Proposed Beach Cities Media Campus Project
Final Environmental Impact Report
State Clearinghouse No.: 2017121035

PREPARED FOR:
The City of El Segundo
Planning and Building Safety Department
Planning Division
350 Main Street
El Segundo, California 90245

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June 20, 2019

EcoTierra
consulting

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I. INTRODUCTION

Pursuant to the California Environmental Quality Act ("CEQA"), the potential environmental effects of the Proposed Beach Cities Media Campus Project (the "Project") have been analyzed in a Draft Environmental Impact Report ("Draft EIR") (SCH No. 2017121035), dated March 2019. This document contains the Final Environmental Impact Report ("Final EIR"), as prepared by the Lead Agency, which is the City of El Segundo Planning Division.

Section 15132 of the State CEQA Guidelines lists the contents of the Final EIR:

a) The Draft EIR or a revision of the Draft EIR.

b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

c) A list of persons, organizations, and public agencies commenting on the Draft EIR.

d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

e) Any other information added by the Lead Agency.

One purpose of the Final EIR is to respond to all comments received by the Lead Agency regarding the environmental information and analyses contained in the Draft EIR. Additionally, any clarifications/corrections to the text, tables, figures, and appendices of the Draft EIR generated either from responses to comments, or independently by the Lead Agency, are stated in the Final EIR in Section III.

The Responses to Comments (Section II in this Final EIR) include copies of all letters received during and after the close of the Draft EIR public review period, as described further below, as well as the responses to all comments received on environmental issues.

Section 15097 of the State CEQA Guidelines states that the Lead Agency shall adopt a program for monitoring or reporting on the revisions that it has required for the project and the measures it has imposed to mitigate or avoid significant environmental effects. Section IV, Mitigation Monitoring and Reporting Program ("MMRP"), describes the mitigation program to be implemented by the Lead Agency.

1. CEQA PROCESS AND PUBLIC REVIEW OF THE DRAFT EIR

The City of El Segundo initiated the City's CEQA review process for the Project through the issuance of a Notice of Preparation ("NOP") as required by CEQA Guidelines Section 15082. The NOP for the Project EIR was prepared by the City, and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on December 8, 2017. The NOP was also distributed to owners and occupants of properties located within 500 feet of the Project Site. The NOP solicited comments from responsible and trustee agencies, as well as interested parties, on the scope of the EIR. The NOP was circulated for a 30-day scoping period that ended on January 6, 2018. A public scoping meeting was held on December 18, 2017.

Upon completion of the Draft EIR, notice of the public review period was given in accordance with Section 15087 of the State CEQA Guidelines. On March 1, 2019, a Notice of Availability ("NOA") of the Draft EIR,

was prepared and distributed to the State Office of Planning and Research, the Los Angeles County Clerk, responsible and trustee agencies, organizations, interested parties, and all parties who requested access to a copy of the Draft EIR in accordance with CEQA. The NOA was also distributed to owners and occupants of properties located within 500 feet of the Project Site.

The NOA was distributed to the mailing list and email list prepared for the Notice of Preparation ("NOP") for the scoping stage of the Project before issuance of the Draft EIR, and was augmented to include individuals requested to be added to the list, as well as individuals who had provided comments on the NOP. The NOA and Draft EIR were posted on the Lead Agency's website for viewing and downloading at:

https://www.elsegundo.org/depts/planningsafety/planning/

Printed copies of the Draft EIR were made available for public viewing at the following locations:

- City of El Segundo - Planning and Building Safety Department, 350 Main Street, El Segundo, CA 90245
- El Segundo Public Library, 111 West Mariposa Avenue, El Segundo, CA 90245

In summary, the Lead Agency conducted all required noticing and scoping for the Project in accordance with the requirements of Section 15083 of the State CEQA Guidelines, and conducted the public review for the Draft EIR in compliance with the requirements of Section 15087 of the State CEQA Guidelines.

During the comment period, comments on the Draft EIR were received by the Lead Agency. The Lead Agency has reviewed all comments, and has determined that no substantial new environmental issues have been raised and that all issues raised in the comments have been adequately addressed in the Draft EIR and/or in the Responses to Comments; Mitigation Monitoring and Reporting Program; and Revisions, Clarifications, and Corrections on the Draft EIR.

The Draft EIR concludes that based on the analysis in Section IV (Environmental Impact Analysis) of the Draft EIR, implementation of the Project would result in significant unavoidable environmental impacts relative to:

- Population, Housing, and Employment (City and regional population and housing demands), and
- Transportation, Traffic and Parking (After applying the mitigation measures, a total of four significant and unavoidable impacts would remain in Existing plus Project and a total of three significant and unavoidable impacts would remain in Future plus Project, and cumulative construction traffic. The traffic impacts of the Project cannot be mitigated below the threshold of significance).

The Final EIR for the Project, dated June 2019, consists of the following documents:

- Draft EIR and Technical Appendices dated March 2019,
- Responses to Comments, Mitigation Monitoring and Reporting Program; and Revisions, Clarifications, and Corrections on the Draft EIR, which includes:
    - A list of all persons, organizations, and public agencies that commented as well as the verbatim comments received on the Draft EIR; and
    - Responses to written comments on the Draft EIR.

This document includes the State Clearinghouse letter that documents compliance with CEQA review requirements; comment letters as provided by persons, organizations, and public agencies; and the Lead Agency's responses to all comments.

Next Procedural Steps

The City of El Segundo is required to consider and certify a Final EIR only if it exercises its discretion to approve the Project in the future. The Final EIR, and related documents will be filed, along with the City staff's recommendations related to the Project, for consideration by the City of El Segundo Planning Commission on a future Planning Commission agenda. Consideration of recommendations relating to the Project will be publicly noticed as required by state law.

Members of the public can view searchable agendas for scheduled Planning Commission meetings and access agenda-related City information and services directly on the following website: https://www.elsegundo.org/depts/planningsafety/agendas.asp. This site has an email notification service enrollment process for copies of future Planning Commission agendas. The Final EIR document will be posted for viewing and download with the previously posted Draft EIR prior to the City's consideration of the Final EIR and Project recommendations on the same website noted above for the posting of the Draft EIR: https://www.elsegundo.org/depts/planningsafety/planning/. Printed copies of the Final EIR will be provided for public viewing at the same publicly accessible locations used for the distribution of the Draft EIR.

2. PROJECT DESCRIPTION

The Project Site consists of approximately 6.39 acres bounded by a vacant lot to the north; a parking structure, surface parking lots, and commercial uses to the east; Rosecrans Avenue, the Kinecta Credit Union building and parking lot is located directly south of the Project Site to the south; and a surface parking lot and commercial uses to the west. The Project Site is currently a vacant lot with a screened chain-link security fence running along the perimeter of the site and along the adjacent roadway. No plantings or trees occur on the Project Site. Temporary landscaping has been installed along the Rosecrans perimeter.

Land Use Regulation

RSP4, the Applicant desires to change both the General Plan land use designation and zoning of the Property from Commercial Center (C-4) to Urban Mixed Use South (MU-S) and develop the Property with the uses allowed by, and at the development standards set forth in the MU-S zone rather than the C-4 zoning standards, within the development parameters set forth above which will be memorialized in a Development Agreement. The primary differences in the development standards between the C-4 zone and the MU-S zone, are the MU-S zone allows greater height (175 feet), greater density (1.3 FAR), and minor differences in setbacks. The C-4 zone has a height of 65 feet and a density of 0.275 FAR. The total buildable square footage under the MU-S zone would be 361,844 square feet, however the Development Agreement limits buildout to 313,00 square feet, limits FAR to 1.13, limits height to 140 feet, and limits or prohibits certain uses. Additionally, there is a greater variety of uses allowed under the MU-S zone.

Land uses allowed in the C-4 zone include, but are not limited to, the following:

- Animal hospitals and veterinary services.
- Day spas.
- Daycare centers
- Farmers' market
- Financial institutions

- Fitness centers (indoors only)
- General offices
- Indoor sale of automobiles, motorcycles, and motor scooters along with the sale of accessories and parts as an accessory use
- Medical and dental offices
- Multi-media offices
- Personal services
- Public assembly/assembly halls, including theaters and museums
- Recreational facilities
- Restaurants and cafes
- Retail sales uses (excluding off site alcohol sales

Land uses allowed in the MU-S zone include, but are not limited to, the following:

- Data centers
- Daycare centers
- Financial institutions
- Fitness centers
- General offices
- Hotels and motels
- Medical-dental offices or facilities
- Motion picture/television production facilities (excluding outdoor facilities)
- Research and development
- Restaurants and cafes
- Retail (excluding off site alcohol sales) and wholesale sales and services
- Other similar uses approved by the Director, as provided by Chapter 22 of this title. (Ord. 1551, 8-15-2017

With the General Plan land use and zoning changes, the Project Site can be developed with a mix of commercial uses aimed at promoting economic development within the City of El Segundo in addition to completing development of the Rosecrans Avenue corridor. A discretionary site plan approval will be required

A Conceptual Site Plan configuration has been provided for the Beach Cities Media Campus, Figure II-2, Site Plan. The Project would replace an underutilized vacant lot with a mixed use development that would improve the urban design and character of the Project Site, and contribute to and complement the development of the nearby neighboring commercial and office uses.

Proposed Development

The Beach Cities Media Campus Project includes the development of an approximately five-story, 240,000 square foot creative office building with the option to incorporate a roof deck, a one-story, 66,000 square foot studio and production facilities building, and 7,000 square feet of retail uses in two, one-story structures. The Project would also include a private event plaza. The Project may be a fully secure campus. The studio and production facilities would operate 24 hours a day, seven days a week.

Table I-1, Conceptual Plan Development Summary, summarizes the proposed land uses.

Table I-1
Project Development Summary

Land Use	Square Footage
Office	240,000 gsf
Studio and Production Facilities	66,000 gsf
Retail	7,000 gsf

Table I-1
Project Development Summary

Land Use	Square Footage
Total Proposed Project	**313,000 gsf**

gsf = gross square feet
Source: Rosecrans-Sepulveda Partners 4, LLC., August 2017.

Parking for the Beach Cities Media Campus Project would be provided in multiple areas of the Property. Parking would be provided in an up to seven-story parking structure with above grade and semi-subgrade parking containing 980 parking spaces, a one level below grade structure beneath the office building containing 120 parking spaces, and in surface parking areas elsewhere on the site.

Vehicular access to the Project Site would be provided by three driveways; these driveways may be gated to create a secure campus for the Beach Cities Media Campus Project. Two entry/exit driveways would be located on Rosecrans Avenue and one driveway to the Project Site would be accessed through the rear of the existing adjacent commercial property to the east that provides access to South Nash Street, as shown in Figure II-2, Site Plan.

Campus signage opportunities would also be available to the Project. Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Proposed signage would include identity signage, including identity signage at Rosecrans Avenue and South Nash Street, office, retail, and studio tenant signage, and general ground-level and pedestrian directional/wayfinding signage. In general, new signage would be architecturally integrated into the design of the building and would establish appropriate identification for the on-site uses. No off-premise billboard advertising is proposed as part of the Project. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. Project signage would comply with the ESMC requirements, and any applicable approval processes for signs set forth therein. The character, placement, size and proportions of the Project's proposed signs would be consistent with the ESMC.

Any development built on the Project Site will incorporate features to support and promote environmental sustainability and meet or exceed the "Green Building" principles required by the City of El Segundo Green Building Program, and CalGreen and other City and State regulations. Additionally, the landscaping will comply with the City's Water Efficient Landscape Ordinance.

Project Construction

The Project would be constructed over approximately 18 months. Construction would occur five days a week, Monday through Friday, and may take place on Saturdays. Construction activities would include site preparation, grading, excavation, and building construction. Site preparation activities are anticipated to start July 1, 2019. Site Grading activities are anticipated to start August 2019 and end September 2019. Construction would start late September 2019 and construction completion and occupancy is anticipated in 2020.

The Project is estimated to require a maximum net export of approximately 35,000 to 49,400 cubic yards of soil. The likely outbound haul route for the Project would be a left turn from the Project Site to head east onto Rosecrans Boulevard, then a right turn onto the 405 Freeway. Exported materials would likely be disposed at Puente Hills Landfill in the City of La Puente. The Project's haul route would be approved by the City as part of its review and approval of the Project's entitlement requests. The City would also approve a Construction Traffic Management Plan to be implemented during construction to minimize potential conflicts between construction activity and through traffic.

Discretionary Actions

The City of El Segundo has the principal responsibility for approving the Project. Approvals required for the development of the Project may include, but are not limited to the following:

- Certification of an Environmental Impact Report for the Project;
- Discretionary Site Plan Permit;
- Approval of a Mitigation Monitoring and Reporting Program;
- Amend the Land Use Element of the City's General Plan to change the land use designation of the Project Site from Commercial Center to Urban Mixed Use-South;
- Amend the City's zoning map to change the zoning of the Project Site from C-4 to MU-S;
- Approval of Development Agreement to detail the Project parameters, standards and conditions that will govern development of the Project Site;
- Haul route approval (if required); and
- Other permits, ministerial or discretionary, that may be necessary in order to execute and implement the Project.

The City of El Segundo is the lead agency for the Project. Responsible agencies may include, without limitation:

- South Coast Air Quality Management District,
- Regional Water Quality Control Board,
- City of Manhattan Beach for Traffic Signal; and
- West Basin Municipal Water District

3. SUMMARY OF ENVIRONMENTAL IMPACTS

An Initial Study was prepared for the Project as permitted by CEQA Guidelines Section 15060(d). The Draft EIR evaluates the environmental impacts associated with Project implementation. Based on the Initial Study, and agency and public comments in response to the NOP and a review of environmental issues, the Draft EIR includes analyses of the following environmental topics as set forth in CEQA Guidelines Appendix G:

Based on a review of environmental issues by the Planning Division, this EIR assesses the following environmental impact areas:

- Air Quality
- Cultural Resources (Archaeological, Paleontological)
- Geology and Soils
- Greenhouse Gas Emissions

- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population, Housing, and Employment
- Public Services
- Transportation, Traffic and Parking
- Cultural Tribal Resources
- Utilities and Service Systems

Potential environmental effects in the areas of Agricultural Resources, Biological Resources, and Mineral Resources, as well as other specific areas related to the topics listed below, were determined to be either less than significant or no impact, or not applicable, and, therefore, are not evaluated in greater detail in the EIR. These areas are addressed in Section VII, Effects Not Found to be Significant, of the Draft EIR.

- Aesthetics (all subtopics);
- Agriculture and Forest Resources (all subtopics);
- Air Quality (objectionable odors);
- Biological Resources (all subtopics);
- Cultural Resources (historical resources);
- Geology and Soils (seismic-related ground failure, including liquefaction, landslides, and septic tanks);
- Hazards and Hazardous Materials (proximity to schools, public and private airports, and wildland fires);
- Hydrology and Water Quality (100-year flooding and seiche/tsunami/mudflow);
- Land Use and Planning (community division and habitat conservation plans);
- Mineral Resources (all subtopics);
- Noise (public and private airports/airstrips);
- Population, Housing and Employment (displacement of existing housing or people);
- Public Services (schools, parks, and public facilities);
- Recreation (all subtopics);
- Transportation, Traffic and Parking (air traffic patterns and hazardous design features); and

- Utilities and Service Systems (compliance with statutes and regulations).

The Draft EIR analysis in Section IV (Environmental Impact Analysis), indicates that implementation of Project Design Features, Regulatory Requirements, and Mitigation Measures would result in the Project having the following impacts reduced to a level of less than significant:

- Paleontological Resources,
- Archaeological Resources,
- Greenhouse Gas Emissions,
- Hazards and Hazardous Materials,
- Hydrology and Water Quality, and
- Tribal Cultural Resources.

Based on the analysis in Section IV (Environmental Impact Analysis) of the Draft EIR, implementation of the Project would result in significant unavoidable environmental impacts after implementation of feasible mitigation measures relative to:

- Population, Housing, and Employment (City and regional population and housing demands), and
- Transportation, Traffic and Parking (After applying the mitigation measures, a total of four significant and unavoidable impacts would remain in Existing plus Project and a total of three significant and unavoidable impacts would remain in Future plus Project, and cumulative construction traffic. The traffic impacts of the Project cannot be mitigated below the threshold of significance).

II. RESPONSE TO COMMENTS

Upon completion of the Draft EIR, notice of the public review period was given in accordance with Section 15087 of the State CEQA Guidelines. On March 1, 2019, a Notice of Availability ("NOA") of the Draft EIR was prepared and distributed to the State Office of Planning and Research, the Los Angeles County Clerk, responsible and trustee agencies, organizations, interested parties, and all parties who requested access to a copy of the Draft EIR in accordance with CEQA. The NOA was also distributed to owners and occupants of properties located within 500 feet of the Project Site. The comments on the Draft EIR were accepted during a 45-day public review period extending from March 1, 2019 through to April 15, 2019.

The NOA was distributed to the mailing list and email list prepared for the Notice of Preparation ("NOP") for the scoping stage of the Project before issuance of the Draft EIR, and was augmented to include individuals requested to be added to the list, as well as individuals who had provided comments on the NOP. The NOA and Draft EIR were posted on the Lead Agency's website.

Letters commenting on the information and analysis in the Draft EIR were received from various parties during the 45-day public review period (i.e., March 1, 2019 through to April 15, 2019). A total of 11 comment letters were received, including four letters from State, four regional and local agencies, and three letters from organizations and individuals. Four of the comment letters submitted to the City (State Clearinghouse letter number 2, dated April 29, 2019, the Department of Toxic Substances Control letter dated April 5, 2019 received to the State Clearinghouse April 29, 2019, the e-mail letter from Lisa Kranitz dated March 25, 2019, which was added as a comment letter on May 17, 2019; and the letter from Lozeau Drury LLP dated May 21, 2019) are considered late letters that do not require a written response from the City.

Under CEQA Guidelines Section 15105, the City was legally required to provide a 45-day public review period on the Draft EIR. The public comment period for the Draft EIR began on March 1, 2019, and ended on April 15, 2019. All comment letters received after expiration of the public review and comment period ending on August 15, 2019, are considered late comments.

A Lead Agency is required to consider comments on the Draft EIR and to prepare written responses if a comment is received within the public comment period (Pub. Resources Code, §21091(d); CEQA Guidelines, §15088). When a comment letter is received after the close of the public comment period, however, a Lead Agency does not have an obligation to respond (Pub. Resources Code, §21091(d)(1); Pub. Resources Code, §21092.5(c).). Accordingly, the City is not required to provide a written response to late comment letters, including: the State Clearinghouse letter number 2, dated April 29, 2019; and the Department of Toxic Substances Control letter dated April 5, 2019 received to the State Clearinghouse April 29, 2019, the e-mail letter from Lisa Kranitz dated March 25, 2019, which was added as a comment letter on May 17, 2019; and the letter from Lozeau Drury LLP dated May 21, 2019 (See, CEQA Guidelines,§15088(a)).

Nonetheless, for information purposes, the City has elected to respond to these late letters, but without waiving its position that written responses to late comment letters are not required by law.

The responses to all comments, are provided below. Responses to State, regional, and local agencies are included in Section 1; responses to organizations and individuals are included in Section 2, and comment letters that were received by the Lead Agency after the end of the review period and are considered late are included in Section 3.

Section 15088 of the CEQA Guidelines states that "[t]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The Lead Agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments." The CEQA Guidelines call for responses that contain a "good faith, reasoned analysis" with statements supported by factual information. Some of the comments submitted to the Lead Agency, however, were general in nature, stating opinion either in favor of or in opposition to the Project. In such cases, the comment is made a part of the administrative record and will be forwarded to the City's decision makers for their consideration.

In accordance with these requirements, this Chapter of the Final EIR provides a good faith, reasoned analysis and responds to each of the written comments on environmental issues received regarding the Draft EIR during the comment periods.

Each comment letter is provided first and is bracketed in the right margin, sequentially numbered (e.g., 1, 2). Following the bracketed comment letter, responses are presented in corresponding order to provide a matching numbered response on the pages following each comment letter.

1. STATE, REGIONAL AND LOCAL AGENCIES

Comment letters from State, regional and local agencies consisted of:

- State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, April 16, 2019
- State of California, Department of Transportation, April 15, 2019
- South Coast Air Quality Management District, April 10, 2019
- County of Los Angeles, Fire Department, March 28, 2019
- County of Los Angeles, County Sanitation Districts, April 15, 2019
- City of Manhattan Beach, April 15, 2019

Responses to the comments in these letters are provided below, after each letter.

Comment Letter No. 1

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

April 16, 2019

Ethan Edwards
El Segundo, City of
350 Main Street
El Segundo, CA 90245

Subject: Proposed Beach Cities Media Campus Project
SCH#: 2017121035

Dear Ethan Edwards:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on 4/15/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

1

Check the CEQA database for submitted comments for use in preparing your final environmental document: https://ceqanet.opr.ca.gov/2017121035/2 . Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly.**

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

Comment Letter No. 1

State of California
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Scott Morgan, Director, State Clearinghouse
1400 10th Street
P.O. Box 3044
Sacramento, CA 95812-3044
April 16, 2019

Response to Comment 1-1

This comment is a standard response from the State Clearinghouse of Planning and Research acknowledging the Draft EIR was sent to State agencies for review, and that the Draft EIR is in compliance with the State Clearinghouse review requirements for draft environmental documents. The comment asks to check the CEQA database for submitted comments for use in preparing the final environmental document. The CEQA databases contains one letter from the State of California, Department of Transportation, District 7, (see Comment Letter No. 2). The comments contained in this letter are responded to in Responses 2-1 through 2-10.

Comment Letter No. 2

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS16
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

April 15, 2019

Mr. Ethan Edwards, AICP
City of El Segundo
350 Main Street
El Segundo, CA 90245

RE: Beach Cities Media Campus Project
Vic. LA-01/PM 23.925, LA-405/PM 19.23
SCH # 2017121035
Ref. GTS # LA-2017-01260-NOP
GTS # LA-2017-02346-DEIR

Dear Mr. Edwards:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project proposes to develop office, retail, and studio and production facilities on an approximately 6.39-acre site. The Project would include the development of an approximately 240,000 square foot creative office building with the option to incorporate a roof deck, a 66,000 square foot studio and production facilities building, and 7,000 square feet of retail uses. The Project would also provide 1,100 parking spaces. 1

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information. 2

http://opr.ca.gov/ceqa/updates/guidelines/

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, future development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way. 3

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. 4

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. 5

After reviewing the Draft Environmental Impact Report for this project based on Level of Service (LOS), Caltrans has the following comments:

1. From the Proposed Beach Cities Media Campus Project DEIR dated on March 1, 2019, it was stated that the project would generate net 2,833 daily trips and 333/309 AM/PM peak hour trips per Table IV.K-3 Project Trip Generation. 6

2. Caltrans concurs with the concept of mitigation measure MM K-5 at Intersection 24. I-405 Northbound on/off-ramps & Rosecrans Avenue shown on page IV.K-48, "This mitigation involves restriping the northbound off-ramp lanes from two lefts and one right to two left and one shared left/right. The western portion of the intersection has three receiving lanes for the left-turn movement. The existing median along Rosecrans Avenue may need to be cut back in order to accommodate the third left turning movement." 7

3. A Caltrans encroachment permit will be required to implement the improvement. A Permit Review Engineering Report (PEER) and intersection operational analysis for the intersection improvement will be required as part of the encroachment permit application. Any modification must meet all design standard and specifications. 8

4. Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan. 9

5. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

10

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # 07-LA-2017-02346AL-DEIR.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Comment Letter No. 2

State of California
Department of Transportation
District 7-Office of Regional Planning
Miya Edmonson, IGR/CEQA Acting Branch Chief
100 South Main Street, MS 16
Los Angeles, CA 90012
April 15, 2019

Response to Comment 2-1

The comment accurately describes the Project as an introduction to the comments on the Draft EIR that follow.

Response to Comment 2-2

The comment states that the mission of Caltrans is to provide a safe, sustainable, integrated efficient transportation system to enhance California's economy and livability. The comment also states Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled. The comment does not identify any specific shortcomings of the Draft EIR analysis or mitigation measures, and no specific response is therefore possible or required. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment 2-3

The comment states that Caltrans is aware of the challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. The comment does not identify any specific shortcomings of the Draft EIR analysis or mitigation measures, and no specific response is therefore possible or required. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment 2-4

The comment states that Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets. The comment does not identify any specific shortcomings of the Draft EIR analysis or mitigation measures, and no specific response is therefore possible or required. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment 2-5

The comment states that they encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VTM) and Greenhouse Gas (GHG), and to evaluate the potential of Transportation Demand Management (TDM) strategies and the Intelligent Transportation System (ITS).

As discussed in Section IV.D, Greenhouse Gas, page IV.D-41 of the Draft EIR, the Project would be consistent with the 2017 Climate Change Scoping Plan's emission reduction goals which focus on building efficiency standards and transportation improvements. The Project, which is located in a Transit Priority Area and near transit opportunities, is within walking distance of nearby retail and entertainment destinations. Additionally, the Project would provide bicycle storage areas for Project employees. These

characteristics would reduce VMTs. In addition, the reduction of VMTs and the increase in energy efficiency, would reduce greenhouse gas emissions, consistent with the goals outlined in the 2017 Climate Change Scoping Plan. Furthermore as discussed in Section IV. K, Transportation, Traffic and Parking, page IV.K-46 of the Draft EIR, the Project would include TDM strategies to discourage single-occupancy vehicle trips and encourage alternative modes of transportation, thus further reducing VMT's. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment 2-6

This comment states that the Project would generate net 2,833 daily trips and 333/309 AM/PM peak hour trips per Table IV.K-3 Project Trip Generation. The commenter accurately describes the Project.

Response to Comment 2-7

The commenter concurs with the concept of mitigation measure MM K-5 at Intersection 24: I-405 Northbound on/off ramps & Rosecrans Avenue as shown on page IV.K-48 of the Draft EIR. The commenter accurately describes the mitigation measure.

Response to Comment 2-8

The comment states a Caltrans encroachment permit is required to implement the improvement, and a Permit Review Engineering Report (PEER) and intersection operational analysis for the intersection improvement will be required as part of the encroachment permit application. The Project will comply with any Caltrans permit requirements regarding encroachment.

Response to Comment 2-9

The comment states storm water run-off is a sensitive issue for Los Angeles and Ventura Counties. The comment states discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan. The Project will comply with any Caltrans storm water management plan.

Response to Comment 2-10

The comment states that transportation of heavy equipment and/or oversized vehicles on State highways requires a permit from Caltrans and recommends that such activity be limited to off-peak commute periods. The Project will comply with any Caltrans permit requirements regarding transportation of equipment or materials.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:
EEdwards@elsegundo.org
Ethan Edwards, AICP, Contract Planner
City of El Segundo, Planning and Building Safety Development
Planning Division
350 Main Street
El Segundo, CA 90245

April 10, 2019

Draft Environmental Impact Report (Draft EIR) for the Proposed Beach Cities Media Campus Project (SCH No.: 2017121035)

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct four buildings with office and retail uses totaling 313,000 square feet on 6.39 acres (Proposed Project). The Proposed Project is located at 2021 Rosecrans Avenue on the northeast corner of Rosecrans Avenue and Village Drive in the City of El Segundo. Based on a review of the Draft EIR, SCAQMD staff found that historically the site was previously developed with an air gas manufacturing plant from 1969 through 2016[1]. As a result of historical usage, soil at the site was found to be impacted with total petroleum hydrocarbons (TPHs), lead, PCBs, and volatile organic compounds (VOCs)[2]. Impacted soil was removed from the site to the levels required for commercial development, and a letter of No Further Action was issued in August 2017[3]. Groundwater remedial action appears to be ongoing[4]. 1

Compliance with SCAQMD Rules & Permits

Since the Proposed Project includes grading and site preparation activities that might cause residual TPHs, lead, PCBs, and VOCs to become airborne during construction, and in addition to a discussion on SCAQMD Rule 1166 – Volatile Organic Compounds from Decontamination of Soil, the Lead Agency should include a discussion to demonstrate compliance with SCAQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants[5] in the Air Quality Section of the Final EIR, among the list of other applicable SCAQMD Rules. If on-site groundwater remediation or any on-site activity would involve equipment or operations, which either emits or controls air pollution, SCAQMD Engineering and Permitting staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to the start of any remedial activities or operations. In the event that implementation of the Proposed Project requires a permit from SCAQMD, the Lead Agency should identify SCAQMD as a Responsible Agency for the Proposed Project in the Final EIR. Emissions from permitted equipment should be quantified and added to the Proposed Project's construction and operational emissions, where applicable, to determine the level of significance. Any assumptions in the Air Quality Analysis in the Final EIR will be used as the basis for 2

[1] Draft EIR. Hazards and Hazardous Materials. Page IV.E.1 - IV.E.3.
[2] *Ibid.*
[3] *Ibid.*
[4] Draft EIR Appendices. Appendix E.1. Phase 1 Environmental Site Assessment. Pages 738-786.
[5] South Coast Air Quality Management District. Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf.

permit conditions and limits. For more information on permits, please visit SCAQMD's webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385. 2 cont.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. 3

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS:AM
LAC190305-07
Control Number

Comment Letter No. 3

South Coast Air Quality Management District
Planning, Rule Development & Area Sources
Lijin Sun, J.D. Program Supervisor, CEQA IGR
21865 Copley Drive
Diamond Bar, CA 91765-4178
April 10, 2019

Response to Comment 3-1

The comment accurately describes the Project as an introduction to the comments on the Draft EIR that follow.

Response to Comment 3-2

The commenter states that the Final EIR needs to add SCAQMD Rule 1166 – Volatile Organic Compounds from Decontaminated Soil, and SCAQMD Rule 1466 - Control of Particulate Emissions from Soils with Toxic Contaminants. The commenter is referred to Section III. Revisions, Clarifications and Corrections on the Draft EIR. IV.A. Air Quality, pages IV.A-12 through IV.A-13 have been revised. Inclusion of these revisions do not affect the analysis or conclusions of the Draft EIR and therefore, recirculation of the Draft EIR is not required.

The commenter states that the project would be required to comply with SCAQMD Rule 1166 and Rule 1466. This comment is noted. The project applicant would be required to comply with SCAQMD Rule 1166 and Rule 1466 because these are existing regulatory requirements.

The commenter states if on-site groundwater remediation or any on-site activity would involve equipment or operations which emits or controls air pollution, SCAQMD Engineering and Permitting staff should be consulted prior to the start of remediation to determine whether or not permits are required by the SCAQMD. The project applicant would comply with SCAQMD Engineering and Permitting staff. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment 3-3

The commenter requests the Lead Agency provide SCAQMD with written responses to all comments prior to the certification of the Final EIR. The Lead Agency will provide the SCAQMD with a copy the responses to their comments prior to certification of the Final EIR. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 4

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

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BOARD OF SUPERVISORS

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FIRST DISTRICT

MARK RIDLEY-THOMAS
SECOND DISTRICT

SHEILA KUEHL
THIRD DISTRICT

JANICE HAHN
FOURTH DISTRICT

KATHRYN BARGER
FIFTH DISTRICT

March 28, 2019

Ethan Edwards, Contract Planner
City of El Segundo
Planning and Building Safety Department
350 Main Street
El Segundo, CA 90245

Dear Mr. Edwards:

NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL IMPACT REPORT, "BEACH CITIES MEDIA CAMPUS PROJECT," PROPOSES TO DEVELOP OFFICE, RETAIL, AND STUDIO AND PRODUCTION FACILITIES ON AN APPROXIMATELY 6.39-ACRE SITE, 2021 ROSECRANS AVENUE, EL SEGUNDO, FFER 201900019

The Notice of Availability of an Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

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

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

This project is located entirely in the City of El Segundo. Therefore, the City of El Segundo Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

2

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Kelly Kim at (818) 890-5719.

3

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no jurisdiction in the City of El Segundo.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

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

4

Very truly yours,

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

Comment Letter No. 4

County of Los Angeles Fire Department
Prevention Services Bureau
Michael Y. Takeshita, Acting Chief, Forestry Division
1320 North Eastern Avenue
Los Angeles, CA 90063-3294
March 28, 2019

Response to Comment 4-1

The comment states the Project is located within the City of El Segundo and is not part of the emergency area of the Los Angeles County Fire Department. The comment states the project does not appear to have any impact on the emergency responsibilities of the Department. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment 4-2

The comment states the Project is located within the City of El Segundo. The comment states the Project is unlikely to have an impact that necessitates a comment from the Land Development Unit of the Los Angeles County Fire Department. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment 4-3

The comment states the responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control , watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance. The comment states potential impacts in these areas should be addressed. The commenter is referred to the Draft EIR Sections, IV.B Cultural Resources, IV.F Hydrology and Water Quality, and Section VII. Effects Not Found to be Significant for a discussion of the above issue areas.

Response to Comment 4-4

The comment states the Health and Hazardous Materials Division of Los Angeles County Fire Department has no jurisdiction in the City of El Segundo. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 5

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

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

GRACE ROBINSON HYDE
Chief Engineer and General Manager

April 15, 2019

Ref. Doc. No.: 4949636

Mr. Ethan Edwards, AICP
Contract Planner
Planning Division
City of El Segundo
350 Main Street
El Segundo, CA 90245

Dear Mr. Edwards:

DEIR Response to Beach Cities Media Campus Project

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on March 4, 2019. The proposed project is located within the jurisdictional boundaries of District No. 5. Previous comments submitted by the Districts in correspondence dated December 26, 2017 (copy enclosed) still apply to the subject project with the following updated information: 1

1. Wastewater Treatment Facilities, *page IV.M-21*, top of page – The Joint Water Pollution Control Plant currently processes an average flow of 261.1 million gallons per day (mgd).

2. Operation, *page IV.M-25*, Table IV.M.21 – Based on the information provided in the table, the expected increase in average wastewater flow from the project is 70,075 gallons per day. 2

3. All other information concerning Districts' facilities and sewerage service contained in the document is current. 3

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

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

cc: A. Schmidt
A. Howard

DOC 5015032.D05

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

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

GRACE ROBINSON HYDE
Chief Engineer and General Manager

December 26, 2017

Ref. Doc. No.: 4380003

Mr. Ethan Edwards, AICP
Contract Planner
Planning Division
City of El Segundo
350 Main Street
El Segundo, CA 90245

Dear Mr. Edwards:

NOP Response for the Beach Cities Media Campus Project

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on December 11, 2017. The proposed project is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Aviation Boulevard Relief Trunk Sewer, located in Aviation Boulevard at Rosecrans Avenue. The Districts' 27-inch diameter trunk sewer has a capacity of 8.7 million gallons per day (mgd) and conveyed a peak flow of 1.6 mgd when last measured in 2011.

2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently produces an average recycled water flow of 253.4 mgd.

3. The expected increase in average wastewater flow from the project, described in the notice as a 313,000 square-foot media campus, is 62,118 gallons per day, after all structures on the project site are demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org,

Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

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

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

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
M. Tatalovich

Comment Letter No. 5

County Sanitation Districts of Los Angeles County
Facilities Planning Department
Adriana Raza, Customer Service Specialist
1955 Workman Mill Road
Whitter, CA 90601-1400
April 15, 2019

Response to Comment 5-1

The comment provides suggested corrections to Section IV.M, Utilities and Service Systems, of the Draft EIR, page IV.M-21. The correction is included in this Final EIR in Section III Revisions, Clarification, and Corrections on the Draft EIR. The correction relates to the Joint Water Pollution Control Plant's average flow of 261.1 million gallons per day. Inclusion of this correction would not change the Draft EIR's determination that impacts related to wastewater would be less than significant.

Response to Comment 5-2

The comment provides suggested corrections to Section IV.M, Utilities and Service Systems, of the Draft EIR, page IV.M-25, Table IV.M.2.1. The correction is included in this Final EIR in Section III Revisions, Clarification, and Corrections on the Draft EIR. The correction relates to the average wastewater flow from the project of 70,075 gallons per day. Inclusion of this correction would not change the Draft EIR's determination that impacts related to wastewater would be less than significant.

Response to Comment 5-3

The comment states all other information concerning the Districts facilities and sewerage service contained in the document is current. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 6

From: Gena L. Guisar <genaG@csgengr.com>
Sent: Tuesday, April 16, 2019 5:40 AM
To: Jenny Mailhot; Craig Fajnor
Subject: FW: EIR for 2201 Rosecrans Ave

FYI

Gena Guisar, AICP Contract Planner
City of El Segundo – Planning & Building Safety
Planning Division (310) 524-2380
genag@csgengr.com

From: Edwards, Ethan <eedwards@elsegundo.org>
Sent: Monday, April 15, 2019 9:55 PM
To: Gena L. Guisar <genaG@csgengr.com>
Subject: Fwd: EIR for 2201 Rosecrans Ave

Ethan Edwards, AICP, Planner
City of El Segundo - Planning & Building Safety
Planning Division (310) 524-2380

Begin forwarded message:

From: Eric Haaland <ehaaland@citymb.info>
Date: April 15, 2019 at 6:29:35 PM CST
To: "eedwards@elsegundo.org" <eedwards@elsegundo.org>
Cc: Erik Zandvliet <ezandvliet@citymb.info>
Subject: EIR for 2201 Rosecrans Ave

Hi Ethan,

I have a couple typo comments as follows:

- The top paragraph on Page II-8 uses the phrase "maximum of 25 bicycle spaces", where it appears it should say "minimum of 25 bicycle spaces".
- For related projects, the statistics for 1000 N. Sepulveda were confused with 707 N. Sepulveda, and should be per the table below (also an updated number of restaurant seats for 707 N. Sepulveda).

1

ME	Medical office building	1000 N. Sepulveda Bl	25,350 sq. ft. medical office building including 23,050 GSF (Med Office), 665 GSF (Pharmacy), 1,715 GSF (Coffee Shop), -5400 GSF (Ex. Restaurant)	833 Med Office 69 Pharmacy 1,660 Coffee Shop (687) Less Rest	43 1 95 (32)	12 1 95 (26)	55 2 186 (58)	23 3 35 (32)	59 3 35 (21)	82 6 70 (53)		Building Permit issued October 2015
ME	Gelsons Grocery Store and Retail/Bank Building	707 N. Sepulveda Bl	27,500 sq. ft. supermarket with 28 seat restaurant component. Conversion from automotive to grocery store plus new 7,000 sq. ft. bank building	1,596 Supermarket 840 Bank 1,469 Restaurant (807) Auto Care	39 23 90 (60)	24 10 59 (31)	63 33 149 (91)	60 30 36 (60)	77 38 21 (65)	157 68 57 (125)		Supermarket completed Fall 2018. Bank under construction

Eric Haaland
Associate Planner
P: (310) 802-5511
E: ehaaland@citymb.info

Office Hours: M - Th 7:30 AM - 5:30 PM | Fridays 7:30 AM - 4:30 PM | Not Applicable to Public Safety

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Comment Letter No. 6

City of Manhattan Beach

Eric Haaland, Associate Planner
1400 Highland Avenue
Manhattan Beach, CA 90266
April 15, 2019

Response to Comment 6-1

The comment provides suggested corrections to Section II, Project Description, of the Draft EIR, page II-8. The correction is included in this Final EIR in Section III. Revisions, Clarification, and Corrections on the Draft EIR. The correction relates to the number of bicycle spaces. Inclusion of this correction would not change the Draft EIR's determination.

The comment provides suggested corrections to Section III, Environmental Setting, Table III-1, Related Projects, pages III-11 through III-12, and Appendix H.1, Traffic Study, Table 4 Related Projects Trip Generation Estimates, page 31 of the Draft EIR. The correction is included in this Final EIR in Section III. Revisions, Clarification, and Corrections on the Draft EIR. The correction reflects a reduction in the square footage and intensity of one related project, and a reduction in the number of restaurant seats for a second related project. These corrections would not affect the traffic analysis, which would conservatively overstate these related projects' traffic generation as a result. Inclusion of this correction would not change the Draft EIR's determination. Below is an e-mail from Mr. Steven Keith, the traffic engineer with Fehr & Peers which provides further response clarification to the City of Manhattan Beach comment.

Steven Keith <S.Keith@fehrandpeers.com>
Mon 4/29, 3:46 PM Jenny Mailhot; Tom Gaul <T.Gaul@fehrandpeers.com>

Hi Jenny,

Thanks for sending over the transportation comments. Below are our responses:

- Caltrans --- The developer will comply with the Caltrans requests regarding the proposed mitigation at Intersection 24: I-405 NB on/off-ramps & Rosecrans Avenue. A Permit Review Engineering Report (PEER) and intersection operational analysis for the improvement will be conducted in order to receive a Caltrans encroachment permit and prior to any construction. Stormwater and heavy construction equipment will also be monitored to comply with Caltrans standards.

- Manhattan Beach --- The related project comment does not impact any additional tables except for the one attached. It was just a typo in regards to 1000 N. Sepulveda land uses. This does not change any of the analysis. I have tracked the changes in the attached table (the red text reflects the old inputs that are incorrect). I do not think any response is needed beyond a corrections and additions citation.

Please let us know if you have any questions.
Best,
Steven

2. ORGANIZATION AND INDIVIDUALS

Comment letters from community organizations and individuals include:

- Lozeau Drury, LLP, on behalf of Supporters Alliance For Environmental ("SAFER"), April 12, 2019

Responses to the comments in these letters are provided below, after each letter.

Comment Letter No. 7

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
richard@lozeaudrury.com

Via Email and U.S. Mail

April 12, 2019

Ethan Edwards, Contract Planner
Planning and Building Safety Dept.
Planning Division
City of El Segundo
350 Main Street
El Segundo, CA 90245
eedwards@elsegundo.org

Gregg McClain, Planning Manager
Planning and Building Safety Dept.
Planning Division
City of El Segundo
350 Main Street
El Segundo, CA 90245
gmcclain@elsegundo.org

Re: Comment on Draft Environmental Impact Report, Beach Cities Media Center Project aka State Clearinghouse #2017121035 and EA-1201

Dear Mr. Edwards and Mr. McClain:

I am writing on behalf of Supporters Alliance For Environmental ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as Beach Cities Media Center Project aka EA-1201 and State Clearinghouse #2017121035, including all actions related or referring to the proposed development of an approximately five-story, 240,000 square foot office building, a one-story, 66,000 square foot studio and production facilities building, and 7,000 square foot of retail uses in two, one-story structures with parking provided in a seven story parking structure with above grade and below grade parking containing 980 parking spaces, one level below grade parking in the office building containing 120 parking spaces, in addition to a limited amount of surface parking located at 2021 Rosecrans Avenue on Assessor Parcel Number (APN) 4138-015-064. 1

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER request that the Planning Division address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997). 2

Sincerely,

Richard Drury

Comment Letter No. 7

Lozeau Drury LLP
Richard Drury
on behalf of Supporters Alliance For Environmental ("SAFER") (sic)
1939 Harrison Street, Ste. 150
Oakland, CA 94612
April 12, 2019

Response to Comment 7-1

The comment states the letter is written on behalf of Supporters Alliance For Environmental ("SAFER") (sic). The comment introduces provides a summary description of the Project. This comment is noted for the administrative record and will be forwarded to the decision makers for review and consideration.

Response to Comment 7-2

The comment suggests the Draft EIR fails as an informational document and fails to impose feasible mitigation measure to reduce the Project's impacts, but provides no specifics. The comment suggests that the Planning Division should address the shortcomings in a revised Draft EIR and recirculate the revised Draft EIR prior to approval. The comment states it reserves the right to supplement the comments during the review of the Final EIR for the Project and at the public hearings. The comment does not identify any specific shortcomings of the Draft EIR analysis or mitigation measures, and no specific response is therefore possible or required. Furthermore, and contrary to the allegation in this comment, the Draft EIR complied fully with all of CEQA's requirements. The comment presents no substantial evidence to the contrary about any specific impact area. As provided in Section 15064(f)(5), unsubstantiated opinion or narrative does not constitute substantial evidence. Since the commenter provides no substantial evidence regarding the alleged inadequacy of the Draft EIR, the claims contained in the comment letter would provide no basis for changes to the Draft EIR.

The general allegations in this comment will be forwarded to the decision-makers for consideration.

3. COMMENT LETTERS RECEIVED AFTER THE CLOSE OF THE COMMENT PERIOD

Comment letters from the State received after the close of the comment period consisted of:

- State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, April 29, 2019
- State of California, Department of Toxic Substances Control, Site Mitigation and Restoration Program – Chatsworth Office, April 5, 2019, received by State Clearinghouse, April 29, 2019
- Lisa Kranitz, on behalf of Wallin, Kress, Reisman & Kranitz LLP, May 8, 2019
- Lozeau Drury, LLP, on behalf of Supporters Alliance For Environmental ("SAFER"), May 21, 2019

Responses to the comments in these letters are provided below, after each letter.

Comment Letter No. 8

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

April 29, 2019

Ethan Edwards
El Segundo, City of
350 Main Street
El Segundo, CA 90245

Subject: Proposed Beach Cities Media Campus Project
SCH#: 2017121035

Dear Ethan Edwards:

The comment (s) on your EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on 4/15/2019. **Please check the CEQA database for these comments**: https://ceqanet.opr.ca.gov/2017121035/2 because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project. 1

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2017121035) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

#2017121035

Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311

late 4/15/19 E

Gavin Newsom
Governor

April 5, 2019

Governor's Office of Planning & Research

APR 29 2019

STATE CLEARINGHOUSE

Ethan Edwards, AICP
Contract Planner
City of El Segundo, Planning Division
350 Main Street
El Segundo, California 90245

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BEACH CITIES MEDIA CAMPUS (PROJECT)

Dear Mr. Edwards:

The Department of Toxic Substances Control (DTSC) has received the document for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.

2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.

3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,

Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Comment Letter No. 8

State of California
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Scott Morgan, Director, State Clearinghouse
1400 10th Street
P.O. Box 3044
Sacramento, CA 95812-3044
April 29, 2019

Response to Comment 8-1

This comment is a standard response from the State Clearinghouse of Planning and Research acknowledging that comments on the Draft EIR were received by the State Clearinghouse after the end of the state review period which closed on April 15, 2019. The comment states CEQA does not require Lead Agencies to respond to late comment, however the State Clearinghouse encourages the incorporation of the additional comments into the Final EIR. The State Clearinghouse submitted one letter from the State of California, Department of Toxic Substance Control (see Comment Letter No. 10). The comments contained in this letter are responded to in Responses 9-1 through 9-5.

#2017121035

Comment Letter No. 9

Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311

late 4/15/19 E

Gavin Newsom
Governor

April 5, 2019

Governor's Office of Planning & Research

APR 29 2019

STATE CLEARINGHOUSE

Ethan Edwards, AICP
Contract Planner
City of El Segundo, Planning Division
350 Main Street
El Segundo, California 90245

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BEACH CITIES MEDIA CAMPUS (PROJECT)

Dear Mr. Edwards:

The Department of Toxic Substances Control (DTSC) has received the document for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows: 1

1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.

2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment. 2

3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight. 3

4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight. 4

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov. 5

Sincerely,

Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Comment Letter No. 9

State of California
Department of Toxic Substances Control
Site Mitigation and Restoration Program – Chatsworth Office
Pete Cooke
9211 Oakdale Avenue
Chatsworth, California 91311
April 5, 2019
Received by State Clearinghouse April 29, 2019

Response to Comment 9-1

This comment states the Department of Toxic Substances Control (DTSC) received the Draft EIR. This comment also states the Draft EIR needs to identify and determine whether current or historic uses at the site have resulted in any releases of hazardous wastes/substances at the Project area. The current Project Site is a vacant lot. It has not released any hazardous wastes or substances at the Project area.

The commenter is referred to Section IV.E Hazards and Hazardous Materials, pages IV.E-2 through IV.E-3. The Project Site appears to have been vacant through the 1960s. Air Products and Chemicals developed and operated an air separation facility ("ASF") at the Project Site between 1969 and 2016. Part of the operations included the installation of four USTs on the southwestern portion of the Project Site in 1970. In February, 1990, the four USTs were abandoned. In March 1990, the abandoned USTs were replaced with two 10,000-gallon diesel USTs and one 1,000-gallon skim oil UST. In May 2002, the 1,000-gallon skim oil UST, was abandoned. On-site operations ceased in 2015 and demolition activities at the Project Site commenced through 2017. Part of the demolition activities included the abandoning of the two remaining 10,000-gallon diesel USTs and removal of the on-site oil/water separator.

The commenter is referred to Section IV.E Hazards and Hazardous Materials, page IV.E-5. The USTs were abandoned in accordance with the workplan submitted to the El Segundo Fire Department in 2016. After excavation activities were completed confirmation soil samples were collected. The samples were analyzed for TPH, VOCs, and methyl tert-butyl ether ("MTBE"). The excavation was backfilled with clean soil from the Project Site. Liquid waste extracted during the abandonment procedures was disposed off-site as non-RCRA hazardous waste to Demenno/Kerdoon Facility in Compton, California. Construction debris from the abandonment process was disposed off-site to WM Simi Valley Landfill in Simi Valley. All USTs installed by Air Products and Chemicals have been removed from the Project Site.

Response to Comment 9-2

The comment states the document needs to identify any known or potentially contaminated site within the project area and whether or not these pose a threat to human health or the environment. As stated above, the commenter is referred the Response to Comment 9-1. The commenter is referred Section IV.E Hazards and Hazardous Materials, page IV.E-7. According to Air Products and Chemicals, all USTs installed by Air Products and Chemicals have been removed from the Project Site. Based on the data collected and work performed by Air Products and Chemicals, the RWQCB issued a NFA determination for the soil on August 31, 2017, which is included as Appendix E.2 in this Draft EIR. The Regional Water Quality Control Board has jurisdiction over the Project Site. As indicated in the No Further Action letter from the Board (Appendix E.2 in this Draft EIR), the site has been cleaned up and abated so as to meet the requirements for a soil closure letter for commercial use of the site. As further noted in the letter, a covenant and environmental restriction has been placed on the property limiting the use to commercial applications.

Response to Comment 9-3

The comment states the document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which the government agency will provide appropriate regulatory oversight. According to Air Products and Chemicals, all USTs installed by Air Products and Chemicals have been removed from the Project Site. Based on the data collected and work performed by Air Products and Chemicals, the RWQCB issued a NFA determination for the soil on August 31, 2017, which is included as Appendix E.2 in this Draft EIR. As stated in Response to Comment 9-2, the Regional Water Quality Control Board has jurisdiction over the Project Site. As indicated in the No Further Action letter from the Board, the site has been cleaned up and abated so as to meet the requirements for a soil closure letter for commercial use of the site. As further noted in the letter, a covenant and environmental restriction has been placed on the property limiting the use to commercial applications.

Response to Comment 9-4

The comment states that if during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. The comment also states If contaminated soil exists, the document should identify how any required investigation or remediation will be conducted and which the government agency will provide appropriate regulatory oversight. The commenter is referred to Response to Comment 9-3.

Response to Comment 9-5

The comment states DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through Voluntary Cleanup Program (VCP). The comment also provides contact information for VCP. The commenter is referred to Response to Comment 9-3. This comment is noted for the administrative record and will be forwarded to the decision makers for review and consideration.

Ethan,

On behalf of the applicant, Rosecrans-Sepulveda 4, LLC, we offer the following minor comments on the DEIR. **1**

The analysis of Noise references Mitigation Measures H-1 – H-7, but these measures do not exist. (See pp. IV.H-15 , IV.H-29.) As the EIR concluded that the impact was less than significant without mitigation, we assume that this language may have been left over from a previous document. The Final EIR should delete these references. **2**

The analysis on cumulative population growth indicates that between 2015 and 2040 the number of households in the (South Bay) region will increase by 1,468,000. The referenced document does not support this number and the number should be revised to reflect the correct calculation. **3**

In the analysis on Water, there are a number of places where the document states, "Error! Reference source not found." In looking at the Water Supply Assessment which is included as Appendix J.1, it is clear that none of the information is missing. Instead, the text should be revised to reflect the appropriate Table as follows: **4**

- Page IV.M-2 – reference Figure IV.M.1-1
- Page IV.M-4 – reference Figure Table IV.M.1-2
- Page IV.M-5 (first occurrence) – reference Table IV.M.1-4
- Page IV.M-5 (second occurrence) – reference Table IV.M.1-5
- Page IV.M-6 – reference Table IV.M.1-7

None of these changes lead to any new significant impacts and do not create a need for recirculation. **5**

Thank you,

Lisa Kranitz
Wallin, Kress, Reisman & Kranitz, LLP
11355 W. Olympic Boulevard, Suite 300
Los Angeles, California 90064
Phone: 310/450-9582, ext. 215
Cell: 310/962-2049
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Comment Letter No. 10

Lisa Kranitz
Wallin, Kress, Reisman & Kranitz LLP
11355 Olympic Boulevard, Suite 300
Los Angeles, California 90064
March 25, 2019

Response to Comment 10-1

This comment states on behalf of the applicant, Rosecrans-Sepulveda 4, LLC, Wallin, Kress, Reisman & Kranitz LLP has minor comments on the Draft EIR. This comment is noted for the administrative record.

Response to Comment 10-2

This comment states that the analysis of Noise refences Mitigation Measures H-1 through H-7, but these measures do not exist. The commenter states as the EIR concluded that the impact was less than significant without mitigation, thus the commenter assumes that this language may have been left over from a previous document. The commenter states the Final EIR should delete these references. The correction is included in this Final EIR in Section III. Revisions, Clarification, and Corrections on the Draft EIR. The correction deletes the referenced mitigation measures. Inclusion of this correction would not change the Draft EIR's determination.

Response to Comment 10-3

The comment states the cumulative population growth indicates between 2015 and 2040 the number of households in the South Bay region will increase by 1,468,000, however the referenced document does not support this number. The correction is included in this Final EIR in Section III. Revisions, Clarification, and Corrections on the Draft EIR. The correction corrects the number of households in the South Bay region. Inclusion of this correction would not change the Draft EIR's determination.

Response to Comment 10-4

The comment states in the analysis on Water there are a number of places where the document states "Error Refence source not found." The commenter states none of the information is missing, the but the text should be revised to source the correct figures and tables. The correction is included in this Final EIR in Section III. Revisions, Clarification, and Corrections on the Draft EIR. The correction corrects both the figure and the table sources. Inclusion of this correction would not change the Draft EIR's determination.

Response to Comment 10-5

The comment states none of these changes lead to any new significant impacts and do not create a need for recirculation. This comment is noted for the administrative record.

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BY E-MAIL AND OVERNIGHT MAIL

May 21, 2019

Chairperson Ryan Baldino and Honorable Members of the
City of El Segundo Planning Commission
Planning and Building Safety Department, Planning Division
350 Main Street
El Segundo, California 90245
rbaldino@elsegundoccb.org; bnewman@elsegundoccb.org;
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Ethan Edwards, AICP, Contract Planner
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Planning and Building Safety Department, Planning Division
350 Main Street
El Segundo, California 90245
eedwards@elsegundo.org

RE: Final EIR for Proposed Beach Cities Media Campus Project SCN 2017121035

Chairperson Baldino and Members of the Planning Commission:

I am writing on behalf of Supporters Alliance For Environmental Responsibility ("SAFER") regarding the Final Environmental Impact Report ("FEIR") prepared for the Project known as Beach Cities Media Center Project aka EA-1201 and State Clearinghouse #2017121035, including all actions related or referring to the proposed development of an approximately five-story, 240,000 square foot office building, a one-story, 66,000 square foot studio and production facilities building, and 7,000 square foot of retail uses in two, one-story structures with parking provided in a seven story parking structure with above grade and below grade parking containing 980 parking spaces, one level below grade parking in the office building containing 120 parking spaces, in addition to a limited amount of surface parking located at 2021 Rosecrans Avenue on Assessor Parcel Number (APN) 4138-015-064. 1

After reviewing the Project and the FEIR, it is evident that the FEIR contains numerous errors and omissions that preclude accurate analysis of the Project. As a result of these inadequacies, the FEIR fails as an informational document and fails to impose all feasible mitigation measures and alternatives to reduce the Project's impacts. 2

Commenters request that the City of El Segundo ("City") address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the document prior to considering approvals for the Project.

I. LEGAL STANDARDS

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report ("EIR") (except in certain limited circumstances). *See, e.g.*, Pub. Res. Code § 21100. The EIR is the very heart of CEQA. *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652. "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Comm. for a Better Env't v. Calif. Resources Agency* (2002) 103 Cal. App. 4th 98, 109.

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 Cal. Code Regs. ("CEQA Guidelines") § 15002(a)(1). "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'" *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal. App. 4th 1344, 1354 ("Berkeley Jets"); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810. **2 cont.**

Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and all feasible mitigation measures. CEQA Guidelines § 15002(a)(2) and (3); *see also Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines §15002(a)(2). If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." Pub.Res.Code ("PRC") § 21081; CEQA Guidelines § 15092(b)(2)(A) & (B).

The lead agency must evaluate comment on the draft EIR and prepare written responses in the final EIR. (PRC §21091(d)) The FEIR must include a "detailed" written response to all "significant environmental issues" raised by commenters. As the court stated in *City of Long Beach v. LA USD* (2009) 176 Cal.App.4th 889, 904:

> The requirement of a detailed written response to comments helps to ensure that the lead agency will fully consider the environmental consequences of

a decision before it is made, that the decision is well informed and open to public scrutiny, and that public participation in the environmental review process is meaningful.

The FEIR's responses to comments must be detailed and must provide a reasoned, good faith analysis. (14 CCR §15088(c)) Failure to provide a substantive response to comment render the EIR legally inadequate. (*Rural Land Owners Assoc. v. City Council* (1983) 143 Cal.App.3d 1013, 1020).

The responses to comments on a draft EIR must state reasons for rejecting suggested mitigation measures and comments on significant environmental issues. "Conclusory statements unsupported by factual information" are not an adequate response. (14 CCR §15088(b, c); *Cleary v. County of Stanislaus* (1981) 118 Cal.App.3rd 348) The need for substantive, detailed response is particularly appropriate when comments have been raised by experts or other agencies. (*Berkeley Keep Jets v. Bd. of Port Comm'rs* (2001) 91 Cal.App.4th 1344, 1367; *People v. Kern* (1976) 72 Cal.app.3d 761) A reasoned analysis of the issue and references to supporting evidence are required for substantive comments raised. (*Calif. Oak Found. v. Santa Clarita* (2005) 133 Cal.App.4th 1219) **2 cont.**

The FEIR abjectly fails to meet these legal standards, as it is riddled with conclusory statements lacking any factual support or analysis.

II. THE CITY HAS PROVIDED INADEQUATE TIME TO REVIEW THE FEIR.

On January 10, 2018, this firm requested written notice of all CEQA documents related to the Project, pursuant to CEQA section 21092.2. Despite this request, we did not receive the complete FEIR until May 20, 2019 – only three days prior to the Planning Commission hearing. We received an incomplete copy of the FEIR on Friday, May 17, 2019, but that document did not include the public comments or responses to comments which are the heart of the FEIR.

CEQA requires the lead agency to provide the FEIR to all public entities that commented on the Draft EIR at least 10 days before certifying the EIR. PRC §21092.5. Many public agencies, as well as SAFER, commented on the DEIR, including CalTrans, South Coast Air Quality Management District ("SCAQMD"), Department of Toxic Substances Control ("DTSC"), and others. The City was required to provide these entities with the FEIR at least 10 days prior to the May 23, 2019 Planning Commission hearing – May 13, 2019. When the City provided the FEIR to the public agencies, it became a public record. At that time, since this firm requested all CEQA documents pursuant to CEQA section 21092.2, we should have been provided with the FEIR. However, we did not receive the document until May 20, 2019 – one week later. Thus, SAFER had only three days to review the FEIR rather than the required ten days. **3**

We request that the City continue the Planning Commission hearing by at least ten days to allow the required review period for the FEIR.

III. THE FEIR FAILS TO ADEQUATELY RESPOND TO COMMENTS ON THE DEIR.

A. HAZARDOUS MATERIALS

The SCAQMD and DTSC raised serious concerns about toxic chemical soil contamination at the Project site. Yet, these concerns are largely ignored in the FEIR. The DEIR largely ignores soil contamination and the SCAQMD Rules governing soil contamination, Rules 1166 and 1466. (DEIR, IV.A.10-12).

Due to the historical Air Products and Chemicals operations, Southern California Edison ("SCE") conducted a limited subsurface investigation in preparation for demolition and the sale of the Project Site. According to the Phase I ESA, several subsurface investigations were conducted to assess potential contaminants of concern in the soil and soil vapor at the Project Site. The majority of these site investigation activities were conducted between March 2015 and September 2016. Based on these investigations, soil was found to be impacted with total petroleum hydrocarbons ("TPH"), lead, and PCBs. In addition, volatile organic compounds ("VOCs") were detected in the shallow soil on the Project Site. An investigation report and remedial action workplan was prepared on behalf of Air Products and Chemicals and submitted to the Los Angeles Area Regional Water Quality Control Board ("RWQCB"). The RWQCB conditionally approved the workplan on June 29, 2017 with additional excavation areas and sampling requirements. In June 2017, 504 cubic yards of impacted soil was reportedly excavated and disposed off-site as non-hazardous waste at Azusa Land Reclamation, Azusa, California as documented in the Remedial Completion Report. Five sets of soil gas probes were then installed in July 2017. Confirmation soil and soil vapor samples were collected after excavation activities were completed per the RWQCB requirements. These results were documented in the Remedial Completion Report and in the Additional Soil and Soil Vapor Sampling Report. The analytical results of the soil samples were non-detected for TPH, lead, and PCBs; and VOCs were detected in soil vapor. Based on the data collected and work performed by Air Products and Chemicals, the RWQCB issued a No Further Action ("NFA"). The NFA referenced a recorded Covenant and Environmental Restriction that restricted the future use of the Project Site to commercial and/or industrial and specifically did not restrict the Project Site use for commercial purposes. DEIR: (IV.E-3). Despite the known presence of toxic chemicals in the soil at the Project site, the DEIR and FEIR largely gloss over this issue. 4

SCAQMD submitted written comments on the DEIR, pointing out that the EIR fails entirely to mention compliance with SCAQMD Rule 1166 (Volatile Organic Compounds from soil) and SCAQMD Rule 1466 (Particulate Matter from soil with Toxic Air Contaminants). These rules are the primary way that SCAMQD protects construction workers and future users of the Project from exposure to toxic chemicals.

In response, the FEIR adds a new section on Rules 1166 and 1466. (FEIR, II-12). However, the City failed to recirculate the FEIR. Recirculation is require when new mitigation measures are added to a project so the public can assess the adequacy of the

proposed mitigation measures. *Gentry v. Murrieta*, 36 Cal.App.4th 1359, 1392, 1411, 1417. As a leading treatise explains, "in *Perley v. Board of Supervisors* (1982) 137 Cal.App.3d 424, the court held that the public has a right to review a project described in a negative declaration in its final form and suggested that a negative declaration must be recirculated if mitigation measures are added." Kostka & Zishcke, Guide to CEQA at §7.19.

DTSC filed written comments raising concerns about site contamination. DTSC recommended a preliminary endangerment assessment and voluntary clean-up plan, but FEIR rejects both mitigation measures without analysis. (FEIR, II-35). CEQA requires implementation of all feasible mitigation measures. These measures are clearly feasible, and the FEIR provides no reason that the measures would be infeasible. **4 cont.**

A Recirculated DEIR is required to analyze soil contamination and propose all feasible mitigation measures to safeguard construction workers and future uses of the Project site.

B. HEALTH RISK ASSESSMENT

Neither the Draft nor Final EIR contain any health risk assessment (HRA). The DEIR states that no HRA is required because construction will "only" take place over 18 months. (DEIR IV.A.21.)

California Office of Environmental Health Hazard Assessment ("OEHHA") guidance makes clear that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors. OEHHA also recommends a health risk assessment of a project's operational emissions for projects that will be in place for more than 6 months. (Id.) Projects lasting more than 6 months should be evaluated for the duration of the project, and an exposure duration of 30 years be used to estimate individual cancer risk for the maximally exposed individual resident. (Id.) The Project would last at least 30 years and certainly much longer than six months. Therefore an HRA is required. **5**

Health risks can often be mitigated by requiring low-emission construction equipment, such as CARB Tier 4 equipment, limiting idling times, limiting opacity, and other measures. A RDEIR should be prepared to analyze HRA and to proposed feasible mitigation measures.

C. GREENHOUSE GAS.

The EIR admits that the Project will have significant greenhouse gas ("GHG") impacts. (FEIR I-17, 18). The DEIR states, "Proposed Project's unmitigated emissions are 6,007.71 metric tons of CO2 equivalents per year resulting in 5.82 MTCO2e/SP/year." (DEIR IV.D-31). This is far above the SCAQMD significance threshold for GHGs of 3,000 MT/year. **6**

Despite this admission, the EIR fails to propose all feasible mitigation measures to reduce GHGs. The only mitigation measures proposed are: (1) sidewalks, (2) energy Star applicances, (3) LED lighting, and (4) low-flow fixtures. Despite having hundreds of parking spaces, the EIR proposes only 1 electric vehicle charger. (DEIR IV.D-35). The EIR fails to propose clearly feasible GHG mitigation measures such as roof-top solar panels, large numbers of electric vehicle charging stations, exceedance of Title 24 energy requirements, LEED certification, and many other measures.

6 cont.

The California Attorney General has published a list of feasible GHG mitigation measures. (Exhibit A). These measures are presumptively feasible. A Revised DEIR should be prepared to analyze these feasible mitigation measures.

D. TRAFFIC.

CalTrans submitted a comment concerning the Project's significant traffic impacts. In response the Final EIR proposes a Traffic Demand Management (TDM) plan, but provides no detail for the TDM plan. (FEIR III-2).

Feasible mitigation measures for significant environmental effects must be set forth in an EIR for consideration by the lead agency's decision makers and the public before certification of the EIR and approval of a project. The formulation of mitigation measures generally cannot be deferred until after certification of the EIR and approval of a project. Guidelines, section 15126.4(a)(1)(B) states: "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." "A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking. Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA." (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307.) "[R]eliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decisionmaking; and[,] consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment." (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92 (Communities).)

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The FEIR's TDM plan is deferred mitigation prohibited by CEQA. A Revised DEIR is required to identify the particular measures that will be implemented as part of the TDM to reduce the Project's traffic impact, and to calculate the amount that those measures will reduce traffic impacts of the Project.

E. INDOOR AIR QUALITY.

The EIR fails entirely to analyze impacts related to indoor air quality. Such impacts may be related to soil-vapor intrusion that may result from toxic soil contamination. Indoor air quality may also be affected by formaldehyde emissions from composite wood products.

8

Formaldehyde is a known human carcinogen. Many composite wood products typically used in residential and office building construction contain formaldehyde-based glues which off-gas formaldehyde over a very long time period. The primary source of formaldehyde indoors is composite wood products manufactured with urea-formaldehyde resins, such as plywood, medium density fiberboard, and particle board. These materials are commonly used in residential and office building construction for flooring, cabinetry, baseboards, window shades, interior doors, and window and door trims. Given the prominence of materials with formaldehyde-based resins that are likely to be used in constructing the Project, there is a significant likelihood that the Project's emissions of formaldehyde to air will result in very significant cancer risks to future workers in the buildings. Even if the materials used within the buildings comply with the Airborne Toxic Control Measures (ATCM) of the California Air Resources Board (CARB), significant emissions of formaldehyde may still occur.

The Project's buildings may have significant impacts on air quality and health risks by emitting cancer-causing levels of formaldehyde into the air that may expose workers to cancer risks in excess of SCAQMD's threshold of significance. A 2018 study by Chan et al. (attached as Exhibit B) measured formaldehyde levels in new structures constructed after the 2009 CARB rules went into effect. Even though new buildings conforming to CARB's ATCM had a 30% lower median indoor formaldehyde concentration and cancer risk than buildings built prior to the enactment of the ATCM, the levels of formaldehyde may still pose cancer risks greater than 100 in a million, well above the 10 in one million significance threshold established by the SCAQMD. **8 cont.**

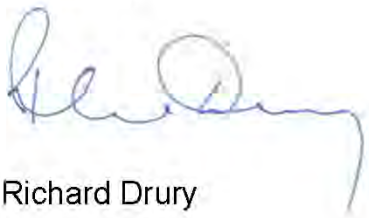
Based on published studies, and assuming all the Project's building materials will be compliant with the California Air Resources Board's formaldehyde airborne toxics control measure, future employees using the Project may be exposed to a cancer risk from formaldehyde greater than the SCAQMD's CEQA significance threshold for airborne cancer risk of 10 per million.

The City has a duty to investigate issues relating to a project's potential environmental impacts. (See *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1597–98. ["[U]nder CEQA, the lead agency bears a burden to investigate potential environmental impacts."].) "If the local agency has failed to study an area of possible environmental impact, a fair argument may be based on the limited facts in the record. Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences." (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311.) Given the lack of study conducted by the City on the health risks posed by emissions of formaldehyde, a fair argument exists that such emissions from the Project may pose significant health risks. As a result, the City must prepare an EIR which calculates the health risks that the formaldehyde emissions may have on future workers and identifies appropriate mitigation measures.

IV. CONCLUSION

For the foregoing reasons, the EIR fails to meet the requirements of CEQA. We urge the City to require preparation of a Revised Draft EIR that addresses the deficiencies identified in this and other comment letters. Thank you for considering our comments and please include this letter in the administrative record for this matter. 9

Sincerely,



Richard Drury

ATTACHMENT A

Under the California Environmental Quality Act (CEQA), local agencies have a very important role to play in California's fight against global warming – one of the most serious environmental effects facing the State today. Local agencies can lead by example in undertaking their own projects, insuring that sustainability is considered at the earliest stages. Moreover, they can help shape private development. Where a project as proposed will have significant global warming related effects, local agencies can require feasible changes or alternatives, and impose enforceable, verifiable, feasible mitigation to substantially lessen those effects. By the sum of their actions and decisions, local agencies will help to move the State away from "business as usual" and toward a low-carbon future.

Included in this document are various measures that may reduce the global warming related impacts at the individual project level. (For more information on actions that local governments can take at the program and general plan level, please visit the Attorney General's webpage, "CEQA, Global Warming, and General Plans" at http://ag.ca.gov/globalwarming/ceqa/generalplans.php.)

As appropriate, the measures can be included as design features of a project, required as changes to the project, or imposed as mitigation (whether undertaken directly by the project proponent or funded by mitigation fees). The measures set forth in this package are examples; the list is not intended to be exhaustive. Moreover, the measures cited may not be appropriate for every project. The decision of whether to approve a project – as proposed or with required changes or mitigation – is for the local agency, exercising its informed judgment in compliance with the law and balancing a variety of public objectives.

Mitigation Measures by Category

Energy Efficiency

Incorporate green building practices and design elements.	The California Department of Housing and Community Development's Green Building & Sustainability Resources handbook provides extensive links to green building resources. The handbook is available at http://www.hcd.ca.gov/hpd/green_build.pdf. The American Institute of Architects (AIA) has compiled fifty readily available strategies for reducing fossil fuel use in buildings by fifty percent. AIA "50 to 50" plan is presented in both guidebook and wiki format at http://wiki.aia.org/Wiki%20Pages/Home.aspx.

Meet recognized green building and energy efficiency benchmarks.	For example, an ENERGY STAR-qualified building uses less energy, is less expensive to operate, and causes fewer greenhouse gas emissions than comparable, conventional buildings. http://www.energystar.gov/index.cfm?c=business.bus_index. California has over 1600 ENERGY STAR-qualified school, commercial and industrial buildings. View U.S. EPA's list of Energy Star non-residential buildings at http://www.energystar.gov/index.cfm?fuseaction=labeled_buildings.locator. Los Angeles and San Francisco top the list of U.S. cities with the most ENERGY STAR non-residential buildings. http://www.energystar.gov/ia/business/downloads/2008_Top_25_cities_chart.pdf. Qualified ENERGY STAR homes must surpass the state's Title 24 energy efficiency building code by at least 15%. Los Angeles, Sacramento, San Diego, and San Francisco-Oakland are among the top 20 markets for ENERGY STAR homes nationwide. http://www.energystar.gov/ia/new_homes/mil_homes/top_20_markets.html. Builders of ENERGY STAR homes can be more competitive in a tight market by providing a higher quality, more desirable product. See http://www.energystar.gov/ia/partners/manuf_res/Horton.pdf. There are a variety of private and non-profit green building certification programs in use in the U.S. See U.S. EPA's Green Building / Frequently Asked Questions website, http://www.epa.gov/greenbuilding/pubs/faqs.htm. Public-Private Partnership for Advancing Housing Technology maintains a list of national and state Green Building Certification Programs for housing. See http://www.pathnet.org/sp.asp?id=20978. These include the national Leadership in Energy and Environmental Design (LEED) program, and, at the state level, Build it Green's GreenPoint Rated system and the California Green Builder program. Other organizations may provide other relevant benchmarks.
Install energy efficient lighting (e.g., light emitting diodes (LEDs)), heating and cooling systems, appliances, equipment, and control systems.	Information about ENERGY STAR-certified products in over 60 categories is available at http://www.energystar.gov/index.cfm?fuseaction=find_a_product. The California Energy Commission maintains a database of all appliances meeting either federal efficiency standards or, where there are no federal efficiency standards, California's appliance efficiency standards. See http://www.appliances.energy.ca.gov/. The Electronic Product Environmental Assessment Tool (EPEAT) ranks computer products based on a set of environmental criteria, including energy efficiency. See http://www.epeat.net/AboutEPEAT.aspx. The nonprofit American Council for an Energy Efficient Economy maintains an Online Guide to Energy Efficient Commercial Equipment, available at http://www.aceee.org/ogeece/ch1_index.htm. Utilities offer many incentives for efficient appliances, lighting, heating and cooling. To search for available residential and commercial incentives, visit Flex Your Power's website at http://www.fypower.org/.

Use passive solar design, e.g., orient buildings and incorporate landscaping to maximize passive solar heating during cool seasons, minimize solar heat gain during hot seasons, and enhance natural ventilation. Design buildings to take advantage of sunlight.	See U.S. Department of Energy, Passive Solar Design (website) http://www.energysavers.gov/your_home/designing_remodeling/index.cfm/mytopic=10250. See also California Energy Commission, Consumer Energy Center, Passive Solar Design (website) http://www.consumerenergycenter.org/home/construction/solardesign/index.html. Lawrence Berkeley National Laboratories' Building Technologies Department is working to develop innovative building construction and design techniques. Information and publications on energy efficient buildings, including lighting, windows, and daylighting strategies, are available at the Department's website at http://btech.lbl.gov.
Install light colored "cool" roofs and cool pavements.	A white or light colored roof can reduce surface temperatures by up to 100 degrees Fahrenheit, which also reduces the heat transferred into the building below. This can reduce the building's cooling costs, save energy and reduce associated greenhouse gas emissions, and extend the life of the roof. Cool roofs can also reduce the temperature of surrounding areas, which can improve local air quality. See California Energy Commission, Consumer Energy Center, Cool Roofs (webpage) at http://www.consumerenergycenter.org/coolroof/. See also Lawrence Berkeley National Laboratories, Heat Island Group (webpage) at http://eetd.lbl.gov/HeatIsland/.
Install efficient lighting, (including LEDs) for traffic, street and other outdoor lighting.	LED lighting is substantially more energy efficient than conventional lighting and can save money. See http://www.energy.ca.gov/efficiency/partnership/case_studies/TechAsstCity.pdf (noting that installing LED traffic signals saved the City of Westlake about $34,000 per year). As of 2005, only about a quarter of California's cities and counties were using 100% LEDs in traffic signals. See California Energy Commission (CEC), Light Emitting Diode Traffic Signal Survey (2005) at p. 15, available at http://www.energy.ca.gov/2005publications/CEC 400 2005 003/CEC 400 2005 003.PDF. The California Energy Commission's Energy Partnership Program can help local governments take advantage of energy saving technology, including, but not limited to, LED traffic signals. See http://www.energy.ca.gov/efficiency/partnership/.
Reduce unnecessary outdoor lighting.	See California Energy Commission, Reduction of Outdoor Lighting (webpage) at http://www.energy.ca.gov/efficiency/lighting/outdoor_reduction.html.

Use automatic covers, efficient pumps and motors, and solar heating for pools and spas.	During the summer, a traditional backyard California pool can use enough energy to power an entire home for three months. Efficiency measures can substantially reduce this waste of energy and money. See California Energy Commission, Consumer Energy Center, Pools and Spas (webpage) at http://www.consumerenergycenter.org/home/outside/pools_spas.html. See also Sacramento Municipal Utilities District, Pool and Spa Efficiency Program (webpage) at http://www.smud.org/en/residential/saving-energy/Pages/poolspa.aspx.
Provide education on energy efficiency to residents, customers and/or tenants.	Many cities and counties provide energy efficiency education. See, for example, the City of Stockton's Energy Efficiency website at http://www.stocktongov.com/energysaving/index.cfm. See also "Green County San Bernardino," http://www.greencountysb.com at pp. 4-6. Businesses and development projects may also provide education. For example, a homeowners' association (HOA) could provide information to residents on energy-efficient mortgages and energy saving measures. See The Villas of Calvera Hills, Easy Energy Saving Tips to Help Save Electricity at http://www.thevillashoa.org/green/energy/. An HOA might also consider providing energy audits to its residents on a regular basis.

Renewable Energy and Energy Storage

Meet "reach" goals for building energy efficiency and renewable energy use.	A "zero net energy" building combines building energy efficiency and renewable energy generation so that, on an annual basis, any purchases of electricity or natural gas are offset by clean, renewable energy generation, either on-site or nearby. Both the California Energy Commission (CEC) and the California Public Utilities Commission (CPUC) have stated that residential buildings should be zero net energy by 2020, and commercial buildings by 2030. See CEC, 2009 Integrated Energy Policy Report (Dec. 2009) at p. 226, available at http://www.energy.ca.gov/2009publications/CEC-100-2009-003/CEC-100-2009-003-CMF.PDF; CPUC, Long Term Energy Efficiency Strategic Plan (Sept. 2008), available at http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/eesp/.
Install solar, wind, and geothermal power systems and solar hot water heaters.	The California Public Utilities Commission (CPUC) approved the California Solar Initiative on January 12, 2006. The initiative creates a $3.3 billion, ten-year program to install solar panels on one million roofs in the State. Visit the one-stop GoSolar website at http://www.gosolarcalifornia.org/. As mitigation, a developer could, for example, agree to participate in the New Solar Homes program. See http://www.gosolarcalifornia.org/builders/index.html. The CPUC is in the process of establishing a program to provide solar water heating incentives under the California Solar Initiative. For more information, visit the CPUC's website at http://www.cpuc.ca.gov/puc/energy/solar/swh.htm. To search for available residential and commercial renewable energy incentives, visit Flex Your Power's website at http://www.fypower.org/.

Install solar panels on unused roof and ground space and over carports and parking areas.	In 2008 Southern California Edison (SCE) launched the nation's largest installation of photovoltaic power generation modules. The utility plans to cover 65 million square feet of unused commercial rooftops with 250 megawatts of solar technology – generating enough energy to meet the needs of approximately 162,000 homes. Learn more about SCE's Solar Rooftop Program at http://www.sce.com/solarleadership/solar-rooftop-program/general-faq.htm. In 2009, Walmart announced its commitment to expand the company's solar power program in California. The company plans to add solar panels on 10 to 20 additional Walmart facilities in the near term. These new systems will be in addition to the 18 solar arrays currently installed at Walmart facilities in California. See http://walmartstores.com/FactsNews/NewsRoom/9091.aspx. Alameda County has installed two solar tracking carports, each generating 250 kilowatts. By 2005, the County had installed eight photovoltaic systems totaling over 2.3 megawatts. The County is able to meet 6 percent of its electricity needs through solar power. See http://www.acgov.org/gsa/Alameda%20County%20-%20Solar%20Case%20Study.pdf. In 2007, California State University, Fresno installed at 1.1-megawatt photovoltaic (PV)-paneled parking installation. The University expects to save more than $13 million in avoided utility costs over the project's 30-year lifespan. http://www.fresnostatenews.com/2007/11/solarwrapup2.htm.
Where solar systems cannot feasibly be incorporated into the project at the outset, build "solar ready" structures.	U.S. Department of Energy, A Homebuilder's Guide to Going Solar (brochure) (2008), available at http://www.eere.energy.gov/solar/pdfs/43076.pdf.
Incorporate wind and solar energy systems into agricultural projects where appropriate.	Wind energy can be a valuable crop for farmers and ranchers. Wind turbines can generate energy to be used on-site, reducing electricity bills, or they can yield lease revenues (as much as $4000 per turbine per year). Wind turbines generally are compatible with rural land uses, since crops can be grown and livestock can be grazed up to the base of the turbine. See National Renewable Energy Laboratory, Wind Powering America Fact Sheet Series, Wind Energy Benefits, available at http://www.nrel.gov/docs/fy05osti/37602.pdf. Solar PV is not just for urban rooftops. For example, the Scott Brothers' dairy in San Jacinto, California, has installed a 55-kilowatt solar array on its commodity barn, with plans to do more in the coming years. See http://www.dairyherd.com/directories.asp?pgID=724&ed_id=8409 (additional California examples are included in article.)

Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use.	See National Renewable Energy Laboratory, Energy Storage Basics (webpage) at http://www.nrel.gov/learning/eds_energy_storage.html. California Energy Storage Alliance (webpage) at http://storagealliance.org/about.html. Storage is not just for large, utility scale projects, but can be part of smaller industrial, commercial and residential projects. For example, Ice Storage Air Conditioning (ISAC) systems, designed for residential and nonresidential buildings, produce ice at night and use it during peak periods for cooling. See California Energy Commission, Staff Report, Ice Storage Air Conditioners, Compliance Options Application (May 2006), available at http://www.energy.ca.gov/2006publications/CEC-400-2006-006/CEC-400-2006-006-SF.PDF.
Use on-site generated biogas, including methane, in appropriate applications.	At the Hilarides Dairy in Lindsay, California, an anaerobic-lagoon digester processes the run-off of nearly 10,000 cows, generating 226,000 cubic feet of biogas per day and enough fuel to run two heavy duty trucks. This has reduced the dairy's diesel consumption by 650 gallons a day, saving the dairy money and improving local air quality. See http://www.arb.ca.gov/newsrel/nr021109b.htm; see also Public Interest Energy Research Program, Dairy Power Production Program, Dairy Methane Digester System, 90-Day Evaluation Report, Eden Vale Dairy (Dec. 2006) at http://www.energy.ca.gov/2006publications/CEC 500 2006 083/CEC 500 2006 083.PDF. Landfill gas is a current and potential source of substantial energy in California. See Tom Frankiewicz, Program Manager, U.S. EPA Landfill Methane Outreach Program, Landfill Gas Energy Potential in California, available at http://www.energy.ca.gov/2009_energypolicy/documents/2009-04-21_workshop/presentations/05-SCS_Engineers_Presentation.pdf. There are many current and emerging technologies for converting landfill methane that would otherwise be released as a greenhouse gas into clean energy. See California Integrated Waste Management Board, Emerging Technologies, Landfill Gas-to-Energy (webpage) at http://www.ciwmb.ca.gov/LEACentral/TechServices/EmergingTech/default.htm.

Use combined heat and power (CHP) in appropriate applications.	Many commercial, industrial, and campus-type facilities (such as hospitals, universities and prisons) use fuel to produce steam and heat for their own operations and processes. Unless captured, much of this heat is wasted. CHP captures waste heat and re-uses it, e.g., for residential or commercial space heating or to generate electricity. See U.S. EPA, Catalog of CHP Technologies at http://www.epa.gov/chp/documents/catalog_of_%20chp_tech_entire.pdf and California Energy Commission, Distributed Energy Resource Guide, Combined Heat and Power (webpage) at http://www.energy.ca.gov/distgen/equipment/chp/chp.html. The average efficiency of fossil-fueled power plants in the United States is 33 percent. By using waste heat recovery technology, CHP systems typically achieve total system efficiencies of 60 to 80 percent. CHP can also substantially reduce emissions of carbon dioxide. http://www.epa.gov/chp/basic/efficiency.html. Currently, CHP in California has a capacity of over 9 million kilowatts. See list of California CHP facilities at http://www.eea-inc.com/chpdata/States/CA.html. The Waste Heat and Carbon Emissions Reduction Act (Assembly Bill 1613 (2007), amended by Assembly Bill 2791 (2008)) is designed to encourage the development of new CHP systems in California with a generating capacity of not more than 20 megawatts. Among other things, the Act requires the California Public Utilities Commission to establish (1) a standard tariff allowing CHP generators to sell electricity for delivery to the grid and (2) a "pay as you save" pilot program requiring electricity corporations to finance the installation of qualifying CHP systems by nonprofit and government entities. For more information, see http://www.energy.ca.gov/wasteheat/.

Water Conservation and Efficiency

Incorporate water-reducing features into building and landscape design.	According to the California Energy Commission, water-related energy use – which includes conveyance, storage, treatment, distribution, wastewater collection, treatment, and discharge – consumes about 19 percent of the State's electricity, 30 percent of its natural gas, and 88 billion gallons of diesel fuel every year. See http://www.energy.ca.gov/2007publications/CEC 999 2007 008/CEC 999 2007 008.PDF. Reducing water use and improving water efficiency can help reduce energy use and greenhouse gas emissions.
Create water-efficient landscapes.	The California Department of Water Resources' updated Model Water Efficient Landscape Ordinance (Sept. 2009) is available at http://www.water.ca.gov/wateruseefficiency/landscapeordinance/technical.cfm. A landscape can be designed from the beginning to use little or no water, and to generate little or no waste. See California Integrated Waste Management Board, Xeriscaping (webpage) at http://www.ciwmb.ca.gov/organics/Xeriscaping/.

Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and use water-efficient irrigation methods.	U.S. Department of Energy, Best Management Practice: Water-Efficient Irrigation (webpage) at http://www1.eere.energy.gov/femp/program/waterefficiency_bmp5.html. California Department of Water Resources, Landscape Water Use Efficiency (webpage) at http://www.water.ca.gov/wateruseefficiency/landscape/. Pacific Institute, More with Less: Agricultural Water Conservation and Efficiency in California (2008), available at http://www.pacinst.org/reports/more_with_less_delta/index.htm.
Make effective use of graywater. (Graywater is untreated household waste water from bathtubs, showers, bathroom wash basins, and water from clothes washing machines. Graywater to be used for landscape irrigation.)	California Building Standards Commission, 2008 California Green Building Standards Code, Section 604, pp. 31-32, available at http://www.documents.dgs.ca.gov/bsc/2009/part11_2008_calgreen_code.pdf. California Department of Water Resources, Dual Plumbing Code (webpage) at http://www.water.ca.gov/recycling/DualPlumbingCode/. See also Ahwahnee Water Principles, Principle 6, at http://www.lgc.org/ahwahnee/h2o_principles.html. The Ahwahnee Water Principles have been adopted by City of Willits, Town of Windsor, Menlo Park, Morgan Hill, Palo Alto, Petaluma, Port Hueneme, Richmond, Rohnert Park, Rolling Hills Estates, San Luis Obispo, Santa Paula, Santa Rosa, City of Sunnyvale, City of Ukiah, Ventura, Marin County, Marin Municipal Water District, and Ventura County.
Implement low-impact development practices that maintain the existing hydrology of the site to manage storm water and protect the environment.	Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site. See U.S. EPA, Low Impact Development (webpage) at http://www.epa.gov/nps/lid/. Office of Environmental Health Hazard Assessment and the California Water and Land Use Partnership, Low Impact Development at http://www.coastal.ca.gov/nps/lid-factsheet.pdf.
Devise a comprehensive water conservation strategy appropriate for the project and location.	The strategy may include many of the specific items listed above, plus other innovative measures that are appropriate to the specific project.
Design buildings to be water-efficient. Install water-efficient fixtures and appliances.	Department of General Services, Best Practices Manual, Water-Efficient Fixtures and Appliances (website) at http://www.green.ca.gov/EPP/building/SaveH2O.htm. Many ENERGY STAR products have achieved their certification because of water efficiency. See California Energy Commission's database, available at http://www.appliances.energy.ca.gov/.

Offset water demand from new projects so that there is no net increase in water use.	For example, the City of Lompoc has a policy requiring new development to offset new water demand with savings from existing water users. See http://www.cityoflompoc.com/utilities/pdf/2005_uwmp_final.pdf at p. 29.
Provide education about water conservation and available programs and incentives.	See, for example, the City of Santa Cruz, Water Conservation Office at http://www.ci.santa-cruz.ca.us/index.aspx?page=395; Santa Clara Valley Water District, Water Conservation at http://www.valleywater.org/conservation/index.shtm; and Metropolitan Water District and the Family of Southern California Water Agencies, Be Water Wise at http://www.bewaterwise.com. Private projects may provide or fund similar education.

Solid Waste Measures

Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).	Construction and demolition materials account for almost 22 percent of the waste stream in California. Reusing and recycling these materials not only conserves natural resources and energy, but can also save money. For a list of best practices and other resources, see California Integrated Waste Management Board, Construction and Demolition Debris Recycling (webpage) at http://www.ciwmb.ca.gov/condemo/.
Integrate reuse and recycling into residential industrial, institutional and commercial projects.	Tips on developing a successful recycling program, and opportunities for cost-effective recycling, are available on the California Integrated Waste Management Board's Zero Waste California website. See http://zerowaste.ca.gov/. The Institute for Local Government's Waste Reduction & Recycling webpage contains examples of "best practices" for reducing greenhouse gas emissions, organized around waste reduction and recycling goals and additional examples and resources. See http://www.ca-ilg.org/wastereduction.
Provide easy and convenient recycling opportunities for residents, the public, and tenant businesses.	Tips on developing a successful recycling program, and opportunities for cost effective recycling, are available on the California Integrated Waste Management Board's Zero Waste California website. See http://zerowaste.ca.gov/.
Provide education and publicity about reducing waste and available recycling services.	Many cities and counties provide information on waste reduction and recycling. See, for example, the Butte County Guide to Recycling at http://www.recyclebutte.net. The California Integrated Waste Management Board's website contains numerous publications on recycling and waste reduction that may be helpful in devising an education project. See http://www.ciwmb.ca.gov/Publications/default.asp?cat=13. Private projects may also provide waste and recycling education directly, or fund education.

Land Use Measures

Ensure consistency with "smart growth" principles – mixed-use, infill, and higher density projects that provide alternatives to individual vehicle travel and promote the efficient delivery of services and goods.	U.S. EPA maintains an extensive Smart Growth webpage with links to examples, literature and technical assistance, and financial resources. See http://www.epa.gov/smartgrowth/index.htm. The National Oceanic and Atmospheric Administration's webpage provides smart growth recommendations for communities located near water. See Coastal & Waterfront Smart Growth (webpage) at http://coastalsmartgrowth.noaa.gov/. The webpage includes case studies from California. The California Energy Commission has recognized the important role that land use can play in meeting our greenhouse gas and energy efficiency goals. The agency's website, Smart Growth & Land Use Planning, contains useful information and links to relevant studies, reports, and other resources. See http://www.energy.ca.gov/landuse/. The Metropolitan Transportation Commission's webpage, Smart Growth / Transportation for Livable Communities, includes resources that may be useful to communities in the San Francisco Bay Area and beyond. See http://www.mtc.ca.gov/planning/smart_growth/. The Sacramento Area Council of Governments (SACOG) has published examples of smart growth in action in its region. See Examples from the Sacramento Region of the Seven Principles of Smart Growth / Better Ways to Grow, available at http://www.sacog.org/regionalfunding/betterways.pdf.
Meet recognized "smart growth" benchmarks.	For example, the LEED for Neighborhood Development (LEED-ND) rating system integrates the principles of smart growth, urbanism and green building into the first national system for neighborhood design. LEED-ND is a collaboration among the U.S. Green Building Council, Congress for the New Urbanism, and the Natural Resources Defense Council. For more information, see http://www.usgbc.org/DisplayPage.aspx?CMSPageID=148.
Educate the public about the many benefits of well-designed, higher density development.	See, for example, U.S. EPA, Growing Smarter, Living Healthier: A Guide to Smart Growth and Active Aging (webpage), discussing how compact, walkable communities can provide benefits to seniors. See http://www.epa.gov/aging/bhc/guide/index.html. U.S. EPA, Environmental Benefits of Smart Growth (webpage) at http://www.epa.gov/dced/topics/eb.htm (noting local air and water quality improvements). Centers for Disease Control and Prevention (CDC), Designing and Building Healthy Places (webpage), at http://www.cdc.gov/healthyplaces/. The CDC's website discusses the links between walkable communities and public health and includes numerous links to educational materials. California Department of Housing and Community Development, Myths and Facts About Affordable and High Density Housing (2002), available at http://www.hcd.ca.gov/hpd/mythsnfacts.pdf.

Incorporate public transit into the project's design.	Federal Transit Administration, Transit-Oriented Development (TOD) (webpage) at http://www.fta.dot.gov/planning/planning_environment_6932.html (describing the benefits of TOD as "social, environmental, and fiscal.") California Department of Transportation (Caltrans), Statewide Transit-Oriented Development Study: Factors for Success in California (2002), available at http://transitorienteddevelopment.dot.ca.gov/miscellaneous/StatewideTOD.htm Caltrans, California Transit-Oriented Development Searchable Database (includes detailed information on numerous TODs), available at http://transitorienteddevelopment.dot.ca.gov/miscellaneous/NewHome.jsp. California Department of Housing and Community Development, Transit Oriented Development (TOD) Resources (Aug. 2009), available at http://www.hcd.ca.gov/hpd/tod.pdf.
Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio.	U.S. EPA, Smart Growth and Open Space Conservation (webpage) at http://www.epa.gov/dced/openspace.htm.
Develop "brownfields" and other underused or defunct properties near existing public transportation and jobs.	U.S. EPA, Smart Growth and Brownfields (webpage) at http://www.epa.gov/dced/brownfields.htm. For example, as set forth in the Local Government Commission's case study, the Town of Hercules, California reclaimed a 426-acre brownfield site, transforming it into a transit-friendly, walkable neighborhood. See http://www.lgc.org/freepub/docs/community_design/fact_sheets/er_case_studies.pdf. For financial resources that can assist in brownfield development, see Center for Creative Land Recycling, Financial Resources for California Brownfields (July 2008), available at http://www.cclr.org/media/publications/8-Financial_Resources_2008.pdf.
Include pedestrian and bicycle facilities within projects and ensure that existing non-motorized routes are maintained and enhanced.	See U.S. Department of Transportation, Federal Highway Administration, Bicycle and Pedestrian Program (webpage) at http://www.fhwa.dot.gov/environment/bikeped/. Caltrans, Pedestrian and Bicycle Facilities in California / A Technical Reference and Technology Transfer Synthesis for Caltrans Planners and Engineers (July 2005), available at http://www.dot.ca.gov/hq/traffops/survey/pedestrian/TR_MAY0405.pdf. This reference includes standard and innovative practices for pedestrian facilities and traffic calming.

Transportation and Motor Vehicles

Meet an identified transportation-related benchmark.	A logical benchmark might be related to vehicles miles traveled (VMT), e.g., average VMT per capita, per household, or per employee. As the California Energy Commission has noted, VMT by California residents increased "a rate of more than 3 percent a year between 1975 and 2004, markedly faster than the population growth rate over the same period, which was less than 2 percent. This increase in VMT correlates to an increase in petroleum use and GHG production and has led to the transportation sector being responsible for 41 percent of the state's GHG emissions in 2004." CEC, The Role of Land Use in Meeting California's Energy and Climate Change Goals (Aug. 2007) at p. 9, available at http://www.energy.ca.gov/2007publications/CEC-600-2007-008/CEC-600-2007-008-SF.PDF. Even with regulations designed to increase vehicle efficiency and lower the carbon content of fuel, "reduced VMT growth will be required to meet GHG reductions goals." *Id.* at p. 18.
Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation.	For example, reduce parking for private vehicles while increasing options for alternative transportation; eliminate minimum parking requirements for new buildings; "unbundle" parking (require that parking is paid for separately and is not included in rent for residential or commercial space); and set appropriate pricing for parking. See U.S. EPA, Parking Spaces / Community Places, Finding the Balance Through Smart Growth Solutions (Jan. 2006), available at http://www.epa.gov/dced/pdf/EPAParkingSpaces06.pdf. Reforming Parking Policies to Support Smart Growth, Metropolitan Transportation Commission (June 2007) at http://www.mtc.ca.gov/planning/smart_growth/parking_seminar/Toolbox_Handbook.pdf. See also the City of Ventura's Downtown Parking and Mobility Plan, available at http://www.cityofventura.net/community_development/resources/mobility_parking_plan.pdf, and Ventura's Downtown Parking Management Program, available at http://www.ci.ventura.ca.us/depts/comm_dev/downtownplan/chapters.asp.
Build or fund a major transit stop within or near the development.	"'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." (Pub. Res. Code, § 21064.3.) Transit Oriented Development (TOD) is a moderate to higher density development located within an easy walk of a major transit stop. http://transitorienteddevelopment.dot.ca.gov/miscellaneous/NewWhatisTOD.htm. By building or funding a major transit stop, an otherwise ordinary development can become a TOD.

Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers.	See U.S. Department of Transportation and U.S. EPA, Commuter Choice Primer / An Employer's Guide to Implementing Effective Commuter Choice Programs, available at http://www.its.dot.gov/JPODOCS/REPTS_PR/13669.html. The Emery Go Round shuttle is a private transportation service funded by commercial property owners in the citywide transportation business improvement district. The shuttle links a local shopping district to a Bay Area Rapid Transit stop. See http://www.emerygoround.com/. Seattle, Washington maintains a public transportation "ride free" zone in its downtown from 6:00 a.m. to 7:00 p.m. daily. See http://transit.metrokc.gov/tops/accessible/paccessible_map.html#fare.
Promote "least polluting" ways to connect people and goods to their destinations.	Promoting "least polluting" methods of moving people and goods is part of a larger, integrated "sustainable streets" strategy now being explored at U.C. Davis's Sustainable Transportation Center. Resources and links are available at the Center's website, http://stc.ucdavis.edu/outreach/ssp.php.
Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments.	Bicycling can have a profound impact on transportation choices and air pollution reduction. The City of Davis has the highest rate of bicycling in the nation. Among its 64,000 residents, 17 percent travel to work by bicycle and 41 percent consider the bicycle their primary mode of transportation. See Air Resources Board, Bicycle Awareness Program, Bicycle Fact Sheet, available at http://www.arb.ca.gov/planning/tsag/bicycle/factsht.htm. For recommendations on best practices, see the many resources listed at the U.S. Department of Transportation, Federal Highway Administration's Bicycle and Pedestrian website at http://www.fhwa.dot.gov/environment/bikeped/publications.htm. See also Caltrans Division of Research and Innovation, Designing Highway Facilities To Encourage Walking, Biking and Transit (Preliminary Investigation) (March 2009), available at http://www.dot.ca.gov/research/researchreports/preliminary_investigations/docs/pi-design_for_walking_%20biking_and_transit%20final.pdf.
Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.	According to local and national surveys of potential bicycle commuters, secure bicycle parking and workplace changing facilities are important complements to safe and convenient routes of travel. See Air Resources Board, Bicycle Awareness Program, Bicycle Fact Sheet, available at http://www.arb.ca.gov/planning/tsag/bicycle/factsht.htm.

Ensure that the project enhances, and does not disrupt or create barriers to, non-motorized transportation.	See, e.g., U.S. EPA's list of transit-related "smart growth" publications at http://www.epa.gov/dced/publications.htm#air, including Pedestrian and Transit-Friendly Design: A Primer for Smart Growth (1999), available at www.epa.gov/dced/pdf/ptfd_primer.pdf. See also Toolkit for Improving Walkability in Alameda County, available at http://www.acta2002.com/ped toolkit/ped_toolkit_print.pdf. Pursuant to the California Complete Streets Act of 2008 (AB 1358, Gov. Code, §§ 65040.2 and 65302), commencing January 1, 2011, upon any substantive revision of the circulation element of the general plan, a city or county will be required to modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users.
Connect parks and open space through shared pedestrian/bike paths and trails to encourage walking and bicycling. Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points.	Walk Score ranks the "walkability" of neighborhoods in the largest 40 U.S. cities, including seven California cities. Scores are based on the distance to nearby amenities. Explore Walk Score at http://www.walkscore.com/. In many markets, homes in walkable neighborhoods are worth more than similar properties where walking is more difficult. See Hoak, *Walk appeal / Homes in walkable neighborhoods sell for more: study*, Wall Street Journal (Aug. 18, 2009), available at http://www.marketwatch.com/story/homes-in-walkable-neighborhoods-sell-for-more-2009-08-18. By creating walkable neighborhoods with more transportation choices, Californians could save $31 million and cut greenhouse gas emissions by 34 percent, according to a study released by Transform, a coalition of unions and nonprofits. See Windfall for All / How Connected, Convenient Neighborhoods Can Protect Our Climate and Safeguard California's Economy (Nov. 2009), available at http://transformca.org/windfall-for-all#download-report.
Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles.	In some communities, twenty to twenty-five percent of morning traffic is due to parents driving their children to school. Increased traffic congestion around schools in turn prompts even more parents to drive their children to school. Programs to create safe routes to schools can break this harmful cycle. See California Department of Public Health, Safe Routes to School (webpage) and associated links at http://www.cdph.ca.gov/HealthInfo/injviosaf/Pages/SafeRoutestoSchool.aspx. See also U.S. EPA, Smart Growth and Schools (webpage), available at http://www.epa.gov/dced/schools.htm. California Center for Physical Activity, California Walk to School (website) at http://www.cawalktoschool.com Regular school bus service (using lower-emitting buses) for children who cannot bike or walk to school could substantially reduce private vehicle congestion and air pollution around schools. See Air Resources Board, Lower Emissions School Bus Program (webpage) at http://www.arb.ca.gov/msprog/schoolbus/schoolbus.htm.

Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.	There are numerous sites on the web with resources for employers seeking to establish telework or flexible work programs. These include U.S. EPA's Mobility Management Strategies: Commuter Programs website at http://www.epa.gov/otaq/stateresources/rellinks/mms_commprograms.htm; and Telework, the federal government's telework website, at http://www.telework.gov/. Through a continuing FlexWork Implementation Program, the Traffic Solutions division of the Santa Barbara County Association of Governments sponsors flexwork consulting, training and implementation services to a limited number of Santa Barbara County organizations that want to create or expand flexwork programs for the benefit of their organizations, employees and the community. See http://www.flexworksb.com/read_more_about_the_fSBp.html. Other local government entities provide similar services.
Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions.	Many types of projects may provide opportunities for delivering more tailored transportation information. For example, a homeowner's association could provide information on its website, or an employer might create a Transportation Coordinator position as part of a larger Employee Commute Reduction Program. See, e.g., South Coast Air Quality Management District, Transportation Coordinator training, at http://www.aqmd.gov/trans/traing.html.
Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles.	See, for example U.S. EPA, SmartWay Transport Partnership: Innovative Carrier Strategies (webpage) at http://www.epa.gov/smartway/transport/what-smartway/carrier-strategies.htm. This webpage includes recommendations for actions that truck and rail fleets can take to make ground freight more efficient and cleaner. The Air Resources Board's Drive Clean website is a resource for car buyers to find clean and efficient vehicles. The web site is designed to educate Californians that pollution levels range greatly between vehicles. See http://www.driveclean.ca.gov/. The Oregon Department of Transportation and other public and private partners launched the Drive Less/Save More campaign. The comprehensive website contains fact sheets and educational materials to help people drive more efficiently. See http://www.drivelesssavemore.com/.
Purchase, or create incentives for purchasing, low or zero-emission vehicles.	See Air Resources Board, Low-Emission Vehicle Program (webpage) at http://www.arb.ca.gov/msprog/levprog/levprog.htm. Air Resource Board, Zero Emission Vehicle Program (webpage) at http://www.arb.ca.gov/msprog/zevprog/zevprog.htm. All new cars sold in California are now required to display an Environmental Performance (EP) Label, which scores a vehicle's global warming and smog emissions from 1 (dirtiest) to 10 (cleanest). To search and compare vehicle EP Labels, visit www.DriveClean.ca.gov.

Create a ride sharing program. Promote existing ride sharing programs e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides.	For example, the 511 Regional Rideshare Program is operated by the Metropolitan Transportation Commission (MTC) and is funded by grants from the Federal Highway Administration, U.S. Department of Transportation, the Metropolitan Transportation Commission, the Bay Area Air Quality Management District and county congestion management agencies. For more information, see http://rideshare.511.org/. As another example, San Bernardino Associated Governments works directly with large and small employers, as well as providing support to commuters who wish to share rides or use alternative forms of transportation. See http://www.sanbag.ca.gov/commuter/rideshare.html. Valleyrides.com is a ridesharing resource available to anyone commuting to and from Fresno and Tulare Counties and surrounding communities. See http://www.valleyrides.com/. There are many other similar websites throughout the state.
Create or accommodate car sharing programs, e.g., provide parking spaces for car share vehicles at convenient locations accessible by public transportation.	There are many existing car sharing companies in California. These include City CarShare (San Francisco Bay Area), see http://www.citycarshare.org/; and Zipcar, see http://www.zipcar.com/. Car sharing programs are being successfully used on many California campuses.
Provide a vanpool for employees.	Many local Transportation Management Agencies can assist in forming vanpools. See, for example, Sacramento Transportation Management Association, Check out Vanpooling (webpage) at http://www.sacramento-tma.org/vanpool.html.
Create local "light vehicle" networks, such as neighborhood electric vehicle systems.	See California Energy Commission, Consumer Energy Center, Urban Options - Neighborhood Electric Vehicles (NEVs) (webpage) at http://www.consumerenergycenter.org/transportation/urban_options/nev.html. The City of Lincoln has an innovative NEV program. See http://www.lincolnev.com/index.html.
Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.	Under existing law, diesel-fueled motor vehicles with a gross vehicle weight rating greater than 10,000 pounds are prohibited from idling for more than 5 minutes at any location. The minimum penalty for an idling violation is now $300 per violation. See http://www.arb.ca.gov/enf/complaints/idling_cv.htm.
Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.	For a list of existing alternative fuel stations in California, visit http://www.cleancarmaps.com/. See, e.g., Baker, *Charging-station network built along 101*, S.F. Chron. (9/23/09), available at http://articles.sfgate.com/2009-09-23/news/17207424_1_recharging-solar-array-tesla-motors.

Agriculture and Forestry (additional strategies noted above)

Require best management practices in agriculture and animal operations to reduce emissions, conserve energy and water, and utilize alternative energy sources, including biogas, wind and solar.	Air Resources Board (ARB), Economic Sectors Portal, Agriculture (webpage) at http://www.arb.ca.gov/cc/ghgsectors/ghgsectors.htm. ARB's webpage includes information on emissions from manure management, nitrogen fertilizer, agricultural offroad equipment, and agricultural engines. "A full 90% of an agricultural business' electricity bill is likely associated with water use. In addition, the 8 million acres in California devoted to crops consume 80% of the total water pumped in the state." See Flex Your Power, Agricultural Sector (webpage) at http://www.fypower.org/agri/. Flex Your Power, Best Practice Guide / Food and Beverage Growers and Processors, available at http://www.fypower.org/bpg/index.html?b=food_and_bev. Antle et al., Pew Center on Global Climate Change, Agriculture's Role in Greenhouse Gas Mitigation (2006), available at http://www.pewclimate.org/docUploads/Agriculture's%20Role%20in%20GHG%20Mitigation.pdf.
Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits.	"There are three general means by which agricultural and forestry practices can reduce greenhouse gases: (1) avoiding emissions by maintaining existing carbon storage in trees and soils; (2) increasing carbon storage by, e.g., tree planting, conversion from conventional to conservation tillage practices on agricultural lands; (3) substituting bio-based fuels and products for fossil fuels, such as coal and oil, and energy-intensive products that generate greater quantities of CO2 when used." U.S. EPA, Carbon Sequestration in Agriculture and Forestry, Frequently Asked Questions (webpage) at http://www.epa.gov/sequestration/faq.html. Air Resources Board, Economic Sectors Portal, Forestry (webpage) at http://www.arb.ca.gov/cc/ghgsectors/ghgsectors.htm.
Protect existing trees and encourage the planting of new trees. Adopt a tree protection and replacement ordinance.	Tree preservation and planting is not just for rural areas of the state; suburban and urban forests can also serve as carbon sinks. See Cal Fire, Urban and Community Forestry (webpage) at http://www.fire.ca.gov/resource_mgt/resource_mgt_urbanforestry.php.

Off-Site Mitigation

If, after analyzing and requiring all reasonable and feasible on-site mitigation measures for avoiding or reducing greenhouse gas-related impacts, the lead agency determines that additional mitigation is required, the agency may consider additional off-site mitigation. The project proponent could, for example, fund off-site mitigation projects that will reduce carbon emissions, conduct an audit of its other existing operations and agree to retrofit, or purchase verifiable carbon "credits" from another entity that will undertake mitigation.

The topic of off-site mitigation can be complicated. A full discussion is outside the scope of this summary document. Issues that the lead agency should consider include:

- The location of the off-site mitigation. (If the off-site mitigation is far from the project, any additional, non-climate related co-benefits of the mitigation may be lost to the local community.)

- Whether the emissions reductions from off-site mitigation can be quantified and verified. (The California Registry has developed a number of protocols for calculating, reporting and verifying greenhouse gas emissions. Currently, industry-specific protocols are available for the cement sector, power/utility sector, forest sector and local government operations. For more information, visit the California Registry's website at http://www.climateregistry.org/.)

- Whether the mitigation ratio should be greater than 1:1 to reflect any uncertainty about the effectiveness of the off-site mitigation.

Offsite mitigation measures that could be funded through mitigation fees include, but are not limited to, the following:

- Energy efficiency audits of existing buildings.

- Energy efficiency upgrades to existing buildings not otherwise required by law, including heating, ventilation, air conditioning, lighting, water heating equipment, insulation and weatherization (perhaps targeted to specific communities, such as low-income or senior residents).

- Programs to encourage the purchase and use of energy efficient vehicles, appliances, equipment and lighting.

- Programs that create incentives to replace or retire polluting vehicles and engines.

- Programs to expand the use of renewable energy and energy storage.

- Preservation and/or enhancement of existing natural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) that provide carbon sequestration benefits.

- Improvement and expansion of public transit and low- and zero-carbon transportation alternatives.

ATTACHMENT B

Indoor Air Quality in New California Homes with Mechanical Ventilation

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SUMMARY
The Healthy Efficient New Gas Homes (HENGH) study measured indoor air quality and mechanical ventilation use in 70 new California homes. This paper summarizes preliminary results collected from 42 homes. In addition to measurements of formaldehyde, nitrogen dioxide (NO_2), and $PM_{2.5}$ that are discussed here, HENGH also monitored other indoor environmental parameters (e.g., CO_2) and indoor activities (e.g., cooking, fan use) using sensors and occupant logs. Each home was monitored for one week. Diagnostic tests were performed to characterize building envelope and duct leakage, and mechanical system airflow. Comparisons of indoor formaldehyde, NO_2, and $PM_{2.5}$ with a prior California New Home Study (CNHS) (Offermann, 2009) suggest that contaminant levels are lower than measured from about 10 years ago. The role of mechanical ventilation on indoor contaminant levels will be evaluated.

KEYWORDS
Formaldehyde; nitrogen dioxide; particles; home performance; field study

1 INTRODUCTION
The HENGH field study (2016–2018) aimed to measure indoor air quality in 70 new California homes that have mechanical ventilation. Eligible houses were built in 2011 or later; had an operable whole-dwelling mechanical ventilation system; used natural gas for space heating, water heating, and/or cooking; and had no smoking in the home. Study participants were asked to rely on mechanical ventilation and avoid window use during the one-week monitoring period. All homes had a venting kitchen range hood or over the range microwave and bathroom exhaust fans. This paper presents summary results of formaldehyde, NO_2, and $PM_{2.5}$ measurements in 42 homes. The full dataset is expected to be available in summer 2018.

2 METHODS
Integrated one-week concentrations of formaldehyde and NO_x were measured using SKC UMEx-100 and Ogawa passive samplers. Formaldehyde samplers were deployed in the main living space, master bedroom, and outdoors. $PM_{2.5}$ were measured using a pair of photometers (ES-642/BT-645, MetOne Instruments) indoor in the main living space and outdoors. $PM_{2.5}$ filter samples were collected using a co-located pDR-1500 (ThermoFisher) in a subset of the homes and time-resolved photometer data were adjusted using the gravimetric measurements. Results are compared with a prior field study CNHS (2007–2008) (Offermann, 2009) that monitored for contaminant concentrations over a 24-hour period in 108 homes built between 2002 and 2004, including a subset of 26 homes with whole-dwelling mechanical ventilation.

3 RESULTS
Figure 1 compares the indoor concentrations of formaldehyde, NO_2, and $PM_{2.5}$ measured by the two studies. Results of HENGH are one-week averaged concentrations, whereas CHNS are 24-hour averages. HENGH measured lower indoor concentrations of formaldehyde and $PM_{2.5}$, compared to CNHS. For NO_2, the indoor concentrations measured by the two studies

are similar. Summary statistics of indoor and outdoor contaminant concentrations (mean and median concentrations; N=number of homes with available data) are presented in Table 1.

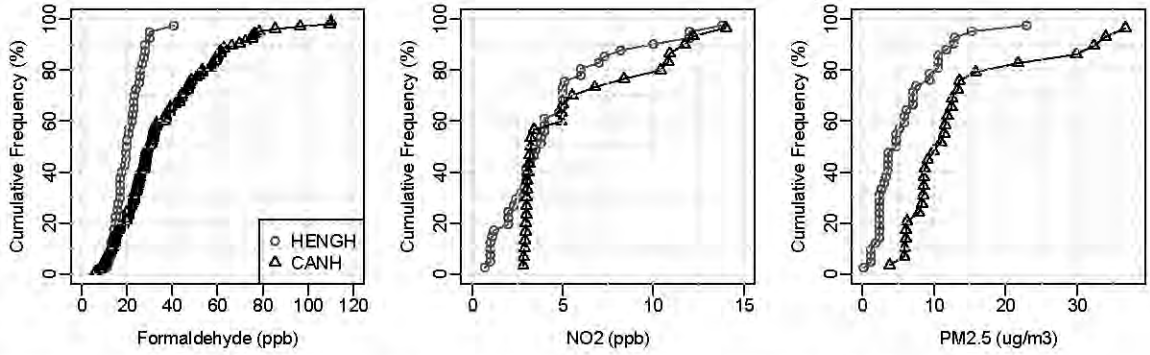

Figure 1. Comparisons of indoor contaminant concentrations measured by two studies.

Table 1. Summary statistics of indoor and outdoor contaminant concentrations.

	HENGH - Indoor			CNHS - Indoor			HENGH - Outdoor			CNHS - Outdoor		
	N	Median	Mean	N	Median	Mean	N	Median	Mean	N	Median	Mean
Formaldehyde (ppb)	39	20.0	20.6	104	29.5	36.3	38	2.0	2.0	43	1.8	2.8
NO_2 (ppb)	40	3.7	4.4	29	3.2	5.4	40	3.0	3.1	11	3.1	3.5
$PM_{2.5}$ (ug/m^3)	41	4.7	5.8	28	10.4	13.3	42	5.9	7.7	11	8.7	7.9

4 DISCUSSION

The lower formaldehyde concentrations measured by HENGH in comparison to CNHS may be attributable to California's regulation to limit formaldehyde emissions from composite wood products that came into effect between the two studies. Gas cooking is a significant source of indoor NO_2 (Mullen et al., 2016). Even though NO_2 concentrations measured by HENGH are similar to levels found in CNHS, the two studies differed in that HENGH homes all use gas for cooking, whereas almost all homes (98%) from the prior study used electric ranges. More analysis is needed to determine the effectiveness of source control, such as range hood use during cooking, on indoor concentrations of cooking emissions such as NO_2 and $PM_{2.5}$. Lower $PM_{2.5}$ indoors measured by HENGH compared to CNHS may be explained from a combination of lower outdoor $PM_{2.5}$ levels, reduced particle penetration due to tighter building envelopes (Stephens and Siegel, 2012) combined with exhaust ventilation, and use of medium efficiency air filter (MERV 11 or better) in some HENGH homes. Further analysis of the data will evaluate the role of mechanical ventilation, including local exhaust and whole-dwelling ventilation system, on measured indoor contaminant levels.

5 CONCLUSIONS

New California homes now have lower indoor formaldehyde levels than previously measured, likely as a result of California's formaldehyde emission standards. Indoor concentrations of NO_2 and $PM_{2.5}$ measured are also low compared to a prior study of new homes in California.

ACKNOWLEDGEMENT

LBNL work on the project was supported by the California Energy Commission. Field data collection was performed by the Gas Technology Institute. Support for field teams was provided by Pacific Gas & Electric and the Southern California Gas Company.

6 REFERENCES

Mullen NA et al. 2016 *Indoor Air* 26(2):231–245.

Offermann FJ. 2009. California Air Resource Board and California Energy Commission Report CEC-500-2009-085.
Stephens B, Siegel JA. 2012 *Indoor Air* 22(6):501–513.

Comment Letter No. 11

Lozeau Drury LLP
Richard Drury
on behalf of Supporters Alliance For Environmental ("SAFER") (sic)
1939 Harrison Street, Ste. 150
Oakland, CA 94612
May 21, 2019

Response to Comment 11-1

The comment states the letter is written on behalf of Supporters Alliance For Environmental ("SAFER") (sic). The comment introduces provides a summary description of the Project. This comment is noted for the administrative record and will be forwarded to the decision makers for review and consideration.

Response to Comment 11-2

The comment suggests the Final EIR contains numerous errors and omissions. Furthermore, the comment suggests the Final EIR fails as an informational document and fails to impose feasible mitigation measure to reduce the Project's impacts, but provides no specifics. The comment suggests that the City of El Segundo should address the shortcomings in a revised Draft EIR and recirculate the revised Draft EIR prior to approval. The comment also suggests the Final EIR fails to provide a reasoned and good faith analysis and fails to meet the legal standards, but provides no specifics. The comment also suggest the response to comments on a Draft EIR must state reasons for rejecting suggested mitigation measures and comments on significant environmental issues. While this comment does not identify any specific shortcomings of the Final EIR analysis or mitigation measures, the follow-on comments identify specific issues related to the Draft EIR. Responses to those comments are provided individually. As such, no specific response to this comment is possible or required. Furthermore, as outlined in the responses below, the Final EIR complied fully with all of CEQA's requirements.

The comment will be forwarded to the decision-makers for consideration.

Response to Comment 11-3

The comment suggests that CEQA requires the Lead Agency provide the Final EIR to all public entities that commented on the Draft EIR at least 10 days before certifying the EIR. The requirement to provide proposed responses to comments to agencies that commented on the Draft EIR 10 days prior to certifying the EIR (Public Resources Code 21092.5) did not apply at the time the comment letter was submitted because the EIR was not considered for certification at the May 23, 2019 Planning Commission meeting. Certification of the EIR will take place at a City Council meeting at a later date to be determined. Proposed responses to comments will be provided to commenting agencies (and the public) at least 10 days before this date. The comment will be forwarded to the decision-makers for consideration.

Response to Comment 11-4

The commenter states the SCAQMD and DTSC raise serious concerns about the toxic chemical soil contamination. The commenter suggest these concerns are largely ignored in the Final EIR and the Draft EIR ignores the soil contamination and the SCAQMD Rules governing the soil contamination, Rules 1166 and 1466 (Draft EIR IV.A.10-12). References to these rules (Rule 1166 – Volatile Organic Compounds from Decontaminated Soil, and SCAQMD Rule 1466 - Control of Particulate Emissions from Soils with Toxic Contaminants) were added to the regulatory requirements section in the Final EIR. The project applicant would be required to comply with SCAQMD Rule 1166 and Rule 1466 because these are existing regulatory

requirements. Even though the references were added to SCAQMD Rules 1166 and 1466 in the Final EIR, they are not mitigation measures. Recirculation of the Draft EIR would not be necessitated by this addition. Further, as indicated in the Draft EIR (page IV.E-24), while a Phase I report identified concerns with regard to TPH, lead and PCBs, a soil remediation plan was developed and implemented which resulted in the removal and proper off-site disposal of 504 cubic yards of impacted soil. Based on the data collected and work performed by the previous owner (Air Products and Chemicals), the Regional Water Quality Control Board, which has jurisdiction over the project site, issued a No Further Action determination for the project site soils on August 31, 2017, which was included as Appendix E.2 to the Draft EIR. As indicated in the No Further Action letter, the site has been cleaned up and abated so as to meet the requirements for a soil closure letter for commercial use of the site. As further noted in the letter, a covenant and environmental restriction has been placed on the property limiting the use to commercial applications.

Further, as discussed in Response to Comment 9-2, all USTs installed by the prior occupant of the site have been removed from the Project Site. The NFA letter establishes that no residual hazards related to contaminated soil or toxic contaminants are currently present on the project site. Since the project has been properly remediated to the satisfaction of the Regional Water Quality Control Board, a preliminary endangerment assessment and voluntary clean-up plan is not required, and no mitigation is required. The Draft EIR correctly concludes that impacts would be less than significant.

Furthermore, the Phase I Environmental Site Assessment Report prepared on September 22, 2017, after the No Further Action letter, determined that there were no Recognized Environmental Conditions (Rec's) located on the Project Site.

Response to Comment 11-5

The commenter states neither the Draft nor Final EIR contain any health risk assessment (HRA). The Draft EIR states that no HRA is required for toxic contaminants associated with construction equipment because construction will take place over 18 months. (DEIR IV.A.21.). An HRA is a technical study that evaluates how toxic emissions are released from a facility, how they disperse throughout the community, and the potential for those toxic pollutants to impact long-term human health. Determination of risk from construction emissions over a 30-year exposure period would not be appropriate since construction activities would be limited to a period of approximately 18 months. Thus, duration of construction activities would represent a fraction of the 30-year exposure period used as the basis for assessing the significance of carcinogenic risk exposure and, therefore, would not represent a source of sustained toxic emissions. Accordingly, the SCAQMD does not require preparation of a health risk assessment for construction emissions. Therefore, exposure to toxic emissions during construction would be less than significant. Furthermore, there are no sensitive receptors adjacent to the project site that would be potentially impacted by construction emissions.

The commenter purports to provide a description of the California Office of Environmental Health Hazard Assessment ("OEHHA") guidance on HRA's. The commenter suggests that this guidance mandates that all short-term projects lasting at least two months be evaluated for cancer risks to nearby sensitive receptors. The commenter provides no specific reference for this requirement. According to the "Air Toxic Hot Spots Program: Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, prepared by OEHHA, and adopted in March 2015, page 1-3, Section 1.3, Who Is Required to Conduct a Risk Assessment:

> "The Hot Spots Act requires that each local Air Pollution Control District or Air Quality Management District (hereinafter referred to as District) determine which facilities will prepare

an HRA. As defined under the Hot Spots Act, an HRA includes a comprehensive analysis of the dispersion of hazardous substances in the environment, their potential for human exposure, and a quantitative assessment of both individual and population-wide health risks associated with those levels of exposure.

Districts are to determine which facilities will prepare an HRA based on a prioritization process outlined in the law. The process by which Districts identify priority facilities for risk assessment involves consideration of potency, toxicity, quantity of emissions, and proximity to sensitive receptors such as hospitals, daycare centers, schools, work-sites, and residences. The District may also consider other factors that may contribute to an increased potential for significant risk to human receptors. **As part of this process Districts categorize facilities as high, intermediate, or low priority**. (emphasis added)"

High priority facilities are required to prepare an HRA and submit to the SCAQMD for review and approval. As noted above, the SCAQMD has not established any requirement to prepare an HRA for construction activity. Moreover, there are no sensitive receptors adjacent to the project site that could potentially be impacted by the construction emissions. Closest receptors are the multi-family residential dwelling units located approximately 0.18 miles (~290 meters) southwest and the multi-family attached and single-family detached residential dwelling units located approximately 0.2 miles (~322 meters) south of the Project Site. After construction is complete, the Project itself would not be not a source of toxic emissions and therefore it not required to provide a health risk assessment for its operations. The comment provides no substantial evidence of a health risk from either project construction or project operations, therefore no HRA or mitigation measures are required.

Response to Comment 11-6

The commenter states that the EIR admits that the Project will have significant greenhouse gas ("GHG") impacts. (FEIR I-17, 18), "Proposed Project's unmitigated emissions are 6,007.71 metric tons of CO2 equivalents per year resulting in 5.82 MTCO2e/SP/year." (DEIR IV.D-31). The commenter states this is far above the SCAQMD significance threshold for GHGs of 3,000 MT/year. While the Draft EIR acknowledges that the Proposed Project's unmitigated emissions would exceed both the SCAQMD Tier 3 and Tier 4 thresholds, the mitigation measures identified in the Draft EIR, MM D-1 through MM D-4 together with the reductions from the CAPCOA-based reduction measures, would reduce emissions to a level of 3.88 MTCO2e/SP/year, which is below the SCAQMD Tier 4 threshold of 4.8 MTCO2e/SP/year for projects (Draft EIR, page IV.D-41). The exceedance of the 3,000 MTCO2e threshold is irrelevant because this is a screening threshold that merely pushes the analysis to the Tier 4 threshold. Furthermore, the Project is not required to incorporate all mitigation measures, just sufficient measures that will reduce the impact to less than significant. This is established in the CalEEMod analysis provided in the Draft EIR and no substantial evidence is presented that would call this conclusion into question.

Response to Comment 11-7

The commenter states CalTrans submitted a comment concerning the Project's significant traffic impacts. The commenter also states, in response the Final EIR proposes a Traffic Demand Management (TDM) plan, but provides no detail for the TDM plan. The commenter states the Final EIR's TDM plan is deferred mitigation prohibited by CEQA. The commenter is referred to Section IV.K. Transportation, Traffic and Parking, page IV. K-46 which provides Mitigation Measure MM-K-1, which is the Transportation Demand Management Program. These measures would need to reflect the characteristics of the Project as finally constructed and occupied that cannot be presently known. Therefore, the Final EIR includes the requirement that the City must approve the TDM plan prior to project opening.

Response to Comment 11-8

The commenter states the EIR fails to analyze impacts of indoor air quality. The commenter suggests such impacts may be related to soil-vapor intrusion from toxic soil contamination. However, as noted above, no residual soil vapor impacts would result from Project Site conditions since the site was previously remediated to the satisfaction of the RWQCB. The commenter suggests that formaldehyde is present in residential and office building construction materials. These materials are regulated by the California Air Resources Board to minimize such emissions. No thresholds have been adopted by any regulatory agency as to what levels of such emissions would result in health impacts and no substantial evidence is provided that construction materials used in project construction would pose any health hazards to future occupants. Moreover, the study cited in the comment merely concludes that contaminant levels measured inside homes have declined from levels identified in a previous study conducted in 2009. This study makes no attempt to assess whether measured levels of formaldehyde, NO_2 or $PM_{2.5}$ exceed any established regulatory levels or pose any health risk to occupants. As provided in CEQA Guidelines Section 15064(f)(5), unsubstantiated opinion or narrative does not constitute substantial evidence. Since the commenter provides no substantial evidence regarding the alleged inadequacy of the EIR, the claims contained in the comment letter would provide no basis for changes to the Draft EIR or the Final EIR.

Response to Comment 11-9

The commenter states for the forgoing reasons the EIR fails to meet the requirements of CEQA. The commenter urges the City to require preparation of a Revised Draft EIR that addresses the identified deficiencies. As noted above, none of the issues identified in the comment letter provide substantial evidence that the Project would result in a new significant impact or substantial increase in severity of an impact previously identified in the Draft EIR. In addition, the commenter provides no substantial evidence that a feasible alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it, or the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. As provided in CEQA Guidelines Section 15064(f)(5), unsubstantiated opinion or narrative does not constitute substantial evidence. Since the commenter provides no substantial evidence regarding the alleged inadequacy of the Draft or Final EIR, the claims contained in the comment letter would provide no basis for requiring recirculation of the Draft EIR under CEQA Guidelines Section 15088.5.

III. REVISIONS, CLARIFICATIONS AND CORRECTIONS ON THE DRAFT EIR

This section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the Project. Such changes are a result of public and agency comments received in response to the Draft EIR and/or new information which clarifies, amplifies, or insignificantly modifies language in the Draft EIR that has become available since publication of the Draft EIR. These changes to the Draft EIR are indicated in this section under the appropriate Draft EIR section or appendix heading. Deletions are shown with strikethrough and additions are shown with underline.

The changes described in this section do not require recirculation of the Draft EIR because they do not result in any new or increased significant environmental impacts of the Project. CEQA requires recirculation of a Draft EIR only when "significant new information" is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: "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:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- 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.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

As demonstrated in this Final EIR, neither the comments submitted on the Draft EIR, the responses to these comments, nor the revisions presented in this section, meet the above criteria for recirculation.

I. INTRODUCTION AND SUMMARY

Section 1. Introduction and Summary, page I-21, MM E-1 and MM E-2, revise as follows:

Construction - The Phase I ESA noted that all structures have been removed from the existing Project Site, and no asbestos or ACMs were found in the soil. Therefore, the potential for the presence of asbestos or ACMs to be located in the soil of the Project Site is considered to be low. However, based on these investigations, on-site soil was found to be impacted with TPH, lead, and PCBs. As stated above, an investigation report and remedial action workplan was prepared on behalf of Air Products and Chemicals and submitted to the RWQCB, and 504 cubic yards of impacted soil was reportedly excavated and disposed off-site as non-hazardous waste at Azusa Land Reclamation, Azusa, California. Based on the data collected and work performed by Air Products and Chemicals, the RWQCB issued a NFA determination for soil on August 31, 2017.

~~In accordance with regulatory requirements, prior to excavation soil shall be sampled and analyzed for TPH, lead and PCBs. During excavation all TPH, lead, and PCBs would be removed in accordance with applicable regulatory requirements. Specifically, Cal-OSHA has established limits of exposure to lead contained in dusts and fumes through California Code of Regulations, Title 8, Section 1532.1. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. Furthermore, any materials found to contain TPH or PCBs must be removed and disposed in accordance with all applicable local, State and federal regulations including, but not limited to California Code of Regulations, Title 22, and EPA 40 CFR. With the compliance of these regulatory requirements and implementation of Mitigation Measure MM E-1,~~ Thus impacts from the release of hazardous materials into the environment would be **less than significant**.

There is a Standard Oil Company and Standard Gasoline Company pipe line easement located along the Project Site frontage. The easement, recorded on December 27, 1968, was to construct, maintain, operate, repair, add to and remove one or more pipelines as well as overhead wires, conductors, cables and conduits, and appurtenances thereof, into the easement. The easement covers a strip of land 43 ½ feet wide, and runs the entire length of the Project Site. The easement includes an existing 3" Chevron oil line and an existing 4" Chevron oil line. Furthermore, there is an easement that runs along the backside of the Project Site, parallel with the railroad tracks. This easement contains a 16" crude oil pipeline for the Four Corners Pipe Line company and was recorded on March 21, 1958. Thus, excavation of the Project could result in the accidental release of oil from one of the pipelines, which would result in potentially significant impacts. However, with the implementation of Mitigation Measure MM E-~~2~~21, impacts would be reduced to a level of **less than significant**.

Section 1. Introduction and Summary, page I-21, MM E-1 and MM E-2, revise as follows:

~~**MM E-1:** In accordance with regulatory requirements, prior to excavation soil shall be sampled and analyzed for TPH, lead and PCBs. During construction and excavation of the Project, the Applicant shall notify the LARWQCB immediately if additional hazardous wastes such as THP, lead, or PCBs are encountered in the soil and/or groundwater during construction activities.~~

MM E-~~2~~21: Prior to the issuance of grading permits, the Applicant shall submit final design plans and a design-level geotechnical engineering report to the City of El Segundo Building and Safety Division for review and approval. The design-level geotechnical engineering report shall provide the location of the Standard Oil Company and Standard Gasoline Company pipe line easement.

Section 1. Introduction and Summary, page I-46, MM K-1, revise as follows:

MM K-1: **Transportation Demand Management Program.** A TDM program will be implemented as part of the mitigation package for the Project. Several TDM program elements are project design features that are currently proposed for implementation. Other TDM program elements would be developed as part of preparation of a detailed TDM plan, to be approved by City of El Segundo prior to approval of a final certificate of occupancy for the Project.

TDM strategies are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation such as carpooling, taking

transit, walking, and biking. Strategies that are suggested as appropriate for this site, as targeted for the office land use, include:

- Commuter Trip Reduction (CTR) Program, Voluntary – The Project could implement a CTR program that encourages alternative modes of transportation such as carpooling, taking transit, walking, and biking. The voluntary program does not require monitoring and reporting and no performance standards are established. The CTR program would provide employees with assistance in the following.
    - Carpool encouragement,
    - Ride-matching assistance,
    - Preferential carpool parking,
    - Flexible work schedules for carpools,
    - Half time transportation coordinator; and
    - Vanpool assistance.
    - Due to the importance of information sharing and marketing, marketing strategies to reduce commute trips would be included as part of the CTR Program. Some marketing strategies may include:
    - New employee orientation of trip reduction and alternative mode options,
    - Event promotions; and
    - Publications.
- Car Share Program – This Project could implement a car-sharing program to allow people to have on-demand access to a shared fleet of vehicles on an as-needed basis. User costs are typically determined through mileage or hourly rates, with deposits and/or annual membership fees. The car-sharing program could be created through a local partnership or through one of many existing car-share companies. Employer-based programs provide a means for business/day trips for alternative mode commuters and provide a guaranteed ride home option.
- Site Design – Project site will be designed to encourage walking, biking, and transit. Amenities could include new, wider sidewalks and street trees along the site perimeter and bicycle parking, showers, and secure lockers.

II. PROJECT DESCRIPTION

Section II. Project Description, page II-8, revise as follows:

Per the ESMC, the number of bicycle spaces required is a minimum of four spaces for buildings up to 15,000 square feet, plus a minimum of five percent of the required vehicle spaces for the portion above 15,000 square feet. Per the ESMC, a ~~maximum~~ minimum of 25 bicycle spaces is required. The Project would meet or exceed these requirements. In addition, as part of the Project, bicycle racks would be installed in accordance with the ESMC and CalGreen requirements.

III. ENVIRONMENTAL SETTING

Section III. Environmental Setting, Table III-1, Related Projects, pages III-11 through III-12, revise as follows:

Table III-1
Related Projects

No.	Address	Land Use	Size
1.	540 East Imperial Avenue[b]	Residential	58 du
2.	201 North Douglas Street[b]	High School	1,200 stu
3.	400 Duley Road[b]	Medical Office	63,540 sf
4.	123 Nevada Street[b]	Office	15,000 sf
5.	2125 Campus Drive[b]	Office	153,530 sf
6.	2130 East Maple Drive and 725 Campus Square West[b]	Hotel	180 room
		Office	22,670 sf
7.	140 Sheldon Street[b]	Office/Warehouse	7,120 sf
8.	740 North Sepulveda Boulevard[b]	Drive through Restaurant	5,000 sf
9.	1492 Hermosa Avenue[a]	Hotel	30 rm
10.	2101 Pacific Coast Highway[a]	Office	10,120 sf
11.	824 1st Street[a]	Office	3,000 sf
12.	707 North Sepulveda Boulevard[a]	Supermarket	27,500 sf
		Restaurant	~~52~~ 28 seats
		Bank	7,000 sf
13.	1800 Manhattan Beach Boulevard[a]	General Office	3,000 sf
14.	2205 North Sepulveda Boulevard[a]	General Office	4,700 sf
15.	1762 Manhattan Beach Boulevard[a]	Medical Office	1,800 sf
		Apartment	1 du
16.	757 Manhattan Beach Boulevard[a]	Condominium	5 du
17.	1101 Manhattan Beach Boulevard[a]	Medical Office	5,000 sf
18.	1100 Manhattan Beach Boulevard[a]	Retail	13,000 sf
19.	2100 East El Segundo Boulevard[a]	Office	1,751,920 sf
		Warehouse	73,580 sf
		Industrial	168,000 sf
		Retail	148,960 sf
20.	500 South Douglas and 2330 Utah Avenue[b]	General Office	78,000 sf
21.	2171-2191 Rosecrans Avenue[b]	Restaurant	13,570 sf
22.	2516-2520 Nelson Avenue[a]	Condominium	9 du
23.	2430 Marine Avenue[a]	Hotel	121 rm
24.	305 South Sepulveda Boulevard, 330 South Sepulveda Boulevard, and Hermosa Beach Sites[a]	Design Center	100,300 sf
		Executive Offices	19,210 sf
		Coffee Shop	1,000 sf
		General Office	57,500 sf

Table III-1
Related Projects

No.	Address	Land Use	Size
25.	1700 East Imperial Avenue[b]	Office	86,520 sf
26.	750 South Douglas Street[a]	Industrial	4,990 sf
27.	1133 Artesia Boulevard[a]	Grocery Store	12,000 sf
28.	865 Manhattan Beach Boulevard[a]	General Office	15,000 sf
		Deli	700 sf
29.	1000 North Sepulveda Boulevard[a]	~~Supermarket~~ Medical Office	~~27,500~~ 23,050 sf
		~~Restaurant~~ Pharmacy	~~52,000~~ 665 sf
		~~Bank~~ Coffee Shop	~~7,000~~ 1,715 sf
30.	445 North Douglas Street[b]	Office	155,660 sf
31.	455 Continental Boulevard and 1995 East Grand Avenue[b]	Office	300,000 sf
32.	2420 Pacific Coast Highway[a]	New Church	32,190 sf
		Supermarket	30,080 sf
33.	3200-3600 North Sepulveda Boulevard[a]	Shopping Center	110,000 sf
34.	535 Indiana Street[b]	Residential	4 du
35.	700-860 South Sepulveda Boulevard, 2001-2015 East Park Place, and 700-740 Allied Way Boulevard[b]	Shopping Center	18,850 sf
36.	14500 Aviation Boulevard[c]	Credit Union	3,600 sf
37.	1301 El Segundo Boulevard[b]	Office	6,270 sf
		Warehouse	5,880 sf

du = dwelling units
sf = square feet
rm = rooms
stu = students
a. Related Project information provided by Erik Zandvliet, City of Manhattan Beach, November 6, 2017.
b. Related Project information provided by Ethan Edwards, City of El Segundo, January 23, 2018.
c. Related Project information provided by City of Hawthorne, January 18, 2018.
Source: Fehr and Peers, LLC., November 2018.

IV.A. AIR QUALITY

Section IV.A. Air Quality, pages IV.A-12 through IV.A-13, revise as follows:

13) SCAQMD Rule 2202

On-Road Motor Vehicle Mitigation Options, is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. It applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average.

Although the SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate air quality issues associated with plans and new development projects throughout the South Coast Air Basin. Instead, this is controlled through local jurisdictions in accordance with the CEQA. In order to assist local jurisdictions with air quality compliance issues the *CEQA Air Quality*

Handbook (SCAQMD CEQA Handbook) prepared by the SCAQMD (1993) with the most current updates found at http://www.aqmd.gov/ceqa/hdbk.html, was developed in accordance with the projections and programs of the AQMP. The purpose of the SCAQMD CEQA Handbook is to assist Lead Agencies, as well as consultants, project proponents, and other interested parties in evaluating a Proposed Project's potential air quality impacts. Specifically, the SCAQMD CEQA Handbook explains the procedures that the SCAQMD recommends be followed for the environmental review process required by CEQA. The SCAQMD CEQA Handbook provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. SCAQMD is in the process of developing an "Air Quality Analysis Guidance Handbook" to replace the CEQA Air Quality Handbook approved by the AQMD Governing Board in 1993. The 1993 CEQA Air Quality Handbook is still available but not online. In addition, there are sections of the 1993 Handbook that are obsolete. In order to assist the CEQA practitioner in conducting an air quality analysis while the new Handbook is being prepared, supplemental information regarding: significance thresholds and analysis, emissions factors, cumulative impacts emissions analysis, and other useful subjects, are available at the SCAQMD website[1].

14) SCAQMD Rule 1166

This rule sets requirements to control the emission of Volatile Organic Compounds (VOC) from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

15) SCAQMD Rule 1466

The purpose of this rule is to minimize the amount of off-site fugitive dust emissions containing toxic air contaminants by reducing particulate emissions in the ambient air as a result of earth-moving activities, including, excavating, grading, handling, treating, stockpiling, transferring, and removing soil that contains applicable toxic air contaminants from sites that meet the applicability requirements of subdivision (b).

~~13)~~ 16) Southern California Association of Governments

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the Federally designated MPO for the majority of the southern California region and is the largest MPO in the nation. With respect to air quality planning, SCAG has prepared the Regional Transportation Plan and Regional Transportation Improvement Plan ("RTIP"), which addresses regional development and growth forecasts. These plans form the basis for the land use and transportation components of the AQMP, which are utilized in the preparation of air quality forecasts and in the consistency analysis included in the AQMP. The Regional Transportation Plan, Regional Transportation Improvement Plan, and AQMP are based on projections originating within the City and County General Plans.

IV.E.HAZARDS AND HAZARDOUS MATERIALS

Section IV.E. Hazards and Hazardous Materials, pages IV.E-24 through IV.E-25, revise as follows:

[1] *http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.*

Threshold (b): The Project could have a significant impact if were to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact (b): Construction of the Project would not create a significant hazard to the public or the environment through release of hazardous materials into the environment. Impacts would be less than significant. However, construction of the Project could release any potentially existing subsurface hazardous substances to the environment, which would result in potentially significant impacts. Mitigation Measures E-1 ~~and E-2~~ would reduce the impacts to less than significant. Operation of the Project would not expose future occupants or site users to hazardous materials and impacts would be less than significant.

i) Construction

As previously discussed, the Phase I ESA noted that all structures have been removed from the existing Project Site, and no asbestos or ACMs were found in the soil. Therefore, the potential for the presence of asbestos or ACMs to be located in the soil of the Project Site is considered to be low. However, based on these investigations, on-site soil was found to be impacted with TPH, lead, and PCBs. As stated above, an investigation report and remedial action workplan was prepared on behalf of Air Products and Chemicals and submitted to the RWQCB, and 504 cubic yards of impacted soil was reportedly excavated and disposed off-site as non-hazardous waste at Azusa Land Reclamation, Azusa, California. Based on the data collected and work performed by Air Products and Chemicals, the RWQCB issued a NFA determination for soil on August 31, 2017. Thus impacts from the release of hazardous materials into the environment would be less than significant.

~~In accordance with regulatory requirements, prior to excavation soil shall be sampled and analyzed for TPH, lead and PCBs. During excavation all TPH, lead, and PCBs would be removed in accordance with applicable regulatory requirements. Specifically, Cal OSHA has established limits of exposure to lead contained in dusts and fumes through California Code of Regulations, Title 8, Section 1532.1, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse health exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. Furthermore, any materials found to contain TPH or PCBs must be removed and disposed in accordance with all applicable local, State and federal regulations including, but not limited to California Code of Regulations, Title 22, and EPA 40 CFR. With the compliance of these regulatory requirements and implementation of Mitigation Measure MM E-1, impacts would be reduced to a level of less than significant.~~

As stated above, there is a Standard Oil Company and Standard Gasoline Company pipe line easement located along the Project Site frontage. The easement, recorded on December 27, 1968, was to construct, maintain, operate, repair, add to and remove a single line of poles and overhead wires, conductors, cables and conduits, and appurtenances thereof, into the easement. The easement covers a strip of land 43 ½ feet wide, and runs the entire length of the Project Site. The easement includes an existing 3" Chevron oil line and an existing 4" Chevron oil line. Furthermore, there is an easement that runs along the backside of the Project Site, parallel with the railroad tracks. This easement contains a 16" crude oil pipeline for the Four Corners Pipe Line company and was recorded on March 21, 1958. Thus, excavation of the Project could result in the accidental release of oil from one of the pipelines, which would result in potentially

significant impacts. However, with the implementation of Mitigation Measure ~~MM E-2~~MM E-1, impacts would be reduced to a level of less than significant.

Section IV.E. Hazards and Hazardous Materials, pages IV.E-28 through IV.E-29, revise as follows:

4. CUMULATIVE IMPACTS

The geographical scope of the cumulative hazards and hazardous materials analysis is the Project vicinity. Adverse effects of hazards and hazardous materials tend to be localized; therefore, the area near the Project Site would be most affected by project activities (generally within a 500-foot radius).

Development of the Project in conjunction with the development of the related projects has the potential to increase the risk for accidental release of hazardous materials. The nearest related projects to the Project Site include related project numbers 14, 17, 19, 20, 21, 26, 33, 35, and 36. These related projects in combination with the Project would intensify the land usage in the immediate project area. However, mitigation measure MM E-1 ~~and MM E-2~~ would reduce the potential impacts associated with the Project to a less than significant level. Furthermore, each of the related projects would require evaluation for potential threats to public safety, including those associated with the accidental release of hazardous materials into the environment during construction and operation, transport/use/disposal of hazardous materials, and hazards to sensitive receptors (including schools). Because hazardous materials and risk of upset conditions are largely site-specific, this would occur on a case-by-case basis for each individual project affected, in conjunction with the development proposals on these properties. In addition, each related project would be required to follow local, State, and federal laws regarding hazardous materials. With mitigation, the Project would have less than significant impacts. Therefore, the Project, in conjunction with the related projects and other planned and/or approved projects, would not have a cumulatively considerable impact on hazards and hazardous materials, and cumulative impacts would be less than significant.

5. MITIGATION MEASURES

~~**MM E-1:** In accordance with regulatory requirements, prior to excavation soil shall be sampled and analyzed for TPH, lead and PCBs. During construction and excavation of the Project, the Applicant shall notify the LARWQCB immediately if additional hazardous wastes such as THP, lead, or PCBs are encountered in the soil and/or groundwater during construction activities.~~

MM E-~~2~~1: Prior to the issuance of grading permits, the Applicant shall submit final design plans and a design-level geotechnical engineering report to the City of El Segundo Building and Safety Division for review and approval. The design-level geotechnical engineering report shall provide the location of the Standard Oil Company and Standard Gasoline Company pipe line easement.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of the Mitigation Measure~~s~~ MM E-1 ~~and MM E-2~~, listed above, Project-level and cumulative hazards impacts would be reduced to a less-than-significant level.

IV.H.NOISE

Section IV.H. Noise, page IV.H-15, revise as follows:

Threshold (a): The Project would have a significant impact on noise if it would expose persons to or generate of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact (a): Construction noise will have a temporary or periodic increase in the ambient noise levels. However, no residential uses are located in close proximity to the Project Site, the site is surrounded by commercial uses. Construction-related noise impacts are considered to be less than significant.~~Construction could generate noise levels in excess of standards established by the City; however, the construction related impact of the Project would be less than significant with the implementation of mitigation measures MM H-1 through MM H-7~~. Operation of the Project would not expose persons to or generate noise levels in excess of standards established by the City and the operational impact of the Project would be less than significant.

Section IV.H. Noise, page IV.H-29, revise as follows:

Threshold (d): The Project would have a significant impact on noise if it would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Impact (d): ***Construction noise will have a temporary or periodic increase in the ambient noise levels. However, no residential uses are located in close proximity to the Project Site, the site is surrounded by commercial uses. Construction-related noise impacts are considered to be less than significant. ~~Construction of the Project would generate a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project. The short-term construction-related impact of the Project would be less than significant with the implementation of mitigation measures MM H-1 through MM H-7.~~***

IV.I.POPULATION, HOUSING AND EMPLOYMENT

Section IV. I. Population, Housing and Employment, Section 4.Cumulative Impacts, pages IV.I-10 through IV.I-13, revise as follows:

The geographic scope of the cumulative employment analysis is the City of El Segundo. Table IV.I-3 presents the estimated increase in employment, housing, and population associated with the 37 related projects identified in Section III, Environmental Setting, of this EIR. As shown in Table IV.I-3, the Project in conjunction with the related projects would result in an increase in employment of approximately ~~15,709~~ 15,680 jobs, an increase of 77 residential units and a population increase of 196 people.

Employment projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The related projects and other potential development projects that may occur throughout the City of El Segundo are expected to be largely consistent with their respective General Plan land use designations. According to projections extrapolated from the adopted 2016 growth forecast, the City is projected to increase in employment opportunities by approximately 3,700 jobs from 2012 to 2020 (8.8 percent growth) and increase by approximately 7,000 jobs from 2012 to 2040 (15.4 percent growth). Implementation of the Project in conjunction with the various related projects identified in Section III. Environmental Setting would further increase employment opportunities in the City of El Segundo and surrounding areas. As indicated in Table IV.I-3, the Project in conjunction with the related projects would cumulatively generate approximately ~~15,709~~ 15,680 new jobs~~, with 3,091 new jobs (cumulative jobs minus the Proposed Project jobs) located within the City of El Segundo~~. Job growth is considered a beneficial effect, and while the project's incremental contribution to regional job growth would be

considered cumulatively considerable, such job growth would not be considered an adverse cumulative impact, as discussed below.

Based upon the foregoing, SCAG employment forecasts clearly underestimate the potential employment growth in the City of El Segundo, and to a lesser extent, in the South Bay Cities Subregion as well. While the provision of employment is generally considered a beneficial effect of a project, this discrepancy in employment forecasts may adversely affect SCAG's regional planning efforts. SCAG's regional forecast "maintains the balance between employment, population, and households due to their interrelationship, assuming that employment growth is a driving force of regional population and household growth".[2]

Table IV.I-3
Cumulative Population, Housing and Employment

ID	Type of Use	Size	Employment Generation Factor[a] (per 1,000 sf)	Total Employment	Total Housing	Population Generation Factor[b] (per unit)	Total Population
1.	Residential	58 du	-	-	58 du	2.53	147
2.	High School	1,200 stu	-	-	-	-	-
3.	Medical Office	63,540 sf	0.00427	271			-
4.	Office	15,000 sf	0.00479	72			-
5.	Office	153,530 sf	0.00479	735			-
6.	Hotel	180 rm[d]	0.00113	81			-
	Office	22,670 sf	0.00479	109			-
7.	Office/ Warehouse	7,120 sf	0.00135	10			-
8.	Drive through Restaurant	5,000 sf	0.00153	8			-
9.	Hotel	30 rm[d]	0.00113	14			-
10.	Office	10,120 sf	0.00479	48			-
11.	Office	3,000 sf	0.00479	14			-
12.	Supermarket	27,500 sf	0.00153	42			-
	Restaurant	~~52~~28seats[c]	0.00153	~~10~~			-

[2] *SCAG Regional Forecast Overview, website: http://www.scag.ca.gov/DataAndTools/Pages/GrowthForecasting.aspx, accessed March 22, 2018.*

	Bank	7,000 sf	0.00283	20			-
13.	General Office	3,000 sf	0.00479	14			-
14.	General Office	4,700 sf	0.00479	23			-
15.	Medical Office	1,800 sf	0.00427	8			-
	Apartment	1 du	-	-	1 du	2.53	3
16.	Condominium	5 du	-	-	5 du	2.53	13
17.	Medical Office	5,000 sf	0.00427	21			-
18.	Retail	13,000 sf	0.00153	20			-
19.	Office	1,751,920 sf	0.00479	8,392			-
	Warehouse	73,580 sf	0.00135	99			-
	Industrial	168,000 sf	0.00135	227			-
	Retail	148,960 sf	0.00153	228			-
20.	General Office	78,000 sf	0.00479	374			-
21.	Restaurant	13,570 sf	0.00153	21			-
22.	Condominium	9 du	-	-	9 du	2.53	23
23.	Hotel	121 rm[d]	0.00113	55			-
24.	Design Center	100,300 sf	0.00269	270			-
	Executive Offices	19,210 sf	0.00269	52			-
	Coffee Shop	1,000 sf	0.00153	2			-
	General Office	57,500 sf	0.00479	275			-
25.	Office	86,520 sf	0.00479	414			-
26.	Industrial	4,990 sf	0.00135	7			-
27.	Grocery Store	12,000 sf	0.00153	18			-
28.	General Office	15,000 sf	0.00479	72			-
	Deli	700 sf	0.00153	1			-
29.	~~Supermarket~~ Medical Office	~~27,500~~ 23,050 sf	~~0.00153~~ 0.00479	~~42~~110			-
	~~Restaurant~~ Pharmacy	~~52,000 sf~~ 0.665 Seats	0.00153	~~80~~0			-

	~~Bank~~ Coffee Shop	~~7,000 sf~~ 1,715 sf	~~0.00283~~ 00153	~~203~~			-
30.	Office	155,660 sf	0.00479	746			-
31.	Office	300,000 sf	0.00479	1,437			-
32.	New Church	32,190 sf	0.00153	49			-
	Supermarket	30,080 sf	0.00153	46			-
33.	Shopping Center	110,000 sf	0.00153	168			-
34.	Residential	4 du	-	-	4 du	2.53	10
35.	Shopping Center	18,850 sf	0.00153	29			-
36.	Credit Union	3,600 sf	0.00153	6			-
37.	Office	6,270 sf	0.00479	30			-
	Warehouse	5,880 sf	0.00135	8			-
			Cumulative Total	**~~14,676~~ 14,647**	**77**		**196**
			Project Total	**1,033**			
			Cumulative and Project Total	**~~15,709~~ 15,680**	**77**		**196**

Notes: sf = square feet

a. Source for generation rate: Los Angeles Unified School District, Level 1 – Developer Fee Justification Study, Table 14, March 2017.

b. U.S. Census Bureau, City of El Segundo, Persons per Household, 2012-2016, website: https://www.census.gov/quickfacts/fact/table/elsegundocitycalifornia/PST045216

accessed March 13, 2018.

c Based on an estimate of 8 sf/seat.

d Based on an estimate of 400 sf/room.

Source: EcoTierra Consulting, Inc. March 2018.

To the extent that employment forecasts are used by SCAG to implement the regions' growth policies, underestimates of future employment in the City of El Segundo and the South Bay Cities Subregion may hinder planning for the timing, financing, and location of public facilities, utility systems, and transportation systems. However, the Regional Comprehensive Plan is to be periodically reviewed, and those sections that are found to be out of date are to be updated as needed. Furthermore, SCAG utilizes

the "employment-population-household ("EPH") forecast framework which is the basis for developing the regional growth forecast for the SCAG region". Therefore, the self-correcting nature of the forecasts would ensure that ongoing infrastructure planning efforts will remain consistent with regional growth trends.

In addition, as discussed in Section IV.G, Land Use and Planning, the Project would be consistent with the applicable City of El Segundo General Plan policies and would not include inappropriate uses for the Project Site nor would any inconsistency regarding cumulative growth occur. Based upon this consistency, the Project and other cumulative growth within the City of El Segundo have been accounted for in the City's long range planning. Furthermore, because SCAG's regional planning incorporates the City of El Segundo's General Plan into its growth forecasts, this cumulative growth may be deemed consistent with SCAG's forecasts and growth policies. Therefore, no significant impacts to the City of El Segundo (or to SCAG's regional planning) due to cumulative employment growth are anticipated.

The employment generated by the Project in conjunction with the related projects would have the potential to increase the resident population in the City of El Segundo, the South Bay Cities Subregion and surrounding areas, and consequently, the City and subregional demand for housing. As can be seen from Table IV.I-1, both population and employment in the City and South Bay Cities Subregion and surrounding area are expected to rise faster than housing between the years 2012 and 2040. This suggests that housing availability will become increasingly tight, and the average number of residents per dwelling can be expected to increase. A review of the related projects listed in Table IV.I-3, confirms the projections for slow housing growth in the region; only 77 new housing units are currently proposed. In addition, approximately ~~15,709~~ 15,680 jobs would be created by the same list of cumulative projects. However, between 2015 and 2040, the number of households in the South Bay Cities Subregion ~~region~~ will increase by ~~1,468,000~~ 23,532 households.[3] Based on the substantial disparity between projected job growth and housing construction locally, it is concluded that there will be a significant cumulative impact on population growth and housing demand. However, because the type of jobs that would be generated by the Project are of a similar nature to jobs found in the area, the Project would not likely result in the relocation and addition of permanent residents to fill the jobs generated by the Project, the incremental contribution of the Project would not contribute substantially to this significant impact.

IV.K.TRANSPORTATION, TRAFFIC AND PARKING

Section IV.K, Transportation, Traffic and Parking, page IV.K-46, MM K-1, revise as follows:

MM K-1: **Transportation Demand Management Program.** A TDM program will be implemented as part of the mitigation package for the Project. Several TDM program elements are project design features that are currently proposed for implementation. Other TDM program elements would be developed as part of preparation of a detailed TDM plan, to be approved by City of El Segundo prior to approval of a final certificate of occupancy for the Project. City approval will be contingent upon submission of an accompanying analysis based on CAPCOA and latest available relevant research confirming that the

[3] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction website: http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed: December 6, 2018.*

elements in the TDM plan will yield the intended 6.5% reduction in weekday peak hour trips that the traffic analysis was based on.

TDM strategies are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation such as carpooling, taking transit, walking, and biking. Strategies that are suggested as appropriate for this site, as targeted for the office land use, include:

- Commuter Trip Reduction (CTR) Program, Voluntary – The Project could implement a CTR program that encourages alternative modes of transportation such as carpooling, taking transit, walking, and biking. The voluntary program does not require monitoring and reporting and no performance standards are established. The CTR program would provide employees with assistance in the following.
    - Carpool encouragement,
    - Ride-matching assistance,
    - Preferential carpool parking,
    - Flexible work schedules for carpools,
    - Half time transportation coordinator; and
    - Vanpool assistance.
    - Due to the importance of information sharing and marketing, marketing strategies to reduce commute trips would be included as part of the CTR Program. Some marketing strategies may include:
    - New employee orientation of trip reduction and alternative mode options,
    - Event promotions; and
    - Publications.
- Car Share Program – This Project could implement a car-sharing program to allow people to have on-demand access to a shared fleet of vehicles on an as-needed basis. User costs are typically determined through mileage or hourly rates, with deposits and/or annual membership fees. The car-sharing program could be created through a local partnership or through one of many existing car-share companies. Employer-based programs provide a means for business/day trips for alternative mode commuters and provide a guaranteed ride home option.
- Site Design – Project site will be designed to encourage walking, biking, and transit. Amenities could include new, wider sidewalks and street trees along the site perimeter and bicycle parking, showers, and secure lockers.

IV.M.1 UTILITIES AND SERVICE SYSTEMS, WATER

Section IV.M.1, Utilities and Service Systems, Water, page IV.M-2, revise as follows:

The City does not currently serve recycled water to the Project Site. Recycled water use for irrigation at the Project Site is proposed—the recycle water demand is estimated at 16.5 AFY. As shown in ~~Error! Reference source not found.~~ Figure IV.M.1-1, Recycled Water Pipe Network, the Project area is directly adjacent to an existing recycled water pipeline.

Section IV.M.1, Utilities and Service Systems, Water, page IV.M-4, revise as follows:

The average annual potable water supply to the City of El Segundo in 2015 was 17,463 acre-feet. The 2015 UWMP used years 2001 through 2003 as a basis for dry-year conditions. Therefore, the increased demand determined during these dry years would be served by increasing the supply from WBMWD, as shown in ~~Error! Reference source not found.~~ Table IV.M.1-2, Current Supply-Normal and Multiple Dry Year.

Section IV.M.1, Utilities and Service Systems, Water, page IV.M-5, revise as follows:

The single dry year demands were estimated based on a 4-percent increase in water demand from normal year conditions. WBMWD anticipates meeting single dry year demands by increasing supplies. WBMWD can meet the increased demands because of the surplus in supply that has been planned for in previous years to ensure WBMWD can meet customer demands with varied climate conditions. Total retail water agencies' water supply was projected by WBMWD for Year 2035. ~~Error! Reference source not found.~~4 Table IV.M.1-4, Supply and Demand – Single Dry Year, provides a summary of projected water deliveries (supply) and demand conditions under single dry year conditions for years 2020 to 2040 on a five-year basis.

Section IV.M.1, Utilities and Service Systems, Water, page IV.M-5, revise as follows:

To estimate multiple-dry-year supply and demand quantities for 2035 and 2040, data from 2020, 2025, and 2030 were extrapolated based on a linear trend. The extrapolations are shown in ~~Error! Reference source not found.~~5, Table IV.M.1-5,Supply and Demand – Multiple Dry Year.

Section IV.M.1, Utilities and Service Systems, Water, page IV.M-6, revise as follows:

~~Error! Reference source not found.~~7, Table IV.M.1-7, Water Use Prohibitions by Rationing Stage, outlines mandatory prohibitions on water uses based on the rationing stages.

IV.M.2 UTILITIES AND SERVICE SYSTEMS, WASTEWATER

Section IV.M.2, Utilities and Service Systems, Wastewater, page IV.M-21, revise as follows:

ii) Wastewater Treatment Facilities

The Project Site is served by JWPCP located in the City of Carson, approximately 9 miles southeast of the Project Site.[4] The JWPCP is one of the largest wastewater treatment plants in the world, and the largest

[4] *Sanitation Districts of Los Angeles County, Wastewater Treatment Facilities Map, available at: http://www.lacsd.org/wastewater/wwfacilities/default.asp#map.*

of the LACSDs' wastewater treatment plants, serving approximately 3.5 million.[5] The facility provides both primary and secondary treatment and has a total permitted capacity of 400 mgd. Currently, the plant treats approximately ~~254.1~~ 261.1 mgd of wastewater and is operating at approximately ~~64~~ 65 percent of capacity.[6]

Section IV.M.2, Utilities and Service Systems, Wastewater, page IV.M-25, revise as follows:

The JWPCP currently treats approximately ~~254.1~~ 261.1 million gpd of wastewater, and has a total permitted capacity of 400 million gpd. Thus, the plant is currently operating at approximately ~~64~~ 65 percent of capacity and has approximately ~~145.9~~ 138.9 million gpd of available capacity. The Project's net increase in wastewater of 70,075 gpd would represent approximately ~~0.05~~ 0.03 percent of this available capacity. Accordingly, adequate available sewage treatment capacity exists at the JWPCP to serve the Project. The operation of the Project would not require or result in the construction or of new or the expansion of existing wastewater treatment facilities.

Section IV.M.2, Utilities and Service Systems, Wastewater, page IV.M-26, revise as follows:

The response to this Impact would be similar to the response to Impact (b) above. As described there, an increase in wastewater flow from the Project Site during construction would be negligible and temporary. The operational increase in wastewater of 70,075 gpd would represent approximately ~~0.05~~-0.03 percent of the available capacity of JWPCP. Accordingly, adequate available sewage treatment capacity exists at the JWPCP to serve the Project. As such, the Project would have a less than significant impact on the capacity of the wastewater treatment provider.

IV.M.1 UTILITIES AND SERVICE SYSTEMS, SOLID WASTE

Section IV.M.1, Utilities and Service Systems, Solid Waste, page IV.M-33, revise as follows:

i) *Construction*

Project development would generate minor amounts of construction debris compared to most construction project, as the site is currently an undeveloped dirt lot. Solid waste produced during construction would primarily be due to daily operations. In accordance with PDF M-4, the Project would be required to implement a construction waste management plan. Much of this material would be recycled and salvaged to the maximum extent feasible from the landfill. The *Countywide Integrated Management Plan 2016 Annual Report* concludes that there is current capacity of 56.34 million tons available throughout the County for the disposal of inert waste.[7] Therefore, the minor amount of Project-generated demolition debris and construction waste would represent a very small percentage of the inert waste disposal capacity in the region. All solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in CALGreen Building Code which requires a 65 percent construction waste diversion from landfills. Therefore, the Project would not create

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[5] *Sanitation Districts of Los Angeles County, Joint Water Pollution Control Plant (JWPCP), available at: http://www.lacsd.org/wastewater/wwfacilities/jwpcp/default.asp.*

[6] *City of El Segundo, Continental Grand Campus Specific Plan Draft EIR, September 2017, page 4.K.2-2.*

[7] *County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2016 Annual Report, December 2017, Appendix E-2, Table 1.*

a need for additional solid waste disposal facilities to adequately handle project construction-generated inert waste and impacts would be less than significant.

VI. ALTERNATIVES

Section VI. Alternatives, Alternative 2, pages VI-14 through VI-15, revise as follows:

Similar to the Project, during excavation, on-site grading, building construction and operation of the Alternative, hazardous materials, such as fuel, and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used. Therefore, hazardous materials would require proper handling and management and, in some cases, disposal. With compliance with relevant regulations and requirements, construction and operational activities associated with the Alternative would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction and operation would be less than significant ~~following mitigation~~, similar to the Project.

Under this Alternative, ~~during excavation all TPH, lead, and PCBs would be removed in accordance with applicable regulatory requirements. With the compliance of these regulatory requirements,~~ impacts associated with the accidental release of a hazardous material would be less than significant, similar to the Project.

Section VI. Alternatives, Alternative 3, pages VI-32 through VI-33, revise as follows:

Similar to the Project, during excavation, on-site grading, building construction and operation of the Alternative 3 , hazardous materials, such as fuel, and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used. Therefore, hazardous materials would require proper handling and management and, in some cases, disposal. With compliance with relevant regulations and requirements, construction and operational activities associated with the Alternative would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction and operation would be less than significant ~~following mitigation~~, similar to the Project.

Under this Alternative, ~~during excavation all TPH, lead, and PCBs would be removed in accordance with applicable regulatory requirements. With the compliance of these regulatory requirements,~~ impacts associated with the accidental release of a hazardous material would be less than significant ~~following mitigation,~~ similar to the Project.

Section VI. Alternatives, Alternative 4, pages VI-70 through VI-71, revise as follows:

Similar to the Project, during excavation, on-site grading, building construction and operation of the Alternative 4 , hazardous materials, such as fuel, and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used. Therefore, hazardous materials would require proper handling and management and, in some cases, disposal. With compliance with relevant regulations and requirements, construction and operational activities associated with the Alternative would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction and operation would be less than significant ~~following mitigation~~, similar to the Project.

Under this Alternative, ~~during excavation all TPH, lead, and PCBs would be removed in accordance with applicable regulatory requirements. With the compliance of these regulatory requirements~~, impacts associated with the accidental release of a hazardous material would be less than significant ~~following mitigation~~, similar to the Project.

Section VI. Alternatives, Alternative 5, pages VI-108 through VI-109, revise as follows:

Similar to the Project, during excavation, on-site grading, building construction and operation of the Alternative 5 , hazardous materials, such as fuel, and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, would be used. Therefore, hazardous materials would require proper handling and management and, in some cases, disposal. With compliance with relevant regulations and requirements, construction and operational activities associated with the Alternative would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction and operation would be less than significant ~~following mitigation~~, similar to the Project.

Under this Alternative, ~~during excavation all TPH, lead, and PCBs would be removed in accordance with applicable regulatory requirements. With the compliance of these regulatory requirements,~~ impacts associated with the accidental release of a hazardous material would be less than significant ~~following mitigation~~, similar to the Project.

APPENDICES

Appendix H. 1 Traffic Study, page 31, Table 4, Related Projects Trip Generation Estimates, Row 12 and Row 29, revise as follows:

12.	707 North Sepulveda Boulevard[a]	Supermarket	27.50 ksf
		Restaurant	~~52~~ 28 seats
		Bank	7.0 ksf

29.	1000 North Sepulveda Boulevard[a]	~~Supermarket~~ Medical Office	~~27,500~~ 23.05 ksf
		~~Restaurant~~ Pharmacy	~~52,000~~ 0.665 ksf
		~~Bank~~ Coffee Shop	~~7,000~~ 1.715 ksf

IV. MITIGATION MONITORING AND REPORTING PROGRAM

1. MITIGATION MONITORING AND REPORTING PROCEDURES

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for the changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment" (Mitigation Monitoring Program, Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). The Planning and Building Safety Department for the City of El Segundo is the Lead Agency for the Beach Cities Media Campus Project.

An Environmental Impact Report has been prepared to address the potential environmental impacts of the Proposed Project. Where appropriate, this environmental document identified project design features or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the Project. This Mitigation Monitoring and Reporting Program (MMRP) is designed to monitor implementation of mitigation measures identified for the Project. The required mitigation measures are listed separately and categorized by impact area, with an accompanying identification of the following:

- Monitoring Phase, the phase of the Project during which the mitigation measure must be monitored;
  - Pre-Construction, including the design phase
  - Construction
  - Post-Construction
- The Implementing Party, the agency with the power to implement the mitigation measure;
- The Enforcement Agency, the agency with the power to enforce the mitigation measure, and
- The Monitoring Agency, the agency to which reports involving feasibility, compliance, implementation and development are made.

The MMRP for the Proposed Beach Cities Media Project will be in place throughout all phases of the Project. The Applicant shall be responsible for implementing all mitigation measures unless otherwise noted. The Applicant shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented. The City's existing planning, engineering, review, and inspection processes will be used as the basic foundation for the MMRP procedures and will also serve to provide the documentation for the reporting program.

The substance and timing of each certification report that is submitted to Planning and Building Safety Department shall be at the discretion of the Planning and Building Safety Department. Generally, each report will be submitted to the Planning and Building Safety Department in a timely manner following completion/implementation of the applicable mitigation measure and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The Planning and Building

Safety Department in conjunction with the Applicant shall assure that Project construction occurs in accordance with the MMRP. The South Coast Air Quality Management District (SCAQMD) shall be responsible for the implementation of corrective actions relative to violations of SCAQMD rules associated with mitigation. Departments listed below are all departments of the City of El Segundo unless otherwise noted.

2. MITIGATION MEASURES AND PROJECT DESIGN FEATURES

A. Aesthetics

No specific Project Design Features are proposed with regard to aesthetics. No mitigation measures are required.

B. Agricultural and Forestry Resources

No specific Project Design Features are proposed with regard to agricultural and forestry resources. No mitigation measures are required.

C. Air Quality

No specific Project Design Features are proposed with regard to air quality. No mitigation measures are required.

D. Biological Resources

No specific Project Design Features are proposed with regard to biological resources. No mitigation measures are required.

E. Cultural Resources

i) Project Design Features

No specific Project Design Features are proposed with regard to cultural resources.

ii) Mitigation Measures

MM B-1: A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed materials to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Project Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may

resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

MM B-2: A qualified professional archaeologist shall monitor all ground disturbing activities of the Project. If buried unique archaeological resources are discovered during ground-disturbing activities, work shall cease within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, invoke appropriate treatment measures. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The City shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Applicant shall implement all measure(s) that the City determines necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the City and the State Office of Historic Preservation. The report shall include documentation of any recovered unique archaeological resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the City.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

F. Geology and Soils

i) Project Design Features

PDF C-1: A Project design-specific geotechnical and engineering report is required to be prepared by a California-licensed geotechnical engineer, California-certified engineering geologist, and civil engineer with expertise in geotechnical issues registered in the State of California during Project design and prior to Project construction in compliance with the most current City of El Segundo Department of Public Works guidelines. The investigation is required to address the proposed Project foundation and structure design to minimize effects from adverse soil conditions including any liquefiable or otherwise unstable/consolidation-prone soils; bedrock characteristics; subsidence; earthquake ground shaking; slope instability; subsurface gas;

groundwater; and/or other geotechnical and engineering geologic hazards. The design and construction recommendations will be incorporated into the foundation and structural design of Proposed Project components, implemented in accordance with the design, and subjected to on-going inspection by the relevant entities/agencies. Prior to Grading Plan approval and issuance of permits, all construction/development plans will be approved by the City for construction of such improvements. Construction will occur in accordance with the approved plans.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department, Public Works Department
Monitoring Agency:	Planning and Building Safety Department, Public Works Department

ii) Mitigation Measures

No mitigation measures are required.

G. Greenhouse Gas Emissions

i) Project Design Features

No specific Project Design Features are proposed with regard to greenhouse gas emissions.

ii) Mitigation Measures

MM D-1: The Project applicant shall provide sidewalks within the Project boundary connecting off-site.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

MM D-2: The Project applicant shall require that all faucets, toilets and showers installed in the proposed structures utilize low-flow fixtures that would reduce indoor water demand by 20% per CalGreen Standards.

Monitoring Phase:	Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

MM D-3: The Project applicant shall require that ENERGY STAR-compliant appliances are installed wherever appliances are required on-site.

Monitoring Phase:	Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

MM D-4: The Project applicant shall require that high-efficiency lighting (such as LED lighting that is 34 percent more efficient than fluorescent lighting) be installed within buildings on-site.

Monitoring Phase:	Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

H. Hazards and Hazardous Materials

i) Project Design Features

No specific Project Design Features are proposed with regard to hazards and hazardous materials.

ii) Mitigation Measures

MM E-1: Prior to the issuance of grading permits, the Applicant shall submit final design plans and a design-level geotechnical engineering report to the City of El Segundo Building and Safety Division for review and approval. The design-level geotechnical engineering report shall provide the location of the Standard Oil Company and Standard Gasoline Company pipe line easement.

Monitoring Phase:	Pre- Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

I. Hydrology/Water Quality

i) Project Design Features

PDF F-1: Construction BMPs will be designed and maintained as part of the implementation of the local SWPPP (which includes an Erosion Control Plan)

in compliance with the General Permit. The Erosion Control Plan shall be implemented when construction commences and before any site clearing or demolition activity. During construction, the Erosion Control Plan will be referred to regularly and amended as changes occur throughout the construction process.

Monitoring Phase:	Construction, Post-Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department, Public Works Department
Monitoring Agency:	Planning and Building Safety Department, Public Works Department

PDF F-2: The Project shall implement the following construction-specific BMPs:

- Disposing of waste in accordance with all applicable laws and regulations;
- Cleaning up leaks, drips, and spills immediately;
- Conducting street sweeping during construction activities;
- Limiting the amount of soil exposed at any given time;
- Covering trucks;
- Keeping construction equipment in good working order; and
- Installing sediment filters during construction activities.

Monitoring Phase:	Construction, Post Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department, Public Works Department
Monitoring Agency:	Planning and Building Safety Department, Public Works Department

PDF F-3: The Project shall meet the applicable requirements of the SUSMP adopted by the Los Angeles Regional Water Quality Control Board through the preparation and implementation of a Project-specific SUSMP.

Monitoring Phase:	Construction, Post Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department, Los Angeles Regional Water Quality Control Board
Monitoring Agency:	Planning and Building Safety Department, Los Angeles Regional Water Quality Control Board

PDF F-4: The Project shall comply with all NPDES Permit and waste discharge requirements.

Monitoring Phase:	Construction, Post Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department, Los Angeles Regional Water Quality Control Board
Monitoring Agency:	Planning and Building Safety Department, Los Angeles Regional Water Quality Control Board

PDF F-5: The Project shall comply with the requirements of the Los Angeles County MS4 Permit, which controls quality of runoff entering municipal storm drains in Los Angeles County.

Monitoring Phase:	Construction, Post Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department, Los Angeles Regional Water Quality Control Board
Monitoring Agency:	Planning and Building Safety Department, Los Angeles Regional Water Quality Control Board

PDF F-6: The Project shall comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion.

Monitoring Phase:	Construction, Post Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department, Los Angeles Regional Water Quality Control Board
Monitoring Agency:	Planning and Building Safety Department, Los Angeles Regional Water Quality Control Board

PDF F-7: The Project shall comply with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

PDF F-8: All trash facilities shall be covered and isolated from stormwater runoff.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

ii) Mitigation Measures

MM F-1: The applicant must prepare a hydrology study of the development on the Project Site. Such study must be reviewed and approved by the City of El Segundo and any other applicable agency.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

MM F-2: The applicant must prepare runoff studies for the development on the Project Site so that the runoff from the Project area would not flow onto another area without the owner's consent. Such studies must be reviewed and approved by the City of El Segundo and any other applicable agency.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

MM F-3: The applicant must prepare a master drainage plan for the development on the Project Site. This plan must include detailed hydrology/hydraulic calculations and drainage improvements, showing quantitatively how the Project will eliminate the potential for downstream flooding due to increased storm water runoff. This plan will also identify the proposed BMPs to be implemented in compliance with the requirements of the Standard Urban Storm Water Mitigation Plan and the ESMC. Such plan must be reviewed and approved by the City of El Segundo and the Los Angeles County Department of Public Works.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department, Los Angeles County Department of Public Works

Monitoring Agency: Planning and Building Safety Department, Los Angeles County Department of Public Works

MM F-4: The applicant must design a conveyance and detainment system to meet the Los Angeles County Department of Public Works limits on the storm drains that would convey the Project Site's discharge for the development on the Project Site.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Planning and Building Safety Department, Los Angeles County Department of Public Works
Monitoring Agency: Planning and Building Safety Department, Los Angeles County Department of Public Works

MM F-5: The Project must comply with City of El Segundo Ordinance No. 1347 and No. 1348, which establishes storm water and urban pollution controls.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Planning and Building Safety Department
Monitoring Agency: Planning and Building Safety Department

MM F-6: The Project owner/developer must maintain all structural or treatment control BMPs for the life of the project.

Monitoring Phase: Construction, Post-Construction
Implementation Party: Applicant
Enforcement Agency: Planning and Building Safety Department, Public Works Department
Monitoring Agency: Planning and Building Safety Department, Public Works Department

J. Land Use/Planning

No specific Project Design Features are proposed with regard to land use/planning. No mitigation measures are required.

K. Mineral Resources

No specific Project Design Features are proposed with regard to mineral resources. No mitigation measures are required.

L. Noise

No specific Project Design Features are proposed with regard to noise. No mitigation measures are required.

M. Population, Housing, and Employment

No specific Project Design Features are proposed with regard to population, housing, and employment. No mitigation measures are required.

N. Public Services

i) Fire Protection

1) Project Design Features

PDF J-1: The Project shall implement a Construction Management Plan ("CMP") that would include street closure information, a detour plan, haul routes and a staging plan. The CMP would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CMP shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and shall include, but not be limited to: prohibition of construction worker parking on nearby residential streets; worker parking would be provided on-site or in designated off-site public parking areas; temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men); scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets; construction-related vehicles shall not park on surrounding public streets; and safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Public Works Department
Monitoring Agency:	Planning and Building Safety Department

PDF J-2: Provide an automatic fire sprinkler system throughout each office/studio building, installed in accordance with California Fire

Code Chapter 9 and the currently adopted edition of the NFPA 13.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Fire Department
Monitoring Agency:	Planning and Building Safety Department

PDF J-3: Provide a manual fire alarm system throughout each building, installed in accordance with California Fire Code Chapter 9 and the currently adopted edition of NFPA 72.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Fire Department
Monitoring Agency:	Planning and Building Safety Department

PDF J-4: Provide a manual standpipe system in each stairwell of the proposed parking garage, installed in accordance with California Fire Code Chapter 9 and the currently adopted edition of NFPA 14.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Fire Department
Monitoring Agency:	Planning and Building Safety Department

2) Mitigation Measures

No mitigation measures are required.

ii) Police Protection

No specific Project Design Features are proposed with regard to police protection. No mitigation measures are required.

iii) Schools

No specific Project Design Features are proposed with regard to schools. No mitigation measures are required.

iv) Parks

No specific Project Design Features are proposed with regard to parks. No mitigation measures are required.

v) Other Public Facilities

No specific Project Design Features are proposed with regard to other public facilities. No mitigation measures are required.

O. Recreation

No specific Project Design Features are proposed with regard to recreation. No mitigation measures are required.

P. Transportation/Traffic

i) Project Design Features

PDF K-1: Prior to the start of construction, the Project Applicant shall prepare a Construction Traffic Management Plan and submit it to the City of El Segundo Traffic Division for review and approval. The Construction Management Plan shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan shall include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Schedule construction material deliveries during off-peak periods to the extent practical;
- Minimize obstruction of traffic lanes adjacent to the Project Site to the extent feasible;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Control truck and vehicle access to the Project Site with flagmen;
- Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented

by the construction contractor through the duration of demolition and construction activity; and/or

- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Public Works Department, Traffic Division
Monitoring Agency:	Planning and Building Safety Department

ii) Mitigation Measures

MM K-1: Transportation Demand Management Program. A TDM program will be implemented as part of the mitigation package for the Project. Several TDM program elements are project design features that are currently proposed for implementation. Other TDM program elements would be developed as part of preparation of a detailed TDM plan, to be approved by City of El Segundo prior to approval of a final certificate of occupancy for the Project. City approval will be contingent upon submission of an accompanying analysis based on CAPCOA and latest available relevant research confirming that the elements in the TDM plan will yield the intended 6.5% reduction in weekday peak hour trips that the traffic analysis was based on.

TDM strategies are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation such as carpooling, taking transit, walking, and biking. Strategies that are suggested as appropriate for this site, as targeted for the office land use, include:

- Commuter Trip Reduction (CTR) Program, Voluntary – The Project could implement a CTR program that encourages alternative modes of transportation such as carpooling, taking transit, walking, and biking. The voluntary program does not require monitoring and reporting and no performance standards are established. The CTR program would provide employees with assistance in the following.
  - Carpool encouragement,
  - Ride-matching assistance,
  - Preferential carpool parking,
  - Flexible work schedules for carpools,
  - Half time transportation coordinator; and
  - Vanpool assistance.

- Due to the importance of information sharing and marketing, marketing strategies to reduce commute trips would be included as part of the CTR Program. Some marketing strategies may include:
- New employee orientation of trip reduction and alternative mode options,
- Event promotions; and
- Publications.

- Car Share Program – This Project could implement a car-sharing program to allow people to have on-demand access to a shared fleet of vehicles on an as-needed basis. User costs are typically determined through mileage or hourly rates, with deposits and/or annual membership fees. The car-sharing program could be created through a local partnership or through one of many existing car-share companies. Employer-based programs provide a means for business/day trips for alternative mode commuters and provide a guaranteed ride home option.
- Site Design – Project site will be designed to encourage walking, biking, and transit. Amenities could include new, wider sidewalks and street trees along the site perimeter and bicycle parking, showers, and secure lockers.

Monitoring Phase: Pre-Construction, Construction

Implementation Party: Applicant
Enforcement Agency: Public Works Department
Monitoring Agency: Planning and Building Safety Department

MM K-2: Driveway 1. A proposed mitigation for the Project is to signalize Driveway 1. Currently proposed as a full-access unsignalized intersection, adding a signal will improve operations and increase safety (see the site access analysis in Chapter 6 of the Traffic Study). The intersection would remain full access, but the installation of a signal would allow for more controlled and efficient movements. Installation of the signal would require approval from both the City of El Segundo and City of Manhattan Beach.

With the proposed mitigation of a signal at Driveway 1, Project related vehicular traffic would shift. Intersections directly affected by this shift would include those in close proximity to Driveway 3, such as Intersection 11: Nash Street & Park Place and Intersection 16: Nash Street & Rosecrans Avenue. Other intersections east of the Project Site would see minor changes in vehicular volume due to the shifting of Project traffic from primarily using Driveway 3 to access the site and instead using Driveway 1. The mitigation analysis takes into account this shift in traffic due to the proposed signal.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant

Enforcement Agency:	Public Works Department, City of Manhattan Beach Public Works Department
Monitoring Agency:	Public Works Department, City of Manhattan Beach Public Works Department

MM K-3: Intersection 12. Douglas Street & Park Place. The mitigation involves signalizing the intersection that is currently stop-controlled. Special attention would be needed in the signal design for the westbound movement, which currently consists of two separate driveways. Signals may be needed that accommodate two separate westbound phases, or coordination with the private property owners may be needed to consolidate the two driveways. The measure would mitigate the significant impact under Existing and Future plus Project conditions. Installation of the signal would require approval from the City of El Segundo.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Public Works Department
Monitoring Agency:	Public Works Department

MM K-4: Intersection 21. Isis Avenue & Rosecrans Avenue. This mitigation involves restriping the southbound lanes from one shared through left and one right to a left-only lane and a shared through/right lane. The southern portion of the intersection has one receiving through lane. This intersection is in the City of Hawthorne and the improvement would require approval of Hawthorne. The measure would mitigate the significant impact under Existing and Future plus Project conditions.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Public Works Department, City of Hawthorne Public Works Department
Monitoring Agency:	Public Works Department, City of Hawthorne Public Works Department

MM K-5: Intersection 24. I-405 Northbound On-/Off-Ramps & Rosecrans Avenue. This mitigation involves restriping the northbound off-ramp lanes from two lefts and one right to two left and one shared left/right. The western portion of the intersection has three receiving lanes for the left-turn movement. The existing median along Rosecrans Avenue may need to be cut back in order to accommodate the third left turning movement. This intersection is under Caltrans jurisdiction and the improvement would require approval of Caltrans. The measure would mitigate the significant impact under Existing and Future plus Project conditions.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant

Enforcement Agency: Public Works Department, Caltrans
Monitoring Agency: Public Works Department, Caltrans

Q. Tribal Cultural Resources

i) Project Design Features

No specific Project Design Features are proposed with regard to tribal cultural resources.

ii) Mitigation Measures

MM L-1: Prior to issuance of a grading permit, the Applicant shall retain a qualified Native American Monitor (Monitor) from the Gabrieleno Band of Mission Indians-Kizh Nation to monitor all grading and excavation activities within the Project Site. The Monitor shall photo-document the grading and excavation activities and maintain a daily monitoring log that contains descriptions of the daily construction activities, locations and mappings of the graded areas, soils, and documentation of any identified tribal cultural resources. On-site monitoring shall end when the Project Site grading and excavation activities are completed, or when the Tribal Representatives and Monitor have indicated that the Project Site has a low potential for archaeological resources. If tribal cultural resources are encountered during monitoring, all ground-disturbing activities within 50 feet of the find shall cease and the Monitor shall evaluate the significance of the find, and if significant, recommend a formal treatment plan and appropriate measure(s) to mitigate impacts. Such measure(s) may include avoidance, preservation in place, archaeological data recovery and associated laboratory documentation, or other appropriate measures. The City shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Applicant shall implement all measure(s) that the City determined necessary, appropriate and feasible. Within 60 days after grading and excavation activities are completed, the Monitor shall prepare and submit a final report to the City and the California Native American Heritage Commission. The report shall include documentation of any recovered tribal cultural resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the City.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Planning and Building Safety Department
Monitoring Agency: Planning and Building Safety Department

R. Utilities/Service Systems

i) Water

1) Project Design Features

PDF M.1-1: Any existing water meters, potable water service connections, fire backflow devices and potable water backflow devices shall be upgraded to current City Water Division standards. These devices shall be placed or relocated onto private property. In addition, any unused water laterals shall be abandoned and properly capped at the City main. The Contractor shall obtain necessary permits and licenses, and provide traffic control plans and shoring plans.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Public Works Department
Monitoring Agency:	Planning and Building Safety Department

2) Mitigation Measures

No mitigation measures are required.

ii) Wastewater

1) Project Design Features

PDF M.2-1: The Project Applicant shall submit a Utility Plan to the City of El Segundo Public Works Department for review and approval. The Utility Plan shall show all existing and proposed utility improvements (sewer, water, gas, storm drain, electrical, etc.), their sizes and associated easements around the Project Site, and traffic control plans for work in the public right-of-way.

Monitoring Phase:	Pre-Construction, Construction
Implementation Party:	Applicant
Enforcement Agency:	Public Works Department
Monitoring Agency:	Planning and Building Safety Department

PDF M.2-2: The Project Applicant shall submit a Sewer Study to the City Engineer for review and approval. Any capacity deficiencies identified in the Sewer Study shall be addressed through upgrades. In addition, any unused sanitary sewer laterals shall be abandoned and properly capped at the City main. The Contractor

shall obtain necessary permits and licenses, and provide traffic control plans and shoring plans.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Public Works Department
Monitoring Agency: Planning and Building Safety Department

2) Mitigation Measures

No mitigation measures are required.

iii) Solid Waste

1) Project Design Features

PDF M.3-1: During construction, the Project would implement a construction waste management plan to recycle non-hazardous construction debris. Off-site recycling centers, such as asphalt or concrete crushers, would be utilized to provide crushed materials for roadbed base.

Monitoring Phase: Pre-Construction, Construction
Implementation Party: Applicant
Enforcement Agency: Planning and Building Safety Department
Monitoring Agency: Planning and Building Safety Department

PDF M.3-2: All structures constructed or uses established within any part of the Project shall be designed to be permanently equipped with clearly marked, durable, source sorted recycling bins at all times to facilitate the separation and deposit of recyclable materials.

Monitoring Phase: Construction
Implementation Party: Applicant
Enforcement Agency: Planning and Building Safety Department
Monitoring Agency: Planning and Building Safety Department

PDF M.3-3: Primary collection bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities.

Monitoring Phase: Construction, Operation
Implementation Party: Applicant

Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

PDF M.3-4: The Applicant or its successor shall continuously maintain in good order clearly marked, durable, and separate recycling bins on the same lot or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times for the collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.

Monitoring Phase:	Construction, Operation
Implementation Party:	Applicant
Enforcement Agency:	Planning and Building Safety Department
Monitoring Agency:	Planning and Building Safety Department

2) *Mitigation Measures*

No mitigation measures are required.

iv) Energy

No specific Project Design Features are proposed with regard to energy. No mitigation measures are required.