

Appendix A-2

Notice of Preparation Comment Letters



NATIVE AMERICAN HERITAGE COMMISSION

May 27, 2020

Paul Samaras
City of El Segundo
350 Main Street
El Segundo, CA 90245

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Re: 2020050508, Pacific Coast Commons Specific Plan Project, Los Angeles County

Dear Mr. Samaras:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:

A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse

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*Making Conservation
a California Way of Life.*

June 24, 2020

Paul Samaras
City of El Segundo
350 Main Street
El Segundo, California 90245

RE: Pacific Coast Commons Specific Plan –
Notice of Preparation (NOP)
SCH# 2020050508
GTS# 07-LA-2020-03270
Vic. LA-1 PM 25.455
Vic. LA-105 PM 00.474

Dear Paul Samaras,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Pacific Coast Commons Specific Plan (Project) includes approximately 6.3 acres (post-dedication) of developed property located along Pacific Coast Highway. The entire area would receive a new General Plan Land Use Designation and zoning of Pacific Coast Commons Specific Plan. The Project would demolish existing structures, including a former restaurant with meeting/ballroom space, a rental car tenant, and the existing surface parking lots of the Fairfield Inn & Suites by Marriott and Aloft Hotel properties, and would allow for the development of up to 263 new housing units and approximately 11,250 gross square feet of new commercial/retail uses, with approximately 923 motor vehicle parking spaces.

The nearest State facilities to the proposed project are SR 1 and I-105. After reviewing the NOP, Caltrans has the following comments:

Caltrans acknowledges and supports infill development that replaces surface parking lots and creates active street frontages, as the Project proposes to do. However, due to the amount of parking, the Pacific Coast Commons Specific Plan is still designed in a way that induces demand for many additional vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. This project is only .5 miles from the Mariposa Green Line Station and all effort should be made to improve upon this connection to the greater Los Angeles

transit network, which will soon include the Crenshaw/LAX transit corridor. For any project to better promote public transit and reduce vehicle miles traveled (VMT), we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building an excessive amount of parking.

Caltrans concurs with the submitted NOP that a Draft EIR should be prepared for this proposed project. The following should be considered or identified during its preparation:

1. Which bus stop improvements along Mariposa Avenue and PCH will be included with the sidewalk/pedestrian improvements.
2. Any setbacks or accommodation made regarding bicycle facilities proposed in the South Bay Bicycle Master Plan. Including the addition of buffered Class II bike lanes or Class IV protected bikeways on Pacific Coast Highway, as this route is part of the legally designated "Pacific Coast Bike Route".
3. Where the bicycle parking required by the El Segundo Municipal Code will be located.
4. The number of long-term, short-term, and cargo bike parking spaces to be provided.
5. How Pacific Coast Commons will be accessed by bicyclists and pedestrians and how they will be able to access nearby destinations, such as restaurants and retail, without having to operate a motor vehicle. This multimodal analysis may be required to better understand new pedestrian, bicycle, and transit movement related to the development.
6. How all ingress/egress driveways shall be designed to be pedestrian and bicycle friendly.
7. As required by SB 743, VMT is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. The City of El Segundo, as the lead agency, has discretion to develop and adopt its own thresholds of significance or to use those recommended by the Governor's Office of Planning and Research.
8. Intersection Control Evaluation (ICE) is required when there would be any physical changes such as addition of a through lane, turning lane, lane reconfiguration, widening, etc. or any operational changes such as altering traffic control or adding, removing, or modifying a traffic signal, etc. to Caltrans intersections.

As noted on page A-5, a Caltrans Encroachment Permit may be required. Please reference the following right-of-way maps when applying: P23579-1, P23579-3.

Additionally, transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03270.

Sincerely,

A handwritten signature in cursive script that reads "Miya Edmonson".

MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



State of California – Natural Resources Agency
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



June 25, 2020

Mr. Paul Samaras
City of El Segundo
350 Main Street
El Segundo, CA 90245
PSamaras@elsegundo.org

**Subject: Notice of Preparation for the Pacific Coast Commons Specific Plan,
SCH #2020050508, City of El Segundo, Los Angeles County**

Dear Mr. Samaras:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) for the Pacific Coast Commons Specific Plan (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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Project Description and Summary

Objective: The City of El Segundo (City) is proposing the Project, which includes approximately 6.3 acres of developed property located along Pacific Coast Highway (PCH). The Project site currently has a General Plan land use designation of "General Commercial" for the property south of Mariposa Avenue and "Parking" for the property north of Mariposa Avenue. The entire area would receive a new General Plan Land Use Designation and zoning of Pacific Coast Commons Specific Plan. The Project would demolish existing structures, including a former restaurant with meeting/ballroom space, a rental car tenant, and the existing surface parking lots of the Fairfield Inn & Suites by Marriott and Aloft Hotel properties, and would allow for the development of up to 263 new housing units and approximately 11,252 gross square feet of new commercial/retail uses, and associated parking.

Location: The proposed Project site is located at roughly 401-600 N. Pacific Coast Highway in the City of El Segundo within the County of Los Angeles. Specifically, the Project site is bound by Palm Avenue on the north, Pacific Coast Highway (PCH) on the east, Holly Avenue on the south, and Indiana Street on the west. Mariposa Avenue bisects the Project site.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the Lead Agency (City of El Segundo) in adequately identifying, avoiding and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Specific Comments

- 1) Nesting Birds. Based on a review of satellite imagery and page B-2 of the NOP, there is scattered vegetation throughout the Project site that may provide potential habitat where Project activities may impact nesting birds. Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.
 - CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
 - Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300-feet of the disturbance area (within 500-feet for raptors). Project personnel, including all

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contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

- 2) Bats. Despite the high diversity and sensitivity of bats in Southern California, numerous bat species are known to roost in structures throughout the Los Angeles city-region. They will often use the cracks and crevices in large concrete structures, such as those found in parking garages or large buildings, as roosting habitat.

Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish and Game Code § 4150, California Code of Regulations § 251.1). An EIR should provide a thorough discussion of potential impacts to bats from construction and operation of the Project to adequately disclose potential impacts and to identify appropriate avoidance and mitigation measures. The CEQA document shall describe feasible measures which could minimize significant adverse impacts (CEQA Guidelines §15126.4[a][1]).

- 3) Landscaping. As part of this redevelopment plan, landscaping will occur throughout the 6.3-acre site for aesthetic purposes. Habitat loss and invasive plants are a leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site. CDFW recommends invasive/exotic plants, such as pampas grass (*Cortaderia selloana*) and salt cedar (*Tamarisk spp.*), be restricted from use in landscape plans for this Project. A list of invasive/exotic plants that should be avoided as well as suggestions for better landscape plants can be found at <https://www.cal-ipc.org/solutions/prevention/landscaping/>

- 4) Biological Baseline Assessment. CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The DEIR should include the following information:

- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting

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<https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>;

- b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 2018) (see <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>);
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer, 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project. CDFW's CNDDDB in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp;
- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,

General Comments

- 1) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive

Mr. Paul Samaras
City of El Segundo
June 25, 2020
Page 5 of 5

biological resources and wildlife movement areas.

- 2) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City of El Segundo in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at Andrew.Valand@wildlife.ca.gov or (562) 292-6821.

Sincerely,

DocuSigned by:

B6E58CFE24724F5...

Erinn Wilson

Environmental Program Manager I

ec: CDFW
Karen Drewe – Los Alamitos
Victoria Tang – Los Alamitos
Andrew Valand – Los Alamitos
Felicia Silva – Los Alamitos
Malinda Santonil – Los Alamitos
CEQA HQ - Sacramento

State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

June 3, 2020

psamaras@elsegundo.org

Paul Samaras, AICP, Principal Planner
City of El Segundo, Planning and Building Safety Department
350 Main Street
El Segundo, CA 90245

Notice of Preparation of an Environmental Impact Report for the Proposed Pacific Coast Commons Specific Plan

The South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion and public release. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operational activities, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

If the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 of South Coast AQMD's CEQA Air Quality Handbook
- South Coast AQMD's CEQA web pages available here:
<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86):
<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- California Air Pollution Control Officers Association (CAPCOA)'s *Quantifying Greenhouse Gas Mitigation Measures* available here:
<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

If the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

If the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit South Coast AQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD's Public Information Center at (909) 396-2001. Much of the information available through the Public Information Center is also available at South Coast AQMD's webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated, and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources



T 510.836.4200
F 510.836.4205

1939 Harrison Street, Ste. 150
Oakland, CA 94612

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email

June 3, 2020

Paul Samaras, Principal Planner
Planning and Building Safety Department
City of El Segundo
350 Main Street
El Segundo, CA 90245
psamaras@elsegundo.org

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

Tracy Weaver, City Clerk
City Clerk's Office
City of El Segundo
350 Main Street
El Segundo, CA 90245
tweaver@elsegundo.org

**Re: CEQA and Land Use Notice Request for Pacific Coast Commons Specific Plan aka
SCH #2020050508**

Dear Mr. Samaras, Mr. McClain, and Ms. Weaver:

I am writing on behalf of Supporters Alliance For Environmental Responsibility ("SAFER"), regarding Pacific Coast Commons Specific Plan, aka SCH #2020050508), including all actions related or referring to the proposed demolition of existing structures and the development of up to 263 new housing units and approximately 11,250 gross square feet of new commercial/retail uses, and associated parking, located at 401-575 N. Pacific Coast Highway (PCH) and parking lot on 600-block of PCH in the city of El Segundo ("Project").

We hereby request that the City of El Segundo ("City") send by electronic mail, if possible or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.
 - Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
 - Notices of any addenda prepared to a previously certified or approved EIR.
 - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.

June 3, 2020

CEQA and Land Notice Request for Pacific Coast Commons Specific Plan aka SCH #2020050508

Page 2 of 2

- Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
- Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
- Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092,** which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send notice by electronic mail, if possible or U.S. Mail to:

Richard Drury
Stacey Osborne
Komalpreet Toor
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
510 836-4200
richard@lozeaudrury.com
stacey@lozeaudrury.com
komal@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Komalpreet Toor
Legal Assistant
Lozeau | Drury LLP

From: [Reagan Maechling](#)
To: [Samaras, Paul](#)
Subject: Scoping Mtg 6/10 for Pacific Coast Commons Specific Plan
Date: Monday, June 8, 2020 2:00:01 PM

Hello Mr. Samaras,

I am resident of El Segundo, residing at [REDACTED] I am writing to submit comments and questions regarding the proposed development, Pacific Coast Commons Specific Plan.

1) The development will contain 263 proposed housing units. How many of these units will be set-aside as affordable housing? I strongly favor a requirement that a minimum of 20% of the units be structured as affordable rental housing and developed in partnership with an experienced affordable housing developer utilizing the Low Income Housing Tax Credit program to ensure affordability for 55-years. There is no way the City should allow this to be built as 100% market rate housing.

2) Has ESUSD been consulted about the impact these additional units may have on our schools?

3) Will the cost of parking for the residential units (and retail) be included in rental/sales prices or separate? Parking should be de-coupled from housing prices to encourage alternate forms of transportation.

I do support the redevelopment of these highly underutilized sites, but the development plan must incorporate a REAL commitment to affordable housing, which is so desperately needed in our community, first and foremost.

Thank you,
Reagan Maechling

From: [kevin.maggay](#)
To: [Samaras, Paul](#)
Subject: Fwd: Pacific Coast Commons NOP
Date: Friday, June 19, 2020 8:36:14 AM

Hello-

Thanks for the opportunity to comment on the Pacific Coast Commons Specific Plan EIR NOP. This is a major development in our city and it is important to provide residents and stakeholders the opportunity to provide continual input. With that said, I would like to offer the following comments on the NOP.

- The project is proposed on a major thoroughfare, that serves airport travelers (at one of the busiest airports in the world) and local and regional commuters, while also being located one block from residential uses. This unique situation requires the traffic study to look deeper into the assumptions and methodologies used, rather than the standard “cookie cutter” assumptions. Traffic on PCH and spill over to residential streets is a major concern for residents. We strongly urge public engagement on the traffic study as previous traffic studies have not been indicative to the unique transportation environment along this corridor.
- Due to its location, the project is highly visible to drivers/passengers. This may be the only visual aesthetic of the City of El Segundo that these people see. That aesthetic could essentially be their impression of the city. Therefore, the design and overall aesthetic should be discussed with community members. A number of public design workshops should be held soliciting aesthetic input from the community.
- The proposed project would add 263 residential units but does not propose any open space or public recreation facilities. This is unacceptable. El Segundo currently enjoys exceptional park and recreation services with a high acre to population ratio (appr 3.8 acres:1,000 residents). We would like to maintain that ratio to have the same level of enjoyment from our park system.

Thanks for your time and please feel free to reach out to me if you have questions.

From: [Zach Levine](#)
To: psamaras@elsegundo.org
Subject: Pacific Coast Commons Specific Plan Environmental Concern
Date: Wednesday, June 24, 2020 7:19:07 PM

Hello Mr. Samaras,

I am writing as a El Segundo resident of [REDACTED] about 30 ft from where some new townhomes for the Pacific Coast Commons are planned to be built. I would like to submit comments regarding 3 particular environmental effects:

1. Population and Housing

The new proposed housing complex is a luxury apartment complex. Looking at similar complexes in the area, its estimated a 1 bedroom apartment in such a complex would be rented today at \$2200 - \$2600 a month. This number will be higher by the time it is completed. This puts these units out of reach of all but the highest paid in El Segundo.

This type of luxury complex does not make El Segundo more accessible and only contributes to the housing crisis here and Los Angeles at large by creating unaffordable housing. If El Segundo is allowing a large traffic inducing apartment complex to be built, the city should, as much as possible, force companies to build actual affordable, non-luxury housing. If El Segundo allows complexes like this the personality and diversity of the city will be lost.

2. Noise

If construction is to occur on this complex, the utmost care must be taken to minimize noise, as the construction would be extremely close (30 ft) to the windows of existing households. An otherwise quiet bedroom could easily become noisy. This issue will be exacerbated if Work From Home is still in effect for many companies.

3. Transportation

Put simply, this complex will lengthen commutes and increase traffic. This complex should consider decreasing its size to widen roads, especially on Mariposa west of PCH.

Thank You for accepting my comments,

Zach Levine

El Segundo, CA

From: Barden, Maria C.
Sent: Thursday, June 25, 2020 3:40 PM
To: Samaras, Paul
Subject: RE: Environmental Assessment No. EA 1248

Importance: High

Hello Mr. Samaras,

I am a resident of El Segundo near the projected new development which consists of three developments including Pacific coast Commons – South, Pacific Coast Commons – Fairfield Parking, and Pacific Coast Commons – North. I have several concerns with the amount of traffic and additional residents in the area. Now with the new norm of social distancing which may continue for a year plus, I don't think it makes sense to add a potential 500 plus residents in this small urban area. With the acceptance of more work from home options, the need to increase residents in a small urban town should decline. People are choosing to live in less expensive cities while maintaining WFH. I find it will be too congestive for this area. My recommendations is to consider only developing the Pacific Coast Commons – South with a maximum of 150 residents and the possible 6 new townhomes off of Palm Avenue. The Fairfield parking lot could be designated to additional retail and parking. I would also like to request permit parking on Palm Avenue between PCH and California Street and double pain windows for residents on the South side of Palm Avenue since we should have received that years ago from the LAX International Airport but apparently the funds had been overspent and our section never received double pain windows as promised.

Thank you,
Maria Barden

From: Tony Manzo
Sent: Thursday, June 25, 2020 4:49 PM
To: Samaras, Paul
Subject: Environmental Assessment No. EA 1248

Dear Paul Samaras,

I live in El Segundo near the proposed Pacific Coast Commons development. I noticed that the potential for a likely increase in crime may not be stressed as much as needed in the environmental impact assessment for this development. The number of homeless, transients, drug addicts, and mentally ill have increased significantly in El Segundo these past few years. Many of these persons are attracted to higher populated areas where they have more opportunity to panhandle and steal. I believe the population of the transients, drug addicts, and mentally ill will keep increasing in El Segundo. The two growing populations of transients and rent/tax paying residents will likely lead to many more incidents of crime. This can be seen in other cities through-out California where homelessness and crime are out of control.

Thank you,
Tony

Tony Manzo

From: Washom, Byron
Sent: Thursday, June 25, 2020 4:52 PM
To: Samaras, Paul
Cc: Magdaleno-rivera Arleen
Subject: Public Comments on the Pacific Commons Project

Dear Mr. Samaras,

Thank you for the Scoping meeting that you conducted on June 10th regarding the Pacific Commons Project. My wife and I are homeowners at [REDACTED] and would like to offer the following input for the preparation of the EIR on the Pacific Commons Project.

Foremost, we would expect that the EIR view the cumulative impacts of the project that will last more than 50 years in light of the significant other development projects either recently installed or in the planning stages. Our concerns center around the topics of Air and Noise Pollution, Traffic, Parking and amenities at the green parks along Washington Street. We regret that the initially briefing was primarily confined to inside the boundaries of the project and did not convey how the project would incorporate the impacts from the forthcoming development of the old Boeing building and Stick and Stein on PCH. Additionally, the significant impacts from the recent In and Out Burger and Chick Filet on PCH. Thus, we would advocate for a holistic neighborhood approach to the EIR rather than planning in isolation or factoring both the recent and forthcoming growth in the area.

We know that there will be additional opportunities to participate in the preparation of the EIR, but we would like to make sure that the forthcoming issues are included.

1. We very much embraced your idea of possible special parking district for the neighbors in the immediate area on Mariposa, Washington and Palm. It is reasonable to fear that what limited on-street parking there is in the area, it will get inundated with overflow and guests from Pacific Commons as well as the Boeing and Stick and Stein developments. This issue should be addressed and resolved on the impacts alone from the Pacific Commons.
2. We will closely examine precisely how the developers of Pacific Common North will provide egress from the apartment and townhouse parking areas onto Mariposa in order to get north and south bound on PCH. Using the fire lane north to Palm to accomplished the same directions at the unsignaled traffic lights at Palm and PCH should not be an option. We suggest that the fire line be a ingress and egress off of Mariposa for the apartments and off of Palm for the townhouses. Removable bollards designed for fire lanes should be install at the boundary between the townhouses and Apartments to prevent the fire lane being an open passage way between Palm and Mariposa.
3. The apartment and commercial complex should not allow deliveries or schedule trash pick up prior to 8 a.m. to minimize the noise impact of the project.
4. The increased air pollution impact from personal automobiles should be of offset by not only meeting but exceeding the CALGREEN requirements for providing Level 2 electric vehicle charging stations for the apartment and townhouse residents in addition to the commercial buildings. Many jurisdictions are imposing higher penetrations of not just "make ready" conduiting, but actual deployment of chargers at the initial commissioning of the project. Rather than viewed as meeting a code requirement, it would be great if the magnitude of the EV charging infrastructure for a MUD be a marketing amenity in the near term and the long term. The commercial parking should have at least one DC Fast Charger.
5. The volume of people using the green park strip along Washington has increased dramatically from the take out food patrons from nearby restaurants. The residents of Pacific Commons will quite reasonably enjoy sharing this park area. Although the playground was a great addition to the area, I doubt it will be sufficient for the volume of new residents that will moving into the neighborhood. Additionally, the level of trash cans and frequency of

pick up has not increased despite the higher level of non-resident luncheon users. For example, there is still only one temporary plastic trash can between Washington and Palm which hardly facilitates these non-resident users from walking a block to through their luncheon garbage away. Upgrading this park area should be considered to minimize the impacts of Pacific Commons.

These are the issues we wished to raise at this time, but as one participant noted on June 10th, Pacific Commons is a first for El Segundo in terms of having residential units directly located on PCH. I am sure other issues will likely arise.

Thank you for your consideration, and we look forward to working with you and the developers.

Sincerely,

Arleen and Byron Washom



CITY OF INGLEWOOD

ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

Planning Division



Christopher E. Jackson, Sr.
Department Director

Mindy Wilcox, AICP
Planning Manager

July 6, 2020

City of El Segundo
Paul Samaras, Principal Planner
Planning and Building Safety Department
350 Main Street
El Segundo, California 90245

RE: Notice of Preparation of an Environmental Impact Report and Public Scoping Meeting for the Pacific Coast Commons Specific Plan

Dear Mr. Samaras,

Thank you for the opportunity to provide comments for the Notice of Preparation of an Environmental Impact Report (EIR) and Public Scoping Meeting for the Pacific Coast Commons Specific Plan at 401 – 575 N. Pacific Coast Highway, El Segundo, California. We have no initial comments at this time regarding the Notice of Preparation. However, we request that you continue to apprise us of all developments in the CEQA process for this project.

Should you have any questions please contact Senior Planner, Fred Jackson at (310) 412-5230. We look forward to reviewing the draft Environmental Impact Report and we appreciate the opportunity to provide input.

Sincerely,

A handwritten signature in cursive script that reads "Mindy Wilcox".

Mindy Wilcox, AICP
Planning Manager

cc: Fred Jackson – Senior Planner

Scoping Meeting Comments

Pursuant to Section 21083.9 of the California Environmental Quality Act (CEQA) Statutes and Section 15082(c) of the State CEQA Guidelines, the City of El Segundo, as the lead agency is required to conduct at least one scoping meeting for all projects of State-wide, regional, or area-wide significance as outlined in Section 15206 of the State CEQA Guidelines. The scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, mitigation measures, and environmental effects to be analyzed. Rather than conducting an in-person meeting, the Governor's Executive Order N-25-20 allows local governments to hold meetings via teleconferencing while still meeting state transparency requirements. Therefore, the Project's Scoping Meeting was held online, through a webinar type format. The City hosted one Scoping Meeting that was held on Wednesday, June 10, 2020 from 6:30 PM to 7:30 PM that was made available through the City's website at <http://www.elsegundo.org/government/departments/planning-and-building-safety-department/planning-division/active-projects> or <https://bit.ly/COESACTIVEPROJECTS>.

At the conclusion of the presentation, attendees of the webinar were able to provide comments and questions about the proposed Project to the City, the Applicant, and the CEQA Consultant during the questions and answers portion of the meeting. There were several questions regarding the project that were answered live during the scoping meeting. In addition to these questions, the City received 6 comments/questions with environmental concerns during the Scoping Meeting, which are provided in Table A below.

Table A. Scoping Meeting Comments Summary

Sender of Comments	Comment/Question	Addressed In Section(s)
Bill Quisenberry	"Our organization, the Southern California District Council of Laborers represents over 32,000 working men and women in the construction industry here in Southern California, many of which reside in the local area where this project will be constructed. We would like to see if we could start a communication with the applicant, Mar Ventures Inc for possible"	N/A
Byron Washom	"How will traffic on the fire lane be designed to restrict traffic to residents of that structure? How will parking be restricted to residents and guests only?"	Section 4.13, Transportation
Anonymous Attendee	"I am a resident on Palm avenue and permit parking would be necessary for residents."	Section 4.13, Transportation
Anonymous Attendee	Will analysis be performed to understand the impact of charging for parking on the density of cars parked on surrounding neighborhood streets?	Section 4.13, Transportation
Anonymous Attendee	"Concerned about a noise for nearby residents."	Section 4.10, Noise
Anonymous Attendee	"Does the traffic study include looking at extending the proposed dedicated right turn lane from Mariposa onto PCH?"	Section 4.13, Transportation