CHAPTER 3
Basis for Cumulative Analyses

This chapter includes an updated Related Projects list and figure. In addition, given the new related projects an evaluation of potential cumulative impacts is included for issue areas included in the 2017 Draft EIR.

The California Environmental Quality Act (CEQA) requires that an EIR analyze cumulative impacts. As defined in CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the project evaluated in the EIR together with other foreseeable projects causing related impacts in the vicinity of the project or the project otherwise contributing to the impact. The cumulative impact is the change in the environmental impact that results from the incremental effect of the project when added to other past, present and future probable projects. CEQA Guidelines Section 15130(a) states that an EIR must discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(c)(a)(3). Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. However, an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR. Furthermore, when the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency must identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

In addition, CEQA Guidelines Section 15130(b) indicates that the analysis of cumulative impacts shall reflect the severity of the impacts and the likelihood of occurrence, but the discussion need not provide the same level of detail as is provided for the impacts attributable to the project alone. Instead, the discussion of cumulative impacts is guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of the other projects which do not contribute to the cumulative impact.

For an adequate discussion of significant cumulative impacts, the CEQA Guidelines Section 15130(b)(1)(A) and (B) allows an EIR to determine cumulative impacts and reasonably foreseeable growth based on either of the following methods:

- A list of past, present, and probable future projects producing related or cumulative impacts; or

- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

For the purposes of the cumulative impacts analysis for the Project, the City is using a list of past, present, and probable future projects. Projects within the Cities of El Segundo, Los Angeles, and Manhattan Beach are included in the analyses.

Table 3-1, *Related Projects List*, provides the updated list of pending projects (i.e., application submitted, approved, under construction). **Figure 3-1**, *Related Projects Map (Revised),* shows the location of the ~~26~~ 31 related projects. Although the projects listed in Table 3-1 serve as the primary basis for evaluation of cumulative impacts, the related projects may vary among certain environmental issues, as the geographic contexts of certain issue areas may vary.

~~The cumulative analyses for each environmental issue, including a discussion regarding the identification of relevant related projects are provided in their applicable sections in Chapter 4, Environmental Impact Analysis, of this Draft EIR.~~ The cumulative analysis for traffic has been updated in Section 4.J, Transportation and Traffic. With regard to aesthetics, two of the new related projects (No. 22 and 25) would not be located within the same view fields as the Project as a result of distance from the Project Site and intervening development. However, three of the new related projects (No. 21, 23, and 24) are located within the geographic area between Maple Street and El Segundo Boulevard on the north and south, and between Douglas Street and Main Street on the east and west. However, these related projects are of a scale and distance from the Project Site that the Project in conjunction with these projects would not contribute to a significant aesthetic impact. In addition, as with the Project, related projects would be required to comply with the City's landscape, signage and height requirements, and other regulations pertinent to visual character and, as such, would contribute to rather than detract from the visual quality of the area.

With regard to air quality, the cumulative analysis is based on the South Coast Air Quality Management District's (SCAQMD) cumulative methodology as provided in Section 4.B, Air Quality. The SCAQMD CEQA Air Quality Handbook states that the "Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects."[1] The SCAQMD CEQA Air Quality Handbook also states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District."[2] The SCAQMD has also provided

[1] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993), p. iii. Accessed April 2019.

[2] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, p. 6-1.

guidance on an acceptable approach to addressing the cumulative impacts issue for air quality as discussed below:[3]

> *"As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

In accordance with SCAQMD guidance, the cumulative analysis in Section 4.B, Air Quality, is appropriately based on the SCAQMD cumulative methodology and SCAQMD thresholds.

As discussed in Section 4.D, Greenhouse Gas Emissions, the analysis of greenhouse gas (GHG) emissions is inherently a cumulative analysis. As discussed on page 4.D-26, according to the California Air Pollution Control Officers Association (CAPCOA) White Paper titled, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[4] Furthermore, per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.[5] In accordance with the CAPCOA White Paper and the CEQA Guidelines, the cumulative analysis in Section 4.D, Greenhouse Gas Emissions, appropriately evaluates cumulative GHG impacts.

As detailed in Section 4.B, Air Quality, and Section 4.D, Greenhouse Gas Emissions, the Project would result in less than significant air quality and GHG emissions impacts and therefore, the Project's incremental contribution considered with related projects would not be cumulatively considerable. Therefore, the Project's cumulative contribution of air quality and GHG emissions would be less than significant.

With regard to cultural resources, with the implementation of mitigation measures, Project impacts to archaeological and paleontological resources would be less than significant. In association with CEQA review, if ground disturbance were to occur in a sensitive area, mitigation measures would be implemented for the related projects. Therefore, the Project's contribution to cumulative impacts on cultural resources would not be cumulative considerable. With regard to tribal cultural resources, AB 52 consultation was conducted for the Project and no tribal cultural resources were identified in the Project Site or vicinity. In association with CEQA review, AB 52 consultation with Native

[3] South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4. Accessed April 2019.

[4] California Air Pollution Control Officers Association, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008, http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf. Accessed April 2019.

[5] 14 CCR § 15064(h)(3).

American tribes would be required for each related project. Therefore, to the extent impacts on tribal cultural resources from related project may occur, contribution from the Project would not be cumulatively considerable. The Project would result in a less than significant cumulative impact.

With regard to hazards and hazardous materials and hydrology and water quality, the Project would result in less than significant impacts. Like the Project, each related project would be required to comply with applicable regulatory requirements. Therefore, the Project would not contribute to a significant cumulative impact.

The Project would be substantially consistent with the City's land use objective to concentrate corporate office uses to the east of Pacific Coast Highway. In addition, the Project is reasonably close in scale to the development anticipated in the 2004 Development Agreement for the Project Site. Three new related projects would be located within the similar geographic area as the Project (between Maple Street and El Segundo Boulevard on the north and south and between Douglas Street and Main Street on the east and west). This area has general access to the Green Line Mariposa Station or the Green Line El Segundo Station and is also well served by bus lines along Pacific Coast Highway. The City has discretionary authority to approve those land uses it deems to be consistent with the objectives of the General Plan. Much of the new development would be within proximity to transit and would be consistent with goals to concentrate development in transit rich areas. Therefore, cumulative land use impacts would be less than significant.

With regard to noise, noise is by definition a localized phenomenon, and reduces in magnitude as the distance from the noise source increases. Thus, noise from construction of the Project and related projects would be localized, thereby affecting areas immediately within 500 feet from the Project and related project construction sites. The cumulative construction noise analysis considered related projects within 500 feet from the Project Site. With implementation of prescribed Project mitigation measures, cumulative construction noise impacts would be less than significant. During operations, cumulative noise impacts would occur primarily as a result of increased vehicle traffic on local roadways due to operation of the Project and related projects, as vehicle traffic is the greatest source of operational noise in the Project area. As shown in Table 4.H-14 of the Draft EIR, the maximum cumulative noise increase from the Project plus related project traffic would be 2.2 dBA CNEL, which would occur along El Segundo Boulevard, between Nash Street and Douglas Street. This increase in sound level would not exceed the significance threshold of an increase of 3 dBA CNEL. Based on the updated cumulative traffic data and the added roadway intersections that are discussed in Section 4.J, Transportation and Traffic of this RPDEIR, cumulative roadway segment volumes would not result in a doubling of daily traffic volumes.[6] Therefore, the increase in sound level would not exceed the significance threshold of an increase of 3 dBA CNEL. As a result, cumulative traffic-related noise impacts would be less than significant. With respect to operational stationary noise sources, although each related project could potentially impact an adjacent sensitive use, that potential impact would be localized to the specific area of each related project and would not contribute to cumulative noise conditions at the Project Site. As the Project's composite stationary-source impacts would be less than significant, the Project would

[6] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, page 2-15, http://www.dot.ca.gov/env/noise/docs/tens-sep2013.pdf. Accessed April 2019. Under the dBA scale, a doubling of sound energy corresponds to a 3 dBA increase.

not contribute to cumulative stationary-source noise impacts. Therefore, cumulative noise impacts from operational stationary-source noise would be less than significant.

With regard to police protection and fire protection services, the Project would result in a less than significant impact to public services. The updated related projects list results in five new related projects within the City. However, each of these projects would be reviewed by the public service providers to ensure that all applicable requirements are met. Any increase in cumulative demand for public services personnel would not be expected to result in the need for the development of new facilities. Finally, the Project, as well as the related projects, would pay the applicable development impact fees. The Project would not substantially contribute to cumulatively considerable impacts regarding police and fire protections services and cumulative impacts would be less than significant.

With regard to utilities, the Project would result in a less than significant impact regarding water supply and wastewater. Future development within the City is considered in the City's Urban Water Management Plan, which considers water demand and supply within the whole of the City through the 2035 planning horizon. While the five new related projects, all of which are located within the City, would increase the demand within the City, these are infill, redevelopment properties that would result in net increases in water demand. In addition, each of the related projects would be required to implement water conservation features pursuant to City ordinances. With regard to wastewater, each related project would be subject to the provisions of the applicable jurisdiction's code requiring the provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. Therefore, the Project would not contribute to a cumulative significant impact with regard to water supply and wastewater facilities. In terms of infrastructure, developers are required to improve facilities where appropriate and development cannot proceed without verification and approval from the City. Therefore, cumulative impacts on the water and wastewater infrastructure would be less than significant.

TABLE 3-1
RELATED PROJECTS LIST

No.	Address	Use	Size[1]	
City of El Segundo				
1	445 N. Douglas Street	Data Center Expansion[2]	173.513	ksf
2	199 Continental Boulevard	Hotel	152	rms
3	540 E. Imperial Avenue	Senior Housing	304	du
4	2100 E. El Segundo Boulevard	Light Industrial/Office (Raytheon)	2,142.457	ksf
5	888 ~~N. Sepulveda Boulevard~~ Pacific Coast Highway	Hotel	190	rms

No.	Address	Use	Size[1]	
6	201 North Douglas	Manufacturing (to be removed)	-170	ksf
		High School	1,200	students
		District Office	12	ksf
7	400 Duley Road	General Office	73	ksf
8	525 ~~N. Sepulveda Boulevard~~ Pacific Coast Highway	Hotel (to be removed)	-23	rms
9	750 South Douglas	Industrial	4.986	ksf
10	2275 Mariposa Avenue	Lakers Training Facility	131.443	ksf
11	500 S. Douglas Street and 2330 Utah Avenue	Industrial (to be removed)	-52	ksf
		Office	78	ksf
12	123 Nevada Street	Industrial (to be removed)	1.7	ksf
		General Office	14.998	ksf
13	2125 Campus Drive	General Office	63.55	ksf
		Hotel	140	rms
14	1700 East Imperial Avenue	General Office	96.898	ksf
15	535 Indiana Street	Single-Family Detached Housing	4	du
16	123 Lomita	Light Industrial	10.764	ksf
17	2130 East Maple Drive	General Office	20.955	ksf
18	140 Sheldon Street	Research and Development	7.692	ksf
19	400 ~~South Sepulveda Boulevard~~ Pacific Coast Highway	Commercial Recreational Driving Range	~~37.991~~ 67.5	ksf
20	2171-2191 Rosecrans	Restaurant	13.57	ksf
21	740 N. Pacific Coast Highway	Fast Food Restaurant w/drive through	4.996 ksf	
22	700-860 Pacific Coast Highway 2001-2015 E. Park Place 700-740 Allied Way	Shopping Center	18.85 ksf	
23	707 Pacific Coast Highway	Hotel and Lounge	116 rooms 1.66 ksf	
24	1301 East El Segundo Boulevard	Warehouse	5.879 ksf	
25	2121 E. Rosecrans Avenue	Office Studio Retail	240.0 ksf 66.0 ksf 7.0 ksf	
City of Manhattan Beach				
~~21~~ 26	3200 North Sepulveda Boulevard	Manhattan Village Mall Expansion	123.7	ksf
~~22~~ 27	2205 Sepulveda Boulevard	Hair Salon (to be removed)	1.04	ksf
		General Office	4.7	ksf

No.	Address	Use	Size[1]	
City of Los Angeles				
~~23~~ 28	11604 Aviation Boulevard	Aviation Station Commercial Retail Conversion	26.5	ksf
~~24~~ 29	LAX Landslide Access Modernization Program[3]	N/A	-	-
~~25~~ 30	Chick-fil-A	Fast-Food Restaurant w/ D.T.	3.999	ksf
~~26~~ 31	OTIS College Consolidation & Relocation	Junior/Community College (To be Consolidated)	-	-

Notes:

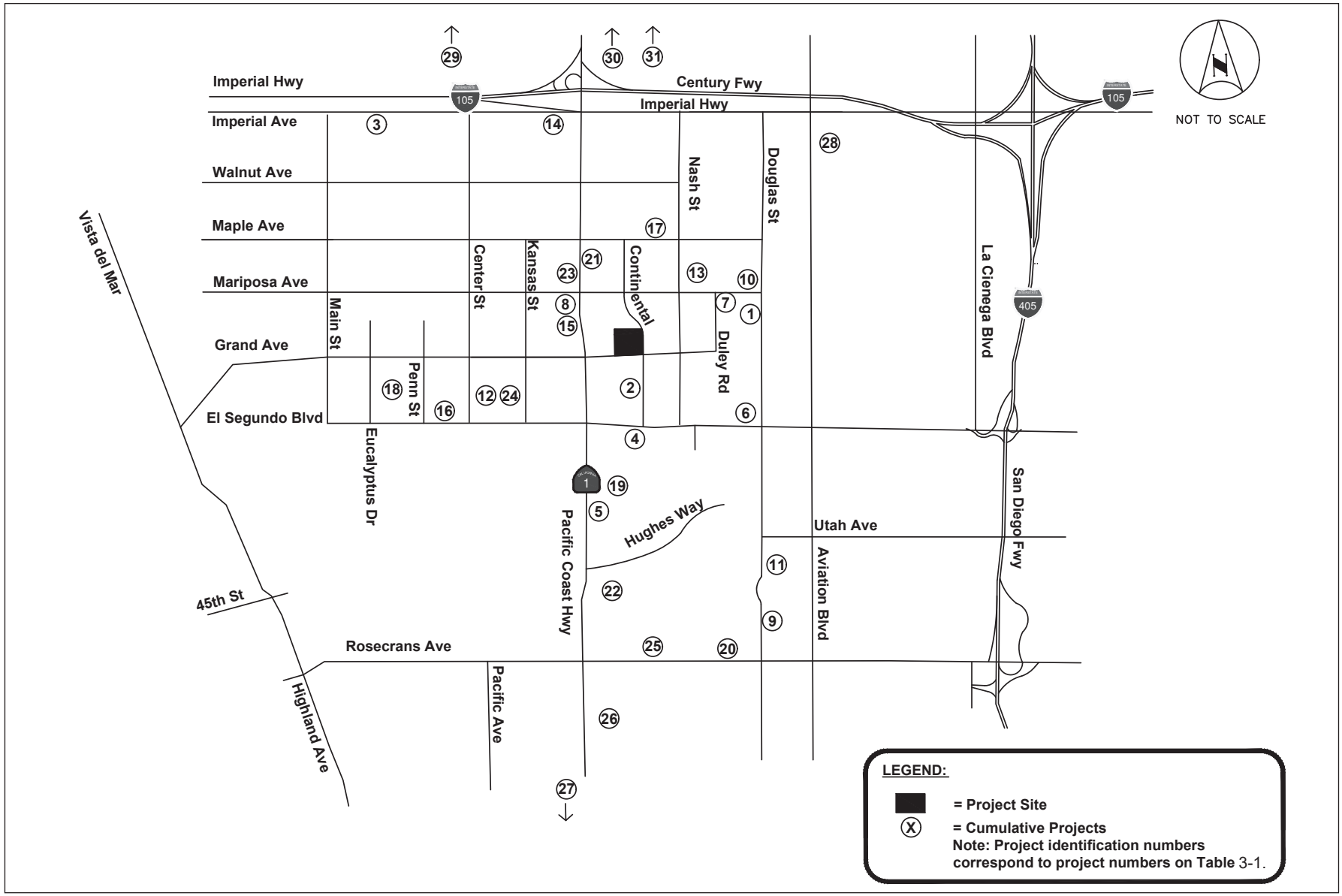
See Figure 3-1, Related Projects Map (Revised), for the location of the related projects. Related Project No. column corresponds to the numbers shown on Figure 3-1.

1 Ksf represents for thousands of square feet.

2 Renovation/expansion to 332,137 sf of Data Center (158,624 sf complete and already operating under Phase 1).

3 LAX Landslide Access Modernization Program (LAMP) envisions a redistribution of existing traffic patterns in the vicinity of LAX. Traffic volumes have been included from the LAX LAMP DEIR.

SOURCE: Kimley-Horn and Associates, Inc, ~~2017~~ 2019.



SOURCE: Kimley Horn, 2019

Continental Grand Campus Specific Plan

Figure 3-1

Related Projects Map (Revised)

ESA PCR