Avenue. New connections would be required for all the new buildings. The existing gas service would be maintained and future gas service would be provided through the Project's private gas service line connections to the SoCal Gas utilities in the surrounding streets. SoCal Gas has confirmed that there are existing facilities in the area and that service would be provided to the Project site in accordance with applicable policies and rules set forth by the CPUC.

Electrical power is provided to the Project area by SCE. There are existing underground electrical lines below PCH and Mariposa Avenue adjacent to the Project site. New underground utility conduit systems would be needed to intercept the existing underground electric system and provide electrical power to the proposed improvements. Final locations and points of connection for the electrical system will be based on a final approved design, in coordination with SCE. SCE has confirmed that there are existing facilities in the area, and service would be provided to the Project site in accordance with applicable policies and rules set forth by the CPUC.

There are existing underground telecommunication lines below PCH, Palm Avenue, and Mariposa Avenue adjacent to the Project site. It is anticipated that Velocity and Sonify would continue to provide service to the Aloft Hotel and the Fairfield Inn and Suites Hotel. Verizon, CenturyLink, and Charter Communications have all confirmed that they have existing services in the area. New underground utility conduit systems would intercept the existing underground telecommunications system and provide services to the proposed buildings.

Upgrades to dry utilities could be required based on the change in land use (i.e., higher density and increase in onsite technology). Any required upgrades are anticipated to be limited the lateral connections to the Project site and not any centralized facilities. This significance criterion is generally applicable to projects that are not already served by municipal utilities, or for greenfield development projects outside of urban areas, because it is those projects that either need to construct new electrical power, natural gas, and telecommunication centralized facilities, or that would tax existing infrastructure.

Upgrades would be coordinated with appropriate service providers (such as SCE, SoCal Gas) to minimize disruptions on service and would be completed by either trenchless technology or open trenching to the depth of the underground utilities. Potential environmental impacts associated with trenching for utilities, including areas of temporary earth disturbance and the operation of construction equipment, are assessed throughout the Draft EIR. Additionally, the Project would be required to comply with all regulatory requirements and mitigation measures outlined within this draft EIR for the purposes of mitigating impacts associated with utility construction activities and the use of heavy machinery. No adverse physical effects beyond those already disclosed in this Draft EIR would occur as a result of implementation of the Project's proposed utility system connections. Therefore, impacts to dry utilities would be less than significant.

### **Sufficient Water Supplies**

The estimated water demand for the proposed Project based on 120% of the estimated sewer demand for the Specific Plan area. The total domestic (potable) water demand from the Project is estimated to be 48,396 GPD or 0.048 MGD or 54.2 AFY. The proposed Project is estimated to require approximately 48,396 GPD (54.2 AFY) of new demand of potable water, based on the calculations provided in the Utility Report (Appendix G of the Draft EIR). Therefore, the Project's water demand would be far below the estimated 210 AFY benchmark for determining whether a Water Supply Assessment is required under SB 610 for a water use equivalent to a 500 dwelling unit development.

Although the proposed Project would not meet the threshold for the preparation of a Water Supply Assessment, it would generate a demand for potable water supplies that were not anticipated during the preparation of the City's 2015 UWMP, as the proposed Project would introduce new land uses that are not currently anticipated in the General Plan. The proposed Project's estimated 54.2 AFY would be approximately 0.31% of the City's overall supply total in 2025, and would be both within the estimates, and exceed the estimates, depending on whether it is a normal, wet, and multiple dry years.

The City of El Segundo will serve the proposed Project and will both provide and require the development to have redundant potable water connections, subject to the City's Water Department approval for all water connections. The City will charge various fees for providing potable water and wastewater services, which include but are not limited to readiness to serve, water usage (quantity), treatment, and utility user taxes.

The MWD is a primary source of water supply within Southern California. Because the City of El Segundo purchases the entirety of its water supply from the WBMWD, which is supplied through MWD, the reliability of the City's water supply is heavily dependent on the reliability analyses of these agencies. The amount of water the City obtains from these sources may vary from year to year, depending on weather conditions and demand. During multiple dry year scenarios, the demand exceeds the supply, however, WBMWD will be able to supply this difference. It was estimated in the MWD 2015 UWMP that surplus supplies are available to meet the increased demands during normal, dry, and multiple dry year scenarios through 2035. If the City uses more water than is naturally replenished during these years the City, WBMWD, and MWD can enact the measures outlined in their respective Water Shortage Contingency

Plans (WSCPs) to ensure that water is used as efficiently and sparingly as possible. This will help preserve the water supplies available, and ensure continued reliability for the future (City of El Segundo 2016).

While additional imported water from MWD can be purchased, if required, to address any additional demands, the City has also implemented measures to address potential water shortages. To respond to potential water supply shortages, including up to a 50% reduction in supply, the City has developed a four-stage rationing plan to be implemented if the City experiences a shortage in the water supply. Mandatory conservation is always required to prevent water waste. The City has also adopted a WSCP as part of its Municipal Code. The WSCP describes the measures to take in the event of a water shortage, including different stages of action corresponding to different levels of drought. Since the City of El Segundo receives its imported water supplies from the WBMWD and MWD, the City is also subject to the WSCPs of these Districts. Each District has water rationing stages and a WSCP that specifies the actions to be taken during a water shortage of 50% or greater. In the event that a water shortage becomes severe and a 50% reduction is necessary, the City will comply with the conservation measures as provided by the WBMWD and MWD WSCPs (City of El Segundo 2016).

WBMWD's 2015 UWMP has identified plans to reduce its imported water use by 17% within the next 20 years through diversifying its water sources; namely developing a full-scale ocean water desalination plant and expanding recycled water use. Water desalination is not included as a potential source in the City's UWMP because WBMWD would be the operator of the desalination plant; however, the City may be able to purchase desalination water as a part of the City's overall purchased water supply (City of El Segundo 2016). The WBMWD's environmental review of their Ocean Water Desalination Project was completed on November 20, 2019, which would include construction and operation of an ocean water desalination facility in El Segundo, with offshore ocean water intake and brine discharge structures, and an inland water conveyance system. The project would produce 20 MGD of potable drinking water and would provide a reliable local water supply, thereby offsetting the need for imported water from the SWP and increasing drought resiliency (WBMWD 2019b).

The City's UWMP must be updated every 5 years, and at the time of the preparation of this evaluation, the City is in the process of preparing the 2020 UWMP. Planned growth is incorporated into the supply and demand projections within the UWMP, in compliance with applicable regulations and standards. The Update to the UWMP would also consider changes to future supplies, such as desalination water. As described above (see Appendix G-2), the City would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years (Xu pers. comm. 2020). Therefore, the City would have sufficient water supplies available to serve the proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years and impacts would be less than significant. No mitigation is required.

### **Adequate Capacity for Wastewater Treatment**

Wastewater generated from the Project site would be treated at the HTP, which has the capacity to treat a maximum daily dry weather flow of 450 MGD of wastewater and a peak wet weather flow of 800 MGD, while on average dry weather days, the facility treats 275 MGD (City of Los Angeles 2020). The difference between the average dry weather flows and the maximum flows is 175 MGD. The City of El Segundo has an agreement with the City of Los Angeles that permits an average flow of 2.75 MGD of wastewater treatment and disposal capacity in HTP. Project wastewater discharges would be typical of the wastewater already generated at nearby properties; it would not include large quantities of unusual industrial/hazardous discharges that can interfere with the ability of a treatment plant meeting the water quality requirements for its discharges.

To be conservative, it was assumed that commercial areas of the proposed Project would consist of restaurants, which generate a higher demand of 1,000 GPD compared to other commercial spaces. Based on the Utility Report, the proposed Project would generate 40,330 GPD (0.0403 MGD) of sewer demand. This wastewater flow would represent approximately 1.46% of the City's permitted average flow to HTP, as well as would represent approximately 0.024% of HTP's remaining capacity. As such, the increase in wastewater generation attributable to the Project would be accommodated within the existing treatment capacity of the HTP and would represent a minimal to negligible percentage of the facility's remaining capacity. Additionally, the requirement to maintain capacity at HTP is monitored through permit requirements with the Los Angeles Regional Water Quality Control Board, which required the submittal of a report within 90 days after the "30-day (monthly) average" daily dry-weather flow equals or exceeds 75% of the design capacity of the plant ( $0.75 \times 450 \text{ MGD} = 337 \text{ MGD}$ ) of waste treatment and/or disposal facilities. This report must include A schedule for studies, design, and other steps needed to provide additional capacity for waste treatment and/or disposal facilities before the waste flow rate equals the capacity of present units. Therefore, the Project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitment. Furthermore, water conservation measures as established at the local and state level would be implemented and would help reduce the amount of wastewater generated by the Project. Therefore, impacts would be less than significant.

### **Generation of Solid Waste**

#### *Construction*

The proposed Project would involve redevelopment of the existing surface parking lots of the Fairfield Inn and Suites Hotel and Aloft Hotel properties, as well as the Fairfield Inn and Suites Hotel Food and Beverage Building (formerly the Hacienda Restaurant). Redevelopment activities associated with the proposed Project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, plastics, and soils. Per CALGreen standards, 65% of construction and demolition waste must be diverted from landfills (CalRecycle 2020b). As such, at least 65% of all construction and demolition debris from the site would be diverted. Additionally, any hazardous wastes that are generated during demolition and construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws. The remaining 35% of construction and demolition material that is not required to be recycled would either be disposed of in a regional landfill or voluntarily recycled at a solid waste facility with available capacity. The inert landfill in the County (Azusa Land Reclamation landfill) has a remaining capacity of 51,512,201 tons and is expected to remain open for approximately 25 years, as of 2020. Due to the temporary nature of construction and required compliance with the City's recycling mandates, construction would not generate waste in excess of standards or in excess of the capacity of local infrastructure and would not otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

#### *Operation*

Once operational, the proposed Project would produce solid waste on a regular basis, in association with operation and maintenance activities. The proposed Project would generate approximately 86.34 tons of solid waste per day. This amount assumes compliance with AB 939 requirements for 50% waste diversion from landfills. Solid waste generated by the proposed Project would be collected and transported to a local or regional landfill. Scholl Canyon landfill has a remaining capacity of 9,900,000 tons and is expected to remain open for another 10 years. Burbank Landfill Site No. 3 has a remaining capacity of 5,174,362 tons and is expected to remain open for another 33 years. Calabasas landfill has a remaining capacity of 14,500,000 tons and is expected to remain open for another 9 years.

The proposed Project is expected to generate approximately 86.34 tons per year. Collectively, the Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill have approximately 29,574,362 tons of available space remaining. As such, the net solid waste that is anticipated to be produced by the proposed Project would equate to approximately 0.00029% of the available capacity of the combined landfills through their estimated closure dates. This number would be further reduced in order to comply with CALGreen requirements for 65% waste diversion, which would require the Project Applicant/Developer to either submit a construction waste management plan to the City that identifies the C&D waste materials to be diverted from the landfills, or use a waste management company that can provide verifiable documentation that the percentage of C&D waste material diverted from the landfill meets CALGreen's 65% requirement.

Once the Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill reach capacity, additional landfills and strategies would be identified so that disposal needs continue to be met. Furthermore, according to the latest annual report for the Countywide Integrated Waste Management Plan, there are landfills used by the County with up to 100 years of remaining life (County of Los Angeles Department of Public Works 2019). For example, the Prima Deshecha Sanitary Landfill in Orange County is expected to remain open for another 85 years, the Mesquite Regional Landfill in Imperial County is expected to remain open for another 100 years, and the Simi Valley Landfill in Ventura County is expected to remain open for another 67 years (CalRecycle 2020a). As such, in the event of closure of the Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill, other landfills in the region would be able to accommodate solid waste from the proposed Project, and regional planning efforts would ensure continued landfill capacity into the foreseeable future.

For the reasons described above, Project operations would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant. No mitigation is required.

### **Solid Waste Statutes and Regulations**

The proposed Project would be required to comply with all applicable local and state regulations related to solid waste. The solid waste facilities in proximity to the Project site, Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill, are regulated under federal, state, and local laws. Additionally, the City is required to comply with the solid waste reduction and diversion requirements set for in AB 939, AB 341, AB 1327, and AB 1826. Per AB 1826, businesses that generate 2 cubic yards or more of commercial solid waste per week are required to arrange for organic waste recycling services. Any hazardous wastes that are generated during construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws.

In addition to the City's requirements for recycling construction and demolition waste, the state has set a goal of 75% recycling, composting, and source reduction of solid waste by 2020. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill, and AB 1826 is mandatory organics recycling. Waste generated by the proposed Project would enter the City's waste stream but would not adversely affect the City's ability to meet AB 341 or AB 1826, because the proposed Project's waste generation would represent a nominal percentage of the waste created within the City and because the businesses and residents at the Project site would be subject to recycling and diversion requirements. In addition, waste diversion and reduction during Project construction and operations would be completed in accordance with CALGreen standards, CalRecycle standards, City requirements, and the County Integrated Waste Management Plan. As a result, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

## Cumulative Utilities and Service Systems Impact

### *Water*

Implementation of the Project, in conjunction with cumulative projects would increase demand for water services provided in the City's water supply system. The Project area and each cumulative projects would incrementally increase the amount of water that is required in the area. However, as previously described, the existing water lines that serve the Project site have the capacity to convey the estimated peak flow generated from the Project. Similar to the Project, the capacity of water lines associated with cumulative project development would be determined on a project-specific basis. In the event that water line upgrades are required due to cumulative projects, all construction work within the City public rights-of-way would be subject to local municipal code and applicable agency requirements, and would be subject to CEQA review accordingly. Based on the analysis presented in the Utility Report (Appendix G of the Draft EIR), the proposed Project is not anticipated to contribute to a cumulative impact related to water infrastructure.

The City (through its UWMP) anticipates its projected water supplies will meet demand through the year 2035. In terms of the City's overall water supply condition, any cumulative project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. The City is currently preparing the 2020 UWMP, which is anticipated to be available in the Fall of 2021. The City's 2020 UWMP will account for anticipated growth within the City through 2040. Cumulative projects that propose changing the zoning or other characteristics beyond what is within the General Plan would be required to evaluate the change under necessary CEQA approval. The CEQA analysis would compare the existing to the proposed uses and the ability of the City and water utility providers to provide a sufficient level of water service.

For projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910–10915 of the State Water Code, a Water Supply Assessment demonstrating sufficient water availability is required on a project-by-project basis. Similar to the Project, each cumulative project would be required to comply with City and State Water Code and conservation programs for both water supply and infrastructure to partially offset the cumulative demand for water. As a result, no significant cumulative water supply impacts are anticipated from development of the Project and cumulative projects, and the Project's incremental effect would not be cumulatively considerable. No mitigation is required.

### *Wastewater*

The Project area and each cumulative project would incrementally increase the amount of wastewater that is being generated in the area. However, as previously described, the existing sewer lines that serve the Project site have the capacity to convey the estimated peak flow generated from the Project. Similar to the Project, the capacity of receiving sewer lines associated with cumulative project development would be determined on a project-specific basis. In the event that sewer upgrades are required due to cumulative projects, all construction work within the City public rights-of-way would be subject to local municipal code and applicable agency requirements, and would be subject to CEQA review accordingly. Based on the analysis presented in the Utility Report (Appendix G of the Draft EIR), the proposed Project is not anticipated to contribute to a cumulative impact related to sewer infrastructure.

Similarly, the proposed Project would generate 40,330 GPD (0.0403 MGD) of sewer demand. This wastewater flow would represent approximately 1.46% of the City's permitted average flow to HTP, as well as would represent approximately 0.024% of HTP's remaining capacity. As cumulative increases in wastewater treatment demand within the service area require facility upgrades, the City would continue to regulate public sewer facilities in

accordance with Title 12 of the El Segundo Municipal Code and the HTP would continue to assess potential expansions to their treatment facilities in accordance with regulatory permit requirements. As such, impacts to wastewater services would not be cumulatively considerable. No mitigation is required.

*Electric Power, Natural Gas, and Telecommunication*

The City of El Segundo is built-out and upgrades in electrical power, natural gas, and telecommunication capabilities are anticipated primarily due to development in the form of the revitalization of outdated or underserved areas, and redevelopment of specific properties that will increase density and require more sophisticated technology, such as the proposed Project. However, such upgrades would generally be confined to the lateral connections to the individual project sites and not any centralized facilities. Upgrades to centralized power, natural gas, and telecommunication facilities would be determined by each of the power, gas, and telecommunications providers, as build-out continues within the region. Individual projects would be required to provide for specific project needs. As a result, cumulative impacts associated with upgrades of electric, natural gas, and telecommunication facilities would not be significant. As such, impacts to electric power, natural gas, and telecommunication services would not be cumulatively considerable.

*Solid Waste*

Development of the Project in combination with cumulative projects would increase land-use intensities in the area, resulting in increased solid waste generation in the service area for the Scholl Canyon Landfill, Burbank Landfill Site No. 3, and the Calabasas Landfill. However, due to the built-out nature of the City, the Project and cumulative projects are considered urban infill and/or redevelopment projects. As such, solid waste is already being generated at the Project site and the majority, if not all, of the cumulative project sites. Further, AB 939, or the Integrated Waste Management Act of 1989, mandates that cities divert from landfills 50% of the total solid waste generated to recycling facilities. In order to satisfy CALGreen requirements of diverting 65% of solid waste and to offset impacts associated with solid waste, the proposed Project and all cumulative projects would be required to implement waste reduction, diversion, and recycling during both demolition/ construction and operation.

Through compliance with City and state solid waste diversion requirements, and due to the recycling collection process that would be part of the proposed Project design and the design of many typical urban infill projects, impacts to solid waste services would not be cumulatively considerable. Impacts would be less than significant, and no mitigation is required.

**Finding**

The City finds that, based upon substantial evidence in the record, the Project would have a less than significant impact on utility and service systems; therefore, no mitigation is required.

2.4.18 Wildfire

The Project site is in a highly urbanized area and is not within a Very High Fire Hazard Severity Zone and would not exacerbate or expose people or structures to wildfire risks or substantially impair an adopted emergency response plan. Based on the CAL FIRE's Fire Hazard Severity Zones maps (CAL FIRE 2020), the entire City, including the Project site, is not located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones. Therefore, impacts associated with wildland fire would not occur.

**Finding**

Appendix B of the Notice of Preparation for the Project found no potential for significant impacts to wildfire; therefore, wildfire was not addressed in the Draft EIR. No mitigation would be required and no significant, unavoidable adverse impacts would occur.

# 3 Findings on Project Alternatives

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CEQA requires that an EIR describe a range of reasonable alternatives to the project, or to the location of the project, that could feasibly attain the basic objectives of the project, and to evaluate the comparative merits of the alternatives (14 CCR 15126.6[a]). The CEQA Guidelines direct that the selection of alternatives be governed by “a rule of reason” (14 CCR 15126.6[a], [f]). As defined by the CEQA Guidelines, “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR needs to examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project” (14 CCR 15126.6[f]).

Additionally, CEQA Guidelines section 15091(a)(3) requires findings to be made as to why project alternatives were rejected. While an alternative may be potentially feasible under Guidelines section 15126.6 for inclusion in an EIR, the ultimate determination of feasibility is to be made by the decision-making body under section 15091(a)(3). As stated above, alternatives may be rejected when specific economic, legal, social, technological or other considerations make the Project infeasible. In making these findings, the City Council finds that there are six objectives for the Project, five of which are dependent upon intensifying the land use. However, the primary objectives of the Project are (1) addressing the regional housing shortage by providing additional housing opportunities, including affordable housing, that support the goals of the Housing Element of the General Plan, and (2) improving the job/housing balance in the City of El Segundo.

## 3.1 Alternatives Carried Forward for Consideration

This section discusses a reasonable range of alternatives to the Project, including a no project alternative, in compliance with CEQA Guidelines Section 15126.6(e). These alternatives include the following:

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

These alternatives are evaluated for their ability to avoid or substantially lessen the impacts of the Project identified in the EIR, as well as consideration of their ability to meet the basic objectives of the proposed project as described in the Final EIR.

### 3.1.1 Alternative A - No Project/Existing Development

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the impacts of a no project alternative. The “purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project” (14 CCR 15126.6[e][1]). When defining the no project alternative, the analysis shall be informed by “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (14 CCR 15126.6[e][2]).

### **Description**

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

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

### **Finding**

Therefore, the City rejects the No Project/Existing Development as it fails to satisfy the Project's underlying purpose and to meet any of the Project objectives, and because specific economic, legal, social, technological or other considerations make the alternative infeasible.

### **Rationale**

No Project/Existing Development would have fewer impacts compared to the Project in terms of aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, recreation, short-term transportation, tribal cultural resources, and utilities and service systems. The No Project/Existing Alternative would result in greater land use and planning impacts and long-term transportation impacts. The No Project/Existing Alternative would eliminate significant and unavoidable impacts related to air quality. In terms of achieving the Project objectives, the No Project/Existing Alternative would meet none.

### 3.1.2 Alternative B - Reduced Development Alternative: Exclusion of PCC-North

#### **Description**

Alternative B proposes a reduction in the Project to eliminate the significant impacts related to population growth projections and the AQMP, as well as lessen the proposed development intensity by eliminating PCC-North from the Specific Plan boundaries.

The Southern California Association of Government's (SCAG) forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. Assuming 2.35 persons per household, the proposed Project's 263 residential units would accommodate 618 individuals at full occupancy of all units. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG's estimated projections through 2045 by 118 persons. Alternative B would not exceed SCAG's estimated projection through 2045. Considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, the proposed Project would result in a population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP. Thus, Alternative B would eliminate an adequate amount of residential units to eliminate this significant and unavoidable impact.

All mitigation measures required under the proposed Project would be implemented prior to or during Project construction for all sites, with the exception of MM-HAZ-1, which is specifically related to PCC-North. Therefore, Alternative B is proposed as a reduced development alternative to exclude PCC-North. Under Alternative B, there would be no development north of Mariposa Avenue, which is included in the proposed Specific Plan as PCC-North. The Specific Plan would be prepared under Alternative B, excluding PCC-Mixed Use 2 (PCC-North) from the land use district. The PCC-North property would remain surface parking lot and no changes to the general plan land use designation or zoning would occur for that area.

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

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

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

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

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

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

### **Finding**

While Alternative B satisfies most of the Project Objectives, it does so to a lesser degree. Alternative B is rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

### **Rationale**

The Reduced Development Alternative: Exclusion of PCC-North would have fewer impacts compared to the Project in terms of air quality, energy, land use and planning, population and housing, public services, recreation, and transportation. The Reduced Development Alternative: Exclusion of PCC-North would be similar to the Project in terms on cultural resources, geology and soils, long-term hazards and hazardous materials, long-term hydrology and water quality, long-term transportation, and tribal cultural resources. The Reduced Development Alternative: Exclusion of PCC-North would reduce significant and unavoidable impacts related to air quality in relation to inconsistency with the AQMP. However, while the Reduced Development Alternative: Exclusion of PCC-North would meet all, with the exception of partially meeting one objective to facilitate a safe and walkable community along Pacific Coast Highway by providing a mix of land uses, including commercial at the street-level with residential uses above, it would do so to a lesser degree.

While the Project would still achieve most of the Project objectives, the objectives would not be achieved to the same extent and would not achieve the primary objectives. Since the time that this project was submitted, the City received its 6th Cycle Housing Element Regional Housing Needs Assessment. The City's allocation included 207

very low units and 99 low-income units. These allocations included a carryover of all of the lower income housing units that had been allocated to the City during the 5<sup>th</sup> Cycle of the Housing Element as no affordable housing was built during that time period at the former school site which was the City’s primary strategy for meeting the RHNA for the 5<sup>th</sup> Cycle. The Project as proposed provides 32 of these lower income units, including 29% of the low-income allocation. Additionally, the City’s housing stock is aging. Less than 7% was built in the last 20 years and more than 62% is more than 50 years old. From a policy perspective, Alternative B is infeasible because it would mean losing the opportunity for an additional 137 new housing units, including six condominium units, and would eliminate 17 affordable housing units. The need for affordable housing and improvement of the jobs/housing balance is critical. Additionally, Alternative B will do nothing to promote a walkable community along that portion of Pacific Coast Highway.

Alternative B is also not financially feasible. An independent development feasibility analysis commissioned by the City and conducted by Keyser Marston Associates determined that restricting 10% of the proposed residential units to affordable households would allow for a feasible project but would leave little ability to negotiate for additional benefits. Nevertheless, through the Development Agreement, the applicant has agreed to increase the affordable housing component to 12%. Additionally, the applicant has agreed to include one very low unit at PCC South and 2 very low units at PCC North. If PCC North is eliminated, then there are no apartments and condominiums to help offset the costs of PCC South and the PCC Fairfield parking structure, which is acknowledged to be costly due to its design.

### 3.1.3 Alternative C - Reduced Development: Reduce 1 Level from PCC-South and PCC-North

#### **Description**

Alternative C proposes to implement a reduced unit count on PCC-South and PCC-North to lessen population growth impacts and aesthetic impacts, and to eliminate the significant and unavoidable impact associated with conflicts with the AQMP. The Southern California Association of Government’s forecasted population growth for the City of El Segundo is 500 persons between 2016 and 2045. Assuming 2.35 persons per household, the proposed Project’s 263 residential units would accommodate 618 individuals. If these 618 individuals would be new residents to the City, then the proposed Project would exceed SCAG’s estimated projections through 2045 by 118 persons. Alternative C would not exceed SCAG’s estimated projection through 2045. Considering the population growth anticipated in the 2016 RTP/SCS of 600 individuals within the City between 2012 and 2040, which was used in the development of the AQMP, the proposed Project would result in a population growth in the City that would exceed the growth assumptions in the 2016 RTP/SCS, and would thereby exceed the population growth assumptions in the AQMP by 18 individuals. Alternative C would eliminate an adequate number of residential units to eliminate this significant and unavoidable impact.

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

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

### **Finding**

Therefore, the City rejects the Reduced Development: Reduce 1 Level from PCC-South and PCC-North as specific economic, legal, social, technological or other considerations make the alternative infeasible. While Alternative B satisfies most of the Project objectives, it does so to a lesser degree. Alternative B is rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

### **Rationale**

The Reduced Development: Reduce 1 Level from PCC-South and PCC-North would have fewer impacts compared to the Project in terms aesthetics, air quality, energy, greenhouse gas emissions, long-term noise, population and housing, public services and recreation, long-term transportation, and utilities and service systems. The Reduced Residential Alternative would be similar to the Project in terms on cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, short-term noise, short-term transportation, and tribal cultural resources. The Reduced Development: Reduce 1 Level from PCC-South and PCC-North would reduce significant and unavoidable impacts related to air quality.

While the Project would still achieve most of the project objectives, the objectives would not be achieved to the same extent and would not achieve the primary objectives. Since the time that this project was submitted, the City received its 6th Cycle Housing Element Regional Housing Needs Assessment. The City's allocation included 207 very low units and 99 low-income units. These allocations included a carryover of all of the lower income housing units that had been allocated to the City during the 5th Cycle of the Housing Element as no affordable housing was built during that time period at the former school site which was the City's primary strategy for meeting the RHNA for the 5th Cycle. The Project as proposed provides 32 of these lower income units, including 29% of the low-income allocation. Additionally, the City's housing stock is aging. Less than 7% was built in the last 20 years and more than 62% is more than 50 years old. From a policy perspective, Alternative C is infeasible because it would mean losing the opportunity for an additional 54 new housing units and would reduce the number of new units that could be made available to lower income households. The need for affordable housing and improvement of the jobs/housing balance is critical.

## **3.2.4 Environmentally Superior Alternative**

An EIR must identify an "environmentally superior" alternative; and, where the no project alternative is environmentally superior, the EIR is then required to identify an alternative from among the others evaluated as environmentally superior (14 CCR 15126.6[e][2]).

Alternative A would result in reduced environmental impacts to all environmental topics in the short-term because construction activity would not occur. Similarly, Alternative A would result in reduced environmental impacts to all environmental topics in the long-term, including elimination of the significant unavoidable impact related to conflicts with the AQMP, because no operational changes would occur. Although, no mitigation measures would be required for Alternative A, the two hotels would continue to be inconsistent with applicable zoning and land use regulations for the Project site. Under Alternative A, the Project site would remain in its existing condition and potential benefits of the proposed Project related to providing new living and working opportunities in close proximity

to transit would not occur. Additionally, the proposed Project would redevelop surface parking lots and construct a mix of land uses including residential and commercial, which would help the City to achieve its goals and policies related to land use, circulation, economic development, and housing, which would not occur under Alternative A. Nevertheless, the elimination of all construction and operational impacts associated with the proposed Project would result in a more environmentally superior alternative when compared to the proposed Project, Alternative B, or Alternative C.

As required under CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the “no project” alternative, the EIR must also identify an environmentally superior alternative among the other alternatives

Alternative B would reduce short-term construction-related impacts when compared to the proposed Project for all environmental topics. Alternative B would eliminate the necessity of MM-HAZ-2 since no development would occur at PCC-North. For long-term operational impacts, most environmental factors would have similar, albeit reduced, impacts under Alternative B to the proposed Project. Alternative B would have similar impacts to the proposed Project in the six areas: cultural resources, geology and soils, long-term hazards and hazardous materials, long-term hydrology and water quality, land use and planning, short-term transportation and tribal cultural resources. Alternative B would eliminate the significant unavoidable impact related to conflicts with the AQMP.

Alternative C would not eliminate any mitigation measures required under the proposed Project. Additionally, Alternative C would have similar impacts to the proposed Project in ten areas: cultural resources, geology and soils, short- and long-term hazards and hazardous materials, short- and long-term hydrology and water quality, land use and planning, short-term noise, short-term transportation, and tribal cultural resources. Alternative C would eliminate the significant unavoidable impact related to conflicts with the AQMP.

Because Alternative B would eliminate the need for MM-HAZ-2 and would reduce the intensity of development and the population growth when compared to both the proposed Project and Alternative C, Alternative B would be the environmentally superior alternative.

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# 4 General CEQA Findings

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Based on the information contained in the administrative record and based on the facts stated below, the City makes the Findings set forth in Sections 4.1 and 4.2.

1. The plans for the proposed project have been prepared and analyzed so as to provide for public involvement in the planning and the CEQA processes.
2. To the degree that any impacts described in the Draft EIR are perceived to have a significant effect on the environment, or such impacts appear ambiguous as to their effect on the environment, any significant effect of such impacts has been substantially lessened or avoided by the mitigation measures set forth in the Draft and Final EIR.
3. Comments regarding the Draft EIR received during the public review period have been adequately addressed in Chapter 2, Responses to Comments Received, in the Final EIR. Any significant effects described in such comments were avoided or substantially lessened by the mitigation measures described in the Draft and Final EIR.

## 4.1 Findings Regarding Recirculation

The City finds that the Draft EIR does not require recirculation under CEQA (CEQA Section 21092.1, CEQA Guidelines Section 15088.5). CEQA Guidelines Section 15088.5 requires recirculation of an EIR prior to certification of the Final EIR when “significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review.” As described in CEQA Guidelines Section 15088.5:

New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it;
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

In addition, CEQA Guidelines Section 15088.5(b) provides that “recirculation is not required where the new information added to the EIR merely clarifies and amplifies or makes insignificant modifications in an adequate EIR.” Recirculation also is not required simply because new information is added to the EIR — indeed, new information is oftentimes added given CEQA’s public/agency comment and response process and CEQA’s post-Draft EIR circulation requirement of proposed responses to comments submitted by public agencies. In short,

recirculation is “intended to be an exception rather than the general rule.” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1132.)

As such, the City makes the following Findings:

1. None of the public comments submitted to the City regarding the Draft EIR present any significant new information that would require the Draft EIR to be recirculated for public review.
2. No new or modified mitigation measures are proposed that would have the potential to create new significant environmental impacts.
3. The Draft EIR adequately analyzed project alternatives and there are no feasible project alternatives or mitigation measures considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the project.
4. The Draft EIR was not fundamentally and basically inadequate and conclusory in nature and did not preclude meaningful public review and comment.

In this legal context, the City finds that recirculation of the Draft EIR prior to certification is not required. In addition to providing responses to comments, the Final EIR and Additional Responses include revisions to expand upon information presented in the Draft EIR (Chapter 3, Changes to the EIR); explain or enhance the evidentiary basis for the Draft EIR’s findings; update information; and to make clarifications, amplifications, updates, or helpful revisions to the Draft EIR. These revisions, clarifications and/or updates do not result in any new significant impacts or increase the severity of a previously identified significant impact. These changes are not substantial, do not deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect, a feasible way to mitigate or avoid such an effect or a feasible project alternative.

In sum, the Final EIR and Additional Responses demonstrates that the proposed project would not result in any new significant impacts or increase the severity of a significant impact, as compared to the analysis presented in the Draft EIR. The changes reflected in the Final EIR also do not indicate that meaningful public review of the Draft EIR was precluded in the first instance. Accordingly, recirculation of the EIR is not required as revisions to the EIR are not significant as defined in Section 15088.5 of the CEQA Guidelines.

## 4.2 Legal Effects of Findings

To the extent that these Findings conclude that the proposed mitigation measures outlined herein are feasible and have not been modified, superseded, or withdrawn, the City hereby commits to implementing these measures. These Findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the City approves the proposed project.

The mitigation measures that are referenced herein and adopted concurrently with these Findings will be effectuated through the process of construction and implementation of the proposed project.

# 5 Statement of Overriding Considerations

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Pursuant to California Public Resources Code, Section 21081(b), and CEQA Guidelines Section 15093(a) and (b), the decision-making agency is required to balance, as applicable, the economic, legal, social, technological, or other benefits of the project against its unavoidable environmental risks when determining whether to approve a project. If the specific economic, legal, social, technological, or other benefits of the project outweigh the unavoidable adverse environmental effects, those effects may be considered “acceptable” (14 CCR 15093 (a)). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (14 CCR 15093(b)).

Courts have upheld overriding considerations that were based on a variety of policy considerations including, but not limited to, new jobs, stronger tax base, and implementation of an agency’s economic development goals, growth management policies, redevelopment plans, the need for housing and employment, conformity to community plan, and provision of construction jobs, See *Towards Responsibility in Planning v. City Council* (1988) 200 Cal App. 3d 671; *Dusek v. Redevelopment Agency* (1985) 173 Cal App. 3d 1029; *City of Poway v City of San Diego* (1984) 155 Cal App. 3d 1037; *Markley v. City Council* (1982) 131 Cal App.3d 656. In accordance with the requirements of CEQA and the CEQA Guidelines, the City finds that the mitigation measures identified in the Final EIR and the MMRP, when implemented, will avoid or substantially lessen virtually all of the significant effects identified in the Final EIR for the Pacific Coast Commons Specific Plan. However, certain significant impacts of the proposed project are unavoidable even after incorporation of all feasible mitigation measures. These significant unavoidable impacts result from air quality impacts due to conflict with SCAQMD 2016 AQMP (see Section 2.2).

The City finds that all feasible mitigation measures identified in the Final EIR that are within the purview of the City would be implemented with the proposed project. As identified below, the City further finds that the remaining significant unavoidable effects are outweighed and are found to be acceptable due to the following specific overriding economic, legal, social, technological, or other benefits, based upon the facts set forth above, the Final EIR, and the record.

The City finds that any one of the benefits set forth below is sufficient by itself to warrant approval of the proposed project. This determination is based on the findings herein and the evidence in the record. Having balanced the unavoidable adverse environmental impacts against each of the benefits, the City hereby adopts this Statement of Overriding Considerations for the following reasons:

- a. The proposed project would maintain the existing hotel uses while providing for a mixed-use multiple-family and commercial neighborhood.
- b. The proposed project would provide additional housing opportunities that support the goals of the Housing Element of the City’s General Plan, including facilitating the development of affordable housing units and meeting the City’s Regional Housing Needs Allocation.
- c. The proposed project would improve the jobs/housing balance in the City of El Segundo, help address the regional housing shortage, and support and retain existing businesses by providing needed housing for employees.
- d. The proposed project would enhance bicycle, pedestrian and vehicular circulation through roadway intersection improvements that facilitate a safe and walkable community along Pacific Coast Highway including:

1. Construction of a right-turn only lane from eastbound Mariposa Avenue onto southbound Pacific Coast Highway and widening of the two existing eastbound lanes;
  2. Widening and sidewalk reconstruction along Holly Avenue between Pacific Coast Highway and Indiana Street;
  3. Installation of street trees along Pacific Coast Highway, Holly Avenue, Indiana Street, Mariposa Avenue, and Palm Avenue; and
  4. Installation of public seating along Pacific Coast Highway.
- e. The proposed project would eliminate underutilized surface parking lots and provide parking garages that allow for sharing among hotel, commercial, and residential land uses in order to allow the development of needed housing units as well as retain services and restaurant uses to serve the neighboring residents and businesses.
  - f. The proposed project would reduce single-occupancy vehicle use by providing a mix of land uses in walkable proximity to the Metro C Line, existing bus routes, and the City's downtown.
  - g. The proposed project is consistent with the City's housing strategy to direct growth in regional centers and areas near transit stations, major bus centers, and bus stops along major bus routes. The proposed project is also consistent with regional growth strategies, such as the SCAG 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy, by increasing density within the Plan area.
  - h. The proposed project would implement the majority of the proposed measures by the California Air Pollution Control Officers Association (CAPCOA) to reduce GHG emissions, which also reduce criteria pollutants.

On balance, the City finds that there are specific economic, legal, social, technological, and other considerations associated with the proposed project that serve to override and outweigh the significant unavoidable effects of the proposed project and, thus, the adverse effects are considered acceptable. Therefore, the City hereby adopts this Statement of Overriding Considerations.

# 6 Conclusion

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The mitigation measures listed in conjunction with each of the findings set forth above, as implemented through the MMRP, will eliminate or reduce to a less-than-significant level most of the adverse environmental impacts of the Project. The significant and unavoidable impacts of the Project would be rendered acceptable by the specific economic, legal, social, technological, or other benefits identified in Section 5, Statement of Overriding Considerations.

Taken together, the EIR which consists of the Draft EIR, Final EIR, and the Additional Responses, the mitigation measures, and the MMRP provide an adequate basis for approval of the Project.

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