

EA-275

City of El Segundo

GENERAL PLAN

FINAL ENVIRONMENTAL IMPACT REPORT

SCH# 91041092

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1. INTRODUCTION

1.1 PURPOSE AND CONTENT OF THE EIR

This document is the second of two volumes, which together constitute the Final Environmental Impact Report (EIR) for the City of El Segundo General Plan update. The first volume consists of the Draft EIR and Technical Appendices, circulated for public review in May 1991, which includes a description of the proposed project, an assessment of the potential effects associated with implementation of the project, a description of proposed mitigation measures to avoid or reduce such effects, and project alternatives.

This second volume consists of a Responses to Comments document which includes an introduction, a revised summary of environmental impacts and mitigation measures, a project description, written comments received on the Draft EIR, responses to the comments raised in the letters, and a summary list of modifications to the Draft General Plan. In addition to the Final EIR, a mitigation monitoring program (contained in a separately bound volume) has been prepared to facilitate monitoring of, and reporting on, proposed mitigation measures.

1.2 ENVIRONMENTAL PROCESS

The Draft EIR was distributed to the public and interested public agencies for review and comment from December 2, 1991 through January 16, 1992, however this period was extended to allow for comments up to February 5, 1992. Written comments on the Draft EIR were received by the Development Services Department.

Copies of all written comments received on the Draft EIR are contained in this volume. Individual comments are bracketed and assigned numbers indicated in the right margin of each page. The responses to each comment, and the responses corresponding to the numbered comments, follow each letter.

A Mitigation Monitoring Program has been prepared and incorporated in a separate document to accompany the Final EIR in compliance with AB 3180 (Public Resources Code Section 21081.6).

The Responses to Comments document and the documents incorporating the Mitigation Monitoring Programs will be available for public review at the City of El Segundo Development Services Department, 350 Main Street, El Segundo, California 90245, and at the City of El Segundo Public Library, 111 West Mariposa Avenue.

1. Introduction

1.3 HOW TO USE THIS REPORT

This report is divided into five sections: Introduction, Summary of Environmental Impacts and Mitigation Measures, Project Description, Comments and Responses, and Proposed Modifications to the Draft General Plan. Each of these sections has its own purpose and serves to aid the reader in fully understanding the project and its implications. A description of each section follows.

The Introduction notes the purposes and content of the Final EIR, the environmental process, and how to use the report.

The Summary of Environmental Impacts and Mitigation Measures chapter lists in the form of a Summary Table all of the potential impacts of the project and the proposed mitigation measures that would reduce or eliminate such impacts. The level of significance of each impact, with and without mitigation, is identified. This section has been revised and updated from the Summary Chapter presented in the Draft EIR to reflect changes that resulted from the public review process. *Italics* indicate new or revised text. Overstrike indicates text that has been deleted. The Summary Table is intended to facilitate understanding of the comments and responses.

The Project Description chapter presents a statement of objectives, the project location, project characteristics, and other relevant information. This section focuses on the physical characteristics of the proposed project, and is provided to aid the reader in understanding the project and relevant comments and responses.

The List of Letters includes a list of all agencies and individuals who submitted written comments on the Draft EIR.

The Comments and Responses chapter includes a reproduction of each letter received during the public period and the responses to each comment. Comments were received from State agencies, local government agencies, and other concerned individuals while a public hearing was conducted on December 19, 1991 to solicit public input on the Draft EIR. In some cases, the same comment has been made more than once, and the text will refer the reader to a response made to a previous letter.

The Proposed Modifications to the Draft General Plan chapter summarizes the major modifications to the proposed General Plan that were made based on Planning Commission and City Council recommendations, comments received from the public, and changes that were made during internal review. The revisions to the proposed General Plan that are summarized in this document have been reviewed to determine if they could potentially result in significant impacts not already identified in the Draft EIR. The review concluded that the changes to Policies, the Land Use Plan, and other revisions to the General Plan text would not result in significant impacts not identified or mitigated in the Draft EIR. As these changes are a refinement of the Draft General Plan, they further support the "self-mitigating" aspect of the document.

2. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

2.1 PROJECT UNDER REVIEW

This EIR evaluates the environmental impacts of the proposed City of El Segundo 1992 General Plan. The proposed General Plan provides the long-term goals and policies necessary to guide growth and development in the City for the upcoming 15-20 years. There are seven mandatory Elements, and two optional Elements in the proposed General Plan. Each of the Elements identifies goals, and sets objectives, policies, and implementation actions to move the City toward achieving those goals. The main focus of the EIR analysis is on the land use aspects of the General Plan which will be the primary reference point of the environmental impacts. For the most part, the General Plan policies and implementation actions are intended to be self-mitigating, and are designed to alleviate impacts anticipated with the growth projected in the Land Use Element. However, in some instances additional mitigation is provided to address those impacts not sufficiently addressed by the proposed policies and implementation actions.

2.2 SUMMARY OF IMPACTS

This summary provides an overview of the analysis contained in Chapter 4 of the Draft EIR, Environmental Setting, Impacts and Mitigation Measures. This summary includes discussions of: a) significant impacts; b) mitigation measures to avoid or reduce identified significant effects; c) unavoidable significant impacts; d) alternatives to the proposed project.

a) Significant Impacts

Under CEQA, a significant effect on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. Adoption of the proposed General Plan and implementation of its policies has the potential to generate environmental impacts in several areas. Impacts in the following areas would be significant without the implementation of mitigation measures: however, they would be reduced to a less-than-significant level if the mitigation measures noted in this report are adopted: geology, hydrology, traffic, land use, noise, air, population, housing and employment, public safety, visual quality and aesthetics, public services and utilities, and cultural resources.

b) Mitigation Measures to Avoid or Significantly Reduce Identified Significant Impacts

The EIR discusses mitigation measures that would be implemented by the City. Generally, these include implementation of the proposed General Plan policies, adoption of additional policies, and/or adopting more specific measures not mitigated by the General Plan. The mitigation measures presented in this EIR will form the basis of the Mitigation Monitoring Program.

c) Unavoidable Significant Impacts

Impacts in the following areas would be significant and unavoidable: transportation and circulation (impacts at intersections and along roadway segments), noise (increases in ambient noise levels), and geology (increased exposure to seismic hazards).

d) Alternatives to the Proposed El Segundo 1992 General Plan

The alternatives to the proposed El Segundo 1991 General Plan that are analyzed in this Draft EIR include:

1. Alternative Land Use Plan. This alternative is analyzed in the main sections of the EIR following the discussion of the proposed General Plan or "Preferred Plan". This alternative assumes that the Urban Mixed Use designation would increase from a floor area ratio (FAR) of 0.9 under the Preferred Plan to a FAR of 1.5. This results in a difference of 8.2 million square feet of floor area. Residential land use does not differ from that proposed for the Preferred Plan.
2. Existing Trends. Assumes that growth would continue to follow existing trends. This alternative allows six million square feet of development above that allowed under the Preferred Plan. This amount accounts for permitting nonconforming development to remain, although new development would conform to the Preferred Plan.
3. No Project (No Growth). This alternative assumes that no new development would occur in the City. Impacts would solely be based upon existing environmental influences that exist in the City or that are created outside of the City (such as traffic generation).

2.3 SUMMARY TABLE

The Summary Table in this chapter updates Table 3-1 found in the Draft EIR to reflect changes in impacts and mitigation measures.

The table has been organized into the following columns: 1) environmental Impacts; 2) the level of significance prior to implementation of the recommended mitigation measure; 3) the recommended mitigation measures and 4) the level of significance of the impact after implementation of the proposed mitigation measures.

2. Summary

New and revised impacts and mitigation measures are identified by the use of bold italicized text. Text with overstrike indicates deletions. New mitigation measures have been added and numbered consecutively where necessary.

TABLE 2-1

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation		Mitigation Measures	Level of Significance With Mitigation
4.1 <u>Geology, Seismicity and Soils</u>				
4.1-1 New development in the City would involve grading activities that may alter natural topography resulting in excess cut or fill material. This is a potentially significant impact.	PS	4.1-1	Implementation of the Public Safety policies related to geo-seismic hazards would reduce this impact to a less-than-significant level.	LS
4.1-2 Preferred Plan Impact 4.1-1 applies to the Alternative Plan.	PS	4.1-2	Preferred Plan Mitigation Measure 4.1-1 applies to the Alternative Plan.	LS
4.1-3 Grading in areas primarily east of Sepulveda with shallow groundwater levels could cause grading, drainage, and slope stability problems.	S	4.1-3	Implementation of the proposed Public Safety policies related to geo-seismic hazards would reduce this impact to a less-than-significant level.	LS
4.1-4 Preferred Plan Impact 4.1-3 applies to the Alternative Plan.	S	4.1-4	Preferred Plan Mitigation Measure 4.1-3 applies to the Alternative Plan.	LS
4.1-5 New development may create or increase slope instability and related hazards. This is a significant impact.	S	4.1-5	Implementation of the proposed Public Safety policies related to geologic hazards would reduce this impact to a less-than-significant level.	LS
4.1-6 Preferred Plan Impact 4.1-5 applies to the Alternative Plan.	S	4.1-6	Preferred Plan Mitigation Measure 4.1-5 applies to the Alternative Plan.	LS

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TABLE 2-1

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.1-7 Construction activities would expose soil to erosion; dust would be generated during demolition, clearing, hauling, earthmoving, and grading. This is a <i>Significant Impact</i> .	S	4.1-7 Implementation of the proposed Public Safety policies related to geo-seismic hazards would reduce this impact to a less-than-significant level.	LS
4.1-8 Preferred Plan Impact 4.1-7 applies to the Alternative Plan.	S	4.1-8 Preferred Plan Mitigation Measure 4.1-7 applies to the Alternative Plan.	LS
4.1-9 Soils or bedrock with expansive or non-cohesive properties could damage building foundations and slabs. This is a <i>significant impact</i> .	S	4.1-9 Implementation of proposed Public Safety policies PS11.1 AND PS11.2 would reduce this impact to a less-than-significant level.	LS
4.1-10 Preferred Plan Impact 4.1-9 applies to the Alternative Plan.	S	4.1-10 Preferred Plan Mitigation Measure 4.1-9 applies to the Alternative Plan.	LS
4.1-11 Development in the City could result in the loss, or partial loss, of access to mineral resources, particularly petroleum resources. This is a <i>less-than-significant impact</i> .	LS	4.1-11 None required.	LS
4.1-12 Preferred Plan Impact 4.1-11 applies to the Alternative Plan.	LS	4.1-12 Preferred Plan Mitigation Measure 4.1-11 applies to the Alternative Plan.	LS
4.1-13 Construction of projects in zones of high seismic risk could result in structural damage from groundshaking, exposing	SU	4.1-13 Implementation of the proposed Public Safety policies related to geo-seismic hazards would reduce the potential for impacts; however,	SU

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SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>additional people to hazard from earthquakes. Implementation of the General Plan would expose additional people to hazard from earthquakes. This is a <i>significant unavoidable impact</i>.</p>		<p><i>impacts from seismic events remains significant and unavoidable.</i></p>	
<p>4.1-14 The higher allowed FAR under the Alternative Plan would increase risks associated with seismic structural damage and liquefaction, thus exposing greater numbers of people to hazard. This is a <i>significant unavoidable impact</i>.</p>	SU	<p>4.1-14 Preferred Plan Mitigation Measure 4.1-13 applies to the Alternative Plan.</p>	SU
<p><u>4.2 Hydrology and Water Quality</u></p>			
<p>4.2-1 Implementation of the proposed General Plan would result in changes to the amount of surface flow generated. This is a <i>less-than-significant impact</i>.</p>	LS	<p>4.2-1 Implement Conservation Element Policies CN2.11 and CN 5.8 and coordinate with the Los Angeles County Flood Control District and Caltrans to ensure that drainage needs are assessed on an on-going basis.</p>	LS
<p>4.2-2 Preferred Plan Impact 4.2-1 applies to the Alternative Land Use Plan.</p>	LS	<p>4.2-2 Preferred Plan Mitigation Measure 4.2-1 applies to the Alternative Plan.</p>	LS
<p>4.2-3 Development occurring under the proposed General Plan would potentially result in</p>	PS	<p>4.2-3 An erosion and sedimentation control plan shall be submitted to the City of El Segundo</p>	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
increased erosion from construction activities and increased site runoff. This is a <i>potentially significant impact.</i>		<p>by the project proponent prior to grading. This plan may include, but not be limited to, the following erosion control methods:</p> <ul style="list-style-type: none"> i. During construction, soil on graded slopes shall be revegetated as soon as possible following disruption. ii. Use of interceptor ditches or drainage swales to intercept storm runoff from transporting sediment into stormwater drainage and to prevent sediment-laden runoff from leaving the disturbed area. iii. Silt fences shall be constructed to prevent sheet flow across the adjacent slopes and down slope into stormwater drainages. <p>These and further measures shall be implemented by the contractor prior to mass grading and other soil disturbing construction activities onsite.</p>	
4.2-4 Preferred Plan Impact 4.2-3 applies to the Alternative Land Use Plan.	PS	4.2-4 Preferred Plan Mitigation Measure 4.2-3 applies to the Alternative Plan.	LS
4.2-5 Development occurring under the Preferred General Plan may require permitting from	LS	4.2-5 None required.	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
the Regional Water Quality Control Board. This is a <i>less-than-significant impact</i> .			
4.2-6 Preferred Plan Impact 4.2-5 applies to the Alternative Land Use Plan.	LS	4.2-6 Preferred Plan Mitigation Measure 4.2-5 applies to the Alternative Plan.	LS
4.2-7 Groundwater contamination at various locations within the City could affect groundwater quality underlying the proposed project area. This is considered a <i>potentially significant impact</i> .	PS	4.2-7 Implement Mitigation Measure 4.2-3.	LS
4.2-8 Preferred Plan Impact 4.2-7 applies to the Alternative Land Use Plan.	PS	4.2-8 Preferred Plan Mitigation Measure 4.2-7 applies to the Alternative Plan.	LS
<u>4.3 Biological Resources</u>			
4.3-1 Buildout of the proposed General Plan will result in loss of the remaining ruderal fields found within the City of El Segundo. This is a <i>less-than-significant-impact</i> .	LS	4.3-1(a) Consistent with proposed Policy OS15.1 of the El Segundo General Plan, it is recommended that the City investigate the feasibility of implementing a restoration plan for remaining portions of the City's sand dune ecosystem in coordination with City of Los Angeles restoration efforts.	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.3-2 Preferred Plan Impact 4.3-1 applies to the Alternative Land Use Plan.	LS	4.3-1(b) Implement proposed Policies OS15.3 and CN4.1-4 of the El Segundo General Plan.	LS
<u>4.4 Land Use</u>			
4.4-1 Density and intensity standards to be provided in the General Plan will allow considerable growth in some areas. This is a <i>potentially significant impact</i> .	PS	4.4-1(a) A specific plan shall be prepared for any site currently designated Heavy Industrial at such time as redevelopment of such a site is contemplated. This measure will reduce potential impacts associated with unanticipated growth in heavy industrial areas to a less than significant level.	LS
		4.4-1(b) The City shall monitor market absorption of general commercial uses, and consider alternative uses for areas designated commercial at a later date if demand does not materialize. This measure will reduce potential impacts associated with overbuilding of commercial uses to a less than significant level.	

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.4-2 Impacts of the alternative land use plan would be the same as those for the proposed plan, except that the increased FARs permitted in Urban Mixed Use areas would permit the development of a maximum of 23,561,473.3 square feet of exclusive office use or equivalent traffic generators, rather than the 17,397,167.0 square feet permitted under the Preferred Plan. This is a <i>potentially significant impact</i> .	PS	4.4-2 Preferred Plan Mitigation Measures 4.4-1(a) and 4.4-1(b) apply to the Alternative Plan.	LS
4.4-3 Implementation of the proposed plan will result in a decrease in areas devoted exclusively to parking. This is a <i>potentially significant impact</i> .	PS	4.4-3 Implementation of proposed General Plan Circulation Element policies C3.2.1 and C3.2.2 would ensure the provision of adequate on-site parking for new development which would reduce this impact to a less than significant level.	LS
4.4-4 Preferred Plan impact 4.4-3 applies to the Alternative Plan.	PS	4.4-4 Preferred Plan Mitigation Measure 4.4-3 applies to the Alternative Plan.	LS

Policy LU13.1

Develop appropriate overlay zoning districts for the area east of Sepulveda Boulevard which permit the continued operation, remodeling and expansion of existing nonconforming uses.

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<p><u>Impact</u></p> <p>4.4-5 This policy could lead to development intensities in excess of those currently existing and in excess of those provided in the adopted plan. This is a <i>potentially significant impact</i>.</p>	PS	4.4-5 Limit overlay districts to intensities and peak hour traffic generation provided under the adopted plan. This will reduce this impact to a less than significant level.	LS
<p><u>Policy LU43.2</u></p> <p>Encourage mixed use developments within one quarter mile of the Green Line stations.</p>			
<p><u>Policy LU44.5</u></p> <p>Consider allowing residential uses within the Urban Mixed Use area when proposed as part of a specific plan of sufficient magnitude to address and provide the service requirements of the proposed residents.</p>			
<p><u>Policy LUAQ91.2</u></p> <p>It is the policy of the City of El Segundo that the City consider encouraging housing in close proximity to the Green Line transit corridor and employment centers.</p>			

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>Impact</u></p> <p>4.4-6 These policies could result in the introduction of residential uses into areas previously utilized exclusively for commercial and industrial uses. Land use conflicts could result at the residential/commercial or residential/industrial interface. This is a <i>potentially significant impact</i>.</p>	PS	4.4-6 Land Use Element policies LU41.3 and LU55.1 require buffering of residential uses through the use of walls, landscaping, and open space. Implementation of these policies would reduce this impact to a less than significant level.	LS
<p><u>Policy C4.2.4</u></p> <p>Monitor and incorporate planning and development of Los Angeles International Airport (LAX) into all aspects of the City's planning.</p>			
<p><u>Impact</u></p> <p>4.4-7 The effects of development at LAX on circulation patterns could lead to removal of residential uses in certain areas or need for additional street rights-of-way and associated reduction in land available for adjacent uses. This is a <i>potentially significant impact</i>.</p>	PS	4.4-7(a) Monitor planning and development proposals at LAX to protect the City from undue noise effects and other potential land use conflicts. 4.4-7(b) Work with the Los Angeles Airport Commission to achieve acceptable planning for LAX. 4.4-7(c) Incorporate measures into City planning programs to reduce cut-through traffic and	LS

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<p><u>Policy ED12.1</u> Seek to expand El Segundo's retail and commercial base so that the diverse needs of the City's business and residential communities are met.</p>		<p><i>other adverse impacts of airport activities on the City.</i></p>	
<p><u>Policy ED12.2</u> Maintain and promote land uses that improve the City's tax base, balancing economic development and quality of life goals.</p>		<p>These measures will reduce the impact of Policy C4.2.4 to a <i>less-than-significant</i> level.</p>	
<p><u>Policy ED21.4</u> Continue to invest in infrastructure that encourages commercial and industrial development.</p>			
<p><u>Impact</u> 4.4-8 These policies would lead to increased commercial growth. This is a <i>potentially significant impact</i>.</p>	PS	4.4-8 Implementation of General Plan policies LU15.4 through 15.6 and LU41.4 and 43.3, concerning community design and City	LS
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2. Summary of Environmental Impacts and Mitigation Measures

TABLE 2-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>Policy AQ91.1</p> <p>It is the policy of the City of El Segundo that the City's Land Use and Housing Element and any subsequent Specific Plans incorporate measures that will promote a better balance of jobs and housing within the City.</p>			
<p>Policy AQ91.3</p> <p>It is the policy of the City of El Segundo that the City participate in subregional efforts to develop mutually beneficial approaches to improving the balance of jobs and housing.</p>			
<p>Impact</p> <p>4.4-9 These policies could place the City in a position in which it could be forced to take measures to increase the production of housing in order to improve the City's jobs/housing balance. This could result in the conversion of single family areas to higher density use or conversion of commercial and industrial areas to residential use. This is a <i>potentially significant impact</i>.</p>	PS	4.4-9(a) Implement Land Use Element Policy LU32.4 which provides for the preservation of low density areas and careful investigation of zone changes to higher density use to ensure land use compatibility.	LS
		4.4-9(b) Develop policies and implement policies to achieve Objective LU31, which call for the preservation, protection, and possible extension of single-family uses.	
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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>Policy N11.4</u> Consider noise impacts from traffic arterials and railroads, as well as aircraft when identifying new areas for residential land use.</p>			
<p><u>Policy N11.8</u> Continue to develop zoning, subdivision, and development controls to prevent future encroachment of noise-sensitive uses into present or planned industrial system or transportation system noise-impacted zones.</p>			
<p><u>Policy N11.10</u> Require all proposed development to meet El Segundo's land use compatibility guidelines.</p>			
<p><u>Impact</u> 4.4-10 These Noise Element policies could restrict development of residential uses in many areas of the City, and could impede development of mixed use areas if noise impacts on specific projects could not be</p>	PS	4.4-10(a) Implement Noise Element policies N11.3, N11.5, N11.6, N11.7, and N21.1 which are designed to alleviate noise from traffic and other causes at their source.	LS

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2. Summary of Environmental Impacts and Mitigation Measures

TABLE 2-1

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>reduced to acceptable levels. Depending upon how these policies were to be interpreted in the future, it could also prevent redevelopment of existing residential sites for residential use where noise compatibility was an issue. This is a particular issue in portions of the northwest quadrant of the City subject to aircraft noise. This is a <i>potentially significant impact.</i></p>		<p>4.4-10(b) Implement Noise Element Policies N11.9, N11.11, and N31.3 and Programs N11.9A, N11.10A, and N11.11A which provide for the incorporation of noise reduction features in new construction.</p> <p>Implementation of these measures will reduce noise conflicts related to land use and will reduce impacts associated with the above policies to a <i>less-than-significant level.</i></p>	
<p><u>Policy N31.2</u></p> <p>Work to remove non-conforming land uses (mixed usage such as a residential dwelling on either CM, M-1, or M-2 zones) which result in noise incompatibility.</p>			
<p><u>Program N31.2A</u></p> <p>The City shall develop strategies for the orderly implementation of mitigation measures for present noise-impacted areas, such as the R1, R2, and R3 uses adjacent to the M1 uses.</p>			
<p><u>Impact</u></p> <p>4.4-11 Noise Element policy N31.2 and implementation program N31.2A could result in the elimination of existing</p>	PS	4.4-11 Develop City programs to incorporate noise reduction measures into existing residential developments.	LS

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residential uses in some areas. This is a <i>potentially significant impact</i> .			
4.5 Population, Housing and Employment			
4.5-1 The Preferred Plan allows potential growth of 597 new housing units and 1,281 new residents to the City of El Segundo. This is a <i>potentially significant impact</i> .	PS	4.5-1(a) The City should work with the Air Force to encourage the development of military housing in the City.	LS
		4.5-1(b) Implementation of Air Quality Element Policies AQ91.1, AQ91.2 and AQ91.3, and Land Use Element Policy LU44.5 would reduce this impact to a less than significant level.	
4.5-2 Preferred Plan Impact 4.5-1 applies to the Alternative Land Use Plan.	PS	4.5-2 Preferred Plan Mitigation Measure 4.5-1(a) and (b) apply to the Alternative Land Use Plan.	LS
4.5-3 The Preferred Plan allows potential growth of 35,215 jobs and 28.6 million square feet of commercial and industrial floor area by the year 2010. This is a <i>potentially significant impact</i> .	PS	4.5-3 Implementation of the Air Quality Element Policies AQ91.1 and AQ91.3, and the Land Element Policy LU44.5 would reduce this impact to a less-than-significant level.	LS

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2. Summary of Environmental Impacts and Mitigation Measures

TABLE 2-1

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.5-4 The Alternative Land Use Plan allows potential growth of 53,358 jobs and 36.8 million square feet of commercial and industrial floor area by the year 2010. This is a <i>potentially significant impact</i> .	PS	4.5-4 Preferred Plan Mitigation Measure 4.5-3 applies to Alternative Land Use Plan Impact 4.5-4.	LS
4.5-5 The Preferred Plan could adversely impact the availability of affordable housing in the City of El Segundo. This is a <i>potentially significant impact</i> .	PS	4.5-5 The City should study the impact of recent development on its housing market by household and occupation type and use the results of this study as a basis for expanding the in-lieu fee housing programs to include the effects of commercial and industrial development in El Segundo on housing demand in the City. Fees collected under this "linkage" program could be used to provide new capital for existing City -sponsored affordable housing funds.	LS
4.5-6 Preferred Plan Impact 4.5-5 applies to the Alternative Land Use Plan.	PS	4.5-6 Preferred Plan Mitigation Measure 4.5-5 and Housing Element policies apply to the Alternative Land Use Plan.	LS
4.5-7 Implementation of the Preferred Plan would provide an inadequate number of needed housing units to maintain a jobs/housing balance in the Santa Monica	PS	4.5-7 Preferred Plan Mitigation Measures 4.5-1 and 4.5-3 apply to the Preferred Plan.	LS

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SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>Bay subregion. This is a <i>potentially significant impact</i>.</p> <p>4.5-8 Implementation of the Alternative Land Use Plan would provide an inadequate number of needed housing units to maintain a jobs/housing balance in the Santa Monica Bay subregion. This is a <i>potentially significant impact</i>.</p>	PS	4.5-8 Preferred Plan Mitigation Measures 4.5-1 and 4.5-3 and Circulation and Air Quality Element policies apply to the Alternative Land Use Plan.	LS
<p><u>4.6 Utilities</u></p>			
<p>4.6-1 Buildout under the preferred plan would result in the consumption of approximately 1,039,383,948 kilowatt hours (Kwh) per year of Electricity. This would result in a net increase in consumption of 183,565,476 Kwh per year or a 4.6 percent increase over existing levels. This is a <i>less-than-significant impact</i>.</p>	LS	4.6-1 None required.	NA
<p>4.6-2 Implementation of the alternative land use plan would result in the consumption of approximately 1,123,810,428 kilowatt hours (Kwh) per year of electricity. This would result in a net increase of 267,991,956 Kwh per year over existing levels of</p>	LS	4.6-2 None required.	NA

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2. Summary of Environmental Impacts and Mitigation Measures

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>consumption. This is a <i>less-than-significant impact</i>.</p> <p>4.6-3 The El Segundo General Plan would result in the consumption of approximately 342,255,947 cubic feet per month of natural gas. This would represent a net increase of 45,475,901 cubic feet per month of natural gas over existing levels of consumption. This is a <i>less-than-significant impact</i>.</p>	LS	4.6-3 None required.	NA
<p>4.6-4 The Alternative Plan would result in the consumption of approximately 362,968,689 cubic feet of natural gas per month. This represents a net increase in consumption of approximately 5.5 percent or 66,288,643 cubic feet per month over existing levels. This is a <i>less-than-significant impact</i>.</p>	LS	4.6-4 None required.	NA
<p>4.6-5 The proposed General Plan would result in the consumption of approximately 21,976,828 gallons per day (gpd). This represents a net increase in water use of approximately 4,839,212 gpd. This is a <i>significant impact</i>.</p>	S	4.6-5(a) Require dual plumbing systems in large new developments and high-rise structures, as reclaimed water becomes available over the next ten years; 4.6-5(b) Reclaimed water where appropriate and feasible should be used as a water source for	LS

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SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.6-6 The Alternative Plan would result in the consumption of approximately 23,075,669 gpd. This represents a net increase in water use of approximately 5,938,053 gpd over existing levels. This is a <i>significant impact</i> .	S	4.6-5(c) <i>Implementation of Conservation Element Policies for water, and the above mitigation measures, would reduce this impact to a less-than-significant level.</i>	LS
4.6-7 The Preferred Plan would result in the generation of approximately 12.4 million gallons per day (mgd). Existing land uses currently generate approximately 10.8 mgd. This would result in a net increase of 1.6 mgd or a 7.75 percent increase over current generation. This is a <i>significant impact</i> .	S	4.6-6 <i>Preferred Plan Mitigation Measures 4.6-5(a) through 4.6-3(c) apply to the Alternative Land Use Plan.</i>	LS
4.6-8 The Alternative Land Use Plan would result in the generation of approximately 13.1 million gallons per day (mgd). Existing land use currently generates 10.8	S	4.6-7(a) <i>Future development projects must comply with the provisions of all interim or future agreements or ordinances regarding sewer capacity allotment in the City of El Segundo.</i> 4.6-7(b) <i>Implement Land Use Element Policy LU71.2 regarding public facilities.</i> 4.6-8 <i>Preferred Plan Wastewater Mitigation Measures 4.6-7(a) and 4.6-7(b) apply to the Alternative Plan.</i>	LS

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2. Summary of Environmental Impacts and Mitigation Measures

TABLE 2-1

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>4.6-9 Under the proposed General Plan update, approximately 596,274 pound per day (298.14 tons) of solid waste would be generated. This is an increase of 80,962 pounds per day, or 15.7 percent, over current generation rates. This is a significant impact.</p>	S	<p>4.6-9 The City of El Segundo shall implement all necessary policies and programs to meet the source-reduction requirements of AB939, referenced in the City of El Segundo Integrated Waste Management Plan and determined to be appropriate in accordance with the requirements of the California Integrated Waste Management Act of 1989 (Assembly Bill 939) and California Integrated Waste Management Board Regulations.</p>	LS
<p>4.6-10 The Alternative Land Use Plan would generate approximately 662,220 pounds per day (311.1 tons) of solid waste. This is an increase of 146,908 pounds per day, or 28.5 percent, over the amount of solid waste generated by existing land uses.</p>	S	<p>4.6-10 Preferred Plan Solid Waste Mitigation Measure 4.6-9 applies to the Alternative Plan.</p>	LS

4.7 Public Services

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SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.7-1 Buildout under the proposed General Plan would result in a need for approximately 36.5 additional police officers. This is a significant impact.	S	4.7-1 Implementation of Land Use Element Policy LU71.1 would reduce this impact to a less-than-significant level.	LS
4.7-2 The Alternative Plan would result in a need for approximately 54.5 additional police officers. This is a significant impact.	S	4.7-2 Implementation of Preferred Plan Impact 4.7-1 applies to the Alternative Plan.	LS
4.7-3 Increases in population and employment under the proposed General Plan would increase the need for fire protection and emergency services, requiring additional emergency responses and the need for additional fire protection personnel, fire prevention personnel, and related support facilities. This is a significant impact.	S	4.7-3 Implementation of Public Safety Element policies PSS1-1, PSS1-2 and PSS1-3, would reduce this impact to a less-than-significant level.	LS
4.7-4 Preferred Plan Impact 4.7-3 applies to the Alternative Plan.	S	4.7-4 Preferred Plan Mitigation Measure 4.7-3 applies to the Alternative Plan.	LS
4.7-5 Buildout of the proposed General Plan and associated increases in population would increase the demand for library services. This is a significant impact.	S	4.7-5 Implementation of Land Use Element Policy LU71.5, Provision of Quality Infrastructure, would reduce this impact to a less-than-significant level.	LS

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2. Summary of Environmental Impacts and Mitigation Measures

TABLE 2-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.7-6 Preferred Plan Mitigation Measure 4.7-5 applies to the Alternative Plan.	S	4.7-6 Preferred Plan Mitigation Measure 4.7-5 applies to the Alternative Plan.	LS
4.7-7 Based on a parkland to population ratio of 5 acres/1000 population, buildout of the proposed general plan would increase the number of park users in the City by 1,281 persons. This is a less-than-significant impact.	LS	4.7-7 Implement proposed Open Space and Recreation Element Policies OS11 Provision and Maintenance of Open Space and Recreational Facilities, OS12 Private Facilities, OS13 Recreation Programs, OS14 Utilities Corridors, and OS15 Natural Resources.	NA
4.7-8 Preferred Plan Impact 4.7-7 applies to the Alternative Plan.	LS	4.7-8 Preferred Plan Park and Recreation Mitigation Measure 4.7-7 applies to the Alternative Plan.	NA
4.7-9 Buildout under the proposed general plan would result in an increase of approximately 269 children in the El Segundo School District. This is a significant impact.	S	4.7-9 Project proponents shall pay school impact fees under the provisions of AB 2926. Currently these fees are set at \$1.58 per square foot of residential space, and \$0.26 per square foot of commercial space.	LS
4.7-10 Preferred Plan Impact 4.7-9 applies to the Alternative Plan.	S	4.7-10 Preferred Plan Mitigation Measure 4.7-9 applies to the Alternative Plan.	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.8 Transportation/Circulation			
4.8-1 Growth projected under the Preferred Plan would increase traffic within the City over existing conditions. This is considered to be a <i>significant impact</i> .	S	4.8-1(a) Implementation of the Circulation Element Policies summarized in this section. 4.8-1(b) A policy should be added to the El Segundo 1991 General Plan Circulation Element stating that the City aggressively pursue implementation of all Circulation element Policies such that all roadways are upgraded and maintained at acceptable levels of service.	SU
4.8-2 Growth projected under the Alternative Land Use Plan would increase traffic within the City over existing conditions. This is considered to be a <i>significant impact</i> .	S	4.8-2 A policy should be added to the El Segundo 1991 General Plan Circulation Element that states that no new project should be approved that cannot mitigate project related impacts on the existing and future circulation system such that daily roadway operation cannot be maintained at acceptable levels of service. Preferred Plan Mitigation Measure 4.8-1(a) through (c) apply to the Alternative Plan.	SU
4.9-1 Construction activities would temporarily increase PM10 concentrations and could	PS	4.9-1(a) Develop and implement a policy specifying that all new development projects meet or	LS

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SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>lead to violations of the Federal and State 24-hr average PM10 standards. This is a potentially significant impact.</p>		<p>exceed requirements of the South Coast Air Quality Management District for reducing vehicle and dust emissions during construction.</p>	
<p>4.9-1(b)</p>	<p>The following measures specified by the SCAQMD shall be required as standard conditions of approval wherever feasible:</p>	<p>Minimize Construction Activity Emissions:</p> <ul style="list-style-type: none"> • Water the site and clean all equipment in the morning and evening • Schedule construction activity during off-peak hours and require a phased schedule of construction to even out emission peaks. • Remove silt by paving construction roads, sweeping streets, and washing trucks leaving construction site. • Suspend grading operations during first and second stage smog alerts. • Maintain construction equipment engines by keeping them tuned. • Use low-sulfur fuel for equipment. 	

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.9-2 Higher PM ₁₀ concentrations and more frequent violations of Federal and State 24-hour average PM ₁₀ standard would result with implementation of the Alternative Plan versus the Preferred Plan.	SU	<ul style="list-style-type: none"> Use existing power sources at project sites from the beginning of project construction. Avoid using temporary power generation. <p><i>Reduce Construction-Related Traffic Congestion:</i></p> <ul style="list-style-type: none"> Provide rideshare and transit incentives for construction personnel. Configure construction parking to minimize traffic interference. Minimize obstruction of through traffic lanes. Provide a flagperson to guide traffic properly. Schedule operations affecting traffic for off-peak hours. 	LS
4.9-3 Implementation of the Preferred Plan would increase NO _x , ROG and CO	SU	Preferred Plan Mitigation Measure 4.9-2 applies to the Alternative Plan.	LS

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SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
emissions as a result of construction-related activities. This is a short-term <i>significant unavoidable impact</i> .			
4.9-4 Increases of criteria air pollutant emissions associated with implementation of the General Plan would hinder the regional attainment goals of the AQMP. This is a <i>significant impact</i> .	S	4.9-4 Implementation of the Air Quality Element Policies summarized in this section and implementation of the proposed Air Quality Action Plan programs would reduce this impact and assist in the attainment of regional goals for air quality.	SULS
4.9-5 Preferred Plan Impact 4.9-5 applies, however, the total level of pollutants would be approximately 12 percent higher than the estimates.	S	4.9-5 Preferred Plan Mitigation Measure 4.9-5 applies.	SULS
4.9-6 The implementation of the General Plan could result in increases in toxic air emissions in the City. This is a <i>potentially significant impact</i> .	PS	4.9-6 Implementation of the Air Quality Element Policies and Air Quality Action Plan programs proposed under the revised General Plan would reduce this impact to a less-than-significant level.	LS
4.10 Noise			
4.10-1 The Preferred Plan would increase traffic-	S	4.10-1 The City shall implement policies N-11.4, through N-11.9 and N-21.1 and N-31.1 of the	LS

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2. Summary of Environmental Impacts and Mitigation Measures

TABLE 2-1

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
generated noise at various locations in the City. This is a <i>significant impact</i> .		Noise Element of the El Segundo 1991 General Plan.	
4.10-2 Preferred Plan Impact 4.4-1 applies to the alternative plan. However, the high FAR allowed under the Alternative Plan would result in the generation of more vehicular noise (See Table 4.4-7). This is a <i>significant impact</i> .	S	4.10-2 Preferred Plan Mitigation Measure 4.10-1 applies to the Alternative Plan.	LS
4.10-3 New development allowed under the Preferred Plan would cause construction noise impacts to surrounding areas. This is a <i>significant impact</i> .	S	4.10-3 Implementation of Noise Element policies N21.1, N31.1, N31.3, N31.4, and N31.5 would reduce this impact to a less-than-significant level.	LS
4.10-4 Preferred Plan Impact 4.10-3 applies to the alternative plan. However, the higher FAR allowed under the Alternative Plan would result in more short-term impacts from construction activities. This is a <i>significant impact</i> .	S	4.10-4 Preferred Plan Mitigation Measure 4.4-3 applies to the Alternative Plan.	LS
4.10-5 The transition of heavy manufacturing uses to Mixed Use and Corporate Office Uses proposed under the 1991 General Plan, may create incompatible noise/land use relationships for existing and new	PS	4.10-5 Implementation of the Noise Element policies summarized in this section would reduce this impact to a less-than-significant level.	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
developments. This is a <i>potentially significant impact</i> .			
4.10-6 Preferred Plan Impact 4.10-5 applies to the alternative plan. However, the higher FAR allowed under the Alternative Plan would result in a greater potential for incompatible noise/land use relationships. This is a <i>significant impact</i> .	S	4.10-6 Preferred Plan Mitigation Measure 4.10-5 applies to the Alternative Plan.	LS
4.10-7 Increases in vehicular traffic noise, due to the implementation of the Preferred Plan may combine with aircraft noise to raise ambient noise levels to unacceptable levels. This is a <i>significant unavoidable impact</i> .	SU	4.10-7 Implementation of Noise Element policies N11.1, N11.2, N11.3, N31.1, and N31.3 would reduce the ambient noise levels and minimize potential noise impacts.	SU
4.10-8 Preferred Plan Impact 4.10-7 applies to the alternative plan. However, the higher FAR allowed under the Alternative Plan would result in the generation of more vehicular traffic. This is a <i>significant impact</i> .	S	4.10-8 Preferred Plan Mitigation Measure 4.10-7 applies to the Alternative Plan.	LS
4.11 Cultural Resources			
4.11-1 Development of the proposed project has the potential to disturb historic resources. This is a <i>significant impact</i> .	S	4.11-1 Implementation of the Land Use Element Policies pertaining to historic sites as	LS

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2. Summary of Environmental Impacts and Mitigation Measures

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.11-2 Preferred Plan Impact 4.11-1 applies to the Alternative Land Use Plan.	S	4.11-2 Preferred Plan Mitigation Measure 4.11-1 applies to the Alternative Land Use Plan.	LS
4.11-3 Implementation of the General Plan has the potential to disturb prehistoric archaeological resources. This is a significant impact.	S	4.11-3(a) A certified archaeologist shall be present during initial project (mass) grading and all soil disturbances of development sites in order to monitor any significant archaeological findings for projects over two acres in size.	LS
4.11-4 Preferred Plan Impact 4.11-3 applies to the Alternative Plan.	S	4.11-3(b) If evidence of subsurface archaeological resources is found, excavation and other construction activity in the area shall cease, and the site archaeologist shall evaluate findings in accordance with standard practice and applicable regulations. Consultation with the Native American Heritage Commission and data/artifact recovery, if deemed appropriate, shall be conducted.	LS
4.11-5 Development of the proposed project has the potential to disturb vertebrate and	S	4.11-5 A paleontologist shall be present during initial project (mass) grading and all soil	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
invertebrate resources. This is a <i>significant impact</i> .		<i>disturbances of development sites to monitor any potential findings for projects over two acres in size.</i>	
4.11-6 Preferred Plan Impact 4.11-5 applies to the Alternative Plan.	S	4.11-6 Preferred Plan Mitigation Measure 4.11-5 applies to the Alternative Plan.	LS
4.12 Aesthetics/Visual Quality			
4.12-1 Intensification of development with the recycling of older underutilized properties has the potential to alter views and degrade the visual quality of the City. This is a <i>significant impact</i> .	S	4.12-1(a) Implementation of Conservation, Open Space and Recreation, and Land Use policies of the El Segundo 1991 General Plan. mitigate potential visual impacts and may result in an improvement in visual quality.	LS
		4.12-1(b) The City should monitor the Century Freeway Project and take appropriate steps to provide or insure the provision of landscape buffers and wide setbacks between the freeway and any new developments proposed in the area.	
4.12-2 Preferred Plan Impact 4.12-1 applies to the alternative plan. However, the higher FAR allowed under the Alternative Plan would	S	4.12-2 Preferred Plan Mitigation Measures 4.12-1(a) through 4.12(c) apply to the Alternative Plan.	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>4.12-3 result in greater overall density of development. This is a <i>significant impact</i>.</p> <p>4.12-3 Development occurring under the proposed General Plan would increase light and glare in the City. This is a <i>significant impact</i>.</p>	S	<p>4.12-4(a) New developments in the City should use minimally reflective glass and all other materials used on building exteriors should be selected with attention to minimizing reflective glare.</p> <p>4.12-4(b) All exterior lighting shall be designed and located to avoid intrusive effects on residential development and other sensitive receptors. Low-intensity street lighting and other exterior lighting shall be used throughout the new developments. Spill-over light shall be minimized by using exterior light standards which are focused and directional.</p>	LS
<p>4.13 Public Health and Safety</p> <p>4.13-1 Construction of future projects adjacent to existing rail lines would expose residents to potential rail road accidents. This is considered a <i>potentially significant impact</i>.</p>	PS	<p>4.13-1 Prior to the acceptance of final maps for new development proposals adjacent to the railroad shall provide a minimum 60-foot setback from the centerline of the track, for safety in the event of an accident lines, project proponents shall ensure that public safety buffers are provided along railroad lines to</p>	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.13-2 Preferred Plan Impact 4.13-1 applies to the Alternative Land Use Plan.	S	4.13-2 Preferred Plan Mitigation Measure 4.13-1 applies to the Alternative Land Use Plan.	LS
4.13-3 Development of new projects could present risks associated with contaminated soil and groundwater. This is a <i>significant impact</i> .	S	4.13-3(a) A Phase I site assessment, by qualified personnel in accordance with applicable regulation, should be conducted to confirm or deny the presence of any soil or groundwater contamination on the site of a proposed development. 4.13-3(b) If the potential for contamination is suspected, sampling shall be conducted by qualified personnel, in accordance with all applicable regulations to determine the constituent levels and the extent of the contamination. 4.13-3(c) If contamination is identified, remediation and disposal procedures shall be conducted by qualified personnel, in accordance with all applicable regulations to determine, and in coordination with all applicable regulatory agencies.	LS
4.13-4 Preferred Plan Impact 4.13-3 applies to the Alternative Land Use Plan.	S	4.13-4 Preferred Plan Mitigation Measure 4.13-3	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.13-5 Future development within the City of El Segundo could expose construction workers and the public to health hazards associated with development adjacent to oil production facilities, storage facilities, and abandoned wells. This is considered to be a significant impact.	S	4.13-5(a) Prior to development of new projects adjacent to existing oil wells, the State Department of Conservation Division of Oil and Gas shall be contacted to confirm the status of such wells. 4.13-5(b) In the event that a project is to be located above or adjacent to a previously abandoned well, the project proponent shall consult with the Division of Oil and Gas to determine whether it will be necessary to reabandon the well to meet current Division specifications. Section 3208.1 of the Public Resources Code authorizes the State Oil and Gas Supervisor to order the re-abandonment of any previously abandoned well when construction of any structure over or adjacent to the well could result in a hazard.	LS
		applies to the Alternative Land Use Plan.	
		4.13-5(c) If construction over an abandoned well is unavoidable, an approved gas venting system should be placed over the well to prevent the buildup of gas and possible explosion.	
4.13-6 Preferred Plan Impact 4.13-5 applies to the Alternative Land Use Plan.	S	4.13-6 Preferred Plan Mitigation Measure 4.13-5 applies to the Alternative Land Use Plan.	LS

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Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
4.13-7 Future development may expose residents to hazardous materials used in adjacent industrial and commercial operations. This is considered a <i>significant impact</i> .	S	4.13-7 Implementation of proposed Petroleum Resources/Hazardous Materials and Waste Programs PS31.1A, 2A, 3A, 3B, 3C, 3D, and 4A of the Public Safety Element of the City of El Segundo General Plan.	LS
4.13-8 Preferred Plan Impact 4.13-7 applies to the Alternative Land Use Plan.	S	4.13-8 Preferred Plan Mitigation Measure 4.13-7 applies to the Alternative Land Use Plan.	LS
4.13-9 Development as proposed under the preferred plan would increase the demand for emergency services. This is a <i>potentially significant impact</i> .	PS	4.13-9 Implementation of proposed Emergency Preparedness Programs PS61.1A, 1B, 1C, PS61.2A, PS61.3A, PS61.4A, and PS 61.5A of the Public Safety Element of the City of El Segundo General Plan.	LS
4.13-10 Preferred Plan Impact 4.13-9 applies to the Alternative Land Use Plan.	S	4.13-10 Preferred Plan Mitigation Measure 4.13-9 applies to the Alternative Land Use Plan.	LS

S = Significant
LS = Less Than Significant

SU = Significant Unavoidable
PS = Potentially Significant

B = Beneficial
N/A = Not Applicable

3. PROJECT DESCRIPTION

Although there are hundreds of policies and programs contained within the El Segundo 1992 General Plan, the foundation of the plan is set out in 49 specific goals established for each of the major subject areas contained in the General Plan. This section summarizes the goals, objectives and policies of the elements of the El Segundo 1992 General Plan.

The El Segundo 1992 General Plan contains nine major subject chapters or elements. Issues for each of the Elements are identified and discussed in a set of Existing Conditions Reports, that serve as appendices to the General Plan. Each Element summarizes these planning issues and contains a set of goals and objectives intended to address and resolve the issues. These elements are further augmented with specific policies and implementation actions.

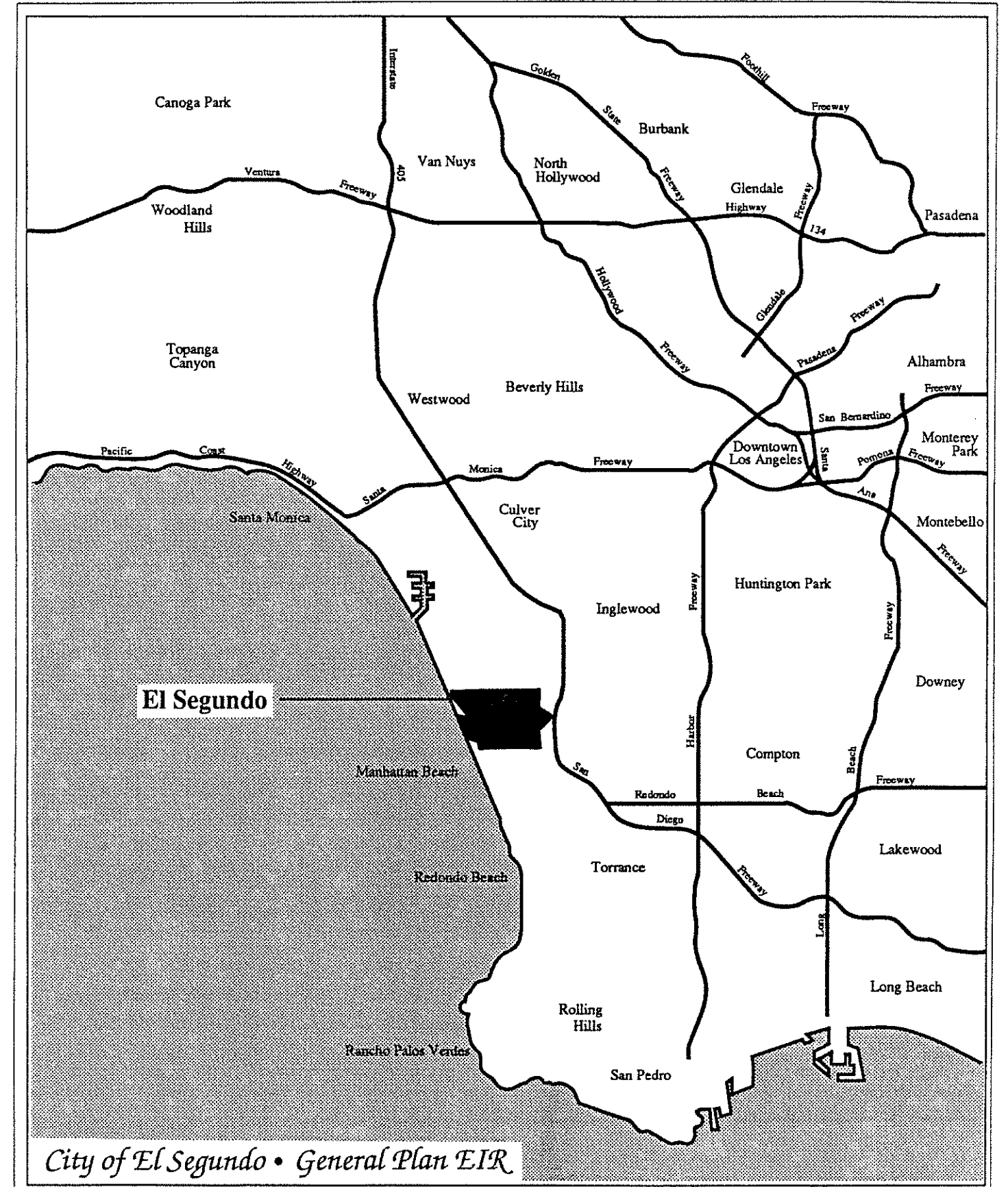
The following description summarizes the goals of each General Plan Element. Implicit in these goals are objectives, policies, and implementation programs which are discussed in detail in the individual environmental issue sections. Impacts of the specific policy implementation actions and mitigation measures are summarized in Table 2-1 of this EIR.

3-1 PROJECT LOCATION

The City of El Segundo encompasses 5.46 square miles (3,494.4 acres) in the urbanized South Bay area of Los Angeles County (see Figure 3-1). The Los Angeles International Airport (LAX) is adjacent to the City on the north, the City of Manhattan Beach is located directly to the south, and the Pacific Ocean and portions of the City of the Los Angeles are located adjacent to the City on the west. A 0.8 acre area of the City, privately owned by Chevron, also defines the City's western edge. Both the City of Los Angeles Hyperion Wastewater Treatment Plant and the Department of Water and Power Scattergood Generating Station are located within the area to the west of the City. Hawthorne and unincorporated areas of Los Angeles County border El Segundo to the east. Regional access to the City is currently via the San Diego Freeway (405) which runs north/south and is located just east of the City limits. The I-105 Freeway currently under construction, is anticipated to open by 1993, providing access from Norwalk, Downey, and other cities to the east. The location and boundaries of the City of El Segundo are shown in Figure 3-2).

Regional Location Map

Figure 3-1



City of El Segundo • General Plan EIR

SOURCE: AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA/EIP ASSOCIATES



3. Project Description

3-2 PROJECT CHARACTERISTICS

Although there are hundreds of policies and programs contained within the El Segundo 1992 General Plan, the foundation of the plan is set out in 49 specific goals established for each of the major subject areas contained in the General Plan. This section summarizes the goals, objectives and policies of the elements of the El Segundo 1992 General Plan.

The El Segundo 1992 General Plan contains nine major subject chapters or elements. Issues for each of the Elements are identified and discussed in a set of Existing Conditions Reports, that serve as appendices to the General Plan. Each Element summarizes these planning issues and contains a set of goals and objectives intended to address and resolve the issues. These elements are further augmented with specific policies and implementation actions.

The following description summarizes the goals of each General Plan Element. Implicit in these goals are objectives, policies, and implementation programs which are discussed in detail in the individual environmental issue sections. Impacts of the specific policy implementation actions are discussed in Table 2-1 Summary of Impacts and Mitigation Measures.

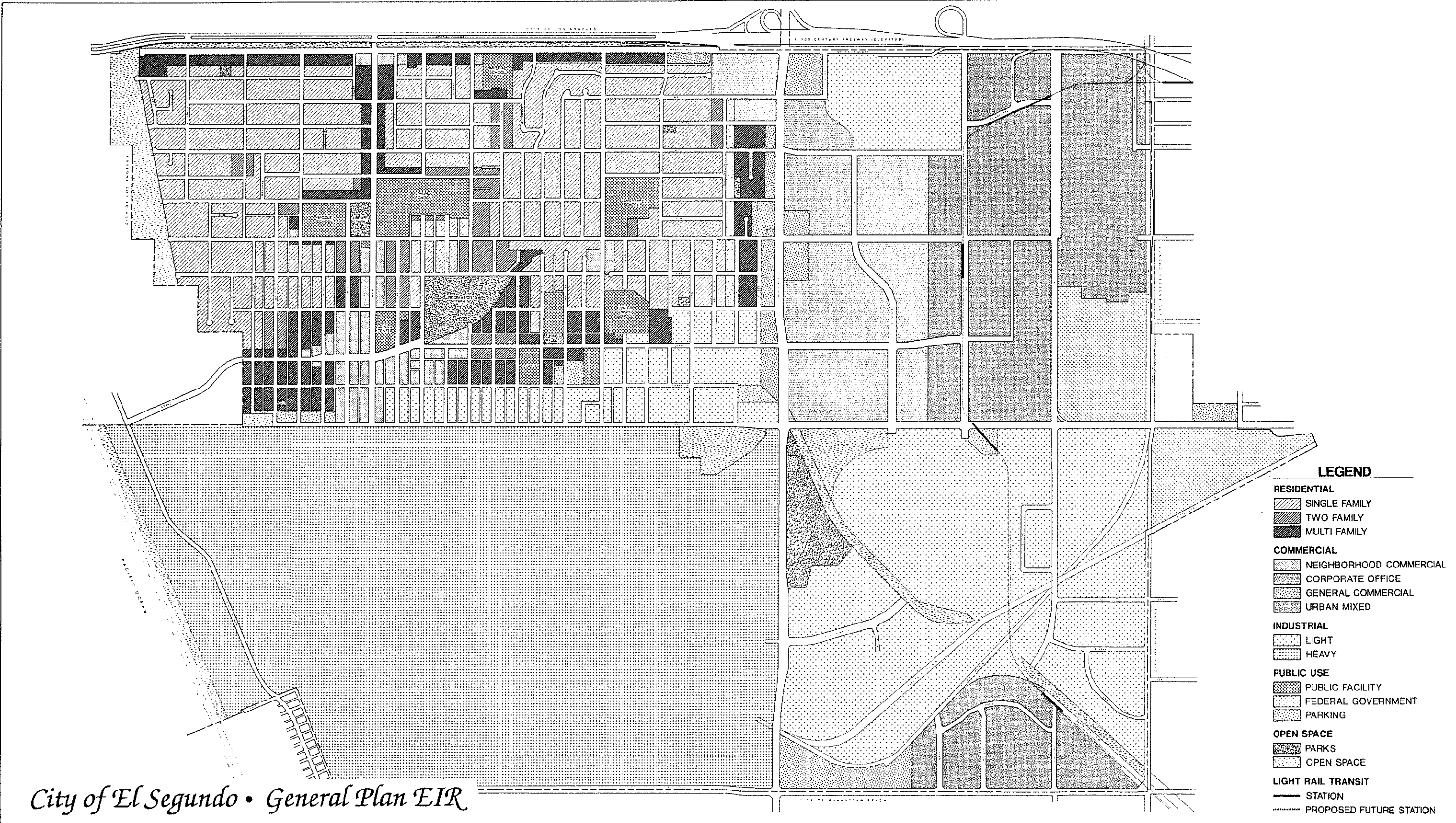
3-3 SUMMARY OF EL SEGUNDO 1992 GENERAL PLAN GOALS

Land Use Goals

The Land Use Element, in combination with the General Plan Land Use Map, provides the opportunity to set forth the community's desired balance among residential, commercial, industrial, public facility and open space uses; the community's framework for planning urban infrastructure; and the legal basis for development regulations and procedures, such as those found in zoning and subdivision ordinances. The land uses designated in the Land Use Element are intended for the approximate eighteen year life span of the General Plan and for the years beyond 2010 subject to changes in the General Plan over time. The Land Use Element establishes the long-range configuration of El Segundo in terms of its urbanized areas and open space. The various land use classifications are detailed in Section 4.4, Land Use of the Draft EIR. Figure 3-3 depicts the proposed El Segundo Land Use Plan.

The key issues identified in the Land Use Element Existing Conditions Report include the encouragement of planning and development that preserves the "small town" feel that contributes to El Segundo's desirability as a place to live, investigation of trends toward the reduction of manufacturing and heavy industrial uses, the increase in commercial and professional uses, the limited availability of land and the potential for commercial uses that serve the daytime population; the revision of land use areas to more effectively address current trends. The goals in the Land Use Element include the following.

Goal LU-1 Maintain El Segundo's "Small Town" atmosphere and provide an attractive place to live and work.



City of El Segundo • General Plan EIR



3. Project Description

- Goal LU-2 Preserve and enhance the City's cultural heritage and buildings or sites that are of cultural, historical, or architectural importance.
- Goal LU-3 Promote the health, safety, and well-being of the people of El Segundo by adopting standards for the proper balance, relationship and distribution of the residential land uses.
- Goal LU-4 Promote a stable tax base for the City through development of new commercial uses, primarily within a mixed use environment without adversely affecting the viability of downtown.
- Goal LU-5 Retain and attract clean and environmentally safe industrial uses that help provide a stable tax base and create a minimum negative impact on the City.
- Goal LU-6 Maintain and upgrade the existing excellent parks, recreation and open space facilities within the City of El Segundo.
- Goal LU-7 Provide the highest quality public facilities, services, and public infrastructure possible to the community.

As implementation of the El Segundo 1992 General Plan proceeds, many of these policies will create clear physical and environmental changes in the City, the effects of which are discussed in detail in the Draft EIR Chapter 4, Environmental Setting, Impacts and Mitigation Measures.

Economic Development Goals

The Economic Development Element provides the City's policy for encouragement of the economic health of the commercial and industrial uses in the City. The Element focuses on expanding and maintaining the City's economic base and enhancing the City's business climate. The goals listed below are designed to maximize the City's economic development potential.

- Goal ED-1 Create a strong, healthy economic community in which all diverse stakeholders may benefit.
- Goal ED-2 To provide a supportive and economically profitable environment as the foundation of a strong local business community.
- Goal ED-3 To preserve and improve the business environment and image of Downtown El Segundo.

Circulation

The policies and programs in the Circulation Element are intended to assist the City in providing a safe, convenient and efficient circulation system. The Element identifies physical improvements that will be needed to attain the Circulation Goals and Objectives, as well as alternative techniques to improve the City's circulation system.

The goals of the Element are stated as follows:

- Goal C-1 Provide a safe, convenient, and cost-effective circulation system to serve the present and future needs of the El Segundo community.

- Goal C-2 Provide a circulation system that incorporates alternatives to the single-occupant vehicle, to create a balance among travel modes based on travel needs, costs, social values, user acceptance and air quality considerations.

- Goal C-3 Develop a balanced General Plan, coordinating the Circulation Element with all other Elements, ensuring that the City's decision making and planning activities are consistent among all City departments.

- Goal C-4 Ensure that the City of El Segundo remains in compliance with all Federal, State and Regional regulations, remains consistent with the plans of neighboring jurisdictions and thus remains eligible for all potential transportation improvement programs.

Housing Goals

The Housing Element provides the data and policies that are intended to assist El Segundo in reaching the goal of decent and safe housing for all of its citizens. Housing production and affordability are affected by many factors, including federal and state public policies (e.g., housing, monetary, and tax policies), the health of the national and regional economy, and the regional distribution of income. While many of these factors fall outside the control of the City of El Segundo, local government's police powers enable the City to author a variety of development policies which address housing supply and quality, affordability problems, and the needs of all residents through its housing programs and land use regulations.

Issues identified in the Jobs/Housing Balance Background Report focus on achieving a better balance of jobs and housing in the City by investigating land use measures that could promote housing growth. Measures to be considered include down-zone of commercial and industrial areas; promoting higher density residential zones by encouraging accessory units, granny flats and unit splits; streamlining review and approvals for residential development/redevelopment; allowing mixed use with a residential component; and converting commercial/industrial uses to residential.

3. Project Description

Specific goals include:

- Goal H-1** All El Segundo housing opportunities (ownership and rental, fair market and assisted) will be in conformance with open housing policies and free of discriminating practices.
- Goal H-2** New housing will be developed with a diversity of types, prices, tenures, densities, and locations and in sufficient quantity to meet the demand of anticipated City growth.
- Goal H-3** Preserve and protect the existing housing stock with special attention to housing located in the City's older neighborhoods.
- Goal H-4** Create new and redeveloped housing which conserves natural resources, in particular, energy and water.
- Goal H-5** Provide sufficient new, affordable housing opportunities in the City to meet the needs of groups with special requirements, and, in particular, the needs of current military, lower and moderate income households.

Open Space and Recreation Goal

The Open Space and Recreation Element provides policy guidance for conserving the City's major open space and recreational resources. The community has a common belief that these resources need to be protected and, wherever feasible, created for recreation, beautification and maintenance of the quality of life of the community.

The goal of the Open Space and Recreation Element is stated as follows:

- Goal OS-1** Provide and maintain high quality open space and recreational facilities that meet the needs of the existing and future residents and employees within the City of El Segundo.

Conservation Goals

The Conservation Element is concerned with a range of environmental issues including coastal resources, water resources, biotic resources, and mineral resources. The following goals reflect the community's needs and values and are intended to guide efforts for the conservation, development, and utilization of the City's natural and manmade resources.

- Goal CN-1** Ensure long term public access to a safe, clean beach environment within and adjacent to the City.

3. Project Description

- Goal CN-2 Assist in the maintenance of a safe and sufficient water supply and distribution system that provides for all of the water needs within the community.
- Goal CN-3 Protect groundwater and coastal waters from contamination.
- Goal CN-4 Protect the rare and endangered El Segundo Blue Butterfly.
- Goal CN-5 Develop programs to protect, enhance, and increase the amount and quality of the urban landscape to maximize aesthetic and environmental benefits.

Air Quality Goals

The Air Quality Element is intended to address the problems of unacceptable air pollution levels, reduce the health and economic impacts of air pollution, comply with air quality requirements for the South Coast Air Basin, and increase awareness of local community and governmental responsibility for air quality. Goals include the following:

- Goal AQ-1 Person work trip reduction for private employees.
- Goal AQ-2 Person work trip reduction for local government employees.
- Goal AQ-3 Vehicle work trip reduction for private employees.
- Goal AQ-4 Reduce motorized transportation.
- Goal AQ-5 Vehicle work and non-work trip reduction.
- Goal AQ-6 Reduction in peak-period truck travel and number and severity of truck-involved accidents.
- Goal AQ-7 Reduce vehicle emissions through traffic flow improvements.
- Goal AQ-8 Reduction in tailpipe emissions from local government vehicle fleets.
- Goal AQ-9 Reduction in length of vehicle trips.
- Goal AQ-10 Reduction in particulate emissions from paved and unpaved roads, parking lots, and road and building construction.
- Goal AQ-11 Reduce emissions associated with government energy consumption.
- Goal AQ-12 Reduction in residential and commercial energy consumption.

3. Project Description

Goal AQ-13 Increase recycling of solid waste and use of recycled materials by glass and paper manufacturers.

Goal AQ-14 Prevent exposure of people, animals, and other living organisms to toxic air pollutants.

Goal AQ-15 Prevent exposure of people, animals and other living organisms to unhealthful levels of air pollutants.

Noise Goal

The Noise Element is concerned with minimizing the exposure of community residents to existing and foreseeable noise impacts. Noise problems identified and appraised in the Element focus on noise from mobile sources, such as automobiles and aircraft, stationary sources such as industrial uses and construction equipment, and approaches to noise abatement that would reduce exposure of residents to excessive noise levels. The goal of the Element is stated as follows:

Goal N-1 An environment within all parts of the City of El Segundo where the public's health, safety, and welfare is not adversely affected by excessive noise.

Public Safety Goals

The Public Safety Element is intended to reduce existing and potential hazards and nuisances and increase the range of services relating to safety and health. The issues addressed in the Element focus on geology and seismicity, flooding, fire, petroleum storage, and hazardous materials. Goals include the following:

Goal PS-1 Protect the health and safety and minimize the social and economic impacts associated with geologic hazards.

Goal PS-2 Minimize injury and loss of life, property damage, and social, cultural and economic impacts caused by earthquake hazards.

Goal PS-3 Reduce threats to public health and safety from hazardous materials, especially threats induced by earthquakes and accidental leaks and spills.

Goal PS-4 Protect public health, safety, and welfare from natural and man-made flood and inundation hazards. Minimize injury, loss of life, property damage and economic and social disruption caused by flood and inundation hazards.

Goal PS-5 A fire safe community.

3. Project Description

Goal PS-6 Protect public health, safety, and welfare from natural and man-made hazards such as: earthquakes, fire, flood, and hazardous materials. Minimize the amount of loss of life, injury, property damage and disruption of vital services resulting from earthquakes, hazardous material incidents and other natural and man-made disasters.

The stated goals and their objectives and policies are evaluated in the Draft EIR. The impacts and mitigation measures stemming from these goals, objectives and policies, and the potential for growth under the El Segundo 1992 General Plan are also evaluated Chapter 4 of the Draft EIR.

4. COMMENTS AND RESPONSES

4.1 INTRODUCTION

Text Changes To EIR

During the public review, text changes and corrections to the Draft EIR were identified. The changes and corrections include text clarification and other changes that do not affect the setting or analysis of impacts. All text changes have been identified in the Response to Comments.

COMMENTS AND RESPONSES

Fourteen letters have been included in the Final EIR. Each letter has been divided into comments, and each comment has been given a number. Responses to each comment are placed directly after each letter.

The letters are numbered consecutively. The comments are numbered consecutively for each letter. For example, Comment 1 from the South Coast Air Quality Management District (Letter 1) is identified as SCAQMD.

<u>Letter No.</u>	<u>Respondent</u>	<u>Comment Code</u>
1.	South Coast Air Quality Management District	SCAQMD
2.	Southern California Area Governments Association	SCAG
3.	County of Los Angeles, Department of Public Works	LADPW
4.	County of Los Angeles, Department of Public Works - 2	LADPW2
5.	County of Los Angeles, Department of Parks and Recreation	LAPR
6.	City of Los Angeles Department of Airports	LADOA
7.	City of Manhattan Beach, Department of Community Development	MBCD
8.	Catellus Management Corporation	CMC
9.	Associated El Segundo Real Estate Owners/Users Group	AERO
10.	California Department of Transportation	DOT
11.	California Department of Fish and Game	DFG
12.	State Lands Commission	SLC
13.	Cameron, Madden, Pearlson, Noblin & Sellars	CMPN&S
14.	Liz Garnholz	GARN



South Coast
AIR QUALITY MANAGEMENT DISTRICT

21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (714) 396-2000

January 16, 1992

Ms. Kendra Morries
City of El Segundo
City Hall 350 Main Street
El Segundo, CA 90245

Dear Ms. Morries:

**Subject: Draft EIR: City of El Segundo General Plan Update.
SCAQMD# LAC911226-04209-01.**

The South Coast Air Quality Management District (District) is responsible for adopting, implementing, and enforcing air quality regulations in the South Coast Air Quality Basin, which includes the project area. As a responsible agency, the District reviews and analyzes environmental documents for projects that may generate significant adverse air quality impacts.

The District has reviewed the Draft Environmental Impact Report (Draft EIR) for the proposed El Segundo General Plan Update. The District's review indicates that the General Plan has the potential to generate significant air quality impacts which have not been fully addressed in the Draft EIR.

SCAQMD-1

The implementation of the El Segundo General Plan policies may cause significant environmental impacts due to their nature and scope. The District's comments are intended to advise the City of El Segundo in addressing and mitigating the potential impacts of General Plan implementation. The attached staff review presents a detailed discussion of the District's analysis of the Draft EIR, and Attachment 2 provides a list of mitigation measures.

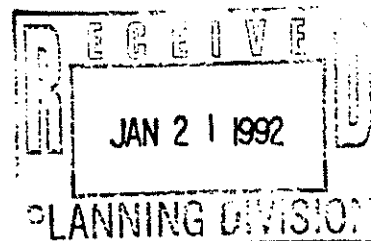
SCAQMD-2

The District appreciates the opportunity to comment on the proposed General Plan Update. If you have any questions regarding these comments, please contact Connie Day, Program Supervisor, at (714) 396-3055.

Sincerely,

Cindy S. Greenwald
Planning Manager
Office of Planning and Rules

CSG:CAD:TS:PF
Attachments



**ATTACHMENT 1
SCAQMD ASSESSMENT
OF THE CITY OF EL SEGUNDO
GENERAL PLAN UPDATE
DRAFT ENVIRONMENTAL IMPACT REPORT**

Project Description

The City of El Segundo proposes to update its General Plan to provide for " long-term goals and policies necessary to guide growth and development in the City for the coming 15-20 years." The General Plan Elements that are proposed to be updated are Land Use, Economic Development, Circulation, Housing, Open Space and Recreation, Conservation, Air Quality, Noise and Public Safety.

The General Plan policies are expected to reduce the anticipated growth in exclusive office construction in the city from 23.5 million square feet, based on current trends, to 17.4 million square feet. In addition, approximately 5.1 million square feet of industrial use will be constructed. Policies to promote mixed use growth within a quarter mile radius of the proposed Green Line rail stations are also proposed. The proposed General Plan Update attempts to mitigate the impacts of existing General Plan policies on the jobs-to-housing balance and the increased vehicle miles traveled (VMT) within the City. The proposed policies include the conversion of single-family areas to multiple-family use, and commercial and industrial areas to residential areas, which will result in lower increases in population, housing and employment compared to current trends. The General Plan anticipates approximately 600 new housing units which will add 1,281 new residents to the city. The overall increase in employment generated by the General Plan policies is 35,215 jobs at buildout.

SCAQMD-3

SCAQMD-4

Air Quality Setting

The Draft EIR accurately characterizes the air quality setting using the 1989-90 air quality data from the West Los Angeles and Hawthorne air monitoring stations.

SCAQMD-5

Air Quality Impacts of Construction

Grading and excavation activities and the use of construction equipment will be the primary cause of construction impacts. The Draft EIR anticipates that the changes in land uses proposed in the General Plan will result in decreased construction activities, compared to the projected trends in construction without the General Plan. However, policies that will ensure the enforcement of construction schedules at all major projects should be included in the General Plan to prevent excessive grading work on any given day. Additional fugitive dust control measures are proposed in Attachment 2 of this document, and should be incorporated as General Plan policies wherever feasible.

SCAQMD-6

SCAQMD-7

Operational Air Quality Impacts

Operational air quality impacts are primarily due to an increase of 615,630 vehicular trips per day by 2010 (table 4-2H). The total daily trips projected for 2010 is over 100 percent compared to the 1991 trip level. Carbon monoxide and PM10 emission increases are anticipated due to the implementation of the General Plan. The Draft EIR has analyzed in detail the average daily trips along the major arterials. No analysis, however, is made of the VMT as a result of implementing the General

SCAQMD-1

Plan. Without providing a VMT estimate based on trip numbers and trip lengths, it is not possible to accurately forecast all estimated emissions due to the General Plan policies. The Final EIR must provide an estimate of the VMT due to the proposed General Plan policies. The Final EIR should also provide an analysis of the emission factors for modeling the criteria pollutants.

SCAQMD-8

SCAQMD-9

Additionally, the VMT from cumulative growth and potential emissions resulting from the proposed changes in land uses should be analyzed in the Final EIR. One example would be an analysis of the emission reductions expected due to housing construction within one quarter mile of the Green Line. An analysis of the proposed General Plan policy to reduce motorized transportation would also provide information regarding lowered VMT and decreased vehicle trip lengths. Similar analysis of the nonmotorized modes of transportation would reveal the potential for further reductions in vehicular emissions.

SCAQMD-10

SCAQMD-11

Trip Reduction Strategy

The General Plan's emission reduction plan is based on a comprehensive trip reduction strategy, which emphasizes the changes in land uses, promotion of mixed uses, provision of transit services, park-and-ride lots, and a variety of non-motorized travel modes including pedestrian walkways, and bicycle paths. Other measures such as rideshare plans, variable work hours, and coordinated transit services are also proposed. Staff commends the strategy proposed in the General Plan, and recommends an analysis of the implementation issues associated with it. An implementation schedule for the proposed trip reduction programs should be included in the General Plan.

SCAQMD-12

An unavoidable impact of the General Plan development is the addition of a substantial quantity of vehicle trips over the next twenty years. The Draft EIR states on page 5-2 that increased traffic congestion will result in increased air pollution and energy consumption. There are several recommended mitigations in the Draft EIR to improve mobility and offset increased VMT. Proposals such as streamlined traffic intersection management and signal synchronization are expected to reduce VMT. Staff recommends that these mitigation measures be viewed as part of an integrated plan to reduce adverse cumulative impacts within an area that may experience accelerated development. The total buildout under the General Plan is expected to occur before the anticipated 15-year period, according to the Draft EIR (Supply and Demand Conditions in El Segundo, Volume 2.0).

SCAQMD-13

SCAQMD-14

Congestion Management

The Draft EIR foresees the city's compliance with the Congestion Management Plan (CMP) and contains the goal of maintaining an efficient level of service (LOS) for highway segments and key road intersections. The compliance plan in the Draft EIR earmarks several roadway improvements for reducing traffic emissions. A schedule for completing these street improvements should be included in the General Plan. In order to ensure that all proposed mitigation measures are completed as planned, the Final EIR must address the issues of financing, and scheduling of transportation improvements. In addition, an implementation monitoring plan must also be provided.

SCAQMD-15

SCAQMD-16

Cumulative Impacts

The Draft EIR states on page 5-3 that "cumulative impacts should be continually monitored through the environmental review process of proposed projects, and additional detailed mitigation measures should be included as part of project EIR's performed for individual projects as development occurs in the City." To ensure that adverse cumulative impacts are mitigated to the greatest extent feasible, the City should consider the option of addressing potential air quality impacts through General Plan policies and programs. These policies and programs, for example, may commit to certain standard types of mitigation to reduce construction and operational air quality impacts. Mitigation measures for construction-related activities may be included as standard development practices (see Attachment 2 for examples).

SCAQMD-17

Specific Mitigation Measures

Air quality policies and programs included in the General Plan may act as mitigation for the overall buildout scenario if those policies contain specific goals and action dates. SCAQMD encourages the adoption of specific standard mitigation measures, policy statements, objectives and goals within the Air Quality Element and other elements of the General Plan. Such action by the City may facilitate the attainment of federal and state ambient air quality standards.

SCAQMD-11

The City may also want to consider requiring development projects to contribute a pro-rata share of the cost of street and intersection improvements as part of CMP efforts. CMP compliance, according to the Los Angeles County CMP, will begin on January 1, 1993, or whenever there is a deterioration in the LOS after that date, whichever date comes first. The Final EIR must address the issue of construction delay regarding street improvements, and ensure that there is no deterioration below desired LOS at all major intersections.

SCAQMD-1

SCAQMD-2

TMA Network

The implementation of Transportation Management Associations (TMAs) should be addressed in the Final EIR. The existing TMAs should be strengthened by including the new TMAs formed with the addition of 35,215 jobs projected in the General Plan. The Final EIR must analyze the potential for a TMA network. The increased transportation capacity anticipated with the completion of the Century freeway should also be accounted for in analyzing the TMA network.

SCAQMD-2

Public transit services should be improved to offset the potential impact of the additional number of daily trips associated with the General Plan policies. This may be accomplished through the provision of minimum transit standards such as access to employment centers, shuttle services from employment centers, transit schedules to meet the peak arrival and departure times of commuters, and conveniently located transit terminals to ensure frequent and adequate transit services. The Final EIR must analyze the availability of transit standards above the minimum and the impact on the reduction of vehicle trips.

SCAQMD-1

SCAQMD-2

School Sites

General Plan policies relative to schools should encourage the reduction of additional vehicle trips at facility and school sites. The enhanced school enrollment anticipated in the General Plan should be analyzed for its potential VMT increase.

SCAQMD-2

Staff recommends a VMT reduction plan that includes the following strategies: preferential parking for high occupancy vehicles and shuttle services; pedestrian, bike, and bus access; and restrictions on parking to discourage traffic.

SCAQMD-21

Curbside idling by vehicles should also be discouraged by providing adequate ingress and egress at all entrances to the school site and public facilities. There should be plans for bus turnouts to encourage public transportation as it becomes available in the future.

SCAQMD-21

Conclusion

The Final EIR should ensure that construction emissions are below the District's threshold levels during any day of construction by including a policy requiring the enforcement of construction schedules at major project sites. The General Plan's emission reduction goals based on a comprehensive trip reduction strategy should be achieved by the strict and timely enforcement of mitigation measures. An implementation plan for the trip reduction strategy, including an analysis of the VMT resulting from the implementation of the General Plan policies, should be included in the Final EIR. Policies to reduce VMT must result in direct emission reductions. The trip reduction implementation plan with target dates and performance schedules must be included in the General Plan. Transportation goals for school sites should be analyzed in view of the increased school enrollment anticipated. A commitment to implement air quality policies and programs through standard conditions of project approval such as those set out in Attachment 2, should also be included in the Final EIR.

SCAQMD-21

SCAQMD-21

SCAQMD-29

SCAQMD-30

SCAQMD-31

SCAQMD-32

**ATTACHMENT 2
MITIGATION MEASURES
FOR THE CITY OF EI SEGUNDO
GENERAL PLAN UPDATE**

General Plan programs should ensure the implementation of the following mitigation measures as standard conditions of project approval wherever feasible.

1. *Minimize Construction Activity Emissions:*
 - o Water the site and clean all equipment in the morning and evening.
 - o Schedule construction activity during off-peak hours and require a phased-schedule of construction to even out emission peaks.
 - o Remove silt by paving construction roads, sweeping streets, and washing trucks leaving construction site.
 - o Suspend grading operations during first and second stage smog alerts.
 - o Maintain construction equipment engines by keeping them tuned.
 - o Use low-sulfur fuel for equipment.
 - o Use existing power sources at project sites from the beginning of project construction. Avoid using temporary power generation.

2. *Reduce Construction-Related Traffic Congestion:*
 - o Provide rideshare and transit incentives for construction personnel.
 - o Configure construction parking to minimize traffic interferences.
 - o Minimize obstruction of through traffic lanes.
 - o Provide a flagperson to guide the traffic properly.
 - o Schedule operations affecting traffic for off-peak hours.

3. *Limit Emissions from Vehicle Trips:*
 - o Schedule goods movements for off-peak traffic hours.
 - o Provide dedicated turn lanes as appropriate.
 - o Work with cities, employers and citizens in the area to implement TDM programs.
 - o Ensure traffic signal synchronization.
 - o Encourage the use of clean fuels and vehicles using clean fuels.
 - o Provide park-and-ride facilities.
 - o Provide temporary roadway controls at peak-hours, such as one-way streets; and install directional traffic signs; and synchronized traffic signals to relieve congestion on surrounding streets; and manage street intersections to improve level of service.
 - o Provide recharge facilities for electric vehicles at commercial and industrial sites.

4. *Maximize Energy Conservation:*
 - o Landscape with native drought-resistant species to reduce water consumption and to provide passive solar benefits.
 - o Improve thermal integrity of structures, and reduce thermal load with automated time clocks or occupant sensors.
 - o Introduce efficient heating and other appliances.
 - o Incorporate appropriate passive solar design.
 - o Ensure proper sealing of all buildings.

5. *Minimize Vehicle Trips at School Sites:*
 - o Provide peripheral park and ride lots at school sites.
 - o Provide preferential parking to high occupancy vehicles and shuttle services; and charge parking lot fees on low occupancy vehicles.
 - o Provide temporary roadway controls at peak-hours, such as one-way streets; and install directional traffic signs, and synchronized traffic signals to relieve congestion on surrounding streets; and manage street intersections to improve Level of Service.
 - o Provide adequate ingress and egress at all entrances to school sites to minimize vehicle-idling at curbsides.

6. *Minimize Potential Exposure of the Public to Air Toxic Emissions:*
 - o Nonsolvent-based coatings should be used on buildings wherever feasible.
 - o The use of high-solid or water-based coatings should be encouraged.
 - o Integrate additional mitigation measures into site design such as the creation of buffering areas between a potential sensitive receptor's boundary and potential pollution sources such as oil fields and contaminated soils.
 - o Minimize or eliminate population exposure to both existing toxic and future toxic emissions, and take precautions including, but not limited to, those recommended in SCAQMD Rules.

4. Comments and Responses

LETTER 1 - SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (January 16, 1992)

SCAQMD - 1 Please see response to comment SCAQMD - 6,7, & 8.

SCAQMD - 2 Comment noted.

SCAQMD - 3 Comment noted.

SCAQMD - 4 Comment noted.

SCAQMD - 5 Comment noted.

SCAQMD - 6 The following Policy has been added to the General Plan:

Policy AQ101.3

It is the policy of the City of El Segundo that all new development projects meet or exceed requirements of the South Coast Air Quality Management District for reducing PM10 standards.

In addition, Section 4.9 (Air Quality) is hereby amended in the Final EIR to include the following Mitigation Measure:

4.9-1(b) The following measures specified by the SCAQMD shall be required as standard conditions of approval wherever feasible:

Minimize Construction Activity Emissions:

- *Water the site and clean all equipment in the morning and evening.*
- *Schedule construction activity during off-peak hours and require a phased schedule of construction to even out emission peaks.*
- *Remove silt by paving construction roads, sweeping streets, and washing trucks leaving construction site.*
- *Suspend grading operations during first and second stage smog alerts.*
- *Maintain construction equipment engines by keeping them tuned.*
- *Use low-sulfur fuel for equipment.*
- *Use existing power sources at project sites from the beginning of project construction. Avoid using temporary power generation.*

Reduce Construction-Related Traffic Congestion:

- *Provide rideshare and transit incentives for construction personnel.*
- *Configure construction parking to minimize traffic interference.*
- *Minimize obstruction of through traffic lanes.*

- *Provide a flagperson to guide traffic properly.*
- *Schedule operations affecting traffic for off-peak hours.*

SCAQMD - 7 Please see response to SCAQMD - 6, and note that the following Air Quality Element Policy has been added to the Final General Plan:

Policy AQ101.3

It is the policy of the City of El Segundo that all new development projects meet or exceed requirements of the South Coast Air Quality Management District for reducing PM10 emissions.

SCAQMD - 8 The following Table provides an analysis of VMT under the existing general plan and it's alternatives.

**TABLE 4-1
VEHICLE MILES ADDED TO ROADWAY SYSTEM BY LAND USE DEVELOPMENT
IN EL SEGUNDO FOR THE EXISTING GENERAL PLAN, THE PREFERRED GENERAL PLAN
AND THE ALTERNATIVE PLAN**

	Vehicle Miles added to El Segundo Roadways	Vehicle Miles Added Outside of El Segundo	Total Vehicle Miles Added to Roadway System	Reduction in Vehicle Miles Attributable to Regional Transit Plans & TDM Programs
Current General Plan Buildout (a)	905,000	1,830,000	2,735,000	-
Current General Plan Buildout w/Reduction (b)	725,000	1,071,000	1,796,000	939,000
Preferred General Plan Buildout (a)	774,000	1,306,000	2,080,000	-
Preferred General Plan Buildout w/Reduction (b)	649,000	746,000	1,395,000	685,000
Alternative Plan Buildout (a)	915,000	1,945,000	2,860,000	-
Alternative Plan Buildout w/Reduction (b)	753,000	1,260,000	2,013,000	847,000

(a) Assumes current vehicle occupancy and mode split trends will continue.

(b) Incorporates regional transit plans and programs and improved vehicle occupancy rates due to regionally mandated trip reduction activities.

4. Comments and Responses

The numbers presented in Table 4-1 represent the amount of Vehicle Miles Traveled (VMT) that would be added to the roadway system due to the new development allowed for each General Plan Alternative. The VMT projection represents the growth in travel associated with new development and does not include the existing VMT currently on the roadway system.

The Total Vehicle Miles added to the roadway system for each of the three alternatives (Current General Plan - 2,735,000 VMT, Preferred General Plan - 2,080,000 VMT, and Alternative General Plan - 2,860,000 VMT) represent the VMT that would be added to the roadway system if current travel habits continue to buildout. This assumes that current mode split choices and vehicle occupancy levels will not be improved.

The total vehicle miles added to the roadway system for each alternative with reductions (Current General Plan - 1,796,000 reduced VMT, and Alternative General Plan - 2,013,000 reduced VMT) represent the VMT added if current travel habits can be changed consistent with targets set forth in Regional plans and programs. The reduced VMT incorporates the impact of improved mode split due to implementation of regional transit plans and programs, including the Metro Rail system and the Metro Green Line. The reduced VMT also incorporates the impact of regional TDM programs and policies. Trip generation estimates were reduced to reflect the regional targets for trip reduction through telecommuting, flex schedules and improved vehicle occupancy.

The El Segundo General Plan Circulation Element and Air Quality Element, and the Draft Air Quality Action Plan incorporate applicable regional policies set forth in the SCAQMP. Thus, the reduced VMT scenarios assume that the City of El Segundo will comply with regional trip reduction requirements. It should be noted that the reduced VMT projections assume that neighboring jurisdictions and all private sector firms in the area will comply with the regional programs and policies.

The land use patterns and densities proposed in the Preferred General Plan would generate a significant amount of added VMT to the roadway system (2,080,000 VMT and 1,395,000 reduced VMT). However, this is a significant improvement to the VMT that would be generated by the growth in land uses allowed by the Current General Plan (2,735,000 VMT, and 1,796,000 reduced VMT). The VMT added by the Alternative General Plan (2,860,000 VMT and 2,013,000 reduced VMT) would be slightly higher than the current General Plan and significantly higher than the Preferred General Plan.

SCAQMD - 9 Please see response to comment SCAQMD - 8. The following presents an analysis of criteria pollutants for the preferred General Plan and its alternatives based on the VMT numbers provided in response to comment SCAQMD - 8.

TABLE 4-2
AIR POLLUTANTS ADDED TO REGION DUE TO INCREASES IN VEHICLE MILES TRAVELED
AS ALLOWED UNDER THE EXISTING, PREFERRED, AND ALTERNATIVE GENERAL PLAN FOR
FUTURE GROWTH

	lbs/day				
	CO	TOG	ROG	NO _x	Particulates
Current General Plan^a					
Within El Segundo	9,369	857	757	2,113	534
Outside El Segundo	18,945	1,733	1,532	4,273	1,080
Total	28,314	2,590	2,289	6,386	1,614
Current General Plan w/ Reduction					
Within El Segundo	7,506	687	607	1,693	428
Outside El Segundo	11,087	1,014	896	2,501	632
Total	18,593	1,701	1,503	4,194	1,060
Reduction ^b	9,721	889	786	2,192	554
Preferred General Plan^a					
Within El Segundo	8,013	733	648	1,807	457
Outside El Segundo	13,520	1,237	1,093	3,049	771
Total	21,533	1,970	1,741	4,856	1,228
Preferred General Plan w/ Reduction					
Within El Segundo	6,719	615	543	1,515	383
Outside El Segundo	7,723	707	624	1,742	440
Total	14,442	1,322	1,167	3,257	823
Reduction ^b	7,091	648	574	1,599	405
Alternative Plan^a					
Within El Segundo	9,472	867	766	2,136	742
Outside El Segundo	20,135	1,842	1,628	4,541	1,148
Total	29,607	2,709	2,394	6,677	1,890
Alternative Plan w/ Reduction					
Within El Segundo	7,795	713	630	1,758	445
Outside El Segundo	13,044	1,193	1,055	2,942	744
Total	20,839	1,906	1,685	4,700	1,189
Reduction ^b	8,768	803	709	1,977	701

^a Assumes current vehicle occupancy and mode split trends will continue.

^b Reduction in pollutants attributable to regional transit plans and TDM programs.

Source: SCAQMD, *Air Quality Handbook*, 1987.

4. Comments and Responses

- SCAQMD - 10 The VMT numbers and emission estimates shown in response to comments SCAQMD - 8 and 9 take into account cumulative growth in surrounding jurisdictions and at LAX, including growth in Manhattan Beach, portions of unincorporated Los Angeles County, Hawthorn, and projects beyond these areas.
- SCAQMD - 11 The VMT numbers and emission estimates provided above incorporate reductions in vehicle trips and VMT associated with employment centers in close proximity to the Green Line.
- SCAQMD - 12 The implementation schedule for trip reduction programs is included in the Draft Air Quality Action Plan (AQAP) which is proposed as the implementing document for the policies found in the Air Quality Element. A specific analysis of VMT related to policies in the AQAP was not conducted as part of the general plan study. However, following adoption of the general plan and finalization of applicable AQMP measures by SCAG, the City will work with SCAG in considering an acceptable approach for incorporating measurable standards into the Final AQAP. Prior to adoption, the Air Quality Action Plan will be forwarded to SCAQMD and SCAG for review and comment.
- SCAQMD - 13 Comment noted.
- SCAQMD - 14 Coopers & Lybrands "Comparative Fiscal Impact Analysis", October 20, 1991 in a discussion of demand for land use states that "Assuming straight line growth in demand, the potential supply of land uses would not be built out until approximately 2030. Similarly, the supply of potential land uses is well in excess of the hypothetical demand projections for both of the proposed plans."
- SCAQMD - 15 While implementation dates could be estimated for some of the proposed improvements, the City is not prepared to commit to a timeline for these improvements given the uncertainty of funding sources and the inability to project when new development requiring improvements will occur.
- SCAQMD - 16 Financing and scheduling of individual improvements is not required as part of the General Plan process. New projects will be reviewed and required to mitigate all related significant impacts. Mitigation Monitoring Plan will be completed following adoption of the Final EIR.
- SCAQMD - 17 See response to comment SCAQMD - 6

4. Comments and Responses

- SCAQMD - 18 Given the evolving nature of air quality policies and regulations and the time required to process changes to the General Plan, the City has chosen to Adopt an Air Quality Action Plan (AQAP) to support the Air Quality Element. The AQAP provides specific programs and action dates for conformance with the South Coast Air Quality Management Plan and for attainment of federal and state ambient air quality standards.
- SCAQMD - 19 Comment noted.
- SCAQMD - 20 New projects should implement any required mitigation measures prior to issuance of an occupancy permit. If there are construction delays due to street improvements or other mitigations, occupancy permits should be withheld until necessary mitigations are implemented.
- SCAQMD - 21 The General Plan and EIR include implementation of TMA's as a potential mitigation measure for new developments.
- SCAQMD - 22 The potential benefits of transit service improvements was stated in the General Plan. In addition, there were several policies which are specifically related to encouragement and improvement of transit service. However, transit schedules, routes and standards will need to be determined by the agencies empowered to do so, and need to be prepared based on a relatively short time frame in order to be as demand-responsive as possible, and thus, are inappropriate for inclusion in the El Segundo General Plan.
- SCAQMD - 23 See response to comment SCAQMD - 22.
- SCAQMD - 24 Growth in school enrollment and the related impacts to traffic were incorporated into the traffic analysis for the General Plan.
- SCAQMD - 25 Each of these strategies is among the list of potential mitigation measures that will be considered for new projects which would cause significant impacts on local and regional transportation.
- SCAQMD - 26 A number of policies contained in the Air Quality and Transportation and Circulation Element address the need for public transit improvements, including funding approaches for bus turnouts. .
- SCAQMD - 27 Please see response to comment SCAQMD - 6.

4. Comments and Responses

SCAQMD - 28 Please see response to comment SCAQMD - 12, and 18.

SCAQMD - 29 Please see response to comment SCAQMD - 12.

SCAQMD - 30 Please see response to Comment SCAQMD - 12 and 18.

SCAQMD - 31 Please see response to SCAQMD - 24.

SCAQMD - 32 Please see response to comment SCAQMD - 6.

818 West Seventh Street, 12th Floor • Los Angeles, California 90017-3435

February 5, 1992

Ms. Kendra Morries, Director of Planning
 City of El Segundo Planning Department
 350 Main Street.
 El Segundo, CA 90245

RE: City of El Segundo General Plan and Draft EIR - SCAG No. LA-55401-EDR


Dear Ms. Morries:

Thank you for submitting the Draft El Segundo General Plan and Draft EIR to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties, and other agencies to review projects and plans for consistency with the Regional Housing Needs Assessment, Regional Mobility, Growth Management, and Air Quality Management Plans, all of which are included in the State Implementation Plan.

The attached comments are meant as administrative staff comments to provide guidance for considering the proposed General Plan Update within the context of our regional goals and policies. These goals and policies have been adopted in the SCAG regional plans specified above and are based in part upon state and federal mandates. The adoption of updated General Plans are a priority for SCAG and the delegation of project level conformity demonstrates an important commitment by local jurisdictions assuring implementation of all AQMP control measures using local General Plan authority.

SCAG's policy level review will be initiated with the presentation of your General Plan to SCAG's Local Assistance and Compliance Committee (LACC) on February 27, 1992. If you have any questions about the attached comments, please contact Glenn Blossom (213) 236-1876. He will be contacting you to invite you to participate in the February 27th LACC meeting.

Sincerely,


ANNE BAKER
 Director of Environmental Planning
 AB:GB

FEB - 7 1992

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COMMENTS ON THE DRAFT EL SEGUNDO GENERAL PLAN AND EIR

BACKGROUND

The revised schedule for the General Plan project obtained from the City of El Segundo indicates that the Draft EIR was released for public review on December 2, 1991. Various Planning Commission meetings, community workshops, and study sessions on the project will continue until January 23, 1992. Planning Commission hearings will be held on February 6 and February 13. The City Council will hold public hearings on February 25 and March 17. March 17 is also the date on which the City Council is scheduled to adopt the General Plan.

SCAG did not receive a copy of the Draft EIR until December 26, 1991. The letter of transmittal requested that comments be returned by January 15, 1992. Shortly after receiving these materials, a SCAG Staff member contacted the City of El Segundo EIR Coordinator to request additional time to prepare and submit comments on the project.

GUIDANCE FOR AIR QUALITY ELEMENT EVALUATION

SCAG's Criteria for Review of Local Air Quality General Plan Provisions and Action Plans provides guidance for Air Quality Element evaluation. Listed below are a group of questions taken from that guidance followed by our evaluation of how well the Draft El Segundo General Plan responds to each criteria.

- o Does the proposed plan element address air quality related issues in a comprehensive manner?

Evaluation: The El Segundo Draft General Plan has an Air Quality Element and an Air Quality Action Plan. Together, these two parts of the plan accomplish this objective in an exemplary manner. We strongly believe that this approach should be emulated by each of the local jurisdictions in this air basin.

- o Are all measures contained within the AQMP which are relevant to the local jurisdiction adequately addressed in the proposed plan element?

Evaluation: Yes. It appears that this objective has been met.

- o Does the proposed plan element define the relationship of its air quality general plan provisions to related policy documents and implementing programs which the jurisdiction is responsible for?

Evaluation: Yes. It appears that this objective has been met.



- o Are the measures included within the proposed plan element consistent with objectives and requirements established in the AQMP?

Evaluation: No. The proposed land uses in the General Plan are inconsistent with the Land Use Measure No. 17 of the AQMP. Program AQ91.1A of the Draft Air Quality Action Plan is described as follows:

"Update the Land Use and Housing Elements of the General Plan to improve the City's jobs/balance and achieve a reduction in the length of commute trips."

SCAG-1

This program is stated differently in the Draft EIR: it is stated there that:

"It is the policy of the City of El Segundo that the City's Land Use and Housing Elements and any subsequent Specific Plans incorporate measures that will promote a better balance of jobs and housing within the City."

A review of the allocation of land uses proposed by the General Plan indicates that industrial and commercial development has not been matched with sufficient housing development. The discussion on Page 4.5-17 of the Draft EIR shows how the Preferred Plan fails to meet the jobs/housing objectives of the Air Quality Management Plan/State Implementation Plan (AQMP/SIP) and produces an inconsistency within the General Plan; such evidence of internal inconsistency within the General Plan is contrary to the State Planning Law.

SCAG-2

SCAG concurs with the statement on Page 4.5-17 that the Preferred Plan would not be found to conform to the AQMP/SIP. We also concur that the Alternative Plan moves further away from Program AQ91.1A of the Draft Air Quality Action Plan and would exacerbate the existing jobs/housing imbalance in the Santa Monica Bay Subregion.

The 1991 AQMP establishes an alternative method to meet the objectives of the jobs/housing balance performance goals of the Regional Growth Management Plan (GMP). This alternative consists of reducing vehicle miles traveled (VMT) to achieve air quality benefits equivalent to those which would be achieved through implementation of the GMP jobs/housing balance policy.

SCAG-3

The average reduction in VMT per job growth which should be achieved in the Santa Monica Bay Subregion is 5.60. El Segundo's share of the reduction in VMT is determined by multiplying the amount of jobs being proposed for development by this factor. To calculate the VMT reduction target for the El Segundo General Plan, the new jobs are first discounted by an amount equivalent to the amount of housing which should be associated with a jobs creating development using the 18-step method outlined in SCAG's Conformity Guidelines. The procedure is shown in the Technical Appendix to



this report. The result is that there is a need for the City of El Segundo to reduce daily VMT by 289,436 miles.

- o Does the proposed plan element provide measurable standards to be used in determining consistency of implementing actions?

Evaluation: Additional standards are needed. Without measurable standards, it will be impossible to monitor progress. The TDM measures, in particular, should be accompanied by the expected effect and VMT/VT reduction targets for each component of the program. In this report we are providing standards extracted from Transportation and Land Use Control Measures: Appendix IV-E to the 1991 Air Quality Management Plan. Please note that clarification and expansion of the standards may be forthcoming within a few months. Also note that an option is provided in the 1991 AQMP for local government to enact a single ordinance implementing the transportation demand management features of Measures 1 and 2.

SCAG-

AQMP STANDARDS

In this list, the standards are organized by the measures as named and described in Appendix IV-E. A summary of all actions designated for implementation by local government taken from Appendix IV-E has been enclosed. The enclosure is somewhat more comprehensive than this report in terms of performance standards and due dates.

1.a. Person Work Trip Reduction

Local governments are to adopt, by December 31, 1992, a specific program for telecommuting, alternative work weeks and non-motorized transportation to reduce motor vehicle person work trips by local government employees by 12%. The target would be increased to 20% in 2000 and 30% in 2006.

Local governments are to adopt, by December 31, 1994, trip reduction ordinances requiring employers to reduce employee motor vehicle person work trips through telecommuting, alternative work weeks and non-motorized transportation by 12%. The target would be increased to 20% in 2000 and 30% in 2006.

Local governments (with the aid of SCAG and SCAQMD) are to seek State legislation, by December 31, 1992, to provide employer tax credits for telecommuting equipment and services.

Local governments, by December 31, 1993, are to adopt ordinances to implement telecommuting requirements in regionally significant developments.



Local Governments with jurisdiction over geographically large areas are to, by December 31, 1994, begin implementing a policy of using branch offices as telecommuting centers, etc.

Local governments are to, by December 31, 1994, adopt ordinances requiring certain employers to set aside space for various forms of telecommuting.

Local governments are to, by December 31, 1994, determine the feasibility of developing centralized ordering and home delivery services.

Local governments are to, by December 31, 1992, ensure that their zoning does not excessively restrict home occupations.

Local governments are to work with other specified entities to get legislation by 1994 for tax incentives to encourage telecommuting centers.

1.b. Non-Motorized Transportation

The first two standards repeat the first two indicated for Measure 1.a. above.

Local governments are to adopt non-work trip reduction ordinances for large retail establishments (by December 31, 1992) and special event centers (by December 31, 1993) which require facilities and incentives for non-motorized transportation.

By December 31, 1994, local governments are to include bicycle routes in their General Plans that will support the employer and non-work trip bicycle transportation plans implemented as a result of the regulations noted above. As part of this action, an implementation program to develop the routes and support facilities would be adopted by local governments.

By December 31, 1993, local governments are to enact ordinances requiring that parking spaces for bicycles be provided in new commercial and industrial developments in excess of 10,000 square feet and that employee shower and locker facilities be provided in new commercial and industrial developments in excess of 100,000 square feet.

2. Mode Shift Strategies

This Measure contains vehicle occupancy standards for each of the designated Activity Centers. Your attention is directed to the ones pertaining to the El Segundo planning area which are replicated here:



Average Vehicle Occupancy Goals for 2010 by Activity Centers

Westchester/Airport	1.26 persons per vehicle
South Bay	1.26 persons per vehicle

2.a. Employer Rideshare & Transit Incentives

Local governments are to adopt ordinances/resolutions, by December 31, 1992, to require facilities and buildings with 100 or more employees to submit trip reduction plans to meet SCAQMD AVR requirements.

2.b. Parking Management

By December 31, 1992, local governments are to conduct local assessments and adopt Air Quality Element into each General Plan, Parking Management and/or Parking Code revisions, as and where appropriate. Twelve types of actions are to be considered and addressed appropriately by each jurisdiction. For details see Appendix IV-E of the 1991 AQMP.

Local governments (or SCAQMD or the State) are to, by December 31, 1992, eliminate free on site employee parking for employers of over 100 employees, and extend this to employers of over 25 employees by December 31, 1994.

2.d. Merchant Transportation Incentives.

The standard given here repeats the ones in Measures 2.a and 2.e.

2.e. Auto Use Restrictions

Adoption of Air Quality Element into General Plans by December 31, 1992, which will identify, as appropriate, the local applicability of requiring special event centers to implement measures such as operating park-n-ride and off-site facility lots, requiring auto free zones, requiring street closure during peak periods, and enhancing transit performance.

Adoption by December 31, 1993, of a special event center trip reduction ordinance, to require special event centers with capacities of 10,000+ to implement measures such as establishing and operating park-n-ride and off-site parking facility lots with shuttle service, requiring discounted transit passes to be advertised and offered for sale with event tickets, and requiring each center to have a transportation coordinator to manage traffic flow or to implement similarly effective measures. Incentives are to be adopted to facilitate the implementation of Control Measure 2.e.



3.a. Truck Dispatching, Rescheduling & Rerouting

Local governments are to, by December 31, 1992, adopt air quality elements and/or ordinances which will deal with this measure, choosing from a variety of alternatives.

12.a. Paved Roads

By December 31, 1992, local governments are to develop "clean streets" management programs. The contents of these programs are defined in Appendix IV-E of the 1991 AQMP cited above.

12.b. Unpaved Roads and Parking Lots

Local governments are to, by December 31, 1993, adopt ordinances and allocate resources to require paving or an alternative control of all vehicle maneuvering areas and parking facilities, according to ARB/Caltrans criteria.

17. Growth Management

Implementation of the growth management policy to attain subregional performance goals by:

Local jurisdiction: through development of general plans and through adoption of measures and ordinances by December 31, 1994 and through issuance of development permits according to suggested guideline.

Adoption of resolutions by December 31, 1992, containing action plans which:

- a. Clarify the work local jurisdictions will commit to do in order to implement Measure 17.
- b. Demonstrate the local jurisdiction's commitment to amending it's general plan, developing an implementation plan, and/or adopting ordinances by December 31, 1994, to implement Measure 17. Copies are to be submitted to SCAG for reporting to state and federal agencies.

To be a non-regulatory measure until December 31, 1994. SCAG, with assistance of local jurisdictions and subregional entities, reassess and reevaluate actions by December 31, 1994 and determine whether backstop measures are needed.

We call your attention to the standards which are provided in 1991 AQMP Table I-1, Growth Management Measure 17, which relate to land use planning. Local governments



have the option of using these subregional jobs/housing targets as the equivalent subregional VMT target. the pertinent portions of the table are replicated here:

1991 AQMP Table I-1

Sub-Regional Vehicle Miles Traveled (VMT) Reduction
Equivalent to Job/Housing Balance
(1984-2010)

<u>Subregion in SCAB</u>	<u>VMT Reductions</u>	<u>Job/Housing Balance for Growth</u>
Santa Monica Bay	1,416,000	1.72

General Requirements for Baseline Data and Monitoring

Implementing ordinances and regulations are to require that baseline data be generated. Upon implementation, the City would be required to monitor the progress and effectiveness of the measure or ordinance and report results and baseline data annually to SCAG for incorporation into the RFP Report.

- o Does the proposed plan element establish a basis for determining consistency with other elements of the general plan?

Evaluation: Yes. This project consists of a comprehensive General Plan Update which is intended to result in an internally consistent General Plan.

- o Are appropriate roles and responsibilities established for the jurisdiction's participation in air quality planning at the subregional and regional levels?

Evaluation: Yes. This appears to have been achieved in the Draft Air Quality Plan.

- o Does the proposed plan element recognize the interrelationship between provisions of the jurisdiction's general plan and relevant plans and programs which are the responsibility of other agencies and jurisdictions within the region and subregion?

Evaluation: Yes.



PROJECT REVIEW PROCEDURES

It is recommended that the City establish local project review procedures which are consistent with Component IV of the AQMP conformity chapter of AQMP Appendix IV-G (pages 305 through 307). The intent is that local jurisdictions will take the responsibility to ensure that all general development projects, individual transportation projects and individual wastewater treatment facilities will be designed and conditionally approved so as to be in conformance with AQMP/SIP. It is also intended that the urban form policies of the GMP be respected in local plans and projects. In addition, the City's CEQA guidelines should be amended to ensure that project level EIRs address AQMP, GMP and RMP.

SCAG-5

AIR QUALITY ELEMENT AMENDMENTS AND OTHER GENERAL PLAN AMENDMENTS

It is recommended that the City acknowledge the need for the Air Quality Element to be amended from time to time as the AQMP is amended to respond to state and federal legislation, guidelines, and additional information that is brought to bear on the issues.

SCAG-6

Also, it should be recognized that all future general plan amendments should be submitted to SCAG for review so that SCAG can assist the City to remain consistent with regional goals, objectives, policies and programs.

CONSISTENCY WITH THE SIP

Analysis:

A project or plan is found to be consistent with the SIP when it has satisfied the following three criteria:

- o It attains the subregional goals of the GMP using either of the alternative test methods.
- o It reduces vehicle trips and vehicle miles traveled to the maximum extent feasible by implementing transportation demand management strategies.
- o Its environmental document includes an air quality analysis which demonstrates that the project will not have a significant negative impact on air quality in the long term.

SCAG-7

As described in the Draft EIR, the El Segundo General Plan would have a negative impact on air quality in the Santa Monica Bay subregion. The proposed TDM program is not adequate to mitigate the adverse effects of increased transportation. The EIR indicates that the proposed General Plan will contribute to existing non-attainment of air quality standards for criteria pollutants.



Findings:

SCAG does not find the proposed El Segundo General Plan to be consistent with the SIP at this time. Greater attention to VMT reduction and to the incorporation of AQMP standards is required in order to meet the goals of the regional plans and to mitigate the effects on air quality to a less than significant level.

SCAG-E

RECOMMENDATIONS

Prior to considering the adoption of the El Segundo General Plan, the City of El Segundo should consider the following recommendations:

- o All inconsistencies of the General Plan with regional plans should be fully addressed.
- o The TDM element of the Plan should be strengthened as recommended above.
- o Analysis should then be conducted to determine that implementation of the General Plan will not have a significant negative impact on air quality in the long term.

SCAG-E

If the El Segundo General Plan is approved, it is requested that SCAG be notified of the action by City of El Segundo so that the implications for the Comprehensive Regional Plan, which is now under preparation, can be evaluated with respect to transportation, wastewater treatment and other service systems.

SCAG-10

Also, all mitigation measures associated with the General Plan should be monitored in accordance with the AB 3180 requirements and should be reported to SCAG through the Annual Reasonable Further Progress Reports.

SCAG-11



Technical Appendix

The Preferred Plan Alternative of the El Segundo General Plan will accommodate 128,187 jobs by 2010. This would be 58,034 more jobs than there were in 1984. The housing need associated with the 58,034 new jobs would be 10,054 units.

$58,034 / 2.45 = 23,687$. This is the amount of housing associated with 58,034 jobs under the trend projection.

$58,034 / 1.72 = 33,741$. This is the amount of housing associated with 58,034 jobs under the GMP forecast.

$$33,741 - 23,687 = 10,054$$

Although the Preferred Plan Alternative will provide for 1,100 dwelling units, there is still a shortfall of 8,954 dwelling units ($10,054 - 1,100 = 8,954$).

The unmitigated jobs equivalency for the housing shortfall is determined by dividing the housing shortfall by the housing need, then multiplying the sum by the number of jobs provided by the plan.

$$(8,954 / 10,054) * 58,034 = 51,685$$

In order to determine the VMT reduction necessary to mitigate these 51,685 jobs, the number of new jobs provided by the General Plan is multiplied by the average VMT reduction for the subregion:

$$51,685 * 5.60 = 289,436 \text{ vehicle miles per day.}$$

LOCAL GOVERNMENT MEASURES CONTAINED IN APPENDIX IV-E, TRANSPORTATION,
LAND USE AND ENERGY CONSERVATION CONTROL MEASURES
OF THE 1991 AIR QUALITY MANAGEMENT PLAN
(AS APPROVED BY SCAG EXECUTIVE COMMITTEE ON JUNE 6, 1991)

1.a. PERSON WORK TRIP REDUCTION

1. As also indicated in the Non-Motorized Transportation measure, local governments adopt by December 31, 1992 a specific program for telecommuting, alternative work weeks and non-motorized transportation to reduce motor vehicle person work trips by local government employees by 12%. The target would be increased to 20% in 2000 and 30% in 2006.
2. As also indicated in the Non-Motorized Transportation measure, local governments are to adopt by December 31, 1994 trip reduction ordinances requiring employers to reduce employee motor vehicle person work trips through telecommuting, alternative work weeks and non-motorized transportation by 12%. The target would be increased to 20% in 2000 and 30% in 2006.
3. Local government, SCAG and SCAQMD seek State legislation by December 31, 1992, to provide employer tax credits for telecommuting equipment and services, whether used for satellite work centers or telecommuting from home (market incentive).
4. Local governments, county transportation commissions, SCAG and SCAQMD utilize local, state and federal funds to develop telecommuting centers and reduce the cost of the equipment, services or planning used to initiate telecommuting programs. Work would include a program to test which incentives are most effective in gaining employer support for telecommuting, and/or eliminating commute trips or their lengths. Utilize existing commute-trip data bases to match telecommuters with sites for satellite work centers.
5. Local governments by December 31, 1993, will adopt ordinances requiring regionally significant employment developments in housing-poor areas and regionally significant housing developments in housing-rich areas to implement telecommuting centers in housing-rich areas (market incentive).
6. Local governments with jurisdiction over geographically large areas will by December 31, 1994 begin implementing a policy of using branch offices as telecommuting centers and for including the potential use as a telecommuting center in the analysis of alternative uses of any public facility being closed in housing-rich areas (such as a school or a library).
7. Local government must, by December 31, 1994, adopt ordinances requiring employers with multiple facilities to set aside space in every office facility above a specified size to facilitate its use

by employees who live near the facility but would normally work at another location. The facility would change in function from a single-function office to a combined office and telecommuting center. A minimum size for application of this measure will be recommended by the AQMP Monitoring Working Group.

8. Local government in conjunction with locally licensed businesses and cable television operators is to determine by December 31, 1994 the feasibility of developing centralized ordering and home delivery services in order to reduce shopping trips. If product prices could be discounted through business overhead savings, delivery costs may be offset. Programs should have phased implementation after 1994.
9. Local governments must ensure by December 31, 1992 that their zoning and licensing ordinances permit telecommuting and do not excessively restrict reasonable home occupations.
10. EPA, SCAG, the SCAQMD, and local governments must look at legislation to remove impediments to alternative work schedules in management bargaining agreements.
11. SCAG, SCAQMD, and other agencies and local governments should work to get legislation by 1994 for tax incentives for developers to voluntarily establish telecommuting centers in housing-rich areas (employment-to-population ratio less than 0.38).

1.b. NON-MOTORIZED TRANSPORTATION

12. (Same as # 1)
13. (Same as # 2)
14. (Same as #'s 22, 24, 25 and 26)
15. By December 31, 1994, local governments include bicycle routes in their General Plan that will support the employer and non-work trip bicycle transportation plans implemented as a result of the regulations noted above. As part of this action, an implementation program to develop the routes and support facilities would be adopted by local government.
16. As indicated in measure 17, one option for local governments to implement the growth management objectives is to amend their General Plans to allow mixed use and cluster developments, and the location of service commercial uses within walking or bicycling distances of residential areas.
17. By December 31, 1993, local government will enact ordinances requiring that parking spaces for bicycles be provided in new commercial and industrial developments in excess of 10,000 square feet and that employee shower and locker facilities be provided in new commercial developments in excess of 100,000 square feet.

2.a. EMPLOYER RIDESHARE & TRANSIT INCENTIVES

18. Local governments will adopt ordinances by December 31, 1992, to require trip reduction plans for facilities and buildings with more than 100 employees. This requirement will apply to all employers located in facilities or buildings with 100 or more employees. This requirement will also apply to owners of facilities or buildings that have 100 or more employees in any one location or worksite.
19. Support passage of vanpool credit tax legislation for employees who vanpool. Local governments should include provision of vanpools among list of options in trip reduction ordinances and require employers to provide preferential parking for vanpool users.

2.b. PARKING MANAGEMENT

20. Local government must adopt air quality element by December 31, 1992, which includes as appropriate:
 - o Increase public parking meter fees and rates in all congested centers in the region.
 - o Develop a local government parking fee structure to support Transit and TDM programs.
 - o Impose a surcharge on parking spaces for single occupant vehicles and/or provide a discount for multi-occupant vehicles in all parking facilities.
 - o Reduce availability of peak period on-street parking in congested urban areas; eliminate on-street parking on at-capacity arterials and major transit routes in congested areas during the day by December 31, 1994.
 - o Restrict residential parking to residents only through permit process in all areas adjacent to congested commercial activity centers.
 - o Require the marking of parking spaces with adequate time-limit to produce rapid turnover thus increasing supply and reducing residential spillover (short and long term).
 - o Limit the number of parking spaces permitted in specified city zones.
 - o Limit the number of parking spaces permitted per square foot for specified uses.
 - o Additional staff time and/or new parking enforcement techniques to parking enforcement operations.

- o Limit access to major activity centers to transit and non-motorized modes and to shuttles from peripheral parking only. Also, see TCM 2.e. -- Auto Use Restrictions.
 - o Apply employer revenues generated by increased parking fees to transit fares and carpools as an employee subsidy.
 - o Reduce the amount of "free" parking provided at non-work centers (e.g. shopping, entertainment enterprises, etc.) by limiting time of free parking, requiring validation, or imposing prices and surcharges based upon vehicle passenger occupancy.
21. Local government through ordinance, or the SCAQMD through a regional rule, or the state through state legislation, shall:
- o Eliminate free on site employee parking for non-residential developments and employment centers, through the "cashing out" of free employee parking, by imposing employee parking charges and replacing the formerly free parking with employee transportation allowances or TDM benefits for employers of 100+ by December 31, 1992; and for employers of 25+, by December 31, 1994, as a substitute for free parking. This would be done in order to achieve higher transit mode split, vehicle occupancy rates, reduced on-site trip generation, and greater non-motorized trip substitution than can normally be achieved with conventional TDM programs.

2.d. MERCHANT TRANSPORTATION INCENTIVES

22. Local government to adopt non-work trip reduction ordinances, by December 31, 1992, which will require major retail centers to offer customer travel incentives; require owners/managers/developers of both new and existing large retail establishments to provide facilities for non-motorized transportation needs, such as providing bike racks, adequate pathway systems and to design sites to facilitate bicycle and pedestrian movement through mixed use and clustered developments.

Increase non-work related transit mode split by 10% annually (or approximately 52,000 trips per year) over 1984 levels. Set local objectives and provide commensurate mode shift opportunities through carpooling, walking, and bicycling incentive programs. Divert 1% of all trips of three miles or less to the bicycle mode, divert 10% of all auto trips of 1/2 mile or less to walking trips. Divert 12% of single occupant auto trips to carpool of 2+ persons.

2.e. AUTO USE RESTRICTIONS

23. Local government adoption of Air Quality Elements in General Plans by December 31, 1992, which will identify, as appropriate, the local applicability of requiring special event centers to operate park-n-ride and off-site facility lots, requiring auto free zones,

requiring street closure during peak periods, and enhancing transit performance.

24. Adopt local ordinances, by December 31, 1993, requiring, as appropriate in light of the analysis of benefits and burdens undertaken pursuant to the General Plan requirement, special event centers such as stadiums, concert halls and amusement parks with potential capacities of 10,000 or more individuals at a time to establish Park-n-Ride and off-site parking facility lots at remote locations. Such ordinances might require measures such as the provision of shuttle service to and from events, increased parking fees at the facility, and require the operator to advertise and offer for sale discounted transit passes with event tickets or to implement similarly effective measures as may be suggested by the Special Event Center for alleviating traffic and air quality concerns associated with its operations. Such ordinances would also take into account local objectives and provide commensurate mode shift opportunities for carpooling. An on-site transportation coordinator, if determined to be appropriate, would manage and monitor the center's trip reduction programs to ensure their success, as well as continue to develop strategies to reduce VMT.
25. The ordinances or Air Quality Elements would specify requirements for new development and pedestrian malls and the coordination with (existing and planned) Park-n-Ride lots, rail service and bus lines.
26. The ordinances or Air Quality Elements would, as appropriate in of the analysis by local agencies, restrict vehicle access to major activity centers to shuttles via peripheral parking, transit, and non-motorized modes; require local governments to close streets as needed. The criteria for street closure are determined by local government and consist of heavy peak-period congestion and lack of parking, combined with existing or potential heavy pedestrian activity. Auto restricted areas must be adequately served by transit/shuttle/park'n'ride.
27. Local government must provide enhancement of transit performance and availability in auto restricted zones and make the transit system user-friendly; improve the local transit system to tie into major truck lines, develop fee structures and passes to facilitate passenger movement between systems, and improved bus service (time schedule, performance, and connections). Provide computerized transit directories at major event centers, major activity centers, and any other area where parking is severely limited. Establish developer fees to offset transit development costs and further develop incentives to encourage local government to develop localized transit systems.

3.a. TRUCK DISPATCHING, RESCHEDULING & REROUTING

28. Local government shall adopt air quality elements and/or ordinances by December 31, 1992, which will include as appropriate:

o Truck Restrictions on Arterials During Peak Periods

Establish truck restrictions on operating schedules of heavy duty vehicles or prohibit operation during peak periods to relieve congestion on major arterials, taking into consideration time sensitive deliveries, such as those mentioned below under special truck operations. Establish a surcharge for commercial vehicles operating during peak periods.

o Peak Period Pricing for Truck Operations

Establish a special surcharge and issue permits and/or medallions for the operation of commercial vehicles during periods of peak traffic congestion on congested portions of major arterials. Those operating without a permit would be fined or penalized.

o Special Truck Operations

Measures to restrict or regulate truck deliveries will require special measures for different types of trucking activity. Special truck operators, such as construction suppliers, concrete delivery, rock and gravel haulers, package delivery and air freight forwarders, dairies, and grocers, would develop voluntary plans to limit operations during peak periods. Consider a fine for noncompliance of the voluntary plan.

4. **TRAFFIC FLOW IMPROVEMENTS**

29. Local government should implement Automated Traffic Surveillance and Control (ATSAC) systems and similar interconnected signal control systems or appropriate non-interconnected synchronization methods on 2500 signalized intersections between 1989 and 1993, 5000 between 1989 and 2000, and to 8000 by 2010. Where high-technology signal interconnection is not feasible, improved fixed-time systems and timing should be provided. Emphasis on system management techniques under AB 471 Congestion Management Programs may accelerate implementation of signal synchronization projects within the South Coast Air Basin.

30. Local government should improve channelization at 125 intersections between 1989 and 1993, and to 500 intersections by 2010. As a part of SCAG's Overall Work Program, and inventory of intersection locations which would be candidates for improved channelization should be identified through the appropriate area study and jurisdictions encouraged to implement the improvements.

12.a. **PAVED ROADS**

31. Local governments would be required to develop a "clean streets" management program which includes enacting construction carryout and entrainment ordinances and vehicle entrainment ordinances, as well

as allocating resources for controlling emissions from unpaved areas adjacent to paved areas and storm water control by December 31, 1992. (Local governments may adopt Development Impact Fee Ordinances or create street maintenance districts (Assessment Districts) to fund this program.) Caltrans and the sanitation/flood control districts would be required to participate in the "clean streets" management program by allocating resources for controlling emissions from unpaved areas adjacent to paved areas and storm water control by December 31, 1992.

12.8. UNPAVED ROADS AND PARKING LOTS

32. Local governments adopt ordinances and allocate resources by December 31, 1993, to require paving or an alternative control of all vehicle maneuvering areas and parking facilities, according to ARB/Caltrans criteria.

17. GROWTH MANAGEMENT

33. Local governments amend general plans, adopt ordinances and develop interregional agreements by December 31, 1994, to attain growth management performance goals at the subregional level consistent with the Growth Management Plan.
34. Local governments adopt resolutions by December 31, 1992, containing action plans which:
 - a. Clarify the work local jurisdictions will commit to do in order to implement Measure 17.
 - b. Demonstrate the local jurisdiction's commitment to amending its general plan, developing an implementation plan, and/or adopting ordinances by December 31, 1994, to implement Measure 17.
35. Local governments submit regionally significant plans and project EIRs to SCAG for conformity review.
36. SCAG review of regionally significant plans and projects for conformity. When local jurisdiction adopts a conforming air quality element or equivalent general plans amendment, conformity reviews will become responsibility of jurisdiction.
37. Local governments develop interregional agreements to attain growth management performance goals consistent with the Growth Management Plan (see Table I-1). Sanitation districts advise local jurisdictions in implementation of the growth management policy.

[Added from 1991 AQMP for SIP Amendment 3/25/91]

TABLE I-1

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

SUB-REGIONAL VEHICLE MILES TRAVELED (VMT) REDUCTION
EQUIVALENT TO JOB/HOUSING BALANCE
 (1984-2010)

SUBREGIONS IN SCAB	VMT REDUCTIONS ^a (000 MILES)	JOB/HOUSING BALANCE FOR GROWTH (1984-2010)
SANTA CLARITA VALLEY	707	1.30
SAN FERNANDO VALLEY	1,767	1.21
SANTA MONICA MTNS.	77	0.86
SANTA MONICA BAY	1,416	1.72
CENTRAL L.A.	2,715	1.65
GLENDALE/PASADENA	1,321	1.38
LONG BEACH/DOWNEY	1,250	1.45
EAST SAN GABRIEL VALLEY	1,655	1.25
WEST SAN BERNARDINO VALLEY	2,147	1.27
EAST SAN BERNARDINO VALLEY	1,469	0.76
ANGELES FOREST	18	NA
SAN BERNARDINO FOREST	1,360	0.17
NORTHWEST ORANGE	3,214	1.76
SOUTHEAST ORANGE	1,361	1.44
RIVERSIDE/CORONA	2,961	0.73
CENTRAL RIVERSIDE	1,868	0.83
TOTAL	25,306	N/A

^a These VMT reductions reflect only the result of Measure 17, Growth Management.

38. To be a non-regulatory implementation measure until December 31, 1994. SCAG, with assistance of local jurisdictions, and subregional entities reassess and reevaluate actions by December 31, 1994, and determine whether backstop measures are needed.

LETTER 2 - SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (2-5-92)

SCAG - 1 The Draft Air Quality Action Plan will be revised after final approval of the General Plan. At that time, the AQAP programs will be consistent with the final approved policies of the General Plan Elements, and implementation dates for AQMP measures will be updated.

"

SCAG - 2 There are significant physical constraints within and adjacent to El Segundo that greatly impact the City's ability to provide opportunities for additional housing. Historically, less than 25 percent of the land within the City has been used for residential development. The remaining land has been and is currently used primarily for a mixture of light and heavy industrial purposes. Uses include oil refineries, aircraft and space vehicle manufacturing, chemical production, corporate research and supporting office, commercial and hotels. The development investment in these properties is literally hundreds of millions of dollars making conversion to residential uses economically infeasible. When sufficient quantities of this property has become available for recycling, the City has permitted residential uses in a mixed use environment provided that on-site and infrastructure issues could be successfully addressed. These issues include hazardous waste disposal, the adequacy of residential services, incompatible traffic patterns and buffering from remaining non-residential uses.

In addition to these internal constraints, residential uses in El Segundo continue to be impacted by external uses. The noise, traffic, air quality, odor and safety issues created by LAX, Hyperion, and two power plants require that a large portion of the City's resources be used to preserve and protect the housing and quality of life of their existing residents. This leaves very few resources available to divert to creating new residential opportunities.

Despite these constraints to achieving a better balance of jobs and housing the City has made significant efforts in the Draft General Plan to conform with the goals and intent of regional plans such as the those for addressing growth management and air quality. Where these efforts may not fully conform with regional policies, it may be due to City concerns based on local priorities. However, the City remains committed to continue working with SCAG in addressing regional problems and any outstanding issues related to the General Plan.

In responding to requested changes to the Draft General Plan the following efforts that relate to your concerns have been made:

- As an option presented to the City for meeting the jobs/housing balance performance goals of the Regional Growth Management Plan an analysis of VMT is presented in

4. Comments and Responses

Letter 1, response to comment SCAQMD -8 and 9, which demonstrates VMT reductions under the existing General Plan, the Preferred General Plan, and the Alternative General Plan.

- A recommendation to the City Council has been made that the designation of two former school sites be changed from Public Facility to Multi-Family residential. The two sites total 14.5 acres which would permit development of a maximum of 420 high density (29 du/ac) attached units.

- A recommendation to the City Council has been made to change the designation of 65.7 acres from Light Industrial to Heavy Industrial and 19.1 acres from General Commercial to Heavy Industrial. The change in the number of acres designated for Light Industrial, Heavy Industrial, and General Commercial will reduce the El Segundo General Plan employment by 4,895 jobs. As mentioned above, housing units could increase by 420 high density units. Although these changes would improve jobs/housing balance in this jobs-rich subregion (Santa Monica Bay), calculations based on the SCAG 18-step conformity procedure still show a housing deficit of 7,686 units. This compares to the 9,944 housing units deficit prior to the City Council recommendations.

SCAG - 3 Please see response to comment SCAQMD - 8.

SCAG - 4 Please see response to comment SCAQMD - 12.

SCAG - 5 Comment noted.

SCAG - 6 Comment noted. The City does acknowledge the need for the Air Quality Element and Action Plan to be amended where appropriate and as required by changes in legislation and guidelines.

SCAG - 7 Please see response to comment SCAQMD - 8 which demonstrates attainment of the subregional goals of the GMP under the proposed General Plan by reducing VMT and promoting implementation of TDM strategies. The VMT analysis provided in comment SCAQMD -8 and 9 along with approval and implementation of the City's AQAP demonstrate that the City will meet regional goals for attainment of air quality standards for criteria pollutants. As the Air Quality Element, AQAP and Circulation Element policies and programs are intended to provide for attainment of Federal, State and Regional air quality standards, and given the estimated VMT reduction demonstrated in this Final EIR, the level of significance for air quality impacts 4.9-4 and 4.9-5 is hereby changed in the Final EIR to **Less-than-Significant**.

4. Comments and Responses

SCAG - 8 See response to comment SCAG - 7.

SCAG - 9 Please see response to comments SCAQMD - 8,9, and 12, and SCAG - 7.

SCAG - 10 Comment noted.

SCAG - 11 Comment noted.



COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
 ALHAMBRA, CALIFORNIA 91803-1331
 Telephone: (818) 438-5100

THOMAS A. TIDEMANSON, Director

ADDRESS ALL CORRESPONDENCE TO:
 P.O. BOX 1460
 ALHAMBRA, CALIFORNIA 91802-1460

January 15, 1992

P-6

IN REPLY PLEASE
 REFER TO FILE:

Ms. Kendra Morries
 Director of Planning
 City of El Segundo Planning Department
 350 Main Street
 El Segundo, CA 90245

DRAFT

Dear Ms. Morries:

**RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT REPORT
 CITY OF EL SEGUNDO GENERAL PLAN REVISION**

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed City of El Segundo General Plan Revision. Although we have not completed the review of the DEIR, we offer the following comments. We will forward additional comments when we complete the review of the DEIR.

1. In the first sentence of the first paragraph on page 4.6-5, the reference to Puente Hills and Spadra Landfills being owned and operated by Los Angeles County is incorrect. The Puente Hills Landfill is owned and operated by the County Sanitation Districts of Los Angeles County. The Spadra Landfill is owned by the County and the California State Polytechnic University. The operation of the landfill is performed by the County Sanitation Districts of Los Angeles County.
2. In the discussion of the Preferred Plan Solid Waste Mitigation Measures on page 4.6-19, the document should specifically reference the implementation of their adopted Source Reduction and Recycling Element prepared in accordance with the requirements of the California Integrated Waste Management Act of 1989 (Assembly Bill 939) and the California Integrated Waste Management Board Regulations.
3. The existing hazardous waste management facilities (HWM) in this County are inadequate to handle the hazardous waste currently being generated. The General Plan buildout of El Segundo may generate additional hazardous waste, including household hazardous wastes, which could negatively impact existing facilities. The study should address the generation of hazardous wastes, disposal, and other mitigation measures such as collection, recycling, and waste reduction, as require by

LADPW-1

LADPW-2

LADPW-3

LADPW-4

Ms. Kendra Morries
January 15, 1992
Page 2

the County Hazardous Waste Management Plan (CoHWMP) dated September 1988 and approved by the State of California Department of Health Services on November 30, 1989.

LADPW-4

The proposed General Plan revision modifies the zoning for areas designated as potentially suitable for the siting of HWM facilities as identified in the CoHWMP. The environmental impact report should discuss this issue and provide the appropriate mitigation measures.

LADPW-5

If you have any questions regarding these comments, please contact Mr. Michael Bohlander of our Waste Management Division at (818) 458-3562. Questions regarding the environmental reviewing process of this Department can be directed to Ms. Clarice Nash at the previous page address or at (818) 458-4334.

Very truly yours,

T. A. TIDEMANSON
Director of Public Works

DRAFT

~~CARL L. BLUM~~
Assistant Deputy Director
Planning Division

MA:aa
1/.026

bc: Waste Management (Bohlander)
Planning (Nagao)

4. Comments and Responses

LETTER 3 - COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS (1-15-92)

LADPW - 1 The first sentence on page 4.6-5 of the DEIR "Currently the majority of solid waste generated in El Segundo is disposed of at the Puente Hills or Spadra Landfill facilities which are owned and operated by Los Angeles County", is hereby amended in the Final EIR to read as follows:

"Currently the majority of solid waste in the City of El Segundo is disposed of at the Puente Hills or Spadra landfills."

Also the following sentence has been added:

"The Puente Hills landfill is owned and operated by the Los Angeles County Sanitation District, and the Spadra landfill is owned by Los Angeles County and California State Polytechnic University, and operated by the County Sanitation District."

LADPW - 2 Mitigation Measure 4.6-9, is hereby amended in the final EIR to read:

"The City of El Segundo shall implement all necessary policies and programs referenced in the City of El Segundo Integrated Waste Management Plan as determined to be appropriate, in accordance with the requirements of the California Integrated Waste Management Act of 1989 (Assembly Bill 939) and California Integrated Waste Management Board Regulations."

LADPW - 3 Comment noted.

LADPW - 4 The City, in conformance with State Law (Chapter 1167 (SB477), Greene, 1987) and consistent with the County Hazardous Waste Management Plan, adopted a Hazardous Materials and Waste Management Element in January 1991. The Element fully addresses the generation of hazardous wastes, disposal and mitigation for collection, recycling and waste reduction.

LADPW - 5 See response to comment LADPW - 4.



COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1131
Telephone (818) 458-5100

THOMAS A. TIDEMANSON, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

February 5, 1992

IN REPLY PLEASE REFER TO FILE P-6

Ms. Kendra Morries
Director of Planning
City of El Segundo Planning Department
350 Main Street
El Segundo, CA 90245

Dear Ms. Morries:

RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT REPORT
CITY OF EL SEGUNDO GENERAL PLAN REVISION

As indicated in our letter dated January 15, 1992, we are now forwarding additional comments on the Draft Environmental Impact Report for the proposed City of El Segundo General Plan Revision. Our comments are as follows:

The report does not address impacts to adjacent roadways within unincorporated County areas as we requested in our May 28, 1991 Notice of Preparation review (copy enclosed). The information requested in that review is still valid and applicable.

Based on the report, significant impacts could occur on adjacent County roads as a result of increased developments in the City of El Segundo. We request that the report also address the adequacy of the circulation system in adjacent unincorporated County areas to handle the increase in traffic at build out of the proposed General Plan Update.

LADPW2-1

We also request that new development in the City of El Segundo be required to analyze potential traffic impacts to adjacent roadways within unincorporated areas and provide appropriate mitigation measures to the satisfaction of this Department. We consider mid-range Level of Service D (ICU = 0.85) the point beyond which mitigation measures are required.

LADPW2-2

The report indicated that very high traffic volumes would be present on surface streets in the City of El Segundo at build out of the General Plan Update. As an example the traffic volumes on Rosecrans Avenue west of Aviation

LADPW2-3

PLANNING DIVISION

FEB 12 1992

FILE

Ms. Kendra Morries
February 5, 1992
Page 2

Boulevard would increase from the current 43,300 daily trips to between 84,000 daily trips and 114,000 daily trips depending on the Land Use Plan alternative selected. Volumes such as these on surface streets would cause them to operate over capacity and would greatly reduce their effectiveness in providing adequate access and circulation to adjacent County areas.

LADPW2-

If you have any questions regarding these comments, please contact Mr. Joe Banales of our Traffic and Lighting Division, Traffic Investigations and Studies Section at (818) 458 5909. Questions regarding the environmental reviewing process of this Department can be directed to Ms. Clarice Nash at the previous page address or at (818) 458-4334.

Very truly yours,

T. A. TIDEMANSON
Director of Public Works



CARL L. BLUM
Assistant Deputy Director
Planning Division

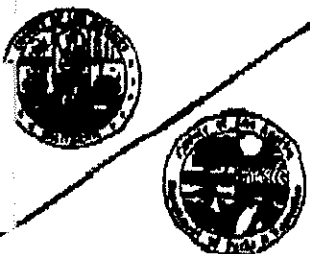
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Enc.

LETTER 4 - COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS (2-5-92)

LADPW2 - 1 & 2 Significant impacts could occur on adjacent County roads as a result of increased development within the City of El Segundo. Analysis of the adequacy of roadways outside the City, and identification of any long-term improvements outside of the City is beyond the scope of this study. However, project related traffic impacts both within and outside of the City will be analyzed and mitigated as required under CEQA on a project-by-project basis.

LADPW2 - 2 & 3 The land use alternative which causes Rosecrans Avenue west of Aviation Boulevard to carry 114,000 daily trips is not the Preferred Plan. This section of roadway is identified as potentially operating below acceptable levels of service. However, all new projects will be required to mitigate project-related traffic impacts on the existing and future roadway systems, including this roadway segment.



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

433 South Vermont Avenue Los Angeles, California 90020-1975 • (213) 758-2961
Rodney E. Cooper, Director

January 21, 1992

COUNTY OF LOS ANGELES
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Ms. Kendra Morris
Director of Planning
City of El Segundo Planning Department
350 Main Street
El Segundo, California 90245

Dear Ms. Morris:

CITY OF EL SEGUNDO GENERAL PLAN
DRAFT ENVIRONMENTAL IMPACT REPORT

The Department of Parks and Recreation has reviewed the document named above, and we have only one comment, regarding proposed land use adjacent to Del Aire County Park. The park, which is located at 12601 South Isis Avenue in Hawthorne, adjoins the rear of property located in El Segundo in the northeast quadrant of Aviation Blvd. and El Segundo Blvd. Changes in planned land use on these parcels could affect Del Aire Park. Impacts to be considered are visual, noise, air quality, and increased demand on park services.

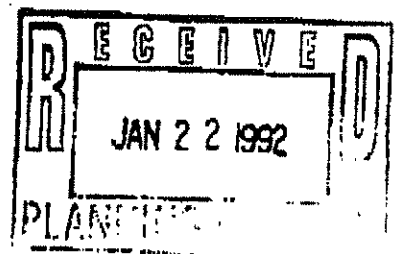
We appreciate the opportunity to review this document. If you have any questions, or require further information, please contact me at (213) 738-2054.

Sincerely,

Barbara A. Koenig

Barbara A. Koenig, ASIA
Environmental Coordinator

BAK



cc: Sara Restamian, City of El Segundo
Project Planner



4. Comments and Responses

LETTER 5 - COUNTY OF LOS ANGELES DEPARTMENT OF PARKS AND RECREATION

LADPR Specific environmental impacts related to visual quality, noise, and air quality as they may relate to Del Aire County Park cannot be anticipated at this time, however, these issues will be considered for the subject parcels on a project by project basis as development occurs under the proposed general plan. Section 4.7 of the Draft EIR, Public Services, provides a comprehensive discussion of parkland and demand for park and recreational services. As stated in this section of the Draft EIR, the City of El Segundo has 89.4 acres of public parkland and a ratio of 5.9 acres of parkland per 1,000 population. The City also has standards for the provision of recreational facilities in new industrial and commercial developments that will continue to be implemented, and has 56 acres of private parks and recreational facilities. Buildout under the proposed general plan would still leave the City with a parkland to population ratio of over 5 acres per 1,000 population. Given the concentration of public parks in close proximity to the residential areas of the City and the distance of Del Aire County Park from the City's residential areas, impacts on the park due to increased demand generated under the proposed plan are not considered significant.



City of Los Angeles Department of Airports
Tom Bradley, Mayor

Board of Airport Commissioners

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President
Jack Tenner
Vice President
Johnnie L. Cochran, Jr.
Maria Elena Durazo
Leland Wong
Clifton A. Moore
Executive Director

January 15, 1992

Kendra Morries, Director of Planning
City of El Segundo
350 Main street
El Segundo, CA., 90245

Subject: **El Segundo Draft General Plan and Draft Environmental Impact Report (EIR)
Comments**

Dear Ms. Morries:

The Los Angeles Department of Airports Environmental Management Bureau staff appreciated the opportunity to review and comment on the City of El Segundo's Draft General Plan and accompanying Draft EIR.

However, the December 31, 1991 date our office received your notice that the El Segundo Draft General Plan and Draft EIR was available for review provided less than adequate time for us to review and comment by your January 15, 1992 deadline date. According to California Environmental Quality Act (CEQA) Guidelines, the public review period for a Draft EIR should not be less than 30 days.

LADOA-

The Draft EIR fails to acknowledge or consider the land-use compatibility issues discussed in the May 5, 1987 Department of Airports letter of comment on the Notice of Preparation for this EIR project (see attached letter). Moreover, the Department of Airports letter of comment on the NOP is not in the Appendices section of the EIR report and it should be included together with all other comments.

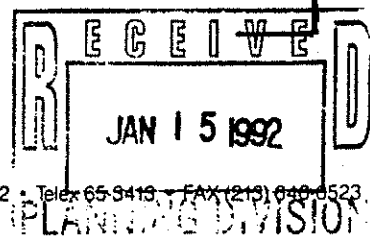
LADOA-

LADOA-

The Noise Element of the Draft General Plan indicates that the residential area within the northwest quadrant of the City, that borders along LAX is impacted. This area is identified in the Plan to be the highest aircraft noise impacted area in El Segundo, affecting approximately 85% of all residential land-uses or 56% of the total housing stock in the City. Nevertheless, the Land-Use Policy in the Draft General Plan designates a higher density of residential use in this already noise impacted area. The Plan should be based on a set of policies that reduces, not increases, the number of dwelling units impacted by noise.

LADOA-

LADOA-



While a Preferred and an Alternative Plan is contained in the Draft EIR, neither is based on a set of goals and objectives to reduce or reverse the growth of future incompatible/noise-sensitive uses along the LAX border. Both the Preferred and Alternative Land-Use Policies discussed in the Draft EIR would have the adverse affect of offsetting progress made in the past to reduce the number of incompatible dwelling units in El Segundo through sound insulation and acoustical treatment programs. This major issue of land use compatibility is not addressed in the noise section of the Draft EIR.

LADOA-

LADOA-

The City of El Segundo should develop a Land-Use Policy that decreases impacted residential dwelling units. Such a Land-Use Policy is in the best interest of existing and future residents and consistent with the LAX Airport Noise Control & Land Use Compatibility (ANCLUC) Program in which El Segundo participated.

LADOA-

The Environmental Management Bureau staff urge that the Noise and Land-Use sections of the Draft EIR be expanded to include a complete and thorough evaluation of other alternative land-use scenarios that makes the airport and the community mutually more compatible. These alternative land-use scenarios should include an analysis of the benefits of recycling or rezoning noise-sensitive uses along the northerly perimeter of the City.

LADOA-

Should you have any questions or comments regarding these comments please contact my office at (310) 646-3853.

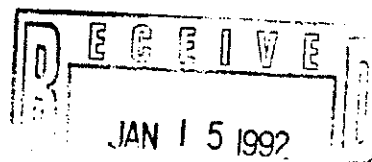
Sincerely,



Maurice Z. Laham, AICP
Airport Environmental Manager

MZL:GB

cc: D. A. Miller
W. M. Schoenfeld
G. R. Netzer
R. M. Beard
Richard Dyer



LETTER 6 - CITY OF LOS ANGELES DEPARTMENT OF AIRPORTS (January 15, 1992)

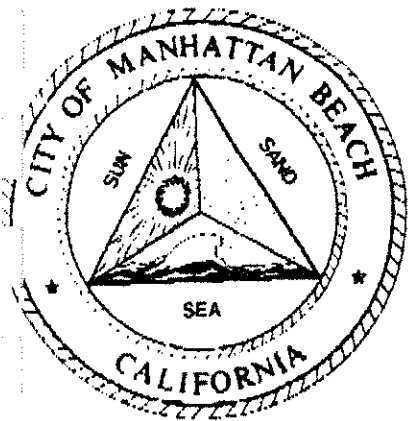
- LADOA - 1 Comment noted. The City has made every effort to incorporate all public agency comments that were submitted up to February 5, 1992.
- LADOA - 2 Land use compatibility issues relative to noise are discussed in the DEIR under Land Use, Section 4.4, Impact 4.4 - 10. Mitigation Measures addressing this impact cite numerous Noise Element Policies, implementation of which would serve to substantially reduce noise conflicts related to land use compatibility.
- LADOA - 3 The letter in response to the Notice of Preparation for the project was inadvertently left out of the Draft EIR, however the issues identified in the letter have been fully considered in this document. In considering the issues no additional impacts or mitigation measures were determined necessary.
- LADOA - 4 Comment noted.
- LADOA - 5 Residential land use patterns in the northwest quadrant of the City are based on the existing zoning of the property. In no case were the zoning densities increased by the proposed general plan. Land which is currently underdeveloped is expected to develop over time in accordance with the zoning, thereby causing an increase in the total number of units in this area. However, land use compatibility issues rendered redesignation to lower densities impractical.
- LADOA - 6 Both the Preferred and Alternative plans covered in the Draft EIR include a comprehensive set of policies and programs relative to noise which provide for continued enforcement of California Noise Insulation Standards to ensure interior noise will not exceed acceptable levels. The City is also committed under proposed Noise Element Policy N.11.10 to continue implementation of programs to incorporate noise reduction measures into existing residential development where interior noise levels exceed acceptable standards. For the large residential area of the City exposed to unacceptable exterior noise levels (defined by California Airport Noise Regulations as a maximum of 65 db) policies primarily focus on encouraging and working with the Los Angeles Department of Airports on a variety of issues to reduce the noise impacted area around LAX to zero.
- LADOA - 7 While land use compatibility is not specifically discussed under a separate heading, Noise, Section 4.10 of the Draft EIR does discuss a number of issues directly related to land use compatibility and clearly states existing conditions which result in unacceptable noise levels for sensitive land uses. Specifically refer to the discussion

4. Comments and Responses

of "Aircraft Noise" beginning on Page 4.10-5. Also see Page 4.10-6 and the discussion of the City's Airport Noise Abatement Policy and Program (Council Resolution No. 3691) which includes objectives for phasing out Stage II aircraft and establishment of curfews on Stage II aircraft until phase-out, reduction of LAX noise impacted areas by year 2000 through reduction of noise contours and increased sound insulation for residences, elimination of unnecessary flight paths and operations, the establishment of a Noise Abatement Preferential Runway Use System, and the construction of a sound barrier wall along the south side of the airport. Noise Element Program N11.1A specifies implementation of this policy and program. This policy and program and others included in the proposed General Plan are not aimed at offsetting progress, but at contributing to continued progress toward a reduction of incompatible land uses in the City.

LADOA - 8 Please see response to comment LADOA - 7.

LADOA - 9 Recycling or rezoning residential uses along the northern perimeter of the City to non-residential uses would create land use incompatibility and traffic issues that are not acceptable to the City.



DEPARTMENT OF COMMUNITY DEVELOPMENT

CITY HALL • 1400 HIGHLAND AVENUE • MANHATTAN BEACH, CALIFORNIA 90268-4798
TELEPHONE (213) 545-5621 FAX (213) 545-5234

JAN 27 1992
PLANNING DIVISION

22 JANUARY, 1992

EL SEGUNDO Planning Department
350 Main Street
EL SEGUNDO, CA; 90245

Attention: Kandra Morrles, Director of Planning

Dear Ms. Morrles:

Re: Draft Environmental Impact Report-EI Segundo General Plan Revision/

The City of Manhattan Beach has received and reviewed the Draft Environmental Impact Report (DEIR) for the City of El Segundo's revised General Plan. We thank you for the extended time for this written response. Our comments relate to the areas of: air quality, quantity and quality of ground waters, risk of human upset from industries using flammable and toxic materials, demand for housing in surrounding cities, effects on traffic flow and circulation both locally and regionally, impacts on the regional road networks and treeways (specifically Sepulveda Boulevard), and demands on regional public transit; as well as solid waste disposal and hazardous waste.

MBCD-1

While we understand that there are certain "unavoidable impacts" due to growth, such as, increase in air and noise pollutants, local and regional traffic flow, circulation, refuse, hazardous waste and energy consumption; we still believe that strict programs should be implemented and fully enforced, where feasible. The policies and programs outlined in both the DEIR and 1991 proposed General Plan are designed to mitigate, to levels of insignificance, potential impacts on air quality, noise, refuse collection, energy consumption and local traffic flow and circulation; however, concerns remain in the area of **Jobs/Housing Ratio, Regional Networks**, (including Sepulveda Boulevard), and **Disposal of Hazardous Waste**.

MBCD-2

JOBS/HOUSING RATIO

El Segundo's, current condition of high rents, high cost and limited availability of single detached homes, (pg. 4.5-6; (Housing Characteristics), DEIR; Population, Housing and Employment), may

MBCD-3

have an impact on Jobs/Housing ratio. Our concern is the possible impact this may have on the regional housing market. Furthermore, (table 4.4-4, (pg. 4.4-14, DEIR; Land Use), shows a reduction of 39.4 acres of single family residences, while two and multifamily residences show gains of 10.9 and 27.8 acres respectively/resulting in a net loss of .7 acres of residential land use.

MBCD-3

In addition, a local survey was taken and this was the result:

"The quality and availability of unskilled labor is more important than the quality or availability of professional and skilled labor. In general, businesses were unsatisfied with the quality and availability of unskilled labor, and more satisfied with the quality and availability of skilled and professional labor". Existing Conditions Report, (Economic and Real Estate Analysis of the City of El Segundo, 1991; pg. 49).

MBCD-4

We would like to see further study of how the City of El Segundo proposes to meet this conflict between meeting the policies of the Economic Element and Housing Element, (in reference to Jobs/Housing balance). One mitigation measure you might want to consider is rezoning; thus, allowing for more acres for single family residences; or, multifamily units depending on the current demand at the time; while at the same time, continue to reduce 'Heavy Industrial' uses and rezone those for Urban-Mix-Use, Light Industry, or, whatever the current economic market is demanding.

MBCD-5

REGIONAL NETWORK

A second issue that still concerns us is the traffic flow and circulation of regional networks, (i.e. freeways), and main arterials, (i.e. Sepulveda Boulevard). The addition of the Century freeway and the Metrorail's 'Green Line', may help to reduce the volume-ratio-capacity (V/C), of the I-405; however, it may also result in generating more traffic. We understand that V/C, and circulation on freeway networks falls within the jurisdiction of Caltrans; but, our concern is for the flow and circulation of that traffic volume once it exits off the freeway network. The DEIR, currently has six roadway links that operate at Level of Service (LOS), 'D' or, less; and, two that operate at 'F' (El Segundo's General Plan , 1991, DEIR; pg. 4.8-5, Transportation and Circulation Element (TCE)). In addition, these conditions are projected to worsen over the next 20 years, (El Segundo's General Plan, TCE, pgs. 4-12 & 13; 4-46). According to your Existing Conditions Report, (pg. 9-10), Imperial Highway, Sepulveda Boulevard and Rosecrans Avenue, will all have a definite impact on the regional network. We understand that even with TSM and TDM techniques that there will be 'unavoidable significant' impacts on the system, which will impact the Congestion Management Program network, (CMP), in Manhattan Beach. Please include considerations of the (CMP) in your DEIR.

MBCD-6

MBCD-7

HAZARDOUS WASTE DISPOSAL

Our concern is not only with future contamination sites within El Segundo, but, with present sites that are currently operating within the city limits. According to the Cortese list which includes sites identified by the Department of Health and Services (DHS), and, other agencies; there are 21 total operating sites within the City of El Segundo, (preferred General Plan, 1991; Public Health and Safety, pg. 4.13-14 to 4.13-18). Please include current applications of businesses that would produce 'hazardous waste' and a projection of how many other companies could, under the preferred General Plan, 1991, conceivably be constructed within the city. Given that the City has decreased its tonnage of hazardous waste and a few select companies have implemented waste minimization programs; please address the consistency between the reduction of acreage designated as 'heavy industry', (297.4ac.(pg. 4.4-14, Land Use Element), with the comments of Thomas A. Tidemanson, Director of the County of Los Angeles, Department of Public Works:

" The existing hazardous waste management facilities in this County are inadequate to handle the hazardous waste currently being generated".

The should address mitigation programs for hazardous waste management, including specific truck routes, (if any), and household hazardous wastes. Also, please clarify the availability of disposal facilities for use by residents in surrounding cities, (i.e. are the sites regional?).

MBCD-8

MBCD-9

Thank-You for the opportunity to comment on these documents.

Sincerely,



Maxine R. Woerner, AICP

Senior Planner

wby: Paul W. Bank, Planning Intern.

**LETTER 7 - CITY OF MANHATTAN BEACH COMMUNITY DEVELOPMENT DEPARTMENT
(January 22, 1992)**

MBCD - 1 Comment noted.

MBCD - 2 Comment noted.

MBCD - 3 Although the area available for future residential development in the City is limited, the proposed General Plan provides the opportunity for residential development when approved under a specific plan for the area of the City proposed as Urban Mixed Use and for certain areas contained within the Smokey Hollow Mixed Use designation. Residential development approved under these designations would add to the new units projected under the proposed General Plan. Also please see response to comment SCAG 2.

MBCD - 4 Please see Section 4.5 Population, Housing and Employment, Page 4.5-16, Mitigation Measure 4.5-5, which specifies that the City should expand its in-lieu housing programs to include the effects of commercial and industrial development in El Segundo on housing demand. The mitigation states that a linkage program could be used for existing City-sponsored affordable housing funds.

MBCD - 5 Rezoning of existing residential land to other residential densities was considered and rejected. Consideration of housing within mixed use areas, dependent on the current economic market, is contemplated by the plan. Also see response to comment LADOA - 5 and MBCD - 3.

MBCD - 6 Please see response to comment CMPNS - 10

MBCD - 7 The Circulation Element contains Policy C41.1 which states "Ensure that the City remains in Compliance with the county, regional and state Congestion Management Programs (CMP) through the development of appropriate City programs and traffic impact analysis of new projects impacting the CMP routes of Sepulveda Boulevard, Imperial Highway, the I-105 Freeway, and the I-405 Freeway. As each new development is proposed, an EIR will be required, and project-related impacts will be mitigated, including those to the CMP network.

MBCD - 8 Comment noted.

MBCD - 9 The City of El Segundo adopted a Hazardous Materials and Waste Management Element in January of 1991. The document, prepared in accordance with State Law (Chapter 1167 (SB477), Greene, 1987) and consistent with the Los Angeles County Hazardous Waste

4. Comments and Responses

Management Plan, provides a much more detailed analysis of hazardous materials and waste management than the comprehensive program EIR for the general plan update. Issues concerning mitigation programs, truck routes, household hazardous waste, and the availability of hazardous waste management facilities in the County are discussed in this document. The effects of proposed changes in the City's land use plan are addressed in this Draft EIR, and relative to hazardous waste, the reduction of acreage designated as "heavy Industry" would over time substantially reduce the amount of hazardous waste generated in the City.

C A T E L L U S
MANAGEMENT CORPORATION

RECEIVED

JAN 13 1992

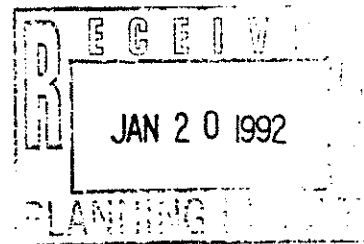
CITY MANAGER'S OFFICE



January 15, 1992

S-2018

Mayor Carl Jacobson
Mayor Pro Tem Scot Dannen
Councilman J. B. Wise
Councilman Alan West
Councilwoman Jan Cruikshank
City of El Segundo
350 Main Street
El Segundo, CA 90245



Re: Comments to the General Plan Draft Environmental Impact Report

Dear City Council Members:

Catellus Management Corporation represents the interests of The Atchison, Topeka and Santa Fe Railway Company (AT&SF) with regard to the AT&SF properties in the City of El Segundo. As you are aware, the AT&SF maintains an active freight rail line along the western edge of Aviation Boulevard between Imperial Highway and El Segundo Boulevard (Planning Area 5). This line continues southwest from El Segundo Boulevard into the southeast quadrant of the City of El Segundo.

In addition to the railroad right-of-way property along Aviation Boulevard, the AT&SF owns approximately 15 acres of property between Imperial Highway and El Segundo Boulevard immediately west of the active freight right-of-way.

We are concerned that the General Plan Draft Environmental Impact Report (DEIR) contains proposed mitigation measures that could drastically reduce the market value and reuse potential of the AT&SF's adjacent 15 acres. Specifically, we are concerned with Mitigation Measure 4.13-1 (Setbacks From Railroads).

- 1. Mitigation Measure 4.13-1
Setbacks From Railroads

We request that the proposed "60-foot setback" be modified to be a "setback that provides acceptable public safety to be determined by the City on a project basis". The flexibility of this language conveys the goal of establishing public safety buffers around freight railroads but also allows for consideration of circumstances surrounding individual future development

CMC-1

CMC-2

projects. The revised language also provides greater opportunity for the City to coordinate railroad buffer designation with the implementation of the General Plan Circulation Element at the individual project level. Additionally, clarification and policy direction is needed in the General Plan and EIR as to what an acceptable use might be (if any, other than open space; e.g., parking, etc.) in a setback area.

CMC-2

CMC-3

2. Transfer of Development Densities or Air Rights

The DEIR does not adequately address the potential environmental and economic impacts of development density or air rights transferability within Planning Area 5. Density and air rights transfers represent a mechanism through which future development can be further directed and a means by which certain projects can more effectively mitigate impacts. The final EIR should address density and air rights transfers, and the General Plan should provide further opportunity to use density and air rights transfer.

CMC-4

Catellus Management Corporation acting as agent for The Atchison, Topeka and Santa Fe Railway Company requests that the City Council of the City of El Segundo consider and adopt the proposed changes to the DEIR contained herein.

Sincerely,



James T. Lemont
Regional Sales Manager

cc: Mr. Ron Cano - City Manager, City of El Segundo
Ms. Kendra Morries - Planning Director, City of El Segundo

LETTER 8 - CATELLUS MANAGEMENT CORPORATION (January 15, 1992)

CMC - 1 Comment noted.

CMC - 2 Mitigation Measure 4.13-1, Section 4.13, Public Health and Safety, is hereby amended in the Final EIR to read as follows:

Preferred Plan Mitigation Measure

4.13-1 Prior to acceptance of final maps for new development proposals adjacent to railroad lines project proponents shall ensure that public safety buffers are provided along railroad lines to prevent exposure of residents to potential railroad accidents.

CMC - 3 Acceptable uses in the buffer setback area would be any for which an acceptable safety factor could be demonstrated.

CMC - 4 Any development within the Urban Mixed Use area requires the approval of a Specific Plan which must demonstrate, among other things, that the overall intensity of development being proposed does not exceed that permitted by the General Plan. The General Plan does not preclude the use of density and air rights transfers within a Specific Plan.

January 15, 1992

Mayor Carl Jacobson
Mayor Pro Tem Scot Darnen
Councilman J.B. Wise
Councilman Alan West
Councilwoman Jan Cruikshank
CITY OF EL SEGUNDO
350 Main Street
El Segundo CA 90245

Re: AERO's Comments to the General Plan Draft Environmental Impact Report

Dear City Council Members:

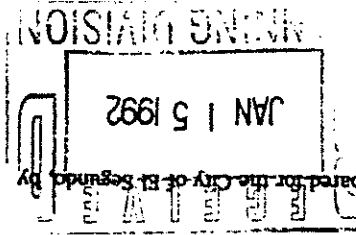
This letter contains comments, requests for clarification and requested modifications to the General Plan Draft Environmental Impact Report (DEIR), from AERO (Associated El Segundo Real Estate Owners/Users Group). As you are aware, AERO is comprised of Hughes Aircraft, Kirtroy Industries, Northrop Corporation and Rockwell International with the support and cooperation of representatives from Aerospace Corporation and the U.S. Air Force Space Systems Division.

AERO occupies over 270 acres, or 56% of Planning Area 5 within the City of El Segundo. Planning Area 5 generated approximately 33% of the Core Revenue of the City according to a November 1990 Report, with aerospace/defense related industries generating approximately 88% of the Core Revenue for Planning Area 5.¹ Additionally, AERO occupies a significant number of acres in the City outside of Planning Area 5, and thereby generates revenue from these holdings as well.

The aerospace industry has recently suffered from deep cutbacks. These cutbacks have resulted in a loss of thousands of jobs from AERO's El Segundo operations. This loss of employment since the 1990 fiscal impact study has resulted in lost revenues to the City of El Segundo of millions of dollars per year.

Due to the sharp decline in aerospace business and the proposed land use changes in Planning Area 5, it is imperative that the General Plan/DEIR provide maximum flexibility in permitted land uses and densities if new development is to replace lost City revenues. Specifically, we are supportive of a Floor Area Ratio (FAR) of 1.5 in Planning Area 5 to maximize flexibility of development potential. By limiting the assignment of a 1.5 FAR to Planning Area 5, residential neighborhoods of El Segundo will not be impacted by increased traffic, thus maintaining the "small town atmosphere" which its residents desire.

1. "Volume 1 Strategic Plan Study" (page H-5 "Fiscal Impact"), issued April 26, 1991, prepared for the City of El Segundo by Municipal Resource Consultants



The economic reality of today's real estate market dictates that land uses and development densities must be flexible enough to provide developers with adequate project revenues. If future land uses are too restrictive and allowable densities are too low to support the cost of a project, or if infrastructure and mitigation costs are too high, a project will not make economic sense and will not be built. A General Plan that maintains flexibility with regard to allowable land uses and densities, and encourages new development that effectively utilizes the growing Regional Transit System (particularly the Green Line Light Rail), will allow the City to replace lost revenues from the declining aerospace business with revenues from new mixed-use development.

AERO's specific comments regarding the proposed Mitigation Measures and traffic analysis are as follows:

1. Mitigation Measure 4.8-1(c)

New Projects Impacts on Circulation Systems

The intent of this measure appears to be implementation of a mechanism that will cause consideration of traffic impacts from projects during the approval process. However, because there is no accompanying definition of "acceptable levels of service", this mitigation measure could potentially be applied so broadly that it could be used to impose a moratorium on all future development that cannot mitigate all additional impacts on the local traffic and circulation system.

AERO-1

This Mitigation Measure should be modified by replacing the words "acceptable levels of services" with "the levels of service projected in the Circulation Element of the General Plan or as determined by the City."

AERO-2

Although the intent of this Mitigation Measure appears to require new projects to mitigate their impacts on the traffic and circulation system, the exact language is somewhat unclear as to whether projects will be held accountable for existing traffic and circulation system deficiencies not directly attributable to the specific project. Because the nexus test requires that projects can only be held accountable for environmental impacts directly caused by a project, we believe that clarification of this issue is needed. We recommend that the Mitigation Measure read that "no new project should be approved that cannot mitigate an acceptable level of impacts on the circulation system as determined by the City."

AERO-3

2. Mitigation Measure 4.13-1
Setbacks From Railroads

The intent of this Mitigation Measure is to provide public safety setbacks from mainline freight railroads, and that it should not apply to either the Green Line passenger light rail or freight rail spurs.

AERO-4

Any application of this Mitigation Measure to the Green Line passenger light rail would undermine the purpose of the regional passenger rail system currently being developed by the Los Angeles County Transportation Commission.

Because the operating premise of a freight rail spur is to access warehouse loading doors directly with rail cars, application of this Mitigation Measure to freight rail spurs would cause land within the proposed 60-foot setback to be unbuildable, and therefore effectively render the spurs useless.

The language of this Mitigation Measure should be modified so that it applies only to "active" mainline freight railroads. The proposed 60-foot setback should be changed to a setback that provides acceptable public safety to be determined on a project by project basis. This flexible approach to establishing public safety buffers around active mainline freight railroads will allow greater coordination with the circulation element and the right-of-way issues that are determined at the individual project level. Furthermore, clarification is needed as to what an acceptable use might be (if any, other than open space) in the setback area.

3. Mitigation Measure 4.8-1(b)

Implementation of Circulation Element

As with Mitigation Measure 4.8-1(c), clarification is needed as to the exact definition of "acceptable levels of service". This Mitigation Measure should be modified by replacing the words "acceptable levels of services" with "the levels of service projected in the Circulation Element of the General Plan or as determined by the City."

4. Traffic Impact Analysis Used in the DEIR

The DEIR traffic impact analysis assumes that the entire circulation system proposed in the General Plan will be completed. However, some of the circulation plan elements are less feasible than others. Furthermore, because developers and timing of new projects will vary, individual elements of the proposed circulation system must not only work as a completed system, but also as separate improvements phased in over time. The Nash and Douglas Street extensions, for example, would require acquisition of road right-of-ways through existing buildings and parking lots. Such improvements may not be feasible at all or may require long time periods to complete. Other improvements are more immediate in nature. Language should be inserted into the EIR acknowledging that some proposed circulation element components may require a long range implementation and recommending that interim strategies for improving traffic be explored when certain mitigations cannot be implemented on a timely basis. By doing so, the General Plan can be made more flexible and more effective in achieving its stated goals.

AERO-6

AERO-5

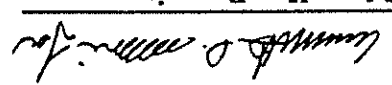
AERO-4

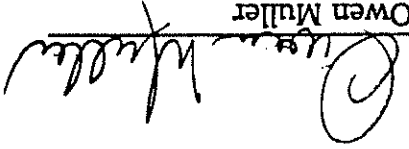
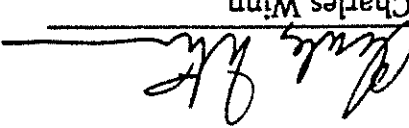
5. Transfers of Densities

The DEIR does not adequately address the potential environmental and economic impacts of development density transferability within Planning Area 5. Density transfers represent a mechanism through which future development can be further directed and a means by which certain projects can more effectively mitigate impacts. For example, density transfers and density bonuses should be provided within a quarter mile radius of passenger rail stations, and density bonuses should be provided as incentives for desirable land use as determined by the City. The final EIR should assess density transfers and the General Plan/EIR should provide further application of density transfers.

By means of this letter, we respectfully request that the City Council consider and adopt the proposed language clarifications and changes contained herein.

Very truly yours,


Mary Kay Esposito
Director of Real Estate
HUGHES AIRCRAFT
Chairman
John B. Kilroy
KILROY INDUSTRIES


Owen Muller
Director of Real Estate
NORTHROP CORPORATION

Charles Winn
Director of Real Estate
ROCKWELL INTERNATIONAL

c: Ron Cano, City Manager - City of El Segundo
Kendra Morris, Director of Planning - City of El Segundo
Kosmont & Associates, Inc.

AERO-7

LETTER 9 - ASSOCIATED EL SEGUNDO REAL ESTATE OWNERS/USERS GROUP

(January 15, 1992)

AERO - 1 Mitigation Measure 4.8-1(c) is intended to allow the city the flexibility to define level of service to be (at a minimum) consistent with regional and state requirements such as the Congestion Management Plan or to develop a definition that more closely reflects local conditions and goals. If including a definition for acceptable levels of service is desired in the General Plan, then an appropriate definition might be "at level of service D or better for roadways and intersections."

AERO - 2 Please see response to comment AERO - 1.

AERO - 3 The intent of Mitigation Measure 4.8-1(c) is to ensure that new projects mitigate their impacts on the traffic and circulation system, and not to required new projects to address existing deficiencies or any other deficiencies which are not attributable to that development. Mitigation Measure 4.8-1(c) has been revised to read:

4.8-1(c)

A policy should be added to the El Segundo 1991 General Plan Circulation Element that states that no new project should be approved that cannot mitigate project related impacts on the existing and future circulation system such that daily roadway operation cannot be maintained at acceptable levels of service.

AERO - 4 Please see response to comment CMC - 2.

AERO - 5 The definition of Levels of Service has been incorporated into the EIR. For clarification of "acceptable" please see response to comment AERO - 1.

AERO - 6 Please see response to comment AERO - 1.

AERO - 7 It is acknowledged that several roadway sections identified in the Master Plan of Roadways are clearly long-term proposals. The General Plan is the appropriate location for identification of the long-term improvements which will be needed in support of the City's long-term land use plans. Improvements that appear to be difficult to implement today will not be implemented if they are not identified in the General Plan to allow long-range planning for their implementation.

4. Comments and Responses

It is also acknowledged that due to the timing of development proposals and roadway improvements, the system identified in the Circulation Element will be implemented in phases. It is the intention of the Mitigation Measures to ensure that the roadway system operates at an acceptable level of service at all points in time (existing, interim phases, or buildout). Further, if the roadway system has not been completed, and a project cannot mitigate all project-related impacts on the roadway system in place at that time, interim strategies or mitigations should be explored. However, if project-related impacts cannot be mitigated such that roadway system operation is maintained at an acceptable Level of Service, even with interim strategies or alternative mitigations, then the project should not be approved. Also please see response to comment CMC - 4.



January 6, 1992

IGR/CEQA
City of El Segundo
DEIR
GENERAL PLAN REVISION
VIC. LA-1-24.91
SCH #91041092

Ms Kendra Morris
Director of Planning
City of El Segundo
350 Main Street
El Segundo, CA 90245
Carson, CA 90749

Dear Ms Morris:

Caltrans has reviewed the above-referenced document. Based on the information received, and in addition to our previous comments made on May 17, 1991 (letter included in the document appendices), we have the following comments:

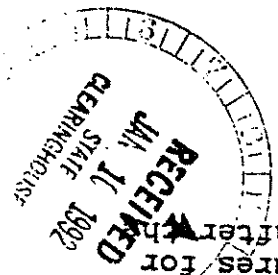
As specific projects of the Adopted General Plan are proposed for development, Caltrans will comment on their impacts on the San Diego Freeway (I-405) and Sepulveda Boulevard (SR-1) as well as on any mitigation measures required.

Any future development which would have a cumulative impact on the State Transportation System should include a traffic analysis of the mainline freeway, affected ramps, and inter-sections and should also cover mitigation measures.

Any mitigation proposed should be fully discussed for specific projects. These discussions should include, but should not be limited to, financing, scheduling considerations, implementation responsibilities, and monitoring.

We also suggest the City consider measures requiring developer "contributions" or "fair-share" funding to be set aside for future improvements to the existing transportation facilities.

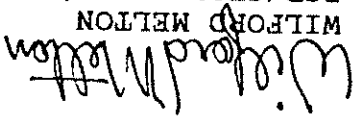
Any future development adjacent to any State Transportation Facility should be informed of our Noise Attenuation Policy. Caltrans will not fund any noise attenuation measures for developments established adjacent to the freeway after the construction of the freeway.



Ms Kendra Morris
January 6, 1992
Page Two

Thank you for this opportunity to comment. If you have
any questions regarding these comments, please call me at
(213) 897-1338.

Sincerely,


WILFORD MELTON
IGR/CRQA coordinator
Advance Planning Branch

CC: Tom Loftus
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

No response necessary.

LETTER 10 - CALIFORNIA DEPARTMENT OF TRANSPORTATION (January 6, 1992)

4. Comments and Responses

STATE OF CALIFORNIA—THE RESOURCES AGENCY
DEPARTMENT OF FISH AND GAME
330 Golden Shore, Suite 50
King Beach, California 90802
(310) 590-5113

January 21, 1992

JAN 27 1992

REGISTRATION



PETE WILSON, Governor

Ms. Kendra Morris
City of El Segundo
250 Main Street
El Segundo, California 90245
Dear Ms. Morris:

Draft Environmental Impact Report for the City of El Segundo general plan, Los Angeles County - SCH 91041092

The California Environmental Quality Act and the California Endangered Species Act require the lead agency to appropriately condition the project and fully implement the statutory mitigation and monitoring requirements to offset adverse impacts to the following resources which may be impacted by this project.

1. Endangered or threatened species of plant and animals. If the project would result in take, on or off project site, of any state-listed species or habitat essential to its continued existence, the applicant must obtain authorization from the Department of Fish and Game (DFG) pursuant to fish and game code Section 2081.

2. Wetlands. Compliance with the DFG's wetland policy requires that there should be no net loss of wetland acreage or wetland habitat values, either on or off project site, due to project development. A mitigation and monitoring plan subject to DFG approval should be required for loss of sensitive habitats, riparian woodland, oak woodland, and riparian scrub vegetation.

3. Watercourses. The DFG opposes the elimination of watercourses and/or their conversion into subsurface drains. All watercourses, whether intermittent or perennial must be retained and provided with setback buffers appropriate to preserve the riparian and aquatic habitat values. Earthen channels should be interconnected with adjacent large open space areas to increase their effectiveness as wildlife corridors in urban surroundings. The DFG has direct jurisdiction under fish and game code sections 1601-03 in regard to any proposed activities that would divert or obstruct the natural flow or change the bed, channel, or bank of any river, stream, or lake. We recommend early consultation since modification of the proposed project may be required to avoid impacts to fish and wildlife resources.

DFG-4

DFG-3

DFG-2

DFG-1

DFG-4 [Formal notification (with fee) under Fish and Game Code Section 1603 should be made after all other permits and certifications have been obtained. Work cannot be initiated until a streambed alteration agreement is executed.

DFG-4 [4. User Fee. The project sponsor is subject to the user fee provided by Fish and Game Code Section 711.4, and the fee is payable to the county clerk at the time of or prior to filing the Notice of Determination by the lead agency. If a Negative Declaration is filed, the user fee is \$1,250. If an Environmental Impact Report is filed, the fee is \$850. It is our assessment that this project will result in cumulative loss of fish and wildlife resources and is not exempt from the user fee.

DFG-6 [In conclusion, if your analysis reveals that the above-mentioned concerns have been fully addressed throughout your decision-making process, we would not object to the project approval. However, we request that you provide us a copy of the final environmental document immediately upon approval and prior to filing the Notice of Determination. If you have any questions, please contact Ms. Kim McKee at the above address or by telephone at (310) 590-5137.

Sincerely,



Fred Worthley
Regional Manager
Region 5

cc: Office of Planning and Research
Environmental Services Division

LETTER 11 - CALIFORNIA DEPARTMENT OF FISH AND GAME (January 21, 1992)

As there are limited biological resources and no wetlands or natural watercourses in the City, no significant impacts on biological resources have been identified. The potential for any impacts on biological resources in the City would continue to be evaluated under the California Environmental Quality Act on a project by project basis as development occurs under the proposed General Plan.

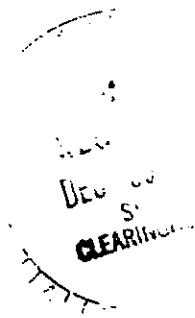
STATE LANDS COMMISSION

LEO T. MCCARTHY, Lieutenant Governor
GRAY DAVIS, Controller
THOMAS W. HAYES, Director of Finance

EXECUTIVE OFFICE
1807 - 13th Street
Sacramento, CA 95814
CHARLES WARREN
Executive Officer

December 23, 1991

SCH 91041092
PRC 5628.9
PRC 5574.1



Mr. Carol Whiteside
State Projects Coordinator
The Resources Agency
1416 Ninth Street, Room 499
Sacramento, California 95814
Ms. Kendra Morris
City of El Segundo
350 Main Street
Sacramento, California 90245

Dear Mesdames:

Subject: Draft Environmental Impact Report for
City of El Segundo General Plan (SCH 91041092)

Staff of the State Lands Commission has reviewed the City of El Segundo's
Environmental Impact Report for the City's General Plan (SCH 91041092). Under the
California Environmental Quality Act, the City is the Lead Agency and the State Lands
Commission is a Responsible and a Trustee Agency.

STATE LANDS COMMISSION JURISDICTION

The State acquired sovereignty over all tidelands and submerged lands and
beds of navigable waterways upon its admission to the United States in 1850. The State
holds these lands for the benefit of all the people of the State for statewide Public Trust
purposes which include waterborne commerce, navigation, fisheries, water-related recreation,
habitat preservation, and open space. The landward boundaries of the State's sovereign
interests are generally based upon the ordinary high water marks of these waterways as they
last naturally existed. Such boundaries may not be readily apparent from present day site
inspections. The State's sovereign interests are under the jurisdiction of the Commission.

The State Lands Commission has jurisdiction over the sovereign tidelands and
submerged lands within the City of El Segundo which extend from the ordinary high water
mark waterward for three nautical miles. These lands are owned in fee by the State.
Activities involving these lands must be consistent with the Public Trust and are subject to

SLC-2

SLC-1

ENVIRONMENTAL ASSESSMENT

SLC-2 [The Commission's permitting authority. The two major leases issued by the Commission within the City limits include one to Southern California Edison Company for activities involving its generating station (PRC 5628.9) and one to Chevron, U.S.A. for a marine terminal facility (PRC 5574.1).

SLC-3 [The Commission has a legal responsibility for, and a strong interest in, protecting the ecological and Public Trust values associated with the State's sovereign lands, including the use of these lands for habitat preservation, open space, public access, and recreation.

SLC-4 [In addition, the City should be aware that it may make and enforce local General Plan designations and zoning ordinances to the extent these do not conflict with State law. Where State law authorizes a particular use, it may not be prohibited by city ordinance [Monterey Oil Company v. City Court (1953), 120 C.A. 2d 31 and 41].

SLC-5 [Neither the EIR nor the General Plan goals, policies and objectives included therein contain goals, policies and objectives which address the State's sovereign lands or its Public Trust Resources and values. These elements should be included in the City's Local Coastal Program which is an integral part of the General Plan. After speaking to a representative of the City, it was confirmed that the policies in the LCP were apparently inadvertently omitted from the analysis in the EIR. Until these policies are analyzed in the EIR and the document recirculated to the public, staff of the Commission must conclude that the document is incomplete.

We would suggest for your consideration, however, the incorporation of a Resource Management Plan into the General Plan using the following model language:

Resource Management Plan

- Fishing: Facilities serving recreational fishing shall be identified and shall be protected and where feasible upgraded.

- Marinas and Recreational Boating: Allow new recreational commercial and marina developments only to the extent that, based upon a carrying capacity study, no significant negative impacts to Public Trust values, human, ecological or water quality, will result.

SLC-6

Ms. Carol Whiteside
Ms. Kendra Morris
December 23, 1991
Page Three

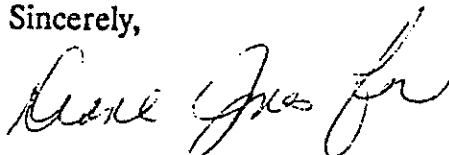
- Scenic Resources: The scenic resources of the Public Trust lands and resources shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect scenic views associated with Public Trust lands and resources.
- Public Access Provisions: Require public access to and along the shoreline in all new developments adjacent to such waterways consistent with statutory and constitutional requirements (Government Code Section 66478.1, et seq; Article X, Section 4 of the California Constitution; and Sections 6210.4 and 6210.5 of the Public Resources Code). A suggested public access plan would include the following provisions:
 - existing and proposed future accessways which are specified based upon access needs and Public Trust lands, specifically identifying accessways with other trail systems including urban paths to ensure linkages;
 - dedication requirements to guarantee permanent access (e.g. dedication of fee, easement or deed restriction);
 - a maintenance and operations plan specifying how accessways shall be maintained and operated and by what agencies;
 - a priority acquisition element specifying the location of accessways for acquisition by in-lieu fees; and
 - accessways standards consistent with state and federal law and state standards of agencies accepting jurisdiction for such accessways.
- Wetlands: All development shall be consistent with a comprehensive wetlands management plan. A suggested plan would include the following provisions:
 - a policy of no net loss in quantity or quality of seasonal and permanent wetlands and sensitive aquatic and riparian habitat based on their ecological characteristics;
 - a policy of avoidance of wetland and aquatic and riparian areas as the preferred method of "mitigation";

Ms. Carol Whiteside
Ms. Kendra Morris
December 23, 1991
Page Four

- a policy of clustering houses and other structures when appropriate to minimize or avoid impacts to habitat areas;
- when it is infeasible to avoid impacts on wetlands or wetland or riparian habitat values, a policy that all proposed development shall replace wetland and riparian habitat values and acres lost due to development with functionally equivalent values and acres; where feasible, lost wetland habitat values and acreage shall be replaced on the project site; and
- prior to project approval, where it is infeasible for a development to occur without impacting wetlands, prepare a Wetland/Riparian Mitigation Plan which shall be reviewed by the appropriate state and federal resource agencies: State Lands Commission, Department of Fish and Game, U.S. Fish and Wildlife Service, National Marine Fisheries, Army Corps of Engineers, and the Environmental Protection Agency. The Mitigation Plan shall include at a minimum the following information: (1) the required minimum ratio of acres lost to acres restored based on like habitat values; (2) identification of wetland linkages/corridors; (3) identification of appropriate preserves and refuges; (4) identification of wetland mitigation areas, if any; (5) specification of adequate setbacks from habitat areas; and (6) specific monitoring and maintenance requirements for mitigation plans.

If you have any questions, please call Diane Jones at 916-327-9568.

Sincerely,



ELIZABETH PATTERSON
Resource Planning and Analysis
Division of Environmental
Planning and Management

cc: 

4. Comments and Responses

LETTER 12 - STATE LANDS COMMISSION (December 23, 1991)

SLC 1 - 4 No response necessary.

SLC - 5 As provided under Section 65302 of the California State Government Code, the seven required elements of the general plan are:

- Land Use Element
- Circulation Element
- Housing Element
- Conservation Element
- Open-Space Element
- Noise Element
- Safety Element

Other optional elements may also be included. While general plans and Local Coastal Programs (LCPs) should be consistent, the LCP is not actually an element of a general plan, as defined in the Government Code. The LCP is, however, discussed in Section 4.4 of the DEIR.

Regarding the specific policies proposed, those policies related to Fishing, Marinas and Recreational Boating, and Wetlands are not applicable to the City of El Segundo, inasmuch as no such resources exist in the city or are planned.

Scenic Resources are discussed in section 4.12 of the DEIR, Aesthetics/Visual Quality. General Plan Open Space Policies 12.6 and 15.1 relate specifically to visual resources in the coastal area. It may be noted that views to be obtained from tidelands in the City of El Segundo are of the adjacent Chevron oil refinery and the Southern California Edison company facility. The unincorporated area to the north of the City is occupied by a sewage disposal plant, with residential development in the City of Manhattan Beach located to the south. The various facilities in the area have affected the quality of the scenic resources in the area.

Public Access is addressed in reference to the LCP in Section 4.4 of the DEIR which notes the public access provisions of the LCP. As noted in Section 4.4, the proposed plan will not have any effect on the City's ability to implement coastal planning programs.

SLC - 6 No response necessary.

LAW OFFICES
CAMERON, MADDEN,
PEARLSON, NOBLIN & SELLARS
ONE WORLD TRADE CENTER, SUITE 1600
LONG BEACH, CALIFORNIA 90831-1600
(310) 436-3888
TELECOPIER (310) 437-1967

January 22, 1992

Sara Rostamian, Associate Planner
City of El Segundo
350 Main Street
El Segundo, California 90245

Re: Draft EIR - El Segundo Plan

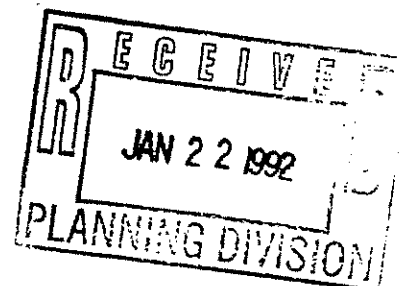
Dear Ms. Rostamian:

This firm represents Air Products & Chemicals, Inc. and Air Products Manufacturing Corporation (collectively "Air Products"). Attached are Air Products' comments to the draft Environmental Impact Report prepared in connection with the proposed amendment to the El Segundo General Plan. As has been stated in public hearings, Air Products opposes the portion of the proposed General Plan which would change the land use designation for its property located north of Rosecrans and east of Sepulveda.

CMPN&S

As presented at the City Council and Planning Commission meetings on January 13th and 15th respectively, Air Products' present and proposed future land uses are consistent with and implement the goals set forth in the proposed General Plan. Specifically, Air Products' use of its property will provide substantially more tax revenues to the City of El Segundo, and is environmentally superior to the proposed shopping center use. Air Products is a major supplier to four of the ten largest employers within the City of El Segundo. In essence, Air Products is an integral and important support industry to El Segundo-based businesses and businesses in the surrounding communities.

CMPN&S



Sara Rostamian
January 22, 1992
Page 2

In the event you have any questions, we are available
to answer them at your convenience.

Very truly yours,

CAMERON, MADDEN, PEARLSON,
NOBLIN & SELLARS


Timothy C. Cameron

TCC/jmw
Enclosure
cc: Carl Cramer

DRAFT EIR - EL SEGUNDO GENERAL PLAN

OUTLINE OF COMMENTS

1. Air Products. Air Products' present and proposed future land uses for its two parcels of land in El Segundo, the southernmost of which fronts on Rosecrans, east of Sepulveda, will contribute substantially to meeting the goals and policies as set forth in the draft EIR. These contributions include strengthening the tax base (Goal LU-4), contributing to the local business community (Goal ED-2), providing an environmentally safe business for the City's residents and workers (Goal LU-5), and participating as a stakeholder in the City of El Segundo (Goal ED-1). In addition, Air Products' present and proposed future land uses will contribute to an efficient, cost effective circulation system (Goal C-1, Policy C1.1.4), will minimize vehicle trips (Goals AQ-1, AQ-3, AQ-4, AQ-5, AQ-6, and AQ-7), and will improve the jobs-housing balance (Policies AQ91.1 and AQ91.3), especially when compared to the shopping center proposed in the draft EIR. Draft EIR, 4.4-16 and 4.12-19.

As set forth in Air Products' January 14, 1992 letter addressed to Ron Cano, Air Products' present and proposed future land uses are conservatively projected to generate annual energy user and real property taxes to El Segundo totalling approximately \$415,000 in 1992 dollars. Air Products provides industrial gases to Chevron, Hughes Aircraft, TRW, and International Rectifier, four of the ten largest employers in El Segundo. Table 3-2 of the proposed Economic Element. Hughes Aircraft alone employs approximately 20,000 people, and Chevron's oil refinery constitutes 93 percent of the City's industrial land area. Draft EIR, 4.5-9 and 4.13-1.

Furthermore, the air separation plant that Air Products operates is an environmentally clean operation. The plant primarily utilizes air, water, and power to separate air into its basic components of oxygen, nitrogen, and argon. Air Products' present land use and business plan is not projected to generate more than 500 vehicle trips per day.

The draft EIR contains certain statements which, as regards Air Products, are incorrect. First, in the Fiscal Impact Analysis section of the draft EIR, see Appendix D, Coopers & Lybrand states in section 4.5 that because utility use is typically dependent on the number of employees, they have calculated the amount of utility user tax collected by the City of El Segundo per non-government employee. However, while utility use within a type of business may be dependent upon the number of employees, industrial users of energy, such as Air

CMPN&S

Products, use unusually large amounts of energy when correlated to the number of its employees. Second, the draft EIR states that because the proposed general plan would eliminate growth in industrial uses, the "qualitative assumption" could be made that air toxic pollutant sources would decrease over time. Draft EIR, 4.9-29. This assumption, however, overlooks the tremendous increase in vehicle traffic and related toxic air emissions and noise pollution that would occur by converting all or a portion of the Air Products site to a shopping center mall.

CMPN&S

CMPN&S-

2. Shopping Center - No Market Study. The draft EIR proposes a shopping center at a 21.3 acre site at Sepulveda and Rosecrans. 4.4-16 and 4.12-19. Notwithstanding this recommendation, the draft EIR states that further market studies are needed to determine if adequate market demand exists for this use. 4.4-16. Thus, the draft EIR does not address whether this 21.3 acre site is of a sufficient size for a shopping center, whether land assembly is realistic given that this 21.3 acre site consists of multiple parcels with diverse ownership, whether a floor area ratio of 1.0 would be realistic for a shopping center with its inherent need for large parking areas, the costs of phasing out current uses, and whether market demand exists or will exist for this use. This unstudied proposal for a shopping center has apparently been made, even though Air Products, one of the current users of a substantial portion of the subject 21.3 acre site, makes the considerable contributions to the City of El Segundo noted above.

CMPN&S-

The failure to conduct market studies, whether of the proposed shopping center or of the "full extent of general commercial uses proposed in the plan," draft EIR, 4.4-16, 4.4-18, prior to any approval of the proposed general plan is a failure to examine the physical or environmental impacts of allowing commercial development in one area of the City to be built at the expense of already existing commercial development in another area. For example, the draft EIR does not examine whether the development of a shopping center at the southernmost boundary of the City will interfere with the preservation and improvement of the business environment and image of Downtown El Segundo (Goal ED-3) by drawing retail customers away from Downtown El Segundo.

3. Shopping Center - Additional Environmental Impacts. A shopping center at the northeast corner of Sepulveda and Rosecrans and at Air Products' property will substantially increase traffic congestion and decrease air quality. A shopping center at this location may also hinder fire safety.

CMPN&S-

A shopping center constitutes a retail use. As is easily calculated from the transportation impact analysis contained in tables 4-1H, 4-2H, and 4-3H of Appendix D to the draft EIR, trips generated by retail use (30.0 per square foot) are twenty times those generated by heavy industrial use (1.5 per square foot)! This disparity in trip generation is particularly important since

the proposed shopping center is to be located at one of the two most congested intersections in El Segundo.

The two most congested intersections in El Segundo are Rosecrans/Sepulveda and Rosecrans/Aviation. These intersections operate at LOS "F" (the worst level of traffic service) or "E" (the next worst level of traffic service) during both peak hours. Draft EIR, 4.8-17. The Air Products site is located on Rosecrans, closer to Sepulveda, but in between both intersections.

In addition, two roadway segments in El Segundo currently experience LOS "F." Draft EIR, 4.8-1 and 4.8-6. One of the two segments, Sepulveda Boulevard from Hughes to Rosecrans, directly affects the proposed shopping center site. According to tables 4.8-4 and 4.8-5 of the draft EIR, this roadway segment is expected to operate at LOS "F" under both the "Preferred Plan" and the "Existing General Plan Buildout Trends."

Thus, a shopping center at the northeast corner of Sepulveda and Rosecrans would add substantially more trips at one of the most congested intersections in the City, especially when compared with current uses, and would interfere with the goals of an efficient, cost effective circulation system. Indeed, given Preferred Plan Mitigation Measure 4.8-1(c), "that no new project should be approved that cannot mitigate impacts on the existing and future circulation system such that daily roadway operation cannot be maintained at acceptable levels of service," it would be financially and technically difficult if not impossible for any developer to build a shopping center and reasonably pay for the impacts of those trips generated by the shopping center upon the subject intersections and roadway segment.

Air quality would also deteriorate as a result of the additional trips generated by the shopping center. First, increased trips means increased carbon monoxide. Carbon monoxide closely follows the spatial and temporal distributions of vehicular traffic. Draft EIR, 4.9-13. While all intersections are over the 8-hour standard for CO, draft EIR, 5-1, the additional trips generated by the shopping center would exacerbate the CO levels at the Rosecrans/Sepulveda intersection. See Draft EIR, 4.9-3 (8-hour standard for CO is less than or equal to 9.1 parts per million) and 4.9-16 (current 8-hour CO concentration at Rosecrans/Sepulveda intersection is 13.9 parts per million). Second, the additional trips generated by the shopping center would diminish regional air quality.

The draft EIR states that "[t]he [Fire] Department's ability to maintain adequate response times east of Sepulveda due to increasing traffic congestion is likely to remain an important fire safety issue." Adding more trips to Rosecrans and Sepulveda may hinder fire safety in El Segundo.

CMPN&S

4. Draft EIR. In addition to the above comments specifically regarding Air Products' property, the following comments pertain generally to the draft EIR. First, the draft EIR's project description of "heavy industrial" uses under the "Preferred Plan" is not internally consistent. Table 4.4-4 states that 969 acres under the Preferred Plan would be zoned heavy industrial, while at the same time stating that there would be 0 square feet of heavy industrial land use.

CMPN&S

Second, the draft EIR does not sufficiently describe any reasonable incremental effect of the buildout of any proposed general plan. For instance, in tables 4-1A through 4-3H of Appendix D to the Draft EIR, the fiscal impact analysis compares various "complete buildouts" without analyzing any reasonable incremental development scenario under one plan compared to another. Additionally, the draft EIR compares "complete buildouts" under the proposed plans for the year 2010 while at the same acknowledging that future demand will not complete buildout by that date.

CMPN&S

Another example of where the draft EIR does not sufficiently describe the likely effects of any proposed general plan is in the traffic projections contained in section 4.8 of the draft EIR. Trip generation projections are made under one plan compared to another, see the tables contained in section 4.8 of the draft EIR, but the assumptions as to what is likely to be built at any given time under one plan compared to another and upon which assumptions the trip generation calculations are based are not set forth in the draft EIR.

CMPN&S-

Third, the draft EIR does not discuss the effect of any plan upon the San Diego Freeway (I-405), adjacent cities, and the future construction of the Century Freeway, notwithstanding that in response to the Notice of Preparation, the California Department of Transportation in their letter of May 17, 1991 and the Los Angeles County Department of Public Works in their letter of May 28, 1991 requested that these topics be studied. If there will be 615,634 daily trips by the year 2010 under the Preferred Plan, see Table 4-2H of Appendix D, the impacts on nearby freeways and cities should be evaluated.

CMPN&S-

Fourth, notwithstanding that one of the alternatives is labeled a "no project" alternative, the draft EIR does not contain a "no project" alternative. Because the "project" here is a new general plan, the "no project" alternative would be to continue the current general plan. The "existing trends" alternative is not a "no project" alternative since it assumes that new development would conform to the Preferred Plan, not the current general plan.

CMPN&S-

Fifth, the "existing trends" alternative is not adequately explained. Presumably, the history of development in El Segundo was examined from which future development was extrapolated. The draft EIR explains neither the data nor the assumptions which

CMPN&S-11

form the basis for the history and extrapolation of future development under the "existing trends" alternative. Without this information, the building square footage and trip generations summarized in certain of the tables in the draft EIR cannot be calculated.

CMPN&S-11

From the draft EIR, it is unclear whether certain of the tables presume that new development would be built in conformance with the "Preferred Plan." For example, did Coopers & Lybrand for its fiscal impact analysis contained in Appendix D to the draft EIR analyze existing plan buildout with the assumption that any new development would conform to the Preferred Plan? Is the data contained in Table 4.8-5 of the draft EIR based on the assumption that any new development would conform to the Preferred Plan?

CMPN&S-

Sixth, the draft EIR does not reasonably compare the Preferred Plan with other alternatives except for the alternative entitled "Alternative Land Use Plan." For example, Table 3-1 of the draft EIR compares the Preferred Plan only with the Alternative Land Use Plan. The brief discussion of project alternatives in section 7 does not substitute for a reasonable comparison of alternatives.

CMPN&S

Seventh, the draft EIR does not discuss a feasible alternative to the Preferred Plan which the draft EIR finds to be environmentally superior. The no further development alternative is simply not feasible and the Alternative Land Use Plan is not environmentally superior.

Eighth, the California Environmental Quality Act requires that the draft EIR list the organizations and persons contacted. The document reviewed does not contain this list.

CMPN&S

Ninth, the traffic analysis in the draft EIR is not substantial evidence upon which to analyze traffic generated by each plan. The following four questions demonstrate this concern: (a) for the year 2010, why does the transportation impact analysis reflected in Tables 4-1H, 4-2H, and 4-3H of Appendix D to the draft EIR list 13% more daily trips under the Preferred plan buildout (615,634) as compared to the existing plan buildout (543,132) when the transportation and circulation section of the EIR, 4.8-30, predicts less congestion under the Preferred Plan buildout than under the existing plan buildout? (b) because retail uses generate substantially more vehicle trips per square foot than other uses, how does the preferred plan which triples the acreage of land zoned commercial result in less congestion than the existing General Plan? 4.8-30, (c) how does the traffic analysis incorporate Preferred Plan Mitigation Measure 4.8-1(c) which requires that "no new project should be approved that cannot mitigate impacts on the existing and future circulation system such that daily roadway operation cannot be maintained at acceptable levels of service," when it appears that Preferred Plan buildout will cause roadways to operate at below acceptable levels of service? and (d) do the traffic numbers

CMPN&S

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generated for the "existing trends" alternative assume implementation of the improvements presented in the Master Plan of Streets, Recommended Truck Routes and Bicycle Master Plan which are incorporated into the analysis of traffic generated by the Preferred Plan?

CMPN&S-1

LETTER 13 - CAMERON, MADDEN, PEARLSON, NOBLIN & SELLARS

- CMPNS - 1 Comment noted.
- CMPNS - 2 Comment noted.
- CMPNS - 3 Comment noted.
- CMPNS - 4 Comment noted.
- CMPNS - 5 Comment noted. The Planning Commission has approved a recommendation that will be forwarded to the City Council to change the land use designation for the area that includes the Air Products site back to its original designation as Heavy Industrial.
- CMPNS - 6 Please see response to comment CMPNS - 5..
- CMPNS - 7 This table is a summary of information presented on Land Use Element Table C pages 3-6, which contains the following note: "The only heavy industrial shown on this plan is the Chevron Refinery and the Southern California Edison Generating Station. These facilities have processing equipment and tanks rather than buildings and both are expected to remain for the life of the plan. Therefore, no estimated building square footage is shown".
- CMPNS - 8 The proposed General Plan and the alternatives presented have been analyzed broadly, under a build-out scenario, to ensure that all reasonably foreseeable impacts are identified and mitigated. It is not within the scope of this EIR to analyze the incremental effects of specific development projects occurring under the proposed General Plan or it's alternatives.
- CMPNS - 9 See response to comment CMPNS - 8.
- CMPNS - 10 Development in the City of El Segundo consistent with the General Plan will have an impact on the I-405 Freeway, the soon to be completed I-105 Freeway, and roadways in neighboring jurisdictions. The City of El Segundo's General Plan designates development and identifies mitigations within the areas for which the City has jurisdiction. All impacts to areas outside the City's jurisdiction, including the freeways, will be identified under the environmental review required for each new development in El Segundo as the projects are proposed. In addition, as required by state law and CEQA guidelines, the projects will have to mitigate all identified significant impacts to neighboring jurisdictions.

4. Comments and Responses

CMPNS - 11 In Dusk v. Anaheim Redevelopment Agency (4th Dist. 1986) 173 Cal.App.3rd 1029,1043 [219 Cal.Rptr. 346,354] which involved the "no project alternative" requirement, the Court stated that "a no project alternative must describe maintenance of the existing environment as a basis for comparison of the suggested alternatives to the status quo." Additionally, the Dusk court equated the "no project" concept with the holding of Environmental Planning & Information Council, (3d Dist. 1982) 131 Cal.App.3rd 350, 354-355 [182 Cal.Rptr. 317, 319-320].) which found that the EIR should have analyzed how buildout under the new plan would affect the existing environment, versus contrasting buildout of the proposed plan with buildout of the existing plan. In reference to analysis of impacts under the existing general plan, there are discussions throughout the document which discuss the provisions of the existing general plan in association with impacts that would occur under the preferred plan. Additionally, the Draft EIRs text description of the existing trends alternative was not correct and is not consistent with the numbers used in analyzing the alternative.

The description of the Existing Trends Alternative on Pages 7-1 of the Draft EIR is hereby changed in the Final EIR to read:

3. Existing Trends. Assumes that growth would continue to follow existing trends. This alternative allows six million square feet of development above that allowed under the Preferred Plan. This amount accounts for permitting existing nonconforming development to remain, ~~although with new development would conforming to the land use designations proposed in the Existing General Plan Preferred Plan.~~

This change does not modify the analysis as the numbers used are consistent with the above description.

CMPNS - 11.5 There are many instances in El Segundo where existing uses on the ground, which are expected to remain for the life of the plan, do not conform to either the existing General Plan of the Proposed Plan densities or intensities. These nonconformities were included in the calculation of dwelling units and square footage in an attempt to achieve a higher level of accuracy in the future projections. That is why the "Existing Trends" nomenclature is used to describe both sets of projections.

CMPNS - 12 The Coopers and Lybrand fiscal impact analysis contained in Appendix B analyzed buildout under the existing general plan as it would conform to the existing general plan. Table 4.8-5 of the Draft EIR is based on buildout under the existing general plan that accounts for existing non-conforming uses that would remain under the plan.

- CMPNS - 13 The analysis of alternatives is not intended to be exhaustive or as detailed as the evaluation of the preferred and alternative land use plans. The alternative analysis is intended to foster informed decision making and informed public participation to the degree reasonable given the limitation of time, and funds.
- CMPNS - 14 Organizations and persons contacted are listed at the end of the individual environmental issue sections in Chapter 4 of the Draft EIR. A single comprehensive list of persons contacted is included in this document on the following page.
- CMPNS - 15 Appendices D does not accurately reflect the conclusions of the traffic analysis and those conclusions provided in the transportation section of the EIR. As shown in Tables provided in Appendix E, more daily trips would occur with buildout under the Existing General Plan than with buildout of the Preferred General Plan. Congestion would also be greater with buildout of the Existing General Plan versus the Preferred General Plan.
- CMPNS - 16 Retail uses do generate substantially more trips per square foot than other uses. Trip generation is conducted on each of the land use types proposed in the city to determine the total trips generated. Reductions in densities are proposed as part of the preferred plan in areas such as industrial, office, and neighborhood retail uses as compared to the Current General Plan. Even though the amount of commercial land use and commercial land use generated traffic increases, the total amount of traffic decreases due to decreases in other land use types.
- CMPNS - 17 The traffic analysis identified several roadway segments which have the potential to carry roadway volumes causing operation to be below acceptable Levels of Service. However, several of the Circulation Elements Policies encourage or require individual projects to incorporate a variety of trip reduction programs and policies. Implementation of the trip reduction programs and policies will depend upon specific project characteristics. Thus, a detailed analysis of project traffic impact incorporating appropriate trip reduction programs and policies will need to be developed on a project-by-project basis. As long as all projects are required to mitigate project-related impacts, all roadways should operate at acceptable levels of service. If any project cannot mitigate project-related impacts such that all existing and future roadways operate at acceptable Levels of Service, then the project should not be approved.
- CMPNS - 18 Analysis of the current General Plan Existing Trends scenario does incorporate implementation of the mitigations and improvements recommended for the preferred general plan.

January 23, 1992

El Segundo City Hall
Planning Department
350 Main Street
El Segundo, CA 90245

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1992

VISION

SUBJECT: DEIR public input

I am submitting five comments: "Unavoidable significant impacts," tax base, traffic, Chevron, and is the Preferred or Alternative Plan really necessary.

1) "Unavoidable significant impacts"

The Draft Environmental Impact Report (DEIR) on Page 3-2 of Volume I, Summary section, Part C) "Unavoidable Significant Impacts," states that unavoidable negative impacts are: traffic, noise, geology (seismic hazards), and air quality. Do we have to be hit over the head. Having common sense and some powers of logic, this statement tells me to stop, look and listen. Just maybe, these plans are not fostering El Segundo's goal or desire to maintain a small town atmosphere and maintain, or better yet, improve the quality of life within the city limits. The negative impacts we already have surrounding us are LAX, the Hyperion, a refinery and the forthcoming deluge of traffic from the Century Freeway. The Preferred or the Alternative General Plan would only intensify the existing negative environmental aspects. We must think synergistically, El Segundo plus what is all around us already equals what we will be. So why would we want to do this to ourselves. Answer, money. (next item)

GARN-

2) Tax Base

Goal LU-4 and 5, page 2-5, Volume I, states that a solid tax base is paramount and more industry will generate this. A solid tax base is important, I agree. But more white and blue collar density is not the only answer. The area around the airport and West LA are saturated with office space. There is a 30% vacancy factor for the Century Blvd corridor and 20% rental/leasable vacancy factor in our town. In addition, the economy is down, and businesses will probably not flock to the LA basin as in the past, because of our high cost of housing. So why build more, answer—to generate a larger tax base. If El Segundo's goal is to generate a solid tax base, we should let an outside tax lawyer/tax accounting firm design a new up-to-date, state-of-the art taxation system, one that is specifically tailored to the goals, needs and "in-house" resources of our town. Our current system is one of a bandage here and a bandage there. Every year there is a new twist. This creates an uncertain and an apprehensive business environment and makes it difficult for companies, small and big, to plan. I am not pro-business nor am I pro-density. I am however realistic, we need them and they need us. Therefore, a mitigation measure not mentioned in the DEIR and one I am proposing is the creation of a comprehensive business taxation program suited to El Segundo and done by professional outsiders. Jamming more industry into a town that is already 3/4 industry only creates more unavoidable significant negative impacts. A well designed assessment system of business taxes, fees and incentives will not have adverse traffic, noise, geology and air quality effects on the environment while meeting our goal of having a more sound tax base.

GARN-

3) Traffic

I am concerned about vehicle traffic—two things. One way of mitigating street traffic, and a mitigation measure not mentioned, is to have a building height restriction IN the general plan. The shorter the building, the fewer people in it, the less associated car traffic, 1 + 1 = 2. Putting a height limit in the plan would also restrict the chances of having the height limit ammended, varianced or rezoned to death, as state law restricts the number of changes in a general plan. (Our consultant has recommended a 100 foot height as a practical limit, I would prefer 30 feet but I'll let him have this one.) This document in Vol I, 1. Introduction, page 1-1, first sentence says "The General Plan has been described as the "Constitution" for a city's development..." "Constitution" is good, it gives solidarity and specifics, it assures equitable rights to small and big, no group has power over another. Changes and non-specifics only create loop-holes and ambiguities in a program. What is it to be, a "Constitution" or swiss cheese.

GARN

Second item. Imperial Highway is classified a secondary arterial because it has less than 8 lanes, your definition. This less than 8-laned street does have: 1) the Century Freeway; 2) a light rail system; 3) the future 12,000 car parking lot for LAX (Plan E, location, Pershing Drive and Imperial Highway Intersection); 4) a 25% projected LAX air passenger service and associated car traffic increase plus 5) a doubling of cargo capacity, which is not mentioned in your document, and its associated ground traffic increase (note: LAX is the third largest cargo capacited airport in the US); and 6) the 18-wheeler trucks (up to 150-200 trips per day) hauling dewatered sludge to points inland. Yet Imperial Highway is only considered a secondary arterial. The Dept. of Public Works letter in Vol II of the DEIR, says to be sure to address these issues. (I added the hyperion truck trips.) I feel you have insufficiently addressed the traffic on the north side of town.

GARN-

4) Chevron

I feel this DEIR and the General Plan are incomplete because Chevron did not meet the October 18, 1991 deadline of inpurting their Infrastructural Plan Existing Conditions Report. Chevron is physically one-quarter of El Segundo. Their lack of input deprives this DEIR from studing the impact one-quarter of the town has on the other three-quarters of the town. Chevron is import from a revenue point of view and it is important environmentally—in air quality and underground piping systems both current and in the future, e.g., the future recycled water pipeline from the Hyperion to Chevron and the forthcoming crude oil pipeline from Santa Barbara County to El Segundo and Wilmington.

GARN-

5) Is the Preferred or Alternative General Plan really necessary

In the DEIR Vol II, Executive Summary, in the Comparative Fiscal Impact section, it is stated "There does not appear to be sufficient hypothetical future demands by land use to fully absorb any of the potential supply of future land uses under the two proposed general plans as well as the potential future supply under the existing General Plan by the year 2000." So why are we intensifying industrial density if this document says there appears to be no demand for more space under any of the three gernerel plans by the year 2000. This document does go on to say there may be a demand by 2030. Well folks, 2030 is 40 years away and a general plan is good for only 15-20 years. If there appears to be not demand why are we doing this? The answer is, the powers that be are fighting for the bits and pieces of land left. Get what you can while you can for it may be gone tomorrow. I am unhappy with this type of hysterical thinking. Land is an endangered commodity, treat it with respect, don't rape it.

GARN-6

6) Thank you for enduring this missive.

Liz Garnholz 1 23-92

Liz Garnholz, El Segundo resident

4. Comments and Responses

LETTER 14 - LIZ GARNHOLZ (January 23, 1992)

GARN - 1 Comment noted.

GARN - 2 Comment noted.

GARN - 3 Comment noted.

GARN - 4 Imperial Highway is classified as a Secondary Arterial because of the function it serves as part of the El Segundo Street system. All of the items mentioned were incorporated into the traffic analysis and are reflected in the projected traffic volumes. The I-105 Freeway will parallel Imperial Highway and will serve the majority of traffic in this corridor. Secondary Arterial Standards (six lanes of divided roadway) were determined to be sufficient to serve the projected traffic on this roadway.

GARN - 5 The Draft EIR and the proposed General Plan have carefully considered the Chevron facility in a number of issue areas which include discussions of the planned water reclamation plant, air quality influences, and public health and safety.

GARN - 6 The area of the City currently devoted to heavy industry under both the preferred and alternative plan will ultimately be replaced with light industrial and commercial uses. When build-out of the City may occur is extremely speculative and as such the proposed general plan has been developed to provide the best mix of land use that can be anticipated under a build-out scenario.

5. PROPOSED MODIFICATIONS TO THE DRAFT GENERAL PLAN

This section of the FEIR summarizes changes that have been made to the Draft General Plan that are being recommended to the City council for final approval of the General Plan . Changes to the document are based on Planning Commission and City Council recommendations, comments received from the public, and changes that were made during internal review. A review of these changes conducted for this document concluded that changes to policies, the Land Use Plan, and other revisions to the General Plan text would not result in significant impacts not already identified or mitigated in the Draft EIR or this document. Furthermore, the majority of the changes are a refinement of the Draft General Plan, which further support the “self-mitigating” aspect of the document.

The most significant changes to the Proposed Plan being recommended by the Planning commission involve the following four issues:

1. Replacement of FAR criteria with traffic generation criteria as a means of measuring and regulating non-residential development intensity. The traffic generation criteria chosen are Average Daily Traffic per acre for each non-residential designation. In each case, except that of Urban Mixed Use (see number 2 below), the ADT is consistent with the traffic generation analysis used in the EIR based on the previous FAR criteria.
2. Designation of a greater development intensity in the Urban Mixed Use designation than that permitted under the Proposed Plan. The ADT criteria selected for Urban Mixed Use equates to an FAR of 1.1 under the previous criteria. The EIR evaluated two intensity scenarios for Urban Mixed Use, FAR 0.9 and FAR 1.5. The Commission assumed that their decision would result in impacts somewhere between those of the two evaluated alternatives and that those impacts would be offset by overriding social and economic benefits to the City.
3. Designation of two former school sites from Public Facility to Multi-Family Residential. These two sites are located in the northwest quadrant of the city and total 14.5 acres. The new designation would permit development of a maximum of 420 high density (29 du/ac) attached units. This increases the future housing opportunities in El Segundo and will help the City achieve their housing goals.
4. Designation of 65.7 acres from Light Industrial to Heavy Industrial and 19.1 acres from General Commercial to Heavy Industrial. These adjacent pieces of property are located at the northeast corner of Sepulveda and Rosecrans and are currently occupied by Allied Signal and Air Products

5. Proposed Modifications to the Draft General Plan

Corporations. The change in designation will greatly reduce anticipated traffic generation from these properties and reduce potential traffic congestion and conflicts at this impacted intersection. Evidence was also presented by the property owners to indicate that this change is consistent with the City's Economic objectives.