

# Smoky Hollow Specific Plan and Program EIR Catalyst Project – Consistency Determination

Prepared for:

City of El Segundo  
Planning Department  
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## TABLE OF CONTENTS

<b>1 Introduction</b>	<b>1</b>
1.1 Project History	1
1.2 Catalyst Project	1
1.3 Consistency Analysis	1
1.4 CEQA Compliance – Supplemental or Subsequent EIR	1
1.5 CEQA Compliance – Program EIR Consistency	3
1.6 Summary of Results	3
<b>2 Project Description</b>	<b>5</b>
2.1 Smoky Hollow Specific Plan	5
2.2 SHSP Area and Location	5
2.3 SHSP Development and Growth	5
2.4 Catalyst Project	11
<b>3 Determination</b>	<b>19</b>
3.1 Environmental Factors Potentially Affected	19
3.2 Determination	19
<b>4 Evaluation of Environmental Impacts</b>	<b>21</b>
4.1 Aesthetics	21
4.2 Agriculture and Forest Resources	22
4.3 Air Quality	23
4.4 Biological Resources	25
4.5 Cultural and Tribal Resources	27
4.6 Geology and Soils	30
4.7 Greenhouse Gas Emissions and Energy Resources	32
4.8 Hazards and Hazardous Materials	34
4.9 Hydrology and Water Quality	36
4.10 Land Use and Planning	39
4.11 Mineral Resources	40
4.12 Noise	41
4.13 Population and Housing	43
4.14 Public Services	44
4.15 Recreation	45
4.16 Transportation and Traffic	46
4.17 Utilities and Service Systems	49
4.18 Mandatory Findings of Significance	52
4.19 Summary of Results	53
<b>5 References</b>	<b>55</b>
5.1 List of Preparers	55
5.2 Persons and Organizations Consulted	55
<b>6 Appendix Materials</b>	<b>57</b>
Appendix A: Kimley Horn Memo	
Appendix B: Translations Memo	
Appendix C: Historical Resources Assessment	

**List of Exhibits**

Exhibit 1: Regional Location ..... 7  
Exhibit 2: SHSP Area ..... 9  
Exhibit 3: Catalyst Project Plan – Location of North and South Site ..... 13  
Exhibit 4A: Catalyst Project Plan – North Site ..... 15  
Exhibit 4B: Catalyst Project Plan – South Site ..... 17

**List of Tables**

Table 1: Smoky Hollow Specific Plan Land Uses ..... 5  
Table 2: Proposed Project Office Uses (Occupied Sq. Ft) ..... 11

## 1.1 Project History

The City of El Segundo (“City”) approved the most current version of the Smoky Hollow Specific Plan (“SHSP”) in March 2018, which included policies and regulations to accommodate the redevelopment and intensification of a variety of primarily office, commercial and industrial use on 120 acres in the central portion of the City near the downtown El Segundo Main Street Corridor. The City was the Lead Agency for the SHSP under the California Environmental Quality Act (“CEQA”) and prepared a Program Environmental Impact Report (EIR) as the CEQA compliance document for the SHSP update. The EIR estimated that the SHSP had the potential to result in a net increase of up to 517,094 square feet of building area, and found that certain greenhouse gas emissions, noise, and traffic impacts of the SHSP would be significant and unavoidable even with mitigation and regulatory compliance.

## 1.2 Catalyst Project

The City has now received an application for a proposed office development (“proposed Project” or “Project”) within the SHSP. The City, as the Lead Agency, must determine if this new application complies with the SHSP and its EIR and what type of CEQA compliance document, if any, must be prepared. The Project comprises 5.2 acres and is located at the northeast and southwest corners of the intersection of Kansas Street and Grand Avenue within the SHSP. Existing buildings on the site total 99,822 square feet and the Project proposes 242,878 occupied square feet or a net increase of 143,833 square feet. The Project site is located within the Smoky Hollow - East (SH-E) zoning district which provides a transitional land use area between higher-intensity office uses east of Sepulveda Boulevard and the smaller, single-parcel industrial and creative businesses of the western portion of the Smoky Hollow area. The SH-E zoning district provides for the development of incubator industrial, research, and technological uses; medium-sized light industrial and manufacturing; and creative office activities.

## 1.3 Consistency Analysis

The potential environmental impacts identified in the SHSP Program EIR will be compared to the proposed project to determine whether the project fits within the scope of the Program EIR, or if new or more severe impacts may occur that were not evaluated in the Program EIR. In order to document this evaluation, a checklist will be used similar to the “Appendix G” CEQA Guidelines. However, the level of detail will be much less than typically provided for a CEQA Initial Study. For each of the checklist issues this analysis will briefly focus on 1) identifying the findings and conclusions of the Program EIR with respect to environmental significance and 2) briefly explaining why the proposed project is within the scope of such findings and conclusions. For each of the issue areas identified in the checklist, conclusions will be made regarding whether the impacts of the project are within the scope of the Program EIR.

## 1.4 CEQA Compliance – Supplemental or Subsequent EIR

CEQA authorizes a Lead or Responsible Agency to determine if a proposed action is within the scope of a previously analyzed project and none of the conditions described in CEQA Guidelines Section 15162 requiring the preparation of a Subsequent EIR or CEQA Guidelines Section 15163 requiring the preparation of a Supplement to an EIR are met.

Pursuant to CEQA Guidelines Section 15162:

- (a) *When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*

- (1) *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- (2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
- (3) *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*
  - (A) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
  - (B) *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
  - (C) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
  - (D) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*
- (b) *If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.*
- (c) *Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.*
- (d) *A subsequent EIR or subsequent negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR or negative declaration shall state where the previous document is available and can be reviewed.*

Pursuant to CEQA Guidelines Section 15163:

- (a) *The lead or responsible agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:*
  - (1) *Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and*
  - (2) *Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.*
- (b) *The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.*
- (c) *A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087.*
- (d) *A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.*
- (e) *When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.*

Based on the analysis provided in Section 4 of this document, the proposed Catalyst Project does not involve changes that will result in new or increased environmental effects, new significant impacts, or the need for additional or increased mitigation beyond those identified in the previously certified SHSP EIR, thus, none of the conditions identified in CEQA Guidelines Section 15162 or 15163 will be triggered by the proposed Project. Therefore, the City may evaluate the Project according to CEQA Guidelines Section 15168 to determine if the Project is consistent with the approved SHSP and its Program EIR.

## **1.5 CEQA Compliance – Program EIR Consistency**

There are provisions in the CEQA Guidelines that allow Lead Agencies to find projects within the scope of a previously prepared Program EIR and thereby eliminate the need for new CEQA documentation (i.e., an addendum to the EIR or a Mitigated Negative Declaration). Provisions related to Program EIRs are found in Section 15168 of the CEQA guidelines, subsection (c) pertaining to the use of a Program EIR for later activities. Key language from CEQA Guidelines, pertaining to this project is contained in Subsections 15168(c)(2) and 15168(c)(4).

**15168(c)(2)** - If the agency finds that pursuant to Section 15162, no subsequent EIR will be required, the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document will be required. Whether a later activity is within the scope of a Program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the Program EIR.

**15168(c)(4)** - Where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the Program EIR.

The SHSP EIR indicated that any future individual project would be subject to its own CEQA review and would be evaluated in accordance with Section 15152 (Tiering) and 15153 (Use of an EIR from an Earlier Project) of the CEQA Guidelines to determine whether potential project impacts were addressed by the SHSP EIR. In this case this document constitutes the CEQA review for the proposed Catalyst Project per CEQA Guidelines Section 15168(c)(4) to determine if the proposed Project is consistent with the SHSP EIR. This determination would also be consistent with the CEQA Guidelines Sections 15152 and 15153 as outlined in the SHSP EIR.

## **1.6 Summary of Results**

The analyses in Sections 4.1 through 4.18 of this document conclude that the proposed Catalyst Project is consistent with the SHSP, is within the scope of the SHSP EIR and is consistent with State CEQA Guidelines Subsection 15168(c)(2). Therefore, no additional CEQA analysis or documentation is required for this Project. However, a Notice of Determination (NOD) will be filed with the County Clerk and State Clearinghouse to fully document this CEQA compliance action.

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## 2 PROJECT DESCRIPTION

### 2.1 Smoky Hollow Specific Plan

The Smoky Hollow Specific Plan (SHSP) is a “specific plan” under state planning law and is one of several policy and regulatory tools used by the City of El Segundo to implement the City’s General Plan. This specific plan implements the General Plan through the establishment of more detailed policies, regulations, and actions specifically focused on the Smoky Hollow Specific Plan area. The SHSP generally provides for the reuse and focused redevelopment of properties within the 120-acre plan area at higher intensities. It also allows for a greater proportion of land uses related to office, research, and development, compared to the existing light industrial uses. The SHSP also provides for improvements to the circulation system, increased on-street parking, streetscape improvements, and enhanced development standards and design guidelines.

### 2.2 SHSP Area and Location

The SHSP area comprises 120 acres in the central portion of the City near the downtown El Segundo Main Street Corridor which supports a number of well-established residential neighborhoods, large aerospace and engineering corporations, and the Chevron Oil refinery (see Exhibit 1, Regional Location). The SHSP area is oriented east-west and is bounded by Indiana Street and Sepulveda Boulevard to the east, downtown El Segundo to the west, the Chevron refinery, and El Segundo Boulevard to the south, and residential neighborhoods generally north of Franklin Avenue (see Exhibit 2, SHSP Area). When it was approved in March 2018 the SHSP contained 329 parcels encompassing 94.3 net acres (not including street rights-of way) and was already developed with approximately 2.46 million square feet of building area mainly industrial and office land uses (see Table 1).

### 2.3 SHSP Development and Growth

The SHSP estimated a development capacity of up to 2.97 million square feet of residential, office, industrial, and public facility building space through 2040. This represents a net increase of 517,094 square feet of total building area for residential, office, and commercial uses. This increase in building area would be accompanied by a substantial shift in uses from light industrial to commercial, office and research and development, as shown in Table 1 below. Table 1 indicates the SHSP will result in a net increase of 1,213,751 additional square feet of office space by 2040, with a total increase in building area of 2,973,910 square feet compared to an existing (2018) figure of 2,456,816 square feet.

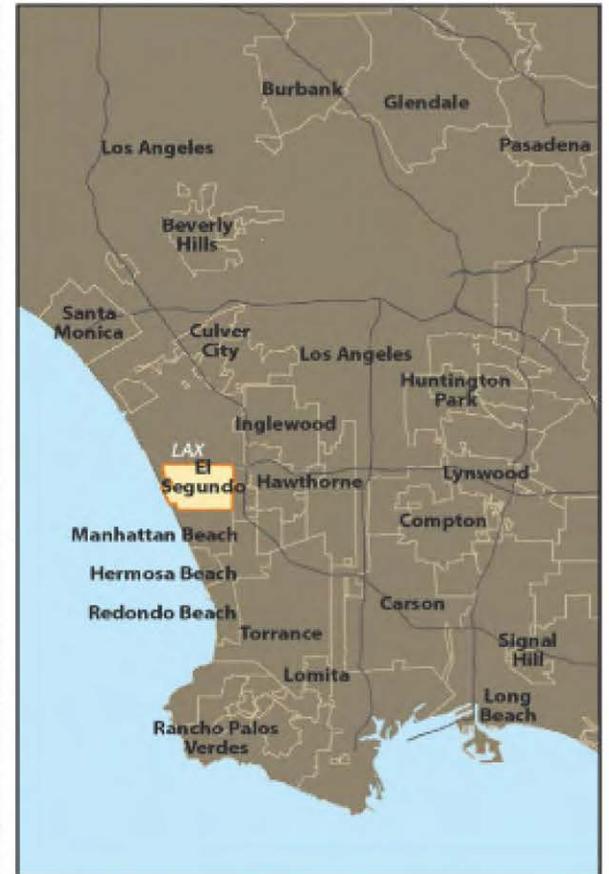
**Table 1**  
**Smoky Hollow Specific Plan Land Uses**

Land Use Category	Existing Overall Intensity	2040 Overall Intensity	Difference
Office	330,607	1,544,358	+1,213,751
Research & Development	110,202	514,786	+404,584
Light Industrial	1,901,602	777,900	-1,123,702
Commercial	84,445	106,906	+22,461
Public Facilities	29,060	29,060	0
Parking	900	900	0
Residential <sup>1</sup>	9 units	15 units	+6 units
<b>Total Building Area</b>	<b>2,456,816</b>	<b>2,973,910</b>	<b>+517,094</b>

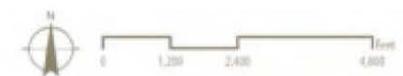
Source: SHSP EIR, Table 2-1. Existing and Projected Year 2040 Land Use

<sup>1</sup> Caretaker Units

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-  Smoky Hollow Specific Plan Boundary
-  City of El Segundo City Limits



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 Smoky Hollow Specific Plan Boundary



Not to Scale



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## 2.4 Catalyst Project

The proposed Project occupies a total of 5.19 acres on two adjacent sites, the North Site on the northeast corner of the intersection of Grand Avenue at Kansas Street and the South Site on the southwest corner (see Exhibit 3). The Project site is within the boundaries of the Smoky Hollow East Zoning District as defined by the Smoky Hollow Specific Plan. The Project site is generally bounded by Holly Avenue to the north, Washington Street to the east, Franklin Avenue to the south, and California Street and commercial uses to the west. The site is currently developed with office buildings and surface parking lots. The Project applicant proposes to expand one existing office building and develop two new office buildings with two parking structures intended for the office building users. The North Site consists of a total proposed building area of 149,710 square feet (SF) with a 5-story parking structure with 482 stalls on a 3.24-acre lot. The South Site consists of a total proposed building area of 93,168 occupied SF and a 6-story parking structure with 396 stalls on a 1.95-acre lot, as shown in Table 2. Exhibit 4 shows the site plans for both the North and South Sites.

**Table 2**  
**Proposed Project Office Uses (Occupied Sq. Ft)**

Location/Building	Existing Buildings	Area to be Demolished	New Construction	Total Building Area	Comments
<b>North Site</b>					
Building 1	62,400	--	24,357	86,757	Rehab 3-story, same height
Building 2	--	--	62,953	62,953	New 6-story building
<u>Building 3</u>	<u>37,422</u>	<u>37,422</u>	<u>NA</u>	<u>NA</u>	6-story Parking Structure
Sub-Total	99,822	37,422	87,310	149,710	
Net Area <sup>1</sup>				112,288	
Allowed <sup>2</sup>				141,134	
<b>South Site</b>					
Building 1	--	--	91,951	91,951	New 3-story building
Building 2	--	--	<u>1,217</u>	<u>1,217</u>	Parking Structure (café only)
Sub-Total	0	0	93,168	93,168	
Net Area <sup>1</sup>	--	--	--	93,168	
Allowed <sup>2</sup>				50,965	
Total 2 Sites	99,822	37,422	180,478	242,878	
Total Net	--	--	--	205,456	
Total Allowed <sup>1,2</sup>	--	--	--	192,099	
Source: 1521 Grand Presentation, EYRC Architects/Ware Malcolm, 2/7/20 updated 8/19/20 NA = Not Applicable (no occupied space)					
<sup>1</sup> total area minus demolition					
<sup>2</sup> North Site = 3.24 ac = 141,134 SF @ 1.0 FAR = 141,134 SF allowed per DEIR Exhibit 3-5					
South Site = 1.95 ac = 84,942 SF @ 0.6 FAR = 50,965 SF allowed per DEIR Exhibit 3-5					

The previous Table 1 indicated that from 2018 to 2040, the SHSP area will experience a net increase of 517,094 total square feet over the existing building area which represents a total increase of 21 percent or just under one percent per year (simple arithmetic average over 22 years) over this period. The proposed Project represents 8.7 percent of the total planned square footage of the SHSP (242,878/2,973,910) and 47 percent of the net growth (242,878/517,094) per Tables 1 and 2. By comparison, light industrial uses are expected to decline by almost 60 percent during this same period as the SHSP land uses transition to more office-oriented development. The Project will also add 205,456 net square feet or 17 percent of the 1.2 million additional planned square footage of office uses. The Project is therefore consistent with the overall intent of the SHSP to transition the land uses of the SHSP area from largely light industrial and commercial uses to more office and research and development uses. Table 2 shows that, under the SHSP floor area ratio (FAR) limits, the entire Project site could have up to 192,099 square feet of new buildings and the Project proposes a total of 242,878 square feet so it is 26.4 percent more intense than what is currently allowed on the site (FAR 1.5). The Project therefore requires site plan approval and a Community Benefits Plan (CBP) to provide additional or enhanced amenities since the Project exceeds the 1.0 FAR allowed by the site's zone designations under the SHSP.

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- North Site
- South Site



### Exhibit 3 Location of North and South Site

<http://www.migcom.com> - 951-787-9222



Catalyst Project  
El Segundo, California

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-  EXISTING BUILDING
-  NEW BUILDING / ADDITION
-  PROPERTY LINE
-  ASSUMED PL
-  ASSUMED PROPERTY LINE



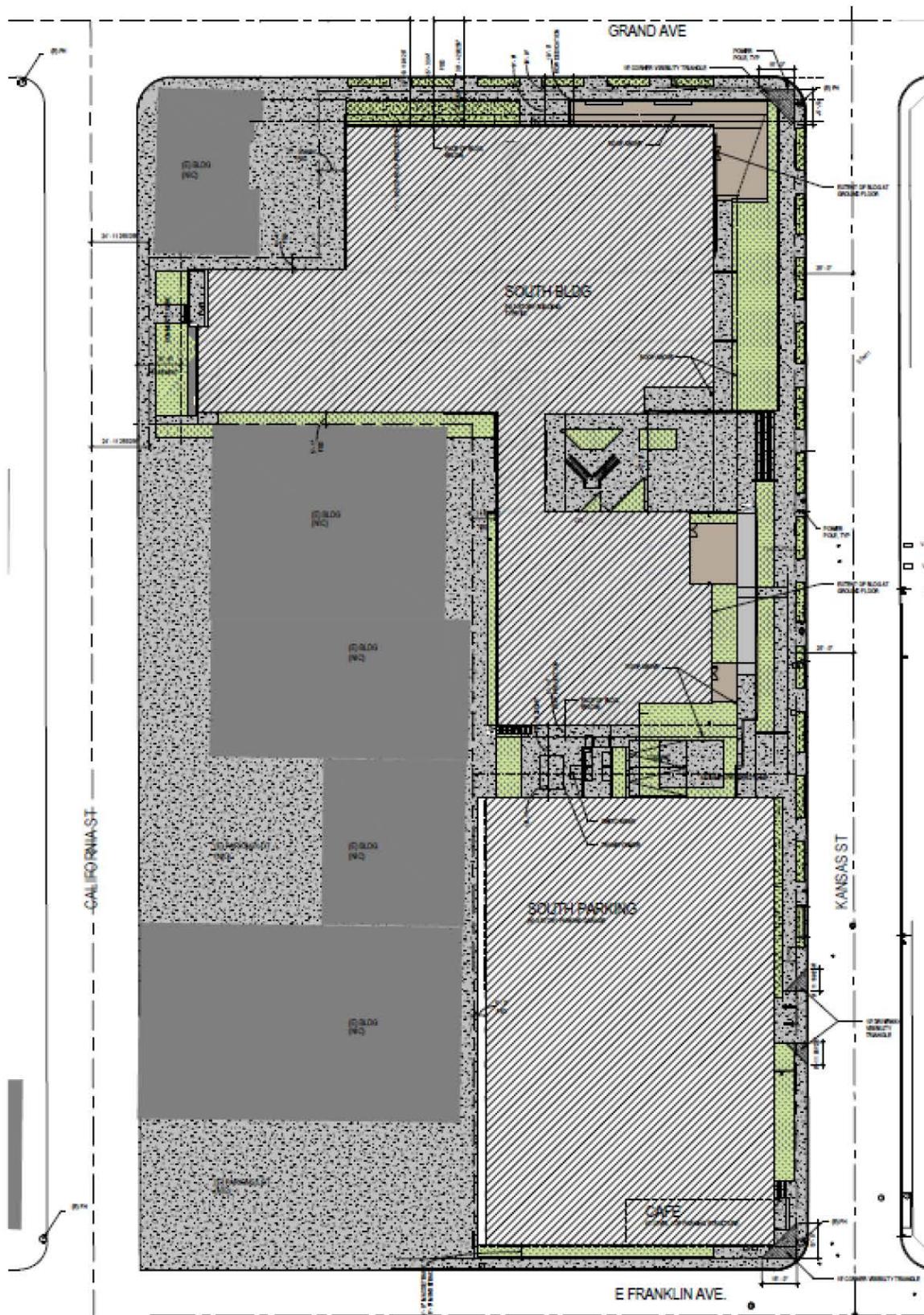
## Exhibit 4A North Site

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Catalyst Project  
El Segundo, California

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-  EXISTING BUILDING
-  NEW BUILDING / ADDITION
-  PL PROPERTY LINE
-  ASSUMED PL ASSUMED PROPERTY LINE



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## Exhibit 4B South Site

Catalyst Project  
El Segundo, California

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## 3 DETERMINATION

### 3.1 Environmental Factors Potentially Affected

The environmental factors checked below were identified in the Smoky Hollow Specific Plan Program EIR as being a 'Potentially Significant Impact' and the checklist on the following pages will identify to what degree the proposed Catalyst Project contributes to these significant impacts.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forest Resources	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural and Tribal Resources	<input type="checkbox"/>	Geology /Soils
<input checked="" type="checkbox"/>	Greenhouse Gas Emissions and Energy	<input type="checkbox"/>	Hazards, Hazardous Materials, and Wildfires	<input type="checkbox"/>	Hydrology / Water Quality
<input type="checkbox"/>	Land Use / Planning	<input type="checkbox"/>	Mineral Resources	<input checked="" type="checkbox"/>	Noise
<input type="checkbox"/>	Population / Housing	<input type="checkbox"/>	Public Services	<input type="checkbox"/>	Recreation
<input checked="" type="checkbox"/>	Transportation/Traffic	<input type="checkbox"/>	Utilities / Service Systems	<input checked="" type="checkbox"/>	Mandatory Findings of Significance

### 3.2 Determination

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input checked="" type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated to the extent feasible pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, the project will not cause any new or greater impacts than those identified in the earlier EIR and nothing further is required.

Name: Gregg McClain, Planning Manager

Date

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## 4 EVALUATION OF ENVIRONMENTAL IMPACTS

**ANALYSIS FORMAT:** Each of the following sections first presents the conclusions of the Smoky Hollow Specific Plan EIR for a particular environmental issue, then evaluates the potential impacts of the proposed Catalyst project to see if they are consistent with the findings of the EIR.

### 4.1 Aesthetics

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) In non-urbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### **Proposed Project in relation to SHSP Program EIR**

- (A) **Scenic Vistas.** The SHSP and surrounding areas contain no important scenic vistas and are largely urban scale developed land uses and neighborhoods. The SHSP PEIR determined the SHSP would have no significant impacts and no mitigation was required. Since the proposed project would be developed under the SHSP, it would have no impacts to scenic vistas.
- (B) **Visual Resources within a State Scenic Highway.** There are no roadways in the SHSP area that are designated or eligible for listing as a State Scenic Highway or locally designated scenic route. In addition, the SHSP area has no visual resources. Therefore, the SHSP and any associated development would have no impacts on these resources.
- (C) **Degrade Existing Visual Character.** The SHSP and its surrounding area is largely built out with industrial, office, commercial, and very limited residential uses. The SHSP EIR concluded the Specific Plan would not significantly change the existing development pattern and its appearance, although it would allow the area to redevelop with higher intensity of uses. The EIR concluded the SHSP would actually improve the visual quality and character of the area by removing dilapidated buildings and older uses. It would rely on the SHSP development standards, design guidelines, and landscaping and streetscape requirements to enhance the visual quality of the planning area. With regard to building height, the SHSP would not change existing regulations except that height bonuses may be granted at the City's discretion and considering surrounding uses, with provision of community benefits. Impacts were determined to be less than significant, and no mitigation was required.

The proposed project would be developed consistent with the design and development requirements of the SHSP including building heights and appearances. Thus, the size and scale of the proposed buildings and parking structures are consistent. The Project would be 26.4 percent more intense than allowed under the SHSP and represents 8.7 percent of the new building planned under the SHSP. However, the overall appearance of new buildings within the Project would be similar in scale and size allowed under the SHSP within an urban context. Therefore, the proposed Project would have less than significant impacts and no mitigation is required.

- (D) **Light and Glare.** The SHSP area and surrounding areas currently have high ambient levels of night lighting for private property security and street lighting. Although the level of development would increase through implementation of the SHSP, light and glare affecting residences and other light-sensitive uses are expected to be similar to current levels since City regulations regarding lighting would continue to apply. The EIR determined light and glare impacts were less than significant and no mitigation was required.

The proposed Project would be consistent with the development anticipated under the SHSP and would also contribute to increased light and glare. However, as analyzed under the SHSP EIR, the proposed project would have to comply with the City’s night-time light regulation and would thus have less than significant impacts. No mitigation is required. This conclusion is consistent with those of the SHSP Program EIR.

## 4.2 Agriculture and Forest Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D) Result in loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

- (A) **Designated Farmland.** According to the Farmland Mapping and Monitoring Program of the California Resources Agency, there are no prime or other important farmland designations within City limits. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. Since the proposed Project is within the SHSP it would also have no impacts related to designated farmland.
- (B) **Williamson Act.** The City and surrounding communities are fully urbanized, and no land is zoned for agricultural use. In addition, there is no land in the City under a Williamson Act contract (agricultural preserve). Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. The proposed Project is within the SHSP so it would also have no impacts related to agricultural preserves.
- (C) **Forest Zoning.** The City does not have any land zoned as forest land or timberland or timberland zoned as Timberland Production. Maps produced by the Forest and Range Assessment Project indicate that the planning area is in an urban area with no forest resources. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. Since the proposed Project is within the SHSP it would also have no impacts related to forest zoning.
- (D) **Loss of Forestland.** The Forest and Range Assessment Project indicates the City is in an urban area with no forest resources. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. The proposed Project is within the SHSP so it would also have no impacts related to loss of forestland.
- (E) **Conversion of Land.** Sub-sections A through D above indicate the City and SHSP area contain no agricultural or forest resources. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. The proposed Project is within the SHSP so it would have no impacts related to agriculture or forestland.

There are no agricultural or forest related resources in or near the Project area or the City of El Segundo. Therefore, the Project will have no impacts relative these resources. This conclusion is consistent with those of the SHSP Program EIR.

**4.3 Air Quality**

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

- (A) **Conflict with AQMP.** The EIR demonstrated that implementation of the SHSP would not exceed the growth assumptions contained in the 2016 Air Quality Management Plan (AQMP)(DEIR Table 6-6). The SHSP also outlined actions to reduce travel, increase expand shuttle and bus service, and increase bicycle and pedestrian connectivity, so the SHSP would support AQMP objectives to reduce trips and would aid in the implementation of the AQMP. The SHSP would provide an increased job density and new employment opportunities for residents who could reduce regional commute trips. The EIR concluded the SHSP would not result in a localized Carbon Monoxide (CO) hotspot and would not cause or contribute to an existing or projected air quality violation. For these reasons, the EIR determined the SHSP would have a less than significant impact and no mitigation was required.

The proposed Project would result in new development (242,878 square feet per previous Table 2) that is within the overall growth limits of the SHSP, however, it does exceed the maximum square footage allowance for the property by approximately 26.4 percent based on FAR limits in the SHSP. Even though the Project is more intense than allowed under the SHSP on these sites, it is still within the overall growth projections for the SHSP, so it is consistent with the AQMP.

- (B) **Cumulative Increase in Air Pollution.** Project impacts include construction, operation, CO hotspots, and cumulative emissions. The EIR evaluated construction impacts and found that the maximum daily emissions estimated under the SHSP would not exceed the SCAQMD's regional pollutant thresholds for all pollutants (EIR Table 6-9) or the SCAQMD's recommended local significance thresholds (LSTs) for this area (DEIR Table 6-10). This conclusion was based on a maximum amount of construction estimated per day.

The EIR also evaluated air emission related to Project operation and found the maximum daily emissions from operation of uses within the SHSP would not exceed the SCAQMD's regional pollutant thresholds for all pollutants (DEIR Table 6-12) or LSTs for this area (DEIR Table 6-13). The EIR also concluded the SHSP would not result cause or contribute to carbon monoxide (CO) concentrations that exceed State or federal ambient air quality standards for CO.

The EIR found the SHSP would not exceed the SCAQMD's regional pollutant thresholds for all pollutants (DEIR Table 6-9) or the SCAQMD's recommended local significance thresholds (LSTs) for this area (DEIR Table 6-10). This conclusion was based on a maximum amount of construction estimated per day, so even though the Project is more intense than that evaluated under the SHSP EIR, the conclusions regarding construction emissions and LST impacts would remain similar to those of the EIR and would not violate any air quality standards with implementation of SCAQMD regulatory compliance.

The air local basin is designated non-attainment for State and/or federal standards for ozone, PM10, and PM2.5, Particulate Matter less than 10 microns and 2.5 microns, respectively. As outlined above, the SHSP would not result in construction or operational emissions of criteria air pollutants that exceed SCAQMD thresholds. The SCAQMD considers projects that result in emissions that do not exceed its CEQA significance thresholds to not result in cumulatively considerable impacts. Since the SHSP would not exceed any SCAQMD CEQA significance thresholds, the EIR concluded it would not result in any significant cumulative air quality impacts and no mitigation was required.

Development of the Project would not exceed the SCAQMD's daily thresholds so it would not have a cumulatively considerable impact on the region. The Project proposes 49,501 square feet more than allowed under the SHSP and is 47 percent of the net 517,094 square feet planned at buildout of the SHSP (242,878/517,094). Even though the daily operational emissions of the SHSP will be slightly increased with additional office uses, the proposed Project is still under the growth projections for the SHSP and the daily operational emissions would still not exceed the SCAQMD's daily significance thresholds.

- (C) **Sensitive Receptors.** The EIR indicated the SHSP would generate long-term emissions primarily associated with area and mobile sources that would combust natural gas or gasoline and which are not a source of diesel particulate matter (DPM) which is considered a toxic air contaminant (TAC). The EIR evaluated health risks of development based on the SCAQMD's screening LST thresholds. The EIR concluded that emissions of operations-related criteria air pollutants would be below SCAQMD LSTs and so would not

result in substantial pollutant concentrations (DEIR Table 6-13). Therefore, the EIR determined the SHSP would have less than significant impacts and no mitigation was required. The proposed offices of the Project do not utilize diesel trucks and do not generate TACs or other emissions that would harm local sensitive receptors (i.e., residences) so there would be no significant impacts.

- (D) **Other Emissions.** According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The SHSP does not include sources of other pollutants of concern to the SCAQMD including those that create odors. The only such source in the area is the Chevron El Segundo refinery located within 500 feet of the planning area. While odors do not present a health risk of themselves, they are often considered a nuisance by people who live, work, or otherwise are located near outdoor odor sources. Odor controls are routinely established by cities, on a case-by-case basis, during the development project review/entitlement process, based on the unique characteristics of the specific development proposal. Based on the types of uses proposed, the EIR concluded the SHSP would have a less than significant impact and no mitigation was required. The proposed office uses of the Project would not generate substantial odors or other pollutants that might affect a substantial number of persons, so its impacts are also less than significant.

Similar to the conclusion of the EIR for the entire SHSP, all air quality-related impacts of the Project will be less than significant, and no mitigation is required. This conclusion is consistent with those of the SHSP Program EIR.

#### 4.4 Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

D) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

(A) **Listed or Sensitive Species.** The EIR stated the City was highly urban and developed and did not support special-status species, riparian habitat or other sensitive habitats, or wetlands and thus no suitable habitat for special-status species exists. No additional species that reside in the City or SHSP area have been listed since the EIR was certified. Similarly, the SHSP area was almost entirely paved and developed with buildings and streets, with vegetation limited to small areas occupied by street trees, and public and private landscaped areas occupied by ornamental trees, shrubs, and lawns. The only water body was a concrete-lined flood control basin that did not support vegetation or habitat for special-status species. Therefore, the SHSP would have no impact on special-status species, sensitive habitats, or wetlands. However, all birds and their nests are protected by the federal Migratory Bird Treaty Act and/or the California Fish and Game Code. The SHSP could impact nesting birds if tree removal, trimming, or construction activities permitted within the plan area in association with a development project include the removal or trimming of trees with bird nests, or disturbance near nests leading to nest abandonment during the nesting season. The EIR conclude that with implementation of Mitigation Measures 7-1 and 7-2 impacts to nesting birds would be less than significant.

The Project site(s) contain no native vegetation or habitat for listed or otherwise sensitive species, although there are a number of street trees and landscaping at present and proposed as part of development of the Project. Construction work during the bird nesting season (February 1 to August 31) may impact protected birds so the proposed Project must implement Mitigation Measures 7-1 and 7-2 as outlined below.

**Mitigation Measure 7-1:** To avoid impacts to nesting birds, construction activities and construction noise should occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occurs within the avian nesting season (during the period from February 1 to September 1), areas within 100 feet of a development site shall be thoroughly surveyed for the presence of nests by a qualified biologist no more than five days before commencement of any vegetation removal. If it is determined that the Project Site is occupied by nesting birds covered under the Migratory Bird Treaty Act, mitigation measure 7-2 shall apply.

**Mitigation Measure 7-2:** If pre-construction nesting bird surveys result in the location of active nests, no grading, vegetation removal, or heavy equipment activity shall take place within an appropriate setback from occupied nests as determined by a qualified biologist. Protective measures (e.g., established setbacks) shall be required to ensure compliance with the Migratory Bird Treaty Act and California Fish and Game Code requirements. The qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts occur. A report of the findings, prepared by a qualified biologist, shall be submitted to the CDFW prior

to construction-related activities that have the potential to disturb any active nests during the nesting season.

- (B) **Riparian or Sensitive Habitat.** As outlined in sub-section A above, the City and surrounding communities are fully urbanized and there is no natural drainages or channels within the SHSP area and thus no riparian resources. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. Since the proposed Project is within the SHSP, it also has no riparian resources or sensitive habitat, so it has no impacts in this regard.
- (C) **Wetlands.** As outlined in sub-section A above, the City and surrounding communities are fully urbanized and there is no natural drainages, channels, or wetlands within the SHSP area. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. The Project is part of the SHSP area and likewise contains no wetlands, so there are no impacts.
- (D) **Wildlife Movement.** The EIR stated no established wildlife movement corridors or nursery sites occurred in or near the City and wildlife movement in the area is severely limited by urban development. Additional dense development and the Los Angeles International Airport are located to the north, the Chevron refinery is to the south, dense commercial and office development are to the east, and dense residential development to the west. Urban parks and schools in the vicinity have lawns and trees, but they are small and isolated from other vegetated areas by surrounding development. Therefore, the EIR concluded the SHSP would have no impact on wildlife movement or nursery sites and no mitigation was required. Similarly, the Project has no resources that would contribute to wildlife movement so there are no impacts.
- (E) **Local Policies.** The SHSP would permit new development or activities such as the removal or maintenance of certain street trees protected by the El Segundo Street Tree Ordinance (Municipal Code Title 9, Chapter 3 Street Trees). The EIR stated that public projects would be governed by criteria in the ordinance, and private persons would be required to obtain a permit and replace removed street trees pursuant to the ordinance. Thus, the SHSP would have no impact regarding conflicts with local policies or ordinances protecting biological resources and no mitigation was required. The Project will comply with the City Street Tree Ordinance so there are no impacts to street trees (threshold E). There are still no habitat conservation plans that affect the SHSP so there are no impacts.
- (E) **Habitat Conservation Plans.** The EIR indicated there were no established Habitat Conservation Plans or Natural Community Conservation Plans within or adjacent to the SHSP. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. There are no HCPs or NCCPs that affect the Project since it is part of the SHSP so there are no impacts.

The Project site contains no natural habitat, drainages, wetlands, sensitive plants or animals, or other important biological resources. With implementation of Mitigation Measures 7-1 and 7-2, all impacts to biological resources will be reduced to less than significant levels. This conclusion is consistent with those of the SHSP Program EIR.

**4.5 Cultural and Tribal Resources**

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
B) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape, that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (1) Listed or eligible for listing in the California Register of Historic Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k), or (ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

(A) **Historical Resources.** The EIR indicated that no federal or State designated historic resources occurred and the City had not designated any local historic resources within the SHSP area. Some buildings within the Plan area were over 50 years in age and may have the potential to be considered as a historic resource if they meet local, state, or national criteria for inclusion on a historic register. Any work on a building or structure that meets the criteria to be considered a historic resource could result in significant impact under CEQA if proper treatment does not occur. However, the EIR concluded that implementation of Mitigation Measure 8-1 would reduce this potential impact to a less than significant level.

**Mitigation Measure 8-1:** Prior to issuing any permit for demolition or redevelopment of a building in the Specific Plan area that is 50 years old or greater, an assessment of the building must take place by a person who meets the Secretary of the Interior’s Professional Qualifications and Standards for history, architectural history, architecture, or historic architecture to assess if it meets the criteria for inclusion on a historic register. If a building meets the criteria for inclusion on the California or National registers, the City will have to prepare and file a completed DPR 523 form with the South Central Coastal Information

Center and the California Office of Historic Preservation, and the building will be treated as a historic resource under CEQA, subject to all regulations that relate to the treatment of historic resources.

An historical assessment of the five existing buildings on the proposed Project site was conducted in April 2019 by Michael Baker International (see Appendix C). The assessment concluded that none of the buildings would be eligible for listing in the California Register under Criteria 1, 2, 3, and 4 due to lack of association with a historic context. Additionally, the resources were evaluated in accordance with Section 15064.5(a)(2)–(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code, and they are not historical resources for the purposes of CEQA. Therefore, impacts to historic resources will be less than significant and the Project does not have to implement Mitigation Measure 8-1.

- (B) **Archaeological Resources.** The City and surrounding communities are fully urbanized, but the Los Angeles area was used extensively by prehistoric Native American Tribes, as well as Spanish explorers and settlers and later colonization. Although resources are likely to have been destroyed by prior development, it is possible that archaeological resources exist beneath the surface. Contact with such resources during construction activities could result in significant impacts. The EIR concluded that with implementation of Mitigation Measures 8-2 and 8-3, potential impacts to archaeological resources would be reduced to less than significant levels.

The Project proposed represents a small portion of the overall SHSP site (5.2 acres versus 120 acres or 4 percent), however, grading may disturb previously undisturbed archaeological resources. Implementation of Mitigation Measures 8-2 and 8-3 outlined below will also reduce its potential impacts on archaeological resources to less than significant levels.

**Mitigation Measure 8-2:** Prior to the commencement of grading or demolition of subsurface structures, a professional archaeologist who meets U.S. Secretary of the Interior’s Professional Qualifications and Standards, shall conduct a brief archaeological and paleontological informational session for construction personnel. The training session may consist of an in-person meeting or a written handout describing: (1) how to identify archaeological and paleontological resources that may be encountered during earth-moving activities and (2) the procedures to be followed in such an event, including contact information for the appropriate entities if archaeological or paleontological resources are discovered.

**Mitigation Measure 8-3:** In the event that archaeological or paleontological resources are unearthed during ground-disturbing activities, the ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find, where construction activities will not be allowed to continue until a qualified archaeologist or paleontologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Work shall be allowed to continue outside the buffer area. If the archaeologist identifies the find as a tribal cultural resource or suspects it to be a tribal cultural resource, the City will contact the Native American Heritage Commission (NAHC) to report the discovery and will contact local Native American tribal representatives as directed by the NAHC. Should the newly discovered artifact(s) be determined to be a tribal cultural resource, Native American construction monitoring will be initiated. The City shall coordinate with the archaeologist and tribal representative(s) to develop an appropriate treatment plan for the resources.

- (C) **Human Remains.** The EIR indicated the potential for the discovery of human remains was low as there were no recorded cemeteries or other burial places within the SHSP area. Prior development would have very likely discovered human remains during construction work if they were present. The EIR concluded that if human remains are discovered during grading, adherence to existing regulations of the State Health and Safety Code and the Public Resources Code would be sufficient to safeguard human remains. Therefore, the EIR concluded impacts were less than significant and no mitigation was required. While the potential for finding human remains during grading on the Project site is low, compliance with established health and safety regulations will reduce potential impacts to less than significant levels and no mitigation is required.
- (D) **Tribal Cultural Resources.** It is known that the Tongva and Chumash Native American tribes inhabited this area, but it is likely that prior development has likely destroyed any artifacts if they were present. The

Project site and surrounding area have not been identified as a significant resource or part of a cultural landscape by any local tribes. However, the potential remains for discovery of Native American tribal resources and contact with such resources during construction activities could result in significant impacts. The EIR conclude that implementation of Mitigation Measures 8-2 and 8-3 would reduce impacts to less than significant levels. Grading of the Project site may disturb previously undisturbed tribal cultural resources, but implementation of Mitigation Measures 8-2 and 8-3 outlined above will reduce potential impacts to less than significant levels.

As part of the SHSP, the proposed Project has the potential to disturb cultural and paleontological resources during grading. With implementation of Mitigation Measures 8-1 through 8-3, all impacts to these resources will be reduced to less than significant levels. This conclusion is consistent with those of the SHSP Program EIR.

### 4.6 Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

E) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

(A) **Faults and Seismic Shaking.** The EIR indicates there are no active faults on or adjacent to the site (A.i), but the SHSP area could experience strong seismic ground shaking and related effects in the event of an earthquake on one of the identified active or potentially active faults in the region (DEIR Table 9-1). The EIR stated that project compliance with the stringent seismic design provisions of the latest California State Building Code, as adopted by the City, would reduce the risk of property loss or hazards to occupants to a less than significant level and no mitigation was required (A.ii). Any potential for earthquake-induced onsite differential settlement, liquefaction, lateral spreading, and subsidence, and associated damage to proposed buildings or other improvements would continue to be addressed through implementation of City-required geotechnical investigations and associated engineering design standards, specifications, and measures to address specific concerns as future site-specific project designs are proposed (A.iii). The SHSP area is flat with no nearby uplands so there is no risk or impacts from landslides (A.iv). Therefore, the EIR determined the SHSP would have less than significant impacts and no mitigation was required.

The Project site is part of the SHSP area, and no geologic or soil conditions beneath the SHSP or Project site have changed since the SHSP EIR was certified. New projects must prepare a site-specific geotechnical report to identify potential geologic and soil constraints for proposed development. The report must evaluate potential risks from seismic ground failure, strong seismic shaking, differential settlement, liquefaction, lateral spreading, and subsidence, and landslides.

(B) **Erosion.** The EIR stated that grading and construction activities in the SHSP may result in minor erosion or the minor loss of some topsoil but standard grading and construction-period erosion control techniques (e.g., for reducing surface water runoff over exposed soil) would mitigate this potential impact to a less than significant level and no mitigation was required. Like any development within the SHSP, the proposed Project will implement standard erosion control measures during construction and operation so it will also have less than significant impacts related to erosion with implementation of standard regulatory compliance.

(C) **Unstable Geologic Unit.** The EIR did not identify any unstable geologic formations beneath the SHSP area that could contribute to landslides, lateral spreading, subsidence, liquefaction, or soil collapse. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. Since the Project is within the SHSP, it also would have no constraints relative to unstable geologic units.

(D) **Expansive Soils.** The EIR did not indicate the SHSP contained any expansive soils and future projects are required to have geotechnical studies to identify potential geologic and soil hazards. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. The Project site is within the SHSP so it would also have no impacts related to expansive soils.

(E) **Septic Systems.** New development within the SHSP will utilize piped wastewater collection and treatment systems so there will be no impacts related to soils that would not be able to support septic systems. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. The Project site is within the SHSP so it would also have no impacts related to septic tanks and soil limitations.

(F) **Paleontological Resources.** The EIR stated there was no indication of unique paleontological resources within the SHSP area but it was possible that subsurface native soils could contain fossilized remains. Previous development activity has disturbed soils, and only grading that extends deeper than prior disturbance is likely to encounter fossilized resources. Contact with such resources during construction

activities could result in significant impacts. The EIR concluded that implementation of Mitigation Measures 8-2 and 8-3 would reduce potential impacts to less than significant levels. As part of the SHSP, the Project would have similar impacts and require similar mitigation as identified in the EIR.

The proposed Project would either have no impacts or less than significant impacts related to geologic and soil constraints with implementation of standard grading, dust control, and erosion control measures as existing regulatory compliance and no mitigation is required. This conclusion is consistent with those of the SHSP Program EIR.

#### 4.7 Greenhouse Gas Emissions and Energy Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Result in potentially significant environmental impact due to wasteful inefficient, or unnecessary consumption of energy resources during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Proposed Project in relation to SHSP Program EIR

(A) **Greenhouse Gases (GHG) Emissions.** The EIR evaluated the maximum GHG emissions from demolition and construction activities under the SHSP using a “worst-case” annual scenario would be 421.3 MTCO<sub>2</sub>e. Cumulative construction GHG emissions would total 3,210.2 MTCO<sub>2</sub>e by 2035 and 4,213.3 MTCO<sub>2</sub>e by 2040. Average annual construction GHG emissions were estimated to be as high as 262.2 MTCO<sub>2</sub>e per year through 2035 (DEIR Table 10-4).

The EIR determined that total operational GHG emissions for 2035 would be 53,885.3 MTCO<sub>2</sub>e/year which is well in excess of established SCAQMD threshold (1,400 MTCO<sub>2</sub>e)(DEIR Table 10-6). In addition, EIR shows implementing the SHSP would result in an 882.5 MTCO<sub>2</sub>e increase in GHG emissions from existing conditions by 2035 (DEIR Table 10-6). The City’s General Plan and Energy Efficiency Climate Action Plan (EECAP) and the Smoky Hollow Specific Plan include feasible policies and measures that would lower GHG emissions within the planning area. These measures include energy audits, green building certification, water leak detection for plumbing fixtures, the installation of cool roofs, the use of recycled water, retrofit of inefficient HVAC equipment and water pumps, and incorporation of drought-tolerant landscaping. In addition, the City would evaluate existing structures and determine if retrofits were required to reduce the energy demand from the building (EECAP Measure 3.4: Promote or Require Commercial Energy Retrofits). New commercial developments would be required to comply with current Title 24 requirements at a minimum, and the City could require the application of additional features that would further increase the efficiency of the buildings (e.g, green building design and water efficiency measures consistent with EECAP Measures 4.1, 5.1, and 5.2). However, even with implementing all these various

policies and measures, GHG emissions from the SHSP would far exceed the SCAQMD's applicable thresholds in 2035 (18.1 versus 4.1 MTCO<sub>2e</sub> per capita) using the Plan Level Efficiency Per Capita Service Area Threshold suggested by SCAQMD (DEIR Table 10-6). Therefore, the EIR concluded that impacts from GHG emissions as a result of SHSP buildout would be significant even with implementation of all feasible mitigation.

As a part of the SHSP, the Project represents a proportional share of the total GHG emissions estimated for the entire SHSP although it should be noted the Project will be approximately 26.4 percent more intense than the maximum development that could be built on both sites under the SHSP. The Project represents 8.7 percent of the SHSP emissions based on total square feet (242,878 v. 2,973,910) or 39.7 percent based on net square feet (205,456 v. 517,094). Though the Project will be required to implement all applicable GHG reduction measures in the City's General Plan and EECAP as well as the CARB Scoping Plan, there would still be significant and unavoidable GHG emission impacts of the Project, even with implementation of EECAP Measures 4.1, 5.1, and 5.2 shown below.

**EECAP Measure 4.1:** *Encourage or Require Energy Efficiency Standards Exceeding Title 24.* City planners have a unique opportunity to inform developers of new energy efficiency opportunities and encourage them to adopt these technologies in new development. This measure will develop City staff to be resources in encouraging and implementing energy efficiency beyond that required by current Title 24 Standards. This will also ensure that as Title 24 Standards are updated, City staff are well-informed and can implement updates quickly and effectively.

**EECAP Measure 5.1:** *Promote or Require Water Efficiency through SBX7-7.* SB X7-7, or The Water Conservation Act of 2009, requires all water suppliers to increase water use efficiency. The legislation set an overall goal of reducing per capita urban water consumption by 20 percent from a baseline level by 2020. This goal can be met by taking a variety of actions, including targeted public outreach, and promoting water efficiency measures such as low-irrigation landscaping. Additional water conservation information, resource materials, education, and incentives are available through the West Basin Water District.

**EECAP Measure 5.2:** *Promote Water Efficiency Standards Exceeding SB X7-7.* In addition to SB X7-7, more actions are being studied or have been taken to exceed water efficiency standards. These efforts include education and outreach practices that could be combined with residential and commercial EECAP actions that emphasize the reuse of recycled/gray water and promote harvesting rainwater. Approximately 1,873 kWh can be saved for every acre foot (AF) of water use replaced by recycled water.

- (B) **GHG Plan Consistency.** The EIR found that the SHSP would not conflict with the California Air Resources Board (CARB) Scoping Plan, the Southern California Association of Governments (SCAG) 2019 Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS), or the City's EECAP so impacts in this regard would be less than significant and no mitigation was required. Since the Project is a part of SHSP, its impacts would also be less than significant (see related discussion of mitigation above).
- (C) **Energy Efficiency.** The EIR stated that energy would be consumed during both construction activity and in association with business operations. Energy in the form of gasoline and diesel fuel would be required during demolition and construction of new structures. The energy required for these activities is a necessary component of construction and would not be used in an inefficient manner. Overall, construction activities would occur over the next 20-25 years and the SHSP would encourage the adaptive reuse of structures. Although operation of businesses may increase energy usage compared to current conditions, the additional draw would not be inefficient or wasteful. The SHSP is located in close proximity to regional transit and has provisions for alternative transportation (e.g., pedestrian and bicycle infrastructure improvements), both of which would encourage the use of energy efficient transit (i.e., mass transit). Furthermore, compliance with City energy reduction and efficiency measures would ensure businesses do not waste energy or consume energy in an inefficient or unnecessary manner. The Project would be required to comply with established regulations and measures which would assure the Project will not waste energy or use energy in an inefficient manner. Impacts in this regard would be less than significant and no mitigation is required.

(D) **Energy Plan Compliance.** The EIR found that the SHSP would not conflict with the California Air Resources Board (CARB) Scoping Plan, the Southern California Association of Governments (SCAG) 2019 Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS), or the City’s EECAP as these plans relate to energy conservation and efficiency. As a part of the SHSP, the Project will be required to comply with these plans as well as the Title 14 Energy Conservation Standards of the CalGreen Code. Therefore, the Project is consistent with energy efficiency plans and impacts would be less than significant and no mitigation was required.

The Project will be required to implement all applicable GHG reduction measures in the City’s General Plan and EECAP as well as the CARB Scoping Plan, but there would still be significant and unavoidable GHG emission impacts of the Project. Compliance with established regulations and measures would assure the Project will not waste energy or use energy in an inefficient manner so impacts in this regard would be less than significant and no mitigation is required. These conclusions are consistent with the conclusions of the SHSP Program EIR.

### 4.8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
G) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
H) Expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

(A) **Hazardous Materials.** The EIR indicated SHSP land uses could utilize a range of hazardous materials for industrial process through routine maintenance, manufacturing, cleaning, etc. These are likely to include fuels, oils, lubricants, paints, acids, cleaning agents, etc. However, local businesses must comply with various Federal and State regulations for the safe management of such materials. The EIR concluded that implementation of the SHSP would result in an overall increase in the number of businesses within the district. However, with continued implementation of standard procedures and regulations the potential for associated hazardous materials impacts would be less than significant and no mitigation was required.

The Project is a part of the SHSP and proposes all office-related uses so the amount and type of hazardous materials that future uses would store, transport, or use would be minimal, and impacts would be less than significant, and no mitigation needed with standard regulatory compliance

(B) **Risk of Upset.** The EIR stated that current and future businesses within the SHSP would likely store hazardous materials, some of which would have the potential to be released in the event of an accident. While the number of new businesses may increase with implementation of the SHSP, it will emphasize offices over traditional heavier industrial and auto-repair related uses. Over the long term, the turnover in businesses could decrease the potential for upset due to a decrease in the levels of hazardous materials used within the SHSP. However, the EIR concluded that compliance with existing regulations and safety codes would guard against potential upset so impacts would be less than significant, and no mitigation was required.

As part of the SHSP, grading for the proposed Project may result in upset conditions if onsite soils contain hazardous materials. Governmental database records indicate there is a Cortese site southwest of Grand and Kansas, but records show it has already been remediated. However, the State Department of Toxic Substances Control (DTSC) is still monitoring this site so Project construction will be required to be coordinated with DTSC oversight and regulatory compliance. Therefore, impacts will be less than significant with regulatory compliance and no mitigation is required

(C) **Proximity to Schools.** The EIR stated that El Segundo Middle School was the only school within a quarter mile from the SHSP boundary (just north of E. Grand Avenue on Center Street). Businesses within the SHSP could use hazardous materials for industrial processes or cleaning, but any hazardous materials would be used in accordance with Federal and State regulations as well as local Fire Department requirements. Both Project sites are within a quarter mile of El Segundo Middle School but compliance with established regulatory requirements and the fact the Project has only office-related uses means that the Project will have less than significant impacts and no mitigation is required.

(D) **Cortese List.** The EIR indicated there were six sites within the SHSP area included on the State Cortese List (DEIR Table 11-1), however, being listed does not necessarily mean a site is a public health or safety hazard. Additionally, the El Segundo Chevron Refinery is immediately to the south across El Segundo Boulevard and is also on the Cortese List. The EIR stated that any future activities at Cortese List sites within the SHSP would be subject to site-specific mitigation protocols administered by DTSC and other jurisdictional

agencies in conformance with federal, State, regional, and local regulations. With compliance with existing regulations, the EIR indicated that impacts would be less than significant, and no mitigation was required.

The SHSP EIR indicated the South Site of the Project contains a Cortese- list site (Site #4 from DEIR Table 11-1) which contains the International Rectifier Corporation, located at 233 Kansas Street. Governmental database information indicates this site was subject to a Cleanup Program which is listed as “Completed Case Closed” by the Regional Water Quality Control Board. However, the State Department of Toxic Substances Control (DTSC) is still monitoring this site so Project construction will need to be coordinated with DTSC oversight and regulatory compliance.

- (E) **Airport Land Use Plan.** The EIR indicated the SHSP was outside the Airport Influence Area (AIA) for the Los Angeles International Airport (LAX) so the SHSP site is not addressed in the Comprehensive Land Use Plan (CLUP) for LAX. Therefore, the SHSP would not interfere with any airport land use plan or otherwise create an airport-related safety hazard and thus there were no impacts. The Project is part of the SHSP so similarly the Project would not interfere with any airport land use plans or activities.
- (F) **Private Airstrip.** The EIR indicated there were no private airstrips within two miles of the SHSP. Therefore, there would be no impacts in this regard. As a part of the SHSP, the Project would also not affect or be affected by any private airstrips.
- (G) **Emergency Plans.** The EIR stated that implementation of the SHSP would not interfere with the City’s adopted Emergency Operations Plan (EOP) because SHSP projects would be reviewed to ensure that new development would not create barriers to evacuation plans. In addition, the Fire Department and Police Department would be involved in any plans to convert existing two-way roads to one-way roads and implement angled parking to ensure emergency access needs can be met. Therefore, impacts would be less than significant, and no mitigation was required.

The Project site is located within the SHSP at the intersection of two major streets and the two site plans indicate they will have adequate emergency access (previous Exhibits 4A and 4B). Therefore, the Project will have less than significant impacts related to emergency plans.

- (H) **Wildfire Risks.** The EIR stated there were no wildlands in or adjacent to the SHSP. The City is a highly urbanized area and no part lies within a Very High Fire Hazard Severity Zone. Therefore, there were no impacts. Similarly, the Project site is not in a wildland are or a high or very high fire hazard severity zone.

The Project is within the SHSP and as such it either has no impact or less than significant impacts related to hazards, hazardous materials, or wildfires as outlined above.

**NOTE:** Because there is no risk of or from wildfires in or adjacent to the SHSP or the Project site, the specific questions under CEQA Checklist Section XX. Wildfire do not need to be addressed in this document. This conclusion is consistent with the conclusions of the SHSP Program EIR.

## 4.9 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
B) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation?			<input type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

(A) **Violate Water Quality Standards.** The EIR stated projects that disturb one or more acres of soil are required to obtain coverage under the General Construction Permit. Before the City issues grading permits, an applicant must prepare a Storm Water Pollution Prevention Plan (SWPPP) to control common pollutants such as suspended soil in storm water runoff from leaving the project area. The SWPPP would include an Erosion Control Plan (ECP) and appropriate Best Management Practices (BMPs). The EIR concluded that construction of SHSP projects would have a less than significant short-term impact on surface water quality and would not significantly impact the beneficial uses of receiving waters as long as they complied with National Pollution Discharge Elimination System (NPDES) and City Municipal Code requirements. Regarding long-term water quality impacts, SHSP Section 3.4 contains strategies to preserve existing open space on private and public property, create new open space in larger new developments, plant more street trees, and provide parklets that include planted areas in on-street parking lanes. The EIR determined these strategies will help to increase the amount of pervious surface area in the planning area and improve storm water filtration and retention. SHSP Section 3.6.3 (Stormwater Drainage) also states the City will require developers to integrate Low Impact Development (LID) strategies including site designs that maximize permeable surface cover and infiltration potential. With implementation of existing regulations and SHSP policies, the EIR concluded that short- and long-term water quality impacts would be less than significant, and no mitigation was required. Development of the proposed Project under the SHSP would be required to comply with the many federal and state laws and regulations regarding both short- and long-term water

quality of both surface and groundwater sources, so its impacts would also be less than significant, and no mitigation is required

- (B) **Groundwater Supplies.** The EIR stated the majority of the area was currently covered in impervious surfaces, and strategies and LID encouraged by the SHSP will eventually increase the amount of pervious surface area and thus groundwater recharge capabilities. The EIR stated that since groundwater was not used as a water supply source for the City, development under the SHSP would not result in the use of or deplete groundwater supplies or recharge. Therefore, both the SHSP and the Project (which is within the SHSP) would have no impacts on groundwater sources, supplies, or management plans and no mitigation was required.
- (C) **Alter Drainage Patterns.** The EIR stated that all new development will occur on properties already developed, and storm water and irrigation runoff will continue to drain into the City's existing curb and gutter system. The SHSP would not create any new drainage facilities or alter the courses of any existing drainage infrastructure, thus it would not create erosion, siltation, or flooding within or outside of the SHSP. The EIR also concluded the SHSP would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Compliance with state and local regulations for new development would improve storm water retention and quality. Therefore, impacts would be less than significant, and no mitigation was required. Development of the proposed Project within the SHSP would be required to comply with the many federal and state laws and regulations regarding both short- and long-term water quality so its water quality impacts would also be less than significant, and no mitigation is required

The EIR concluded the SHSP would not create any new drainage facilities or alter the courses of any existing drainage infrastructure. As a part of the SHSP, the Project would also not alter existing drainage patterns or infrastructure so impacts would be less than significant, and no mitigation is required.

The EIR stated the SHSP would not create any new drainage facilities or alter the courses of any existing drainage infrastructure, thus it would not create erosion, siltation, or flooding within or outside of the SHSP. The EIR also concluded the SHSP would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. This conclusion similarly applies to the proposed Project. Therefore, impacts would be less than significant, and no mitigation was required.

The EIR stated the SHSP would not create erosion, siltation, or flooding within or outside of the SHSP. The EIR also concluded the SHSP would not provide substantial additional sources of polluted runoff. Therefore, impacts would be less than significant, and no mitigation was required.

The EIR stated the SHSP was not within a 100-year flood hazard area so the SHSP would not place housing or structures within a 100-year flood hazard area. Therefore, development of the Project site or the larger SHSP area would not alter or impede flood flows and thus would have no impacts in this regard, and no mitigation was required.

- (D) **Other Water-Related Pollution.** The EIR concluded that, due to the location and physical characteristics of the City, the SHSP would have less than significant impacts with respect to seiches, tsunamis, or mudflows. Since there are no impacts, there would be no opportunity for additional polluted runoff from these sources. Therefore, there are no impacts and no mitigation is required. The Project is part of the SHSP so its impacts in this regard would be the same.
- (E) **Groundwater Management.** The EIR stated the majority of the area was currently covered in impervious surfaces, and strategies and LID encouraged by the SHSP will eventually increase the amount of pervious surface area and thus groundwater recharge capabilities. The EIR stated that since groundwater was not used as a water supply source for the City, development under the SHSP would not result in the use of or deplete groundwater supplies or recharge. Therefore, both the SHSP and the Project which is within the SHSP would have no impacts on groundwater management planning or plans and no mitigation was required.

The Project site conditions are included in those described in the EIR relative to hydrology, flooding, and water quality. Development under the proposed Project would be required to comply with the many federal and state laws and regulations regarding both short- and long-term water quality so either no impacts or less than significant impacts are expected, and no mitigation is required. These conclusions are consistent with the conclusions of the SHSP Program EIR.

### 4.10 Land Use and Planning

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Proposed Project in relation to SHSP Program EIR

(A) **Divide Neighborhoods.** The EIR stated that future development activity in the SHSP would not disrupt or divide the physical arrangement of the community due to its location and the types of land uses within and adjacent to the SHSP. Development in the SHSP would result in a modest intensification of land uses but would not alter the existing pattern of land use nor create any physical divisions within the SHSP. Therefore, the EIR determined the SHSP would have no impact and no mitigation was required. The Project site is already developed with buildings and surface parking. Development of the two Project site properties would not interfere or divide any existing neighborhoods so there are no impacts.

(B) **Conflict with Applicable Plans.** The EIR stated that implementation of the SHSO would eventually shift land uses from industrial to offices and related uses (DEIR Table 13-2). The EIR concluded that policies, standards, and regulations outlined in the SHSP were consistent with existing City regulations and would not conflict with existing City General Plan policies. SCAG’s RTP/SCS outlines goals for guiding the development of local land uses as “smart growth”. The EIR explains how the SHSP meets the SCAG goals (DEIR Table 13-3). The EIR concluded that the SHSP was consistent with applicable land use plans and goals. Impacts in this regard are therefore less than significant and no mitigation was required.

The Project is a part of the planned development under the SHSP. The Project proposes a net total of 205,456 square feet of development compared to the 517,094 total net square feet proposed under the SHSP. The proposed Project is therefore consistent with the growth limits allowed by the SHSP. The Project is also consistent with the various land use-related plans evaluated in the EIR which have not changed substantially since the EIR was certified in 2018. Therefore, impacts related to land use plans are less than significant and no mitigation is required.

The Project is consistent with the various land use-related plans evaluated in the EIR which have not changed substantially since the EIR was certified in 2018. Therefore, impacts related to land use plans are less than significant and no mitigation is required. This conclusion is consistent with those of the SHSP Program EIR.

### 4.11 Mineral Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

- (A) **Designated Mineral Resources.** The EIR stated that the entire City was within the El Segundo Oil Field. From 1935 to 1987, 76 wells were drilled in this field, and it produced over 13.6 million barrels of oil. While there are several wells still operating in the City, there are no oil wells in operation within the SHSP area. The City is also in the San Fernando Valley Production-Consumption Region and is classified as Mineral Resources Zone 3 (MRZ-3). This classification is defined as “Areas containing mineral deposits the significance of which cannot be evaluated from available data”. The EIR noted that the City is already highly urbanized and does not have any other known mineral resources. Therefore, the EIR determined the SHSP would have less than significant impacts and no mitigation was required. As part of the SHSP area, the Project site does not contain identified mineral resources either at a state level or local level that can be reasonably extracted given existing onsite and surrounding land uses. Therefore, impacts regarding mineral resources are less than significant and no mitigation is required
- (B) **Local Mineral Designations.** The EIR noted that the SHSP site has no zoning designation or general plan land use designation for mineral resource extraction, and the surrounding area is developed with a variety of urban uses so mineral extraction would not be possible. Therefore, the EIR concluded the SHSP would have less than significant impacts related to local mineral resources and no mitigation was required. Since the Project is within the SHSP the conclusions of the EIR in this regard apply as well to the Project site.

The Project site does not contain identified mineral resources either at a state level or local level that can be reasonably extracted given existing onsite and surrounding land uses. Therefore, impacts regarding mineral resources are less than significant and no mitigation is required. This conclusion is consistent with those of the SHSP Program EIR.

## 4.12 Noise

Would the project result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) For a project located within the vicinity of a private airstrip or an airport land use plan, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Proposed Project in relation to SHSP Program EIR

(A) **Noise Exceeds Standards.** Detailed traffic and noise studies were prepared for the SHSP as part of the EIR process to evaluate the potential future increases in traffic-related noise levels associated with SHSP build-out. The noise study looked at 44 separate roadway segments for potential noise impacts. The EIR determined that implementation of the SHSP would result in a worst-case increase in traffic-related day-night average sound level (Ldn) of 6.5 decibels (dBA) on Maryland Street south of Franklin Avenue which supports mainly of commercial and industrial uses. The anticipated 6.5 dBA Ldn increase would not exceed the ambient plus 8 dBA standard established by the Municipal Code. However, from a CEQA perspective any direct Project-related increase in noise levels of 5dBA in urban areas or more is considered a significant noise impact. The EIR identified five roadway segments anticipated to have noise level increases greater than or equal to 5 dBA Ldn (DEIR Table 15-7). These roadway segments are: (1) Franklin Avenue from Lomita Street to Maryland Street (ID 31); (2) Maryland Street, north of Franklin Avenue (ID 32); (3) Maryland Street, south of Franklin Avenue (ID 33); (4) Franklin Avenue from Maryland Street to Oregon Street (ID 34); and (5) Franklin Avenue, east of Oregon Street (ID 37). It should be noted none of the above roadway segments identified are adjacent to existing residential development.

The EIR demonstrated that, existing and future development within the SHSP would not be subject to incompatible noise levels (DEIR Table 15-7). However, traffic-related noise levels along two roadway segments both on Sepulveda Boulevard and outside the SHSP area may approach or exceed the City's General Plan 75 Ldn compatibility standard for commercial and industrial land uses as follows:

1. Traffic noise levels along Sepulveda Boulevard north of Grand Avenue will increase from 74.1 Ldn under existing conditions to 75.1 Ldn under future build-out conditions. This roadway segment is generally bordered by existing commercial land uses that are not part of the SHSP.
2. Traffic noise levels along Sepulveda Boulevard south of El Segundo Boulevard will increase from 74.6 Ldn under existing conditions to 75.4 under future build-out conditions. This roadway segment is generally bordered by commercial and industrial facilities, including parts of the Chevron Refinery, and a golf course all of which are outside of the SHSP.

Although future development projects may be able to reduce actual future noise levels, the EIR determined that no feasible mitigation was available that could demonstrate noise reductions to within City noise standards. Since a reduction in vehicle trips cannot be guaranteed, traffic noise levels along modeled segments of Sepulveda Boulevard would exceed the City's exterior compatibility standard. Therefore, the EIR concluded these impacts were **significant and unavoidable**.

The Project site is within the SHSP and was covered by the noise study prepared for the entire specific plan area. The proposed development is well within the overall growth parameters established by the SHSP per land use (i.e., Project will provide a net of 205,456 square feet of new office space compared to a net total of 1,213,251 square feet of new office space under SHSP buildout, so the Project represents 16.8 percent of the planned office growth of the SHSP. However, the Project is 26.4 percent more intense than the maximum development that would be allowed on this site under the SHSP (205,456 allowed v. 242,878 square feet proposed). The only Project improvement close to a residential use is the parking structure proposed on the North site which is adjacent to residential uses on Kansas Street and Holly Avenue. It should be noted the Project would not add a substantial amount of traffic to the roadways that were identified by the SHSP noise study as having a potential for significant noise impacts (those roadways had adjacent residential uses). Noise from Project traffic will be incrementally higher than originally identified in the SHSP EIR and long-term noise and vibration impacts will also be **significant and unavoidable** as outlined in the EIR.

- (B) **Excessive Vibration.** The EIR indicated specific vibration levels associated with construction of a specific project depend on the distance and intensity of the equipment used (DEIR Table 15-6). The EIR determined that residential land uses adjoining roadway and intersection improvement projects would not be subject to distinctly perceptible vibration levels over extended periods of time. Therefore, the EIR concluded the SHSP would have less than significant impacts and no mitigation was required. The Project is within the SHSP so it would similarly have less than significant vibration impacts.

number of project-specific factors that are not known at this time (2018), including proximity to sensitive land uses, time of day construction activities are occurring, intervening barriers, construction intensity (e.g.,

- (C) **Airport/Airstrip Noise.** The EIR indicated the SHSP was outside the Airport Influence Area (AIA) for the Los Angeles International Airport (LAX) so the SHSP site is not addressed in the Comprehensive Land Use Plan (CLUP) for LAX. Therefore, the SHSP would not be impacted by airport noise so there are no impacts and no mitigation was required. The Project is part of the SHSP so the conclusions regarding airport impacts apply to the Project as well. In addition, the EIR indicated there were no private airstrips within two miles of the SHSP (including the proposed Project site). Therefore, there would be no impacts in this regard.

Noise from Project traffic will be incrementally higher than originally identified in the SHSP EIR and impacts are expected to be significant. The only Project-related improvement adjacent to any residential uses is the parking structure on the North site. Implementation of standard regulatory compliance will help assure construction noise and vibration impacts will be maintained at less than significant levels. In addition, the Project will not be affected by noise from any airport or airstrip so there are no impacts and no mitigation required. These conclusions are consistent with those of the SHSP Program EIR.

**4.13 Population and Housing**

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

(A) **Induce Population Growth.** The EIR stated the only new residential dwellings allowed in the SHSP were up to six new caretaker units which would only generate 18 residents in the City. This small amount of population growth is readily accommodated under both the SCAG 2040 projection and City General Plan Buildout forecast. Implementation of the SHSP would also generate an estimated 951 additional jobs which could result in an increase in population within the City and adjoining areas as future employees and their families relocate to areas closer to their jobs. Since it is not residential in nature, the EIR determined the SHSP would have less than significant impacts on the City’s future population and housing growth and no mitigation was required.

The site plans for the two proposed Project sites show only office uses and no caretaker units are planned, so there will be no direct growth impacts related to population or housing. However, the additional 205,456 net square feet of office uses to be developed by the Project may result in some amount of indirect or induced housing and/or population growth to the degree that new Project residents choose to buy a house or rent an apartment and move into the City. The EIR examined the potential impacts to the City-wide housing stock and indicated there were sufficient vacant homes or multi-family units such that the SHSP would not have significant impacts on housing in the City. Conversely, the Project is not expected to result in the displacement of any existing City residents (population) or housing by its development. Therefore, potential impacts are considered to be less than significant, and no mitigation is required

(B) **Displace Housing.** The EIR noted the SHSP did not contain any provisions authorizing eminent domain of residential properties by either the City or other jurisdictions. Infrastructure, roadway, open space, and other public improvements proposed under the SHSP would not require the displacement of housing. Over time, existing residential units may be voluntarily replaced by non-residential uses by owners in accordance with SHSP provisions regarding allowable land uses. However, it would neither require nor encourage the displacement of existing housing. The EIR determined the SHSP would have less than significant impacts relative to displacement of housing and no mitigation was required. Since the Project is part of the SHSP, the same conclusion would apply to the proposed Project as well.

The additional 205,456 net square feet of office uses to be developed by the Project may result in some amount of indirect or induced housing and/or population growth to the degree that new Project residents choose to buy a house or rent an apartment and move into the City. However, the Project is not expected to result in the displacement of any existing City residents (population) or housing by its development. Therefore, potential impacts are considered to be less than significant, and no mitigation is required. This conclusion is consistent with those of the SHSP Program EIR.

### 4.14 Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A)	Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B)	Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C)	Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D)	Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E)	Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Proposed Project in relation to SHSP Program EIR

- (A) **Fire Protection.** The EIR stated that future development under the SHSP would incrementally increase demand on fire protection and emergency medical services provided by the City Fire Department (CFD). The CFD reviews its facilities and operations annually and any changes are based on population and housing growth. The CFD would review all future development within the SHSP to assure it can continue to provide adequate fire protection services. In 2018 the ratio for operational protection/EMS personnel was one fire fighter per 1,026 population. The EIR concluded the SHSP would increase the population by 18 persons which would cause a 0.1 percent increase in the service ratio. The EIR also concluded that demand for protection/EMS personnel or equipment from the SHSP would not exceed the current CFD operation standards. In addition, proposed construction would be subject to City Development Impact Fees (DIF) for fire protection and EMS facilities. The CFD indicated the SHSP would not result in any significant impacts to CFD staff or facilities. The DIF would offset additional incremental demand for services created by new and/or more intense development. The EIR determined the SHSP would have less than significant impacts on fire protection services and no mitigation was required.
- (B) **Police Protection.** The EIR stated that future development under the SHSP would incrementally increase demand on police protection services provided by the City Police Department (CPD). The CPD reviews its facilities and operations annually and any changes are based on population and housing growth. The CPD would review all future development within the SHSP to assure it can continue to provide adequate protection services. In 2018 the ratio for operational protection personnel was one sworn officer per 241 population. The EIR concluded the SHSP would incrementally increase the population but also increase the number of employees in the City which would incrementally increase in the CPD service ratio. The EIR also concluded that demand for police protection personnel or equipment from the SHSP would not exceed the current CPD operation standards. In addition, proposed construction would be subject to City Development Impact Fees (DIF) for police protection. The CPD indicated the SHSP would not result in any significant impacts to CPD staff or facilities. The DIF would offset additional incremental demand for services created by new and/or more intense development. The EIR determined the SHSP would have less than significant impacts on police protection services and no mitigation was required.
- (C) **Schools.** The EIR noted the SHSP would result in intensified commercial and industrial uses. No schools are located within the Smoky Hollow Specific Plan area boundaries. Residential uses within SHSP area are limited and the only new residential uses allowed would be caretaker units. Under state law, the payment of school impact fees is considered full project mitigation under CEQA. The EIR concluded that construction of new schools or alteration to existing school facilities would not result from with implementation of the SHSP. The EIR determined the SHSP would have no impacts on school facilities or services no mitigation

was required with payment of applicable school impact fees. The Project is part of the SHSP so it would also have no school impacts.

- (D) **Parks.** The EIR first noted the SHSP would not result in conversion of parks or recreational facilities within City. The SHSP would intensify existing land uses within its boundaries by allowing for an additional 517,094 square feet of buildable area as well as approximately six new residential (caretaker) units. As a result, existing public parks and other recreational facilities may experience incremental increased use. The proposed commercial and industrial uses allowed would be subject to development impact fees (DIF) that would offset the incremental increase in demand for parks and recreational facilities. The DIF revenues are used for operation and maintenance of existing parks and recreational facilities citywide. Lastly, the proposed project identifies design standards that encourage existing commercial and industrial tenants to provide access to recreational facilities by providing streetscapes and pedestrian walkways for residents and employers to use. The EIR determined the SHSP would have no impacts on parks and recreational services and no mitigation was required. The Project is part of the SHSP so it would also have no impacts on parks or recreation.
- (E) **Other Public Services.** The EIR did not anticipate significant additional impacts on other public facilities, including the El Segundo Public Library, due to the nature of the SHSP (i.e., non-residential). The eventual adaptive reuse of existing structures and intensifying land uses could lead to an increase in the local daytime (employee) population some of whom may use library services. The incremental increase in demand that would occur from the 6 additional residences with implementation of the proposed project would be offset through payment of the Library Service fees. Non-residential development is not subject to the City of El Segundo Library Service fees because the fee study prepared to establish the library fee did not find a strong link between non-residential development and library service impacts. Therefore, impacts with respect to non-residential uses would be less than significant and no mitigation was required. Since the Project is non-residential and within the SHSP, it will have no impacts on other public services.

The Project will construct a net of 205,456 square feet of new office uses within the SHSP area which will incrementally increase the need for public services including fire and police but not measurably increase the need for school services or facilities, parks and recreational services, or other public services. The payment of Development Impact Fees (DIF) for police and fire services and park facilities will help offset the increased costs for these services from the new and rehabilitated land uses under the SHSP. The payment of school impact fees will help offset any minor school facility or service needs created by the SHSP. Increased property tax revenues and subventions will help offset any increased costs for other governmental services. The Project will have either be no impacts or less than significant impacts on public services and no mitigation is required. This conclusion is consistent with those of the SHSP Program EIR.

### 4.15 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

(A) **Increased Park Use.** The EIR stated the SHSP contained essentially no new residential development (only six caretaker units with a total of 18 residents) and was focused on non-residential development (primarily new commercial and office uses). These types of uses do not generate a substantial direct demand or regional or local park facilities or recreational services. However, to the degree the SHSP would induce or attract new residents and housing to the City, there may be a small indirect increase in the need for park facilities and services as the SHSP builds out. It should be noted that the proposed construction would be subject to City Development Impact Fees (DIF) for park facilities which would offset any incremental demand for local park facilities or services created by new and/or more intense development. The EIR determined the SHSP would have no impacts on any regional or local park facilities and no mitigation was required.

The Project is part of the SHSP and will construct new office uses which would only result in an incremental increase in the need for regional or local parks and recreational services. The City’s park DIF would offset any incremental increase in demand for local parks or services, so impacts in this regard are less than significant and no mitigation is required

(B) **Need for New Parks.** The EIR noted the SHSP would not result in conversion of parks or recreational facilities within City. The SHSP would intensify existing land uses within its boundaries by allowing for an additional 517,094 square feet of buildable area as well as approximately six new residential (caretaker) units. As a result, existing public parks and other recreational facilities may experience incremental increased use. The proposed commercial and industrial uses allowed would be subject to development impact fees (DIF) that would offset the incremental increase in demand for parks and recreational facilities. The DIF revenues are used for operation and maintenance of existing parks and recreational facilities citywide. Lastly, the proposed project identifies design standards that encourage existing commercial and industrial tenants to provide access to recreational facilities by providing streetscapes and pedestrian walkways for residents and employers to use. The EIR determined the SHSP would have no impacts on parks and recreational services and would not cause the construction of new park facilities that would have environmental impacts, and no mitigation was required. Due to this low demand for new parks or services, the Project will have no impacts relative to the construction of new park facilities.

The Project will construct new office uses which would only result in an incremental increase in the need for regional or local parks and recreational services. (threshold A). Therefore, the Project will have no impacts on park facilities. This conclusion is consistent with those of the SHSP Program EIR.

**4.16 Transportation and Traffic**

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Would the project conflict with or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

- (A) **Circulation Plan Consistency.** The traffic study prepared for the EIR determined the SHSP would generate a total of 12,677 vehicle trips per day with 1,585 AM peak trips and 1,363 PM peak trips. The EIR stated that without the SHSP and any improvements, Level of Service (LOS) congestion at two area intersections along Sepulveda Blvd. (at El Segundo Blvd. and Grand Ave.) would approach or exceed City standard (LOS D or better during peak periods (DEIR Table 18-8). The SHSP proposed various road improvements to El Segundo Blvd., Franklin Ave., Grand Ave., and a number of alleys to improve overall area circulation. In addition, the traffic study and EIR recommended Mitigation Measure 18-1 to reduce local congestion impacts.

**Trip Generation Analysis.** A comparison of the trip generation characteristics of the proposed Project were evaluated by Kimley Horn (KH) on April 3, 2020 (see Attachment A). KH compared the trip generation of the Project to the estimated trip generation for the Project site according to the allowable square footage in the Specific Plan. KH found the Project will generate 282 more trips on a daily basis with 32 more total trips in the morning peak hour and 33 more total trips in the evening peak hour for the total Project site. KH also compared the Project trip generation to the existing land uses for the total Project site and found the Project will generate 1,210 more trips on a daily basis with 143 more total trips in the morning peak hour and 143 more total trips in the evening peak hour. Although the trip generation numbers were incrementally higher than planned under the SHSP, the KH analysis concluded the Project trip generation estimates are consistent with the estimated trips for the Project site outlined in the SHSP TIA based on the assumed land uses in the Smoky Hollow East zone within the SHSP.

**VMT Analysis.** SB 743 was approved by the California legislature in September 2013 and requires changes to CEQA to use an alternative metric for transportation impacts. The old metric was based on vehicular “level of service” (LOS) which measures congestion of local intersections and roadways. As of July 2020, the new CEQA metric for transportation projects will be Vehicle Miles Traveled (VMT). KH conducted a qualitative analysis of the Project’s potential VMT impacts (see Attachment A). KH concluded the Project would provide additional jobs and some related trips to the local area, but it is anticipated these trips would most likely occur regardless of whether this location were developed as it is in response to a likely existing demand for jobs in the greater Los Angeles area. Accordingly, if this site were not developed, a similar site will be developed elsewhere to meet this demand. Therefore, any alternatives to this development would likely not eliminate any related VMT so KH concluded the Project would not result in a significance finding under SB 743.

**Traffic Study Analysis.** An analysis of the Project traffic impacts compared to those identified in the EIR traffic impact assessment (TIA) was prepared by Translutions Inc. (TI) on May 1, 2020. The Project is part of Traffic Analysis Zones (TAZs) 11251-2 and 11251-3 from the EIR traffic study. TI reviewed the change in trip generation for these two TAZs (Table 7, TI Memo, Attachment B). Both TAZs show increases in trip generation during the peak hours but decreases in the daily trips compared to the EIR traffic study. The Specific Plan EIR estimated approximately 2,960,000 total square feet of non-residential uses by Year 2040 while the proposed Project is 242,878 square feet of non-residential uses. Based on review of the parcels included in the KOA TIA, the Project appears to be approximately 6 percent of the total area of the SHSP but utilizes approximately 8.7 percent of the non-residential square footage which is a 26.4 percent increase in intensity over the average SHSP intensity, but based on the number of trips generated by the proposed land uses, the TI concluded the Project is consistent with and is not a major deviation from the SHSP or its TIA.

TI also stated the KOA TIA prepared for the EIR disclosed a significant impact at the intersection of Sepulveda Boulevard/El Segundo Boulevard. If development of the SHSP is limited to the approved envelope (i.e., 2.96 million square feet at buildout), that finding should not change and findings at other intersections should not change.

It should also be noted the traffic section of the EIR was recirculated for additional public review and determined that the SHSP would have an additional significant unavoidable impact related to freeway ramp congestion (potential mitigation was under the control of Caltrans and not the City so the City as the lead

agency determined mitigation was infeasible. Based on the KH and TI analyses, the Project will not create traffic impacts greater than those identified in the EIR and its TIA. With implementation of Mitigation Measure 18-1, traffic impacts of the Project will remain at less than significant and no additional mitigation is required

**Mitigation Measure 18-1:** Improvement to the impacted intersections will be performed as follows at the time the City determines that such improvements are needed to maintain desired service levels:

- Sepulveda Boulevard/Grand Avenue: New right-turn overlap phases on all approaches
- Sepulveda Boulevard/El Segundo Boulevard: Second eastbound left-turn lane, new right-turn overlap phase at northbound approach

Prior to the issuance of a certificate of occupancy, individual development projects that would result in a net increase in vehicle trips, as determined by the City based on project-specific traffic studies, will be required to pay to the City of El Segundo a fair-share contribution for the above improvements.

The City shall have the responsibility of ensuring that the improvements specified above will be constructed at that point in time necessary to avoid identified significant impacts.

The EIR also determined that with future land uses and planned improvements under the SHSP, the same area intersections would still be congested and exceed local LOS standards, but that the City was shifting away from LOS to Vehicle Miles Traveled (VMT) per SB 743 as a more appropriate measure of traffic impacts under CEQA. Therefore, the EIR concluded that the SHSP would have less than significant impacts on the performance of the circulation system and consistency with local circulation plans with the planned improvements and implementation of Mitigation Measure 18-1. Since the Project is part of the SHSP, it is also consistent with local circulation plans and will not significantly impact the local circulation system.

Regarding non-vehicular transportation, the EIR determined the SHSP would not affect or impede the two transit lines (the Lunchtime Shuttle and Beach Cities Line 109) that traverse Grand Avenue since no physical changes were proposed to Grand Avenue. Additional growth that would result from SHSP implementation would likely increase ridership along these lines over time. In addition, the SHSP includes a system of bike-friendly streets that would link to other bike routes and paths currently proposed in the City as well as provide sidewalk improvements and other enhanced pedestrian facilities. Therefore, impacts would be less than significant, and no mitigation was required. The proposed Project is part of the SHSP and has access to local bus routes and bus stops and will provide bicycle parking improvements per City code.

- (B) **CEQA Guidelines Section 15064.3(b).** This section of CEQA addresses a shift in significance thresholds from Level of Service (LOS or congestion) to Vehicle Miles Traveled (VMT). However, the EIR evaluated LOS impacts under the then current standard of consistency with the local Congestion Management Plan (CMP). The EIR stated that traffic generation from the SHSP met the criteria for analyzing CMP intersections. The SHSP was not expected to add more than 150 new trips per hour to the nearby I-405 freeway and would add more than 50 new trips per hour to the Sepulveda Blvd./El Segundo Blvd. intersection (DEIR Table 18-14). The CMP significance threshold standard is an increase in the Volume to Capacity (v/c) ratio of 0.02 or more or causing worse LOS F conditions. Since the v/c would worsen by 0.042, a significant impact would occur. Even after implementing Mitigation Measure 18-1 (see sub-section A above), this intersection would still exceed the CMP standard for evening peak hour congestion. Project traffic will contribute to the SHSP's inconsistency with the County's Congestion Management Plan so impacts in this regard are still **significant and unavoidable** even with implementation of Mitigation Measures 18-1 and 18-2.

**Mitigation Measure 18-2:** No fair-share funding agreements or mechanisms are in place or currently available that would allow the City to contribute to specific Caltrans projects in the vicinity of the plan area. As future development occurs within the Smoky Hollow Specific Plan that would trigger thresholds for additional CEQA analysis, the City will contact Caltrans to discuss traffic study requirements, mitigation, and possible fair-share funding contributions.

It should also be noted the traffic section of the EIR was recirculated for additional public review and determined that the SHSP would have an additional significant unavoidable impact related to freeway ramp congestion and Mitigation Measure 18-2 was added to address Caltrans’ concerns. Even with this additional measure, these impacts are **significant and unavoidable** even with implementation of all feasible mitigation.

CEQA Guidelines Section 15064.3(b) requires an evaluation of VMT impacts of a land project which was prepared and discussed in Sub-Section A above. This analysis determined the SHSP and the Project which is a part of the SHSP would not have a significant impact under CEQA relative to VMT.

- (C) **Circulation Design Hazards.** The EIR stated the SHSP would provide street improvements to change traffic patterns to create one-way streets and bike and pedestrian improvements, all within existing rights-of-way but would not create any localized traffic hazards. All designs and alterations would be performed in accordance with all applicable standards relating to motorized vehicle, bicycle, and pedestrian safety. Therefore, the EIR determined the SHSP would have less than significant impacts in this regard and no mitigation was required. The proposed Project is part of the SHSP, and it located at the intersection of two major streets, so it will have less than significant impacts relative to design hazards and no mitigation is required.
- (D) **Emergency Access.** The EIR stated that implementation of future projects under the SHSP would be reviewed to ensure new development would not create barriers to emergency response vehicles. In addition, the Fire Department and Police Department would be involved in any plans to convert existing two-way roads to one-way roads and implement angled parking to ensure emergency access needs can be met. Therefore, impacts would be less than significant, and no mitigation was required. The proposed Project is part of the SHSP, and it located at the intersection of two major streets, so it will have less than significant impacts relative to emergency access and no mitigation is required.

The proposed Project would contribute to the SHSP’s significant traffic impacts relative to the County Congestion Management Plan, otherwise all other traffic- and transportation-related impacts will be less than significant (or no impact) and no mitigation is required. This conclusion is consistent with those of the SHSP Program EIR.

**4.17 Utilities and Service Systems**

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during, normal, dry, or multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

C) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Proposed Project in relation to SHSP Program EIR**

(A) **Utility Infrastructure.** The EIR stated there would be no significant utility-related impacts of overall development of the SHSP but that development of individual sites would require utility upgrades and in some cases relocation of pipes or other infrastructure to accommodate new development. The Project is part of the SHSP and will construct a net of 205,456 square feet of new office uses within the SHSP area which will generate additional wastewater and make connections and improvements as necessary to provide adequate utility service for the future Project employees (approximately 300) but no new residents (no new caretaker units proposed on the two Project sites). By comparison, the EIR estimated the SHSP would develop over 517,000 square feet of new commercial, industrial, office, and other uses and generate a total of 951 additional employees and up to 18 additional residents (max. 3 persons per caretaker unit). The development proposed for the Project is well within the growth estimates for the SHSP as a whole, represents a maximum of 39.7 percent of the new building square footage planned under the SHSP, however, the Project will be built at an intensity that is 26.4 percent higher than the maximum that would be allowed on the Project site based on the Floor Area Ratios (FARs) of the two adjacent sites. This additional building area will not substantially increase wastewater generation or the ability to treat the additional generated wastewater.

The EIR stated the SHSP would not create any new drainage facilities or alter the courses of any existing drainage infrastructure, thus it would not create erosion, siltation, or flooding within or outside of the SHSP. The EIR also concluded the SHSP would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Therefore, impacts would be less than significant, and no mitigation was required. Since the proposed Project is part of the SHSP, it will also have less than significant impacts regarding the existing storm drain system. Neither the SHSP or the Project will substantially increase the need or infrastructure to provide electricity, natural gas, or telecommunications.

(B) **Sufficient Water Supplies.** The City's projected water supply for 2035 is 17,750 Acre-Feet Per Year (AFY) and the current (2018) projected demand for water supply in 2035 during a single dry year is 17,250 AFY, as shown in DEIR Table 19-4. A 500 AFY surplus is anticipated based on the projected water demands for a single dry year in 2035. Projections indicate that supply and demand from 2020 to 2035 typically retain a variance of one, as the City imports all water supplies to meet its water demands. The SHSP would result in a net increase in water demand of 118.38 AFY. The DEIR concluded sufficient water supplies were available to serve buildout of the SHSP area. Future development within the SHSP would have to comply with the City's Municipal Code water conservation measures such as drought-tolerant landscaping, water conservation measures to minimize water consumption, and use of recycled water which would decrease the projected water demand needs for the City. The EIR concluded that implementation of the SHSP would not increase system demands to require new facilities or result in infrastructure improvements beyond those

projected by the City Public Works Department. Therefore, impacts were less than significant, and no mitigation was required.

The Project will construct a net of 205,456 square feet of new office uses within the SHSP area which will consume additional water, generate additional wastewater, generate additional solid waste, and make connections and improvements as necessary to provide adequate utility service for the future Project employees (approximately 300) but no new residents. By comparison, the EIR estimated the SHSP would develop over 517,000 square feet of new commercial, industrial, office, and other uses and generate a total of 951 additional employees and up to 18 additional residents (max 3 persons per caretaker unit). The development proposed for the Project is well within the growth estimates for the SHSP as a whole, represents a maximum of 39.7 percent of the new building square footage planned under the SHSP, however, the Project will be built at an intensity that is 26.4 percent higher than the maximum that would be allowed on the Project site based on the Floor Area Ratios (FARs) of the two adjacent sites. This additional building area will not substantially increase waste generation or the ability to dispose of the additional generated wastes.

- (C) **Wastewater Treatment Capacity.** The EIR stated that implementation of the SHSP would result in an additional net wastewater generation of 42,951.2 gallons per day, which would remain consistent with the capacity of existing facilities. In 2018 the City's sewer flow was 2.66 million gallons per day (mgd) of which 1.17 mgd was conveyed to the Hyperion Plant with the remaining volume conveyed to other facilities of the Sanitation District of Los Angeles County (SDLAC). The City's capacity was 2.75 mgd so the remaining capacity on the system was 0.9 mgd. Therefore, the EIR concluded that implementation of the SHSP would not result in the need for construction of new water or wastewater facilities, or expansion of existing facilities. Impacts with respect to projected wastewater generation and infrastructure needs would be less than significant and no mitigation was required. As outlined in Sub-Section A above, the Project is part of the SHSP but will not create additional non-residential development to the degree it would exceed the available wastewater treatment capacity at existing facilities.
- (D) **Solid Waste Infrastructure.** The EIR estimated the total solid waste generated by residents and employees by implementation of the SHSP would be 2,216.17 cubic yards (CY) per year. Current disposal facilities include the Chiquita Canyon, Scholl Canyon, and Sunshine Canyon landfills which will continue to remain in operation. In 2018, the EIR indicated the Scholl Canyon landfill had a remaining capacity of 9.9 million CY, Sunshine Canyon landfill had a remaining capacity of 96.8 million CY, and the Chiquita Canyon landfill had a remaining capacity of 8.6 million CY. The EIR concluded the landfills serving the SHSP area had sufficient capacity to accommodate the additional solid wastes generated by the SHSP. Therefore, impacts would be less than significant, and no mitigation was required.

The Project will construct a net of 205,456 square feet of new office uses within the SHSP area which will generate additional solid waste and make connections and improvements as necessary to provide adequate utility service for the future Project employees (approximately 300) but no new residents. By comparison, the EIR estimated the SHSP would develop over 517,000 square feet of new commercial, industrial, office, and other uses and generate a total of 951 additional employees and up to 18 additional residents (max 3 persons per caretaker unit). The development proposed for the Project is well within the growth estimates for the SHSP as a whole, represents a maximum of 39.7 percent of the new building square footage planned under the SHSP, however, the Project will be built at an intensity that is 26.4 percent higher than the maximum that would be allowed on the Project site based on the Floor Area Ratios (FARs) of the two adjacent sites. This additional building area will not substantially increase waste generation or the ability to dispose of the additional generated wastes.

- (E) **Solid Waste Regulations.** The SHSP provides for additional development all of which is subject to review by the City. All proposed projects would be subject to compliance with local, State, and federal regulations pertaining to solid waste. Therefore, the EIR concluded that impacts with respect to federal, State, and local statutes and regulations related to solid waste would be less than significant and no mitigation was required. As outlined in Sub-Section D above, the Project is part of the SHSP but will not create additional non-residential development to the degree it would exceed the available landfill capacity and will also be consistent with existing solid waste regulations implemented by the City.

Based on analysis above, the Project will have less than significant impacts on local utilities and service systems and no mitigation is required. This conclusion is consistent with those of the SHSP Program EIR.

### 4.18 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Does the project have impacts that are individually limited, but cumulatively considerable?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Proposed Project in relation to SHSP Program EIR

- (A) **Degrade the Environment.** The EIR determined that the SHSP would not result in no or less than significant impacts to scenic vistas, scenic resources, or the visual character of the area, and would not result in excessive light or glare. Since the Project is part of the SHSP, its impacts relative to these issues would also be less than significant and no mitigation required. The Project, as part of the SHSP, is located within a highly urbanized area with no natural habitat, so impacts to the natural habitat of a fish or wildlife species will be less than significant with implementation of **Mitigation Measures 7-1 and 7-2** to protect nesting birds. Adverse impacts to historic, paleontological resources, or human remains will remain less than significant with implementation of **Mitigation Measures 8-1 through 8-3** to monitor grading for possible archaeological resources or fossil materials. This site is not known to have any association with an important example of California’s history or prehistory – this conclusion applies to the SHSP and the Project which is a part of the SHSP.
- (B) **Cumulative Impacts.** Section 4 through 19 and 20.1 of the EIR stated that implementation of the SHSP would not result in any cumulatively considerable impacts with regulatory compliance and implementation of the recommended mitigation measures. The analysis in Sections 4.1 through 4.17 of this document indicate impacts of the Project are generally consistent with and a proportional part of those impacts identified in the EIR for the SHSP as a whole (i.e., significant contributions to GHG emissions, noise, and traffic congestion).
- (C) **Adverse Impacts.** The EIR concluded that impacts related to emissions of criteria pollutants and other air quality impacts will be less than significant with regulatory compliance. This conclusion would be the same for the same for the Project since it is a part of the SHSP. The EIR concluded the SHSP’s greenhouse gas emissions exceeded SCAQMD thresholds and could not be mitigated to a less than significant levels. Since

the Project is part of the SHSP, it would contribute to these significant GHG emission impacts. Impacts related to hydrology and water quality would also be less than significant with regulatory compliance.

The EIR also found that noise impacts from SHSP development would be significant and adverse and could not be mitigated. The Project is within the SHSP and has residential uses adjacent to the North site parking structure, so its noise impacts would also be significant. Traffic from the SHSP was also found to exceed the thresholds of the County's Congestion Management Plan even with implementation of **Mitigation Measure 18-1** for improvements to two intersections on Sepulveda Boulevard. The analysis in Sections 4 through 19 of the EIR, and as summarized in Sections 4.1 through 4.17 of this document, support the conclusion that the SHSP would not degrade the quality of the environment. The EIR concluded there is no indication that the SHSP would result in substantial adverse effects on human beings. The analysis in Sections 4.1 through 4.17 of this document indicate the impacts of the Project would be equivalent to those identified in the EIR since the Project is part of the SHSP.

## **4.19 Summary of Results**

The analysis in Sections 4.1 through 4.18 of this document concludes that proposed Catalyst Project is consistent with the SHSP and is within the scope of the SHSP EIR and consistent with State CEQA Guidelines Subsection 15168(c)(2). Therefore, no additional CEQA analysis or documentation is required for this Project, however, a Notice of Determination (NOD) will be filed with the County Clerk and State Clearinghouse to fully document this CEQA compliance action.

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### 5.1 List of Preparers

#### City of El Segundo

Planning Department  
350 Main Street  
El Segundo, California 90245  
(310) 524-2380

- Gregg McClain, Planning Manager
- Brenna Wengert, Assistant Planner
- Ethan Edwards, Contract Planner

#### MIG

1650 Spruce Street, Suite 102  
Riverside, California 92507  
951-787-9222

- Bob Prasse, Director of Environmental Services
- Kent Norton, Senior Project Manager

### 5.2 Persons and Organizations Consulted

None

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**APPENDIX A - KIMLEY HORN MEMO**

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April 3, 2020

Mr. Bill Messori  
Griffin Capital Real Estate Company, LLC  
1520 E. Grand Avenue  
El Segundo, CA 90245

Subject: *Trip Generation Comparison Memorandum for 1521 E. Grand Avenue & 330  
Kansas Street in the City of El Segundo, CA*

Dear Mr. Messori:

Kimley-Horn and Associates, Inc. has prepared a trip generation comparison memorandum, per request from the City of El Segundo, for the proposed office buildings located at 1521 E. Grand Avenue and 330 Kansas Street. The memorandum has been prepared to evaluate the trip generating characteristics of the proposed office buildings, compared to existing uses and the assumed land uses for the project site in the Smoky Hollow East Zoning District within the Smoky Hollow Specific Plan boundary.

#### PROJECT DESCRIPTION

The project sites are located on the northeast and southwest corners of the intersection of Grand Avenue at Kansas Street. The project site is within the boundaries of the Smoky Hollow East Zoning District as defined by the Smoky Hollow Specific Plan. The project site is generally bounded by Holly Avenue to the north, Washington Street to the east, Franklin Avenue to the south, and California Street and commercial uses to the west. The site is currently developed with office buildings and surface parking lots.

The project applicant proposes to expand one existing office building and develop two new office buildings with two parking structures intended for the office building users. The project is divided into two sites: North Site and South Site. The North Site consists of a total proposed building area of 162,800 square feet (SF) with a 5-story parking structure with 488 stalls on a 140,926 SF lot. The South Site consists of a total proposed building area of 92,200 SF and a 4-story parking structure with 295 stalls on a 85,111 SF lot. A copy of the project site plan for both the North Site and South Site are provided in Attachment A.

#### TRIP GENERATION COMPARISON

A trip generation analysis has been prepared to evaluate the consistency of the trip generating characteristics for the proposed project, compared to the assumed land uses in the Smoky Hollow East Zoning District in the Smoky Hollow Specific Plan. Also, the trip generation analysis compares the net new trips generated by the project, compared to existing land uses.

*Potential Smoky Hollow Specific Plan Trips – Project Site*

The City of El Segundo Smoky Hollow Specific Plan (dated: October 2018), provides a base minimum gross Floor Area Ratio (FAR) of 1.0 for the Smoky Hollow East Zoning District. According to the Specific Plan, “developments that propose to exceed this base standard for...density...beyond the minor deviation threshold allowed by Section 4.51 Administrative Adjustment, shall in return provide community benefits that enhance Smoky Hollow’s character and experience.” It should be noted that a FAR of 1.5 or higher may be allowed for Community Benefits Tier 1 and Tier 2. The Smoky Hollow East Zoning District of the Smoky Hollow Specific Plan Building Intensity can be found in Chapter 2 of the Specific Plan (see Attachment B).

Trip generation estimates for the project site according to the allowable square footage in the Specific Plan were based on the Institute of Transportation Engineers (ITE) Trip Generation Manual (10<sup>th</sup> Edition). The Smoky Hollow Specific Plan trip generation estimates assume the following land use quantities for the project site:

- North Site - General Office Building (710) - 140,926 square feet (SF)
- South Site - General Office Building (710) - 85,111 SF

Trip generation estimates are shown on Tables 1, 2, and 3 for the North Site, South Site, and total project site, respectively.

*Trip Generation – North Site*

The North Site is currently comprised of approximately 99,822 SF of existing office use. The proposed project on the North Site would include a total proposed square footage of 162,800 SF for office use, including the expansion of an existing office building. Trip generation estimates for the existing and proposed uses on the North Site were estimated using the ITE Trip Generation Manual (10<sup>th</sup> Edition) trip rate for General Office Building (710). Trip generation estimates for the Specific Plan, existing uses, and proposed project for the North Site are shown on Table 1 (previously mentioned). Below is a summary of the estimated trips:

- When comparing the proposed project trip generation to the estimated trip generation for the North Site according to the allowable square footage in the Specific Plan, the North Site proposed project generates 213 more trips on a daily basis, with 24 more total trips in the morning peak hour and 25 more total trips in the evening peak hour.
- When comparing the proposed project trip generation to the existing land uses, the North Site proposed project generates 614 more trips on a daily basis, with 72 more total trips in the morning peak hour and 73 more total trips in the evening peak hour.

*Trip Generation – South Site*

The South Site is currently comprised of approximately 31,000 SF of existing office use. The proposed project on the South Site would include a total proposed square footage of 92,200 SF for office use. Trip generation estimates for the existing and proposed uses on the South Site were estimated using the ITE Trip Generation Manual (10<sup>th</sup> Edition) trip rate for General Office Building (710). Trip generation estimates for the Specific Plan, the existing uses, and the proposed project for the South Site are shown on Table 2 (previously mentioned). Below is a summary of the estimated trips:

- When comparing the proposed project trip generation to the estimated trip generation for the South Site according to the allowable square footage in the Specific Plan, the South Site proposed project generates 69 more trips on a daily basis, with 8 more total trips in the morning peak hour and 8 more total trips in the evening peak hour.
- When comparing the proposed project trip generation to the existing land uses, the South Site proposed project generates 596 more trips on a daily basis, with 71 more total trips in the morning peak hour and 70 more total trips in the evening peak hour.

*Trip Generation – Total Project Site*

The total project site is currently comprised of approximately 130,822 SF of existing office use. The proposed project would include a total proposed square footage of 255,000 SF for office use. Trip generation estimates for the Specific Plan, the existing uses, and the proposed project for the total project site are shown on Table 3 (previously mentioned). Below is a summary of the estimated trips:

- When comparing the proposed project trip generation to the estimated trip generation for the total project site according to the allowable square footage in the Specific Plan, the proposed project generates 282 more trips on a daily basis, with 32 more total trips in the morning peak hour and 33 more total trips in the evening peak hour for the total project site.
- When comparing the proposed project trip generation to the existing land uses, for the total project site, the proposed project generates 1,210 more trips on a daily basis, with 143 more total trips in the morning peak hour and 143 more total trips in the evening peak hour for the total project site.

Based on the trip generation comparison, the proposed project trip generation estimates are more than the Specific Plan project site, based on a base standard FAR of 1.0.

**SENATE BILL (SB) 743 ANALYSIS**

SB 743 was approved by the California legislature in September 2013. SB 743 requires changes to California Environmental Quality Act (CEQA), specifically directing the Governor's Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular "level of service" (LOS) for evaluating transportation projects. OPR has updated guidelines for CEQA and written a technical advisory for evaluating transportation impacts in CEQA and has set a deadline of July 2020 for local agencies to update their CEQA transportation procedures. OPR has recommended that Vehicle Miles Traveled (VMT) replace LOS as the primary measure of transportation impacts.

The City of El Segundo has until July 2020 to update their traffic impact study guidelines to comply with SB 743. Since El Segundo guidelines are not in place, a qualitative VMT analysis has been provided instead.

*Existing Transit Service*

Transit service to the project area is provided by Beach Cities Transit, which serves the South Bay region of Los Angeles County; Metro; and LADOT Transit. The project site is within ¼-mile of bus stop for all transit service. Currently, the project site is served by the following transit lines:

Beach Cities Transit Line 109 operates between the City of Rancho Palos Verdes and the LAX Bus Center, traveling through the project area along Grand Avenue and Sepulveda Boulevard. Line 109 operates on weekdays from 5:55 AM to 9:45 PM with approximately 45-minute headways (the time between bus arrivals), and on Saturdays and Sundays from approximately 6:05 AM to 10:15 PM with approximately 1-hour headways.

Metro Line 232 operates between the City of Long Beach and LAX City Bus Center, traveling through the project area along Sepulveda Boulevard. Line 232 operates on weekdays from 3:48 AM to 1:04 AM with approximately 11 to 30-minute headways, on Saturdays from 3:53 AM to 1:01 AM with approximately 30-minute headways, and on Sundays and holidays from 4:38 AM to 1:01 AM with approximately 39-minute headways.

LADOT Transit Commuter Express Route 574 operates between the City of El Segundo and the area of Sylmar in the City of Los Angeles, traveling through the project area along Sepulveda Boulevard. Route 574 operates on weekdays in the morning from 5:20 AM to 8:56 AM and in the evening from 3:35 PM and 7:42 PM with approximately 30 to 60-minute headways,

*Office-Related Trips*

To qualitatively analyze the VMT impact of this facility on the surrounding area, two types of trips were considered: employee commute trips; and other trips related to the function of the business and/or its employees. The following discussion is provided regarding these two trip types.

Employee commute trips. The City of El Segundo is a residential community in character, so it is understood that many of its residents travel considerable distance for employment. Most often an important strategy for reducing VMT in a community like this is to improve the local jobs/housing balance by increasing the number of employment opportunities. As such, it is reasonable to expect that increasing local employment opportunities will reduce the average commuter trip lengths of residents, resulting in a net decrease to regional net VMT.

Other trips. These are often the smallest number and shortest distance of trips for a facility like this and include a broad range of trip types, such as, employee lunches off-site, maintenance teams for on-site infrastructure, and office supply deliveries. As such, their impact to the overall VMT of the site is likely minimal. Therefore, it is not likely that they are impactful to the local transportation system and are secondary to the other trip type previously discussed.

Finally, it is worth noting that while this facility is expected to provide additional jobs and some related trips to the area, it is anticipated that these trips would most likely occur regardless of whether this location were developed as it is in response to a likely existing demand for jobs in the greater Los Angeles area. Accordingly, if this site were not developed, a similar site will be developed elsewhere to meet this demand. Therefore, the alternative to this development would likely not eliminate any related VMT. In consideration of this and the other considerations discussed above, it is not anticipated that the development of this site would result in a significant finding under SB 743.

**FINDINGS AND CONCLUSIONS**

This trip generation analysis has been prepared to evaluate the trip generating characteristics of the proposed office buildings located at 1521 E. Grand Avenue and 330 Kansas Street, compared to the trip generation from the Smoky Hollow East Zoning District of the Smoky Hollow Specific Plan.

The project site area is approximately 226,037 SF. The total project site is currently comprised of approximately 130,822 SF of existing office use. The proposed project would include a total proposed square footage of 255,000 SF for office use.

When comparing the proposed project trip generation to the estimated trip generation according to the allowable square footage for the project site in the Specific Plan, the proposed project generates 282 more trips on a daily basis, with 32 more total trips in the morning peak hour and 33 more total trips in the evening peak hour for the total project site.

When comparing the proposed project trip generation to the existing land uses, the proposed project generates 1,210 more trips on a daily basis, with 143 more total trips in the morning peak hour and 143 more total trips in the evening peak hour for the total project site.

Based on the trip generation comparison, the proposed project trip generation estimates are consistent with the estimated trips for the proposed site, based on the assumed land uses in the Smoky Hollow East zone within the Smoky Hollow Specific Plan boundary.

The Governor's Office of Planning and Research has recommended that Vehicle Miles Traveled (VMT) replace LOS as the primary measure of transportation impacts. The City of El Segundo has until July 2020 to update their traffic impact study guidelines to comply with SB 743. Since El Segundo guidelines are not in place, a qualitative VMT analysis has been provided. Based on the qualitative VMT analysis, it is not anticipated that the development of this site would result in a significant finding under SB 743.

Please contact me if you have any questions or if you need additional information.

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.



Trevor Briggs, P.E (C87664)

TABLE 1  
SUMMARY OF PROJECT TRIP GENERATION COMPARISON  
NORTH SITE

Land Use	ITE Code	Unit	Trip Generation Rates <sup>1</sup>						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
General Office Building	710	KSF	9.740	0.998	0.162	1.160	0.184	0.966	1.150
<b>Trip Generation Estimates</b>									
Land Use	Quantity	Unit	Trip Generation Estimates						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
<i>Smoky Hollow Specific Plan - Project Site</i>									
General Office Building	140.926	KSF	1,373	141	23	164	26	136	162
<i>Total Existing Trips</i>			1,373	141	23	164	26	136	162
<i>Existing Land Uses</i>									
General Office Building	99.822	KSF	972	100	16	116	18	96	114
<i>Total Existing Trips</i>			972	100	16	116	18	96	114
<i>Proposed Use</i>									
General Office Building	162.800	KSF	1,586	162	26	188	30	157	187
<i>Total Proposed Project Trips</i>			1,586	162	26	188	30	157	187
Total Net Trips (Proposed Minus Specific Plan Project Trips)			213	21	3	24	4	21	25
Net Difference (Proposed Minus Existing Trips)			614	62	10	72	12	61	73
<sup>1</sup> Source: Institute of Transportation Engineers (ITE) <u>Trip Generation Manual</u> , 10th Edition									

TABLE 2  
SUMMARY OF PROJECT TRIP GENERATION COMPARISON  
SOUTH SITE

Land Use	ITE Code	Unit	Trip Generation Rates <sup>1</sup>						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
General Office Building	710	KSF	9.740	0.998	0.162	1.160	0.184	0.966	1.150
<b>Trip Generation Estimates</b>									
Land Use	Quantity	Unit	Trip Generation Estimates						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
<i>Smoky Hollow Specific Plan - Project Site</i>									
General Office Building	85.111	KSF	829	85	14	99	16	82	98
<i>Total Existing Trips</i>			829	85	14	99	16	82	98
<i>Existing Land Uses</i>									
General Office Building	31.000	KSF	302	31	5	36	6	30	36
<i>Total Existing Trips</i>			302	31	5	36	6	30	36
<i>Proposed Use</i>									
General Office Building	92.200	KSF	898	92	15	107	17	89	106
<i>Total Proposed Project Trips</i>			898	92	15	107	17	89	106
Total Net Trips (Proposed Minus Specific Plan Project Trips)			69	7	1	8	1	7	8
Net Difference (Proposed Minus Existing Trips)			596	61	10	71	11	59	70
<sup>1</sup> Source: Institute of Transportation Engineers (ITE) <u>Trip Generation Manual</u> , 10th Edition									

TABLE 3  
SUMMARY OF PROJECT TRIP GENERATION COMPARISON  
TOTAL PROJECT SITE

Land Use	ITE Code	Unit	Trip Generation Rates <sup>1</sup>						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
General Office Building	710	KSF	9.740	0.998	0.162	1.160	0.184	0.966	1.150
<b>Trip Generation Estimates</b>									
Land Use	Quantity	Unit	Trip Generation Estimates						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
<i>Smoky Hollow Specific Plan - Project Site</i>									
General Office Building	226.037	KSF	2,202	226	37	263	42	218	260
<i>Total Existing Trips</i>			2,202	226	37	263	42	218	260
<i>Existing Land Uses</i>									
General Office Building	130.822	KSF	1,274	131	21	152	24	126	150
<i>Total Existing Trips</i>			1,274	131	21	152	24	126	150
<i>Proposed Use</i>									
General Office Building	255.000	KSF	2,484	254	41	295	47	246	293
<i>Total Proposed Project Trips</i>			2,484	254	41	295	47	246	293
Total Net Trips (Proposed Minus Specific Plan Project Trips)			282	28	4	32	5	28	33
Net Difference (Proposed Minus Existing Trips)			1,210	123	20	143	23	120	143
<sup>1</sup> Source: Institute of Transportation Engineers (ITE) <u>Trip Generation Manual</u> , 10th Edition									

**ATTACHMENT A**

**PROJECT SITE PLAN**

## Scope of Work

Date: 2/7/2020

1521 E. Grand, El Segundo, CA  
Grand/Kansas Project

The project includes the proposed development of two adjacent sites:

**North Site:** (Refer to Square Footage Summary Below)

The North Site will include development of three buildings: 1) An existing 3-story building expanded and converted to a Core and Shell Office Building; 2) A new 4-story Core and Shell Office Building (Holly Building); 3) A new 5-story above grade open parking garage to replace an existing 37,422 sf 3-story building that will be demolished.

### 1. Site Coverage

- North Site Area: 140,926 SF
- Open Area: 45,065 SF
- Open %: 32%

### 2. New / Existing Buildings and Square Footages:

- **Building 1: 1521 Grand Building: Existing Building + New Addition**
  - Square Footage: 62,400 SF (Existing)  
40,400 SF (Addition)  
**102,800 SF Total**
  - Number of Stories: 3-Story (Including Basement)
  - Height: (E) 37'-10" (N) 37'-10" (No Change)
- **Building 2: New Holly Building**
  - Square footage: **60,000 SF Total**
  - Number of Stories: 4-Story
  - Height: 46'-6"
- **Building 3: New Above Grade Parking Structure**
  - Number of Stories: 5-Story
  - Required Stalls (2.5 stalls per 1,000): 369
  - Provided Stalls (3.3 stalls per 1,000 SF): 488
- **Total North Site Building Area: 162,800 SF**  
(Not including Parking Garage)



VACINITY MAP

**South Site:**

The South Site will include the demolition of all existing buildings and development of two new buildings: 1) A new 3-story Core and Shell Office Building; 2) A new 4-story above grade open parking garage with a café located on the ground floor corner of the garage.

### 1. Site Coverage

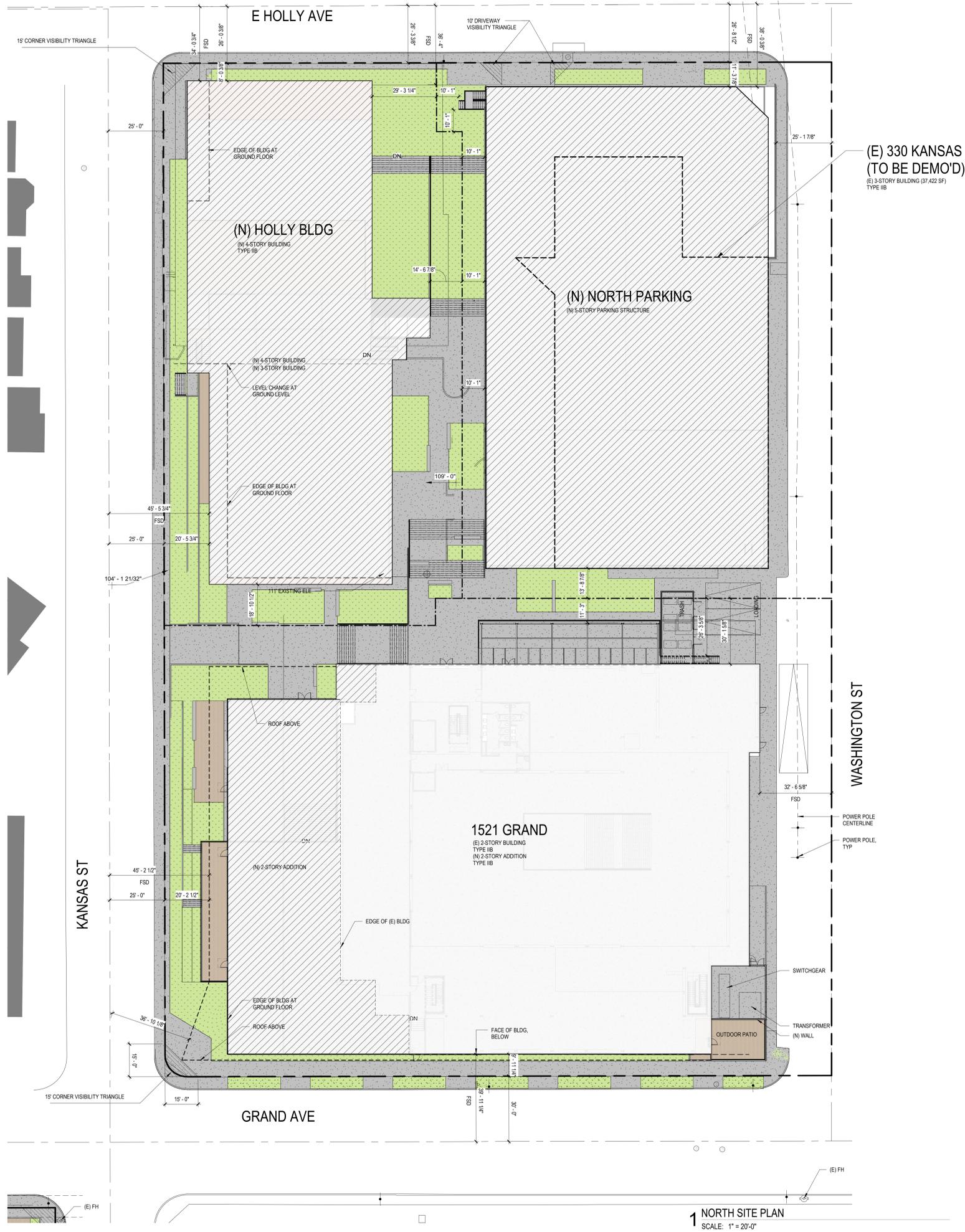
- South Site Area: 85,111 SF
- Open Area: 22,968 SF
- Open %: 27%

### 2. New Building Square Footages:

- **Building 1: New South Building**
  - Square footage: **91,100 SF Total**
  - Number of Stories: 3-Story
  - Height: 44'-6"
- **Building 2: New Above Grade Parking Structure**
  - Number of Stories: 4-Story
  - Required Stall (2.5 Stalls per 1,000 SF): 223
  - Provided Stalls (3.3 stalls per 1,000 SF): 295
  - **Cafe** - Located inside Ground Floor Level of Parking Garage
    - Square footage: **1,100 SF Total**
- **Total South Site Building area: 92,200 SF**  
(Not including Parking Garage, except Café)

**Total Project Building Area (N+S Sites): 255,000 SF**

2/10/2020 12:28:06 PM C:\Users\zcocker\Documents\1521\_Grand\_CENTRAL\_zcocker.rvt



KEYNOTES

**EHRlich  
YANAI  
RHEE  
CHANey**

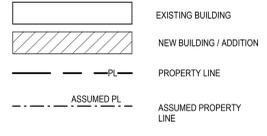
ARCHITECTS  
 O 310 838 9700  
 F 310 838 9737

**WARE MALCOMB**

ARCHITECTURE | PLANNING  
 INTERIORS | CIVIL ENGINEERING  
 BRANDING | BUILDING MEASUREMENT

NOT FOR CONSTRUCTION

LEGEND



ISSUE DATES

NO. DATE REVISION

**1521 GRAND**  
 1521 E Grand Ave, El  
 Segundo, CA 90245

NORTH SITE PLAN

The plans and specifications prepared by Ehrlich Yanai Rhee Chaney Architects, LLP are protected from unauthorized modification, reuse and/or release under California Business & Professions Code section 25424, North & South Code Section 105100, and Education Code Section 17120.

JOB NUMBER: 000  
 DATE:

**A101**

**1 NORTH SITE PLAN**  
 SCALE: 1" = 20'-0"



KEYNOTES

**EHRlich  
YANAI  
RHEE  
CHANey**

ARCHITECTS  
 o 310 838 9700  
 F 310 838 9737

**WARE MALCOMB**

ARCHITECTURE INTERIORS BRANDING | PLANNING CIVIL ENGINEERING BUILDING MEASUREMENT

NOT FOR CONSTRUCTION

LEGEND

- EXISTING BUILDING
- NEW BUILDING / ADDITION
- PROPERTY LINE
- ASSUMED PL
- ASSUMED PROPERTY LINE

ISSUE DATES

NO. DATE REVISION

**1521 GRAND**  
 1521 E Grand Ave, El  
 Segundo, CA 90245

SOUTH SITE PLAN

The plans and specifications prepared by Ehrlich Yanai Rhee Chaney Architects, LLP are protected from unauthorized modification, reuse and/or release under California Business & Professions Code section 25424, Health & Safety Code Section 186701, and Education Code Section 17518.

JOB NUMBER: 000  
 DATE:

**A102**

## **APPENDIX B - TRANSLATIONS MEMO**

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## Fw: El Segundo TIA

**Sandipan Bhattacharjee** <sandipan@translutions.com>

Tue, Aug 25, 2020 at 9:08  
PM

To: Kent Norton <knorton@migcom.com>

Thanks,  
Sandipan

(949) 656-3131 (Office)  
(949) 232-7954 (Mobile)  
[Download vCard](#)

---

**From:** Sandipan Bhattacharjee  
**Sent:** Friday, May 1, 2020 2:19 AM  
**To:** Kent Norton  
**Subject:** RE: El Segundo TIA

Hi Kent,

I have reviewed the Specific Plan TIA prepared by KOA Corporation with respect to the current proposal. The current proposal is part of TAZs 11251-2 and 11251-3. We reviewed the change in trip generation for these two TAZs included in Table 7. Both TAZs show increases in trip generation during the peak hours but decreases in the daily trips. While we are not sure why this is happening, since the TIA was approved, we assume City Staff has accepted this trip generation.

The Specific Plan included approximately 2,960,000 square feet of non-residential uses of which the current proposal is 255,000 square feet. Based on review of the parcels included in the KOA Study, the current proposal appears to be approximately 6% of the total area of the specific plan, but utilizes approximately 8.6% of the non residential square footage. While it is almost 40% increase in intensity over the average intensity, based on the size of the lots should be acceptable and should not be considered a major deviation from the Specific Plan. However, with the increased density, other parcels within the plan would potentially have reduced development potential for the overall development envelope to remain the same as the approved Specific Plan. When evaluated in the context of the TAZs, for example, the Specific Plan analysis shows a decrease of 484 daily trips in TAZ 11251-3, while just the 40,000 square-foot addition to building 1 will generate almost 400 new daily trips. The City should evaluate the project in this context as we are not aware of parcel ownership and implications of reduced intensity.

The KOA Study disclosed a significant impact at the intersection of Sepulveda Boulevard & El Segundo Boulevard. If development of the Specific Plan is limited to the approved envelope, that finding should not change and findings at other intersections should not change. The proposal shows driveways on Holly Avenue for the North Parking Structure – it should be noted that Holly Avenue was not analyzed in the KOA study. While we anticipate the driveways to operate acceptably based on the characteristics of Holly Avenue, it might be beneficial to evaluate the project driveways on Holly Avenue – especially because of the residential uses along Holly Avenue.

Since the proposed project is generally consistent with the Specific Plan, a VMT analysis should not be required for the current proposal.

Please let me know if you need anything else. Do you need this in a memo format? Also, my understanding was that Kimley Horn was preparing a traffic study for the project – is that not happening?

Thanks,

Sandipan Bhattacharjee

(949) 656-3131 (Office)

(949) 232-7954 (Mobile)

[Download vCard](#)

**From:** Kent Norton <[knorton@migcom.com](mailto:knorton@migcom.com)>  
**Sent:** Thursday, April 23, 2020 10:19 AM  
**To:** Sandipan Bhattacharjee <[sandipan@translutions.com](mailto:sandipan@translutions.com)>  
**Subject:** El Segundo TIA

Here is the original traffic study to review relative to the new office project, I will send you a project summary as soon as I can, will probably be via DropBox as it is quite large but you may only need what's on the first page...

## **Kent Norton, AICP, REPA**

*Senior Project Manager*



PLANNING | DESIGN | COMMUNICATIONS | MANAGEMENT | SCIENCE | TECHNOLOGY

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o 951-787-9222 ext 832 cell 909-518-8200  
[knorton@migcom.com](mailto:knorton@migcom.com)  
[www.migcom.com](http://www.migcom.com)



**Former State President of the Association**

**of Environmental Professionals (AEP)**

## **APPENDIX C - HISTORICAL RESOURCES ASSESSMENT**

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April 15, 2019

Paul Samaras, Principal Planner

**CITY OF EL SEGUNDO**

350 Main Street

El Segundo, CA 90245

**RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

Dear Mr. Samaras:

In consideration of the Griffin Capital Development Project (project), Michael Baker International staff completed a South Central Coastal Information Center (SCCIC) records search, field survey, literature and historical map review, and California Register of Historical Resources (California Register) evaluations to determine whether the project site contains significant historical resources as defined by CEQA Section 15064.5(a). Methods, results, and recommendations are summarized below; figures are provided in **Attachment 1**.

**PROJECT DESCRIPTION**

As part of the project, Griffin Capital is purchasing and redeveloping the following properties. The following is a list of buildings with build dates and proposed project activities:

**233 Kansas Street (APN 4139-006-063)**

The building was constructed in 1956 and is planned for demolition.

**247 Kansas Street (APN 4139-006-064)**

The building was constructed in 1948 and is planned for demolition.

**348 Kansas Street (APN 4139-008-010)**

The building was constructed in 1952 and is planned for demolition.

**330 Kansas Street (APN 4139-008-056)**

The building was constructed in 1980. Project plans include interior remodeling.

**318 Kansas Street/1521 East Grand Avenue (APN 4139-008-047)**

The building was constructed in 1997. Project plans include interior remodeling.

**CULTURAL RESOURCES IDENTIFICATION METHODS**

The results of the SCCIC records search, historical map search, pedestrian survey, and California Register evaluations are presented below.

## MICHAEL BAKER INTERNATIONAL

### RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA

Page 2

#### SOUTH CENTRAL COASTAL INFORMATION CENTER

SCCIC staff conducted a records search (File No. 19983.5947) for the project on March 7, 2019. The SCCIC, as part of the California Historical Resources Information System, California State University, Fullerton, an affiliate of the California Office of Historic Preservation (OHP), is the official state repository of cultural resources records and reports for Los Angeles County. As part of the records search, the following federal and California inventories were reviewed:

- California Inventory of Historic Resources (OHP 1976).
- California Points of Historical Interest (OHP 1992 and updates).
- California Historical Landmarks (OHP 1996).
- Directory of Properties in the Historic Property Data File (OHP 2012). The directory includes the listings of the National Register of Historic Places (National Register), National Historic Landmarks, California Register, California Historical Landmarks, and California Points of Historical Interest.

#### Results

No cultural resources were identified within the project area; two were identified within a quarter-mile search radius as identified below. Neither resource is a historical resource as defined by CEQA Section 15064.5(a).

Resource Name/#	Description	OHP Status Code
P-19-192402	Railroad segment	N/A
1700 East Grand Avenue	Military Entrance Processing Station	6Y - Not eligible for inclusion in the National Register

One cultural resources study was completed in the project area and five were completed within the search radius, as identified below.

Author	Date	Title	In project area?	Resources identified in project area?
Wlodarski, Robert J.	1986	<i>Negative Archaeological Survey Report for O7-LA-1 23.4/25.2.</i>	No	No
Stickel, Gary E.	1993	<i>Draft Report a Phase I Cultural Resources Literature Search for the West Basin Water Reclamation Project.</i>	Yes	No

**MICHAEL BAKER INTERNATIONAL****RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

Page 3

<b>Author</b>	<b>Date</b>	<b>Title</b>	<b>In project area?</b>	<b>Resources identified in project area?</b>
Maki, Mary K.	2005	<i>Records Search Results for the Chevron El Segundo Refinery, El Segundo, Los Angeles County.</i>	No	No
Bonner, Wayne H.	2007	<i>Direct APE Historic Architectural Assessment for Royal Street Communications, LLC Candidate LA2640A (SCE El Nido), 1703 East Mariposa Avenue, El Segundo, Los Angeles County, California.</i>	No	No
Harper, Caprice D. and Francesca Smith	2008	<i>Preliminary Cultural Resources Survey for the Formation of the Wiseburn Unified School District Project, Cities of El Segundo and Hawthorne, and Unincorporated Los Angeles County, CA.</i>	No	No
Metro	2011	<i>Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Final Environmental Impact Statement.</i>	No	No

**HISTORICAL MAP REVIEW**

Michael Baker International staff reviewed literature and historic maps for archaeological, ethnographic, historical, and environmental information about the project area and the vicinity. Below is a list of resources reviewed, followed by a narrative description of the results for the project area.

- Official Map of Los Angeles County (Rowan 1888)
- Official Map of Los Angeles County (Wright 1898)
- Venice, Calif. 1:24,000 scale topographic quadrangle (USGS 1924)
- Venice, Calif. 1:24,000 scale topographic quadrangle (USGS 1934)
- Venice, Calif. 1:24,000 scale topographic quadrangle (USGS 1950)
- Aerial single-frame photograph ARM6018001L0487 (USGS 1960)
- Aerial single-frame photograph 1VASK00010031 (USGS 1963)
- Venice, Calif. 1:24,000 scale topographic quadrangle (USGS 1964)
- Aerial single-frame photograph ARM6631405R1241 (USGS 1966)

## **Results**

The project area was originally within the boundaries of Rancho Sausal Redondo; however, no features are depicted in the project area until at least 1924. A 1924 topographic map depicts the Pacific Electric railroad through the project area. By 1950, the project area contains the railroad, and five buildings including 247 Kansas Street. A 1960 aerial of the project area depicts 233, 247, and 348 Kansas Street. The project area remains unchanged until 1980 when 330 Kansas Street was constructed. The railroad is no longer extant within the project area. (Rowan 1888; Wright 1898; USGS 1924, 1934, 1950, 1960, 1963, 1964, 1966; ParcelQuest 2019; Historicaerials.com 2019)

## **PEDESTRIAN SURVEY**

Michael Baker International's architectural historian, Margo Nayyar, conducted a built environment field survey of the project area on March 21, 2019. The survey was conducted to photograph buildings proposed for demolition (233, 247, and 348 Kansas Street) in support of the California Register evaluations (see **Attachment 2**).

No archaeological survey was completed because exposed soils are not extant within the project area.

## **HISTORIC CONTEXT**

Eric Lidow was born to a Jewish family in Vilnius, Lithuania, in 1912 during a period of Russian control. He later moved to Berlin, where he completed a master's degree in electrical engineering from the Technical University of Berlin. He reportedly helped several Jews escape Nazi Germany before WWII broke out. Lidow immigrated to New York in 1937, the same year he graduated (Jarvey 2013). Arriving in New York with only \$14 and limited English skills, he found work washing dishes. After two years, Lidow moved to California where he started the Selenium Corporation of America in 1939 or 1940. After growing to over 200 employees, the company was acquired by the Sperry Corporation in 1944 (Sperry went on to become a major electronics and aerospace manufacturer). Lidow continued working with the company until 1946 (Funding Universe 2005; Jarvey 2013).

Eric's father Leon, a Holocaust survivor, immigrated to the United States by 1947. The father and son team established the International Rectifier Corporation (IR) in Inglewood, California, in August 1947 (Jarvey 2013). The startup began with a staff of six and focused on advancing the process Lidow had developed for manufacturing selenium rectifiers (rectifiers convert alternating electrical current [AC] to direct electrical current [DC]). The group worked to develop, improve, and manufacture electrical rectifiers, semiconductors, and photoelectric cells. Their specialized technology was "pioneering" and "predated the development of the transistor by more than four months" (though it does not appear that IR was assigned any patents during this period) (Funding Universe 2005; US Patent Office 2019).

Jagadish Chandra Bose invented the earliest "cat's whisker" semiconductor at the turn of the twentieth century, though it proved unreliable and problematic (a semiconductor is a solid

## MICHAEL BAKER INTERNATIONAL

### RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA

Page 5

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substance with a conductivity level somewhere between that of an insulator and that of a conductor; semiconductors are used to control flows of energy, depending upon conditions). Engineers at Bell Labs began improving the “cat’s whisker” design starting in 1939; they gradually made improvements until the testing material, germanium crystals, had been perfected. As understanding of semiconducting evolved, scientists at labs and universities across the country began developing the technology for mass production. William Shockley, John Bardeen, and Walter Brattain are credited with inventing the first transistor (a semiconductor device) in 1947. Brattain filed three patents for this device in 1946 and early 1947 (US Patent Office, “Light-sensitive electric device,” US2537255A, US2537256A, and US2537257A).

IR presumably coupled Bell Labs’ findings with their own to take a strong foothold in the semiconductor industry. One source notes IR as “the oldest independent power semiconductor manufacturer in the world” prior to its merger with Infineon in 2015 (Funding Universe 2005). One of IR’s inventions at the Inglewood location, in 1948, was selenium plates which were 50 percent larger than existing plates. In 1949, IR introduced selenium photo cells, selenium diodes, and selenium cartridge rectifiers. In 1950, it improved the “single crystal P-N junction technology” to allow rectifiers to be made smaller and withstand greater temperature extremes. It also introduced selenium stack rectifiers (for battery charging) by 1951 (Infineon.com 2019).

In 1951, IR relocated from its original location on Victoria Street in Inglewood, California, to 1521 East Grand Avenue in El Segundo. The address was formerly occupied by Kwikly Inc., a manufacturer of frozen meals (San Bernardino County Sun [SBCS] 1950:14). The building was demolished sometime between 1994 and 1997. In the 1950s, IR gained momentum, and the new home in El Segundo provided greater space for expanding facilities. At the time, the Pacific Electric Railroad fronted IR’s property, making it a strategic location. The company soon owned buildings at over 15 addresses along Kansas Street, East Grand Avenue, Nevada Street, and Center Street.

<b>Known International Rectifier Addresses in El Segundo</b>	
<b>Address</b>	<b>Approximate construction date and notes</b>
120 Kansas Street	1958
145 Kansas Street	1957
222 Kansas Street	1960 - New 80,000-square-foot facility begins production.
223 Kansas Street	1955
233 Kansas Street	1956
247 Kansas Street	1948

**MICHAEL BAKER INTERNATIONAL****RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

Page 6

<b>Known International Rectifier Addresses in El Segundo</b>	
<b>Address</b>	<b>Approximate construction date and notes</b>
318 Kansas Street	Unknown
330 Kansas Street	1979 - IR breaks ground for HEXFET wafer fabrication.
337 Kansas Street	Unknown
340 Kansas Street	Unknown
344 Kansas Street	Unknown
348 Kansas Street	1952
1111 E Grand Avenue	1959 - 8,000 square foot building used by IR's Astro-Power Division to produce solar energy converters.
1521 E Grand Avenue	1950 - original building; 1997 – new building.
200 Nevada Street	1955 - used as a machine shop.
201 Nevada Street	1955 - built to produce selenium rectifiers for the radio and television industry.
200 Center Street	1959 - IR opens pilot plant for the manufacture of encapsulated miniature silicon diodes.
<i>(El Segundo Herald 1983:1)</i>	

Innovations during the 1950s included the “technological leap” from selenium to germanium-based rectifiers in 1954, and silicon-based rectifiers in 1959. The silicon-based rectifier was “small[er] than a thimble,” and “replaces other units up to 100 times larger” (Los Angeles Times 1959). The company owned patents to at least 40 inventions during the 1950s, primarily involving rectifiers, photoelectric energy, and selenium photo electric cells (US Patent Office 2019). In 1957, IR built a branch company in Japan, followed by another subsidiary in Great Britain in 1958 (Funding Universe 2005). In 1959, IR was awarded a \$500,000 contract with Lockheed Martin's Aircrafts, Missiles, and Space Division to work on U.S. space program projects. Specifically, the contract was to build “silicon solar cells that convert sunlight energy into electrical currents” (SBCS 1959:6).

## **MICHAEL BAKER INTERNATIONAL**

### **RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

**Page 7**

---

IR debuted “the world’s first” solar-powered car in 1960. Additional international branches were established in Italy in 1961, India in 1965, Canada in 1966, and Mexico in 1973. In the late 1960s, competitors began producing silicon control rectifiers, leading to financial instability. Eric’s sons Derek and Alexander joined IR in 1975 and 1977, at the same time the semiconductor industry was undergoing a substantial transformation in technology. Until this point, rectifiers functioned primarily using bipolar transistors, but the industry was shifting toward using power MOSFETs (metal-oxide-semiconductor-field-effect-transistor), which were “more efficient, faster, and smaller” than bipolars (Funding Universe 2005). Alexander Lidow introduced the HEXFET-Power-MOSFET, with a hexagonal shape, in 1979. The product helped make energy use more efficient; it eventually became IR’s staple product, with IR controlling over half the power-MOSFET market. In 1987, the success of this invention led to construction of HEXFET America, an \$82 million production plant in Temecula, California (Funding Universe 2005).

In 1989, Eric Lidow divided the company, giving control of one half to each son. The split did not provide positive results for the company and its clients; thus, in 1992, the company reunified. Expansion continued as the Temecula plant was enlarged in 1997, followed by the construction of a manufacturing plant in Wales in 1998. Alexander Lidow became the CEO in 1999, which ushered in unprecedented growth. IR began to acquire other companies, giving the company new technology that enabled it to expand its aerospace and defense markets. In 2004, sales surpassed \$1 billion (Funding Universe 2005). Finally, Infineon Technologies, headquartered in Neubiberg, Germany, acquired IR in 2015 for \$3 billion (Mil and Aero Staff 2015).

During its 68-year span, IR was the assignor to over 2,000 patents, many of which now belong to Infineon.

Architecturally, the buildings at 233, 247, and 348 Kansas Street are modest examples Contemporary-style architecture. They display many of the identifying features such as low-pitched gable roof with overhanging eaves, exposed roof beams, curtain walls, and use of natural materials such as brick. However, prominent examples of the Contemporary style are located throughout El Segundo and Los Angeles County including the Scientific Data Systems Corporation (SDS), Manufacturing Building (built 1965-1966) at 555 South Aviation Boulevard in El Segundo (PCAD 2019a). It was designed by the influential architectural firm, Craig Ellwood and Associates, and consisted of 260,000 square feet of manufacturing space, and was:

constructed with tilt-up concrete panels attached to an exposed exterior structural system of steel columns. The administration and factory spaces are unified through similar materials, finishes and design concept based upon structure. Craig Ellwood and Associates designed the SDS Administration Engineering Building, 701 South Aviation Boulevard, El Segundo based on the ideas of the earlier SDS building, but without the exposed structure attached to the exterior. The square floor plan was divided into a grid by structural columns and had a central atrium. Ellwood designed two other buildings for SDS between 1966-1968 using the same materials, finishes, and structure as the first two facilities. The four SDS building all located adjacent to each other form a cohesive campus with a holistic

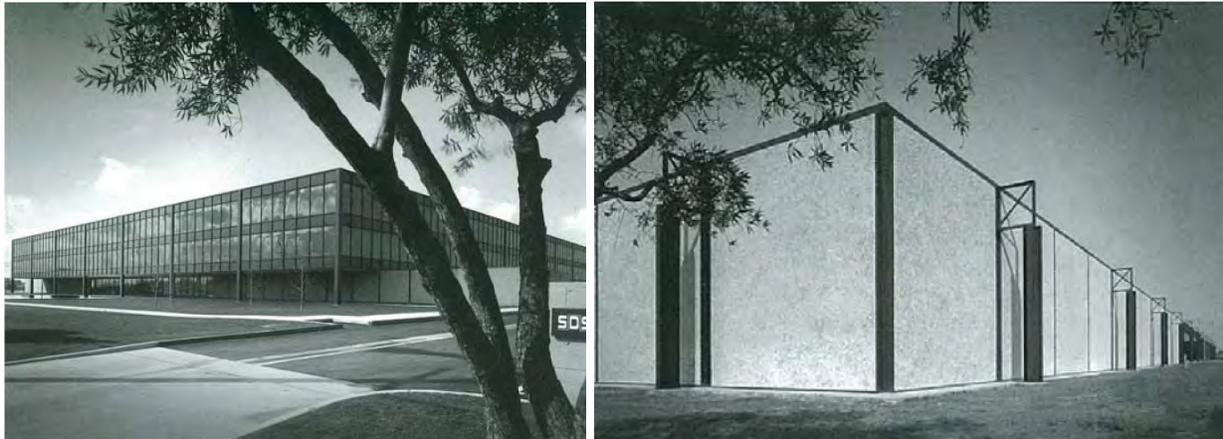
## MICHAEL BAKER INTERNATIONAL

### RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA

Page 8

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Modern design and without architectural or spatial hierarchy. Other notable Modern factory buildings designed by Craig Ellwood's office are the Xerox Corporation Manufacturing Facility (1967) located at 800 E. Bonita Ave, Pomona, (demolished), and the Torrington Manufacturing Company (1953) located at 16300 Roscoe Boulevard, Van Nuys, (demolished). The Magnavox Building (1960) in Torrance, designed by Torrance Risley and Gould, and the Firestone Store, Offices and Warehouse (1958) in Commerce designed by Pereira & Luckman are also good example of post-World War II Modern factories in the Los Angeles area. (PCR 2009:4-5)



Scientific Data Systems (now Xerox), El Segundo, California, designed by Craig Ellwood and Associates (1965-1966)

A similar contemporary-style manufacturing building was constructed in 1960 at 222 Kansas Street (demolished circa 2009) and designed by the California firm Thonis, Harrison, & Wolfe. Despite the stylistic similarities, it is not known whether 233, 247, or 348 Kansas Street buildings were designed by the same firm. Even so, Thonis, Harrison & Wolfe does not appear to have gained particular significance during its tenure because it is not listed in the Pacific Coast Architecture Database of significant architectural firms or identified during electronic database searches (PCAD 2019b; google.com 2019).

## CALIFORNIA REGISTER EVALUATIONS

The buildings located at 233 Kansas Street, 247 Kansas Street, and 348 Kansas Street were evaluated and recommended ineligible for inclusion in the California Register. See **Attachment 2** for the complete individual evaluations presented on DPR 523 forms.

### 233 Kansas Street

**Criterion 1** – The building at 233 Kansas Street was constructed circa 1956, apparently as a new headquarters building for IR. This date is corroborated by historical aerial photographs and historical mapping, as well as visual inspection. It operated as IR's headquarters until 1968, at which time the company's executives moved to the Charles Luckman & Associates Building (9220 Sunset Boulevard, West Hollywood, CA) in order to be closer to the firms with whom they

## **MICHAEL BAKER INTERNATIONAL**

### **RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

**Page 9**

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conducted business (Los Angeles Times 1968:129). The building also served as home to the company's Semiconductor Division for many years. It is not known which, if any, of IR's products were invented or produced in this building.

In its 68-year span, IR had grown into a "worldwide provider of analog, digital, and mixed signal chips that convert electricity into power for electronics, computers, appliance and cars," among many other inventions. In 2013, the company had almost 5,000 employees and a market cap of \$1.32 billion (Jarvey 2013). IR was also the assignor to over 2,000 patents by the time it merged with Infineon in 2015. While IR was a formidable electronics company, its inventions, patents, and influence over the rectifier and semiconductor niche do not appear to have made a significant contribution to the broad patterns of our history. Other companies, labs, and engineers are credited with introducing the basic concepts of IR's technologies, including rectifiers, solar cells, and transistors. For example, Bell Labs in New Jersey is credited with introducing the transistor, and solar cells were developed by many scientists, including Einstein, since the 1880s.

Further, IR does not appear to have been significant at a local level, within the community of El Segundo. El Segundo began to develop alongside Standard Oil's second oil refinery, in 1910. In 1928, Mines Field (now known as Los Angeles International Airport) became the airfield to serve the expanding Los Angeles area. The airport bolstered the community's aerospace industry, leading to the establishment of many related enterprises. Thus, the oil refinery and the aerospace employed a large percentage of El Segundo's workers, and anchored the local economy. IR was not a small company, but its presence in El Segundo did not have a significant impact on the area because it is not documented as a significant employer or area business leader.

To be considered eligible for listing under Criterion 1, 233 Kansas Street must be associated with an event important to history, such as the IRs invention of selenium plates, single crystal P-N junction technology, selenium stack rectifiers, silicon solar cells, or the world's first solar-powered car, mentioned above. However, research failed to conclusively link the building with any of these inventions, and a property cannot be eligible if its historic associations are speculative (NPS 1995:12).

Therefore, 233 Kansas Street does not appear eligible for inclusion in the California Register under Criterion 1 because it does not appear to be associated with an event that has made a significant contribution to the broad patterns of history at the local, state, or national level.

**Criterion 2** – The Lidow family (including Leon, Eric, Alexander, and Derek) was instrumental in founding and growing IR into a multinational corporation. However, it is not evident that these individuals made a significant contribution to local, state, or national history. Therefore, 233 Kansas Street does not appear eligible under California Register Criterion 2.

**Criterion 3** – The building at 233 Kansas Street is a modest example of contemporary-style architecture and is not comparable to local resources that represent excellent examples of the style including the Scientific Data Systems Corporation, Manufacturing Building in El Segundo, as described above. Furthermore, 233 Kansas Street is not known to represent the work of a master because the architect is unknown. Therefore, the building at 233 Kansas Street does not display a

distinctive type, period, or method of construction; does not represent the work of a master engineer or designer; and is not a superior example of an architectural style. The building is not eligible under California Register Criterion 3.

**Criterion 4** – The property is not likely to yield valuable information that will contribute to our understanding of human history because the property is not and never was the principal source of important information pertaining to subjects such as mid-twentieth century offices. Therefore, the property does not appear eligible for listing under California Register Criterion 4.

Lastly, 233 Kansas Street maintains integrity of location, setting, design, materials, workmanship, feeling, but lacks association with a historic context. It appears largely unchanged since the time of construction.

### **247 Kansas Street**

**Criterion 1** – The building at 247 Kansas Street was constructed circa 1948. This date is corroborated by historical aerial photographs and historical mapping, as well as visual inspection. It is not known which, if any, of IR's products were invented or produced in this building.

In its 68-year span, IR had grown into a "worldwide provider of analog, digital, and mixed signal chips that convert electricity into power for electronics, computers, appliance and cars," among many other inventions. In 2013, the company had almost 5,000 employees and a market cap of \$1.32 billion (Jarvey 2013). IR was also the assignor to over 2,000 patents by the time it merged with Infineon in 2015. While IR was a formidable electronics company, its inventions, patents, and influence over the rectifier and semiconductor niche do not appear to have made a significant contribution to the broad patterns of our history. Other companies, labs, and engineers are credited with introducing the basic concepts of IR's technologies, including rectifiers, solar cells, and transistors. For example, Bell Labs in New Jersey is credited with introducing the transistor and solar cells were developed by many scientists, including Einstein, since the 1880s.

Further, IR does not appear to have been significant at a local level, within the community of El Segundo. El Segundo began to develop alongside Standard Oil's second oil refinery, in 1910. In 1928, Mines Field (now known as Los Angeles International Airport) became the airfield to serve the expanding the Los Angeles area. The airport bolstered the community's aerospace industry, leading to the establishment of many related enterprises. Thus, the oil refinery and the aerospace employed a large percentage of El Segundo's workers, and anchored the local economy. IR was not a small company, but its presence in El Segundo did not have a significant impact on the town because it is not documented as a significant employer or area business leader.

To be considered eligible for listing under Criterion 1, 247 Kansas Street must be associated with an event important to history, such as the IRs invention of selenium plates, single crystal P-N junction technology, selenium stack rectifiers, silicon solar cells, or the world's first solar-powered car, mentioned above. However, research failed to conclusively link the building with any of these inventions, and a property cannot eligible if its historic associations are speculative (NPS 1995:12).

Therefore, 247 Kansas Street does not appear eligible for inclusion in the California Register of Historical Resources (California Register) under Criterion 1 because it does not appear to be associated with an event that has made a significant contribution to the broad patterns of history at the local, state, or national level.

**Criterion 2** – The Lidow family (including Leon, Eric, Alexander, and Derek) was instrumental in founding and growing IR into a multinational corporation. However, it is not evident that these individuals made a significant contribution to local, state, or national history. Therefore, 247 Kansas Street does not appear eligible under California Register Criterion 2.

**Criterion 3** – This building was constructed circa 1948, is a modest example of contemporary-style architecture and is not comparable to local resources that represent excellent examples of the style including the Scientific Data Systems Corporation, Manufacturing Building in El Segundo, as described above. Furthermore, 247 Kansas Street is not known to represent the work of a master because the architect is unknown. Therefore, the building at 247 Kansas Street does not display a distinctive type, period, or method of construction; does not represent the work of a master engineer or designer; and is not a superior example of an architectural style. The building is not eligible under California Register Criterion 3.

**Criterion 4** – The property is not likely to yield valuable information that will contribute to our understanding of human history because the property is not and never was the principal source of important information pertaining to subjects such as mid-twentieth century offices. Therefore, the property does not appear eligible for listing under California Register Criterion 4.

Lastly, 247 Kansas Street maintains integrity of location, setting, design, materials, workmanship, feeling, but lacks association with a historic context. It appears largely unchanged since the time of construction.

In conclusion, 247 Kansas Street appears ineligible for listing in the California Register under Criteria 1, 2, 3, and 4 due to lack of association with a historic context. Additionally, the resource was evaluated in accordance with Section 15064.5(a)(2)–(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code, and it is not a historical resource for the purposes of CEQA.

### **348 Kansas Street**

**Criterion 1** – The building at 348 Kansas Street was constructed circa 1952; this date is corroborated by historical aerial photographs and historical mapping, as well as visual inspection. It is not known which, if any, of IR's products were invented or produced in this building.

In its 68-year span, IR had grown into a “worldwide provider of analog, digital, and mixed signal chips that convert electricity into power for electronics, computers, appliance and cars,” among many other inventions. In 2013, the company had almost 5,000 employees and a market cap of

## **MICHAEL BAKER INTERNATIONAL**

### **RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

**Page 12**

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\$1.32 billion (Jarvey 2013). IR was also the assignor to over 2,000 patents by the time it merged with Infineon in 2015. While IR was a formidable electronics company, its inventions, patents, and influence over the rectifier and semiconductor niche do not appear to have made a significant contribution to the broad patterns of our history. Other companies, labs, and engineers are credited with introducing the basic concepts of IR's technologies, including rectifiers, solar cells, and transistors. For example, Bell Labs in New Jersey is credited with introducing the transistor and solar cells were developed by many scientists, including Einstein, since the 1880s.

Further, IR does not appear to have been significant at a local level, within the community of El Segundo. El Segundo began to develop alongside Standard Oil's second oil refinery, in 1910. In 1928, Mines Field (now known as Los Angeles International Airport) became the airfield to serve the expanding the Los Angeles area. The airport bolstered the community's aerospace industry, leading to the establishment of many related enterprises. Thus, the oil refinery and the aerospace employed a large percentage of El Segundo's workers, and anchored the local economy. IR was not a small company, but its presence in El Segundo did not have a significant impact on the town because it is not documented as a significant employer or area business leader.

To be considered eligible for listing under Criterion 1, 348 Kansas Street must be associated with an event important to history, such as the IRs invention of selenium plates, single crystal P-N junction technology, selenium stack rectifiers, silicon solar cells, or the world's first solar-powered car, mentioned above. However, research failed to conclusively link the building with any of these inventions, and a property cannot eligible if its historic associations are speculative (NPS 1995:12).

Therefore, 348 Kansas Street does not appear eligible for inclusion in the California Register of Historical Resources (California Register) under Criterion 1 because it does not appear to be associated with an event that has made a significant contribution to the broad patterns of history at the local, state, or national level.

**Criterion 2** – The Lidow family (including Leon, Eric, Alexander, and Derek) was instrumental in founding and growing IR into a multinational corporation. However, it is not evident that these individuals made a significant contribution to local, state, or national history. Therefore, 348 Kansas Street does not appear eligible under California Register Criterion 2.

**Criterion 3** – This building at 348 Kansas Street is a modest example of contemporary-style architecture and is not comparable to local resources that represent excellent examples of the style, including the Scientific Data Systems Corporation, Manufacturing Building in El Segundo, as described above. Furthermore, 348 Kansas Street is not known to represent the work of a master because the architect is unknown. Therefore, the building at 348 Kansas Street does not display a distinctive type, period, or method of construction; does not represent the work of a master engineer or designer; and is not a superior example of an architectural style. The building is not eligible under California Register Criterion 3.

**Criterion 4** – The property is not likely to yield valuable information that will contribute to our understanding of human history because the property is not and never was the principal source

## **MICHAEL BAKER INTERNATIONAL**

### **RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

**Page 13**

---

of important information pertaining to subjects such as mid-twentieth century offices. Therefore, the property does not appear eligible for listing under California Register Criterion 4.

Lastly, 348 Kansas Street maintains integrity of location, setting, design, materials, workmanship, feeling, and association. It appears largely unchanged since the time of construction.

In conclusion, 233, 247, and 348 Kansas Street appear ineligible for listing in the California Register under Criteria 1, 2, 3, and 4 due to lack of association with a historic context. Additionally, the resources were evaluated in accordance with Section 15064.5(a)(2)–(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code, and they are not historical resources for the purposes of CEQA.

## **FINDINGS**

The SCCIC records search, field survey, historic map review, and California Register evaluations identified no historical resources as defined by CEQA Section 15064.5(a) within the project area.

## **PREPARERS' QUALIFICATIONS**

This report and California Register evaluations were prepared by Michael Baker International Architectural Historian Margo Nayyar. Ms. Nayyar is a cultural resources manager with eight years of cultural resources management experience in California. Her experience includes built environment surveys, historic context development, archival research, evaluation of historic-era resources using guidelines outlined in the National, California, and various local registers; preparation of cultural resources technical studies pursuant to CEQA and Section 106 of the NHPA; municipal preservation planning; and providing Certified Local Government training to interested local governments. She also specializes in producing HABS/HAER/HALS (Historic American Buildings Survey, the Historic American Engineering Record, and Historic American Landscapes Survey) heritage documentation. Ms. Nayyar meets the Secretary of the Interior's Professional Qualification Standards for history and architectural history.

The California Register evaluations were also completed by Michael Baker International Architectural Historian Katherine Molnar. Ms. Molnar is a cultural resources manager with 12 years of experience completing historic resource surveys, National Register and California Register evaluations, historic context development, criteria of effects evaluations, programmatic agreement preparation, archival records research, deed research, and HABS/HAER documentation. Ms. Molnar meets the Secretary of the Interior's Professional Qualification Standards for history and architectural history.

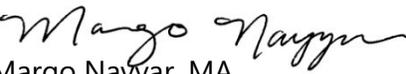
**MICHAEL BAKER INTERNATIONAL**

**RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL  
REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

**Page 14**

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Sincerely,

  
Margo Nayyar, MA  
Architectural Historian

Attachments:

Attachment 1 – Figures

Attachment 2 – DPR Forms

**REFERENCES**

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**RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

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**MICHAEL BAKER INTERNATIONAL**

**RE: CULTURAL RESOURCES IDENTIFICATION AND EVALUATION MEMO FOR THE GRIFFIN CAPITAL REDEVELOPMENT PROJECT IN THE CITY OF EL SEGUNDO, LOS ANGELES COUNTY, CALIFORNIA**

**Page 17**

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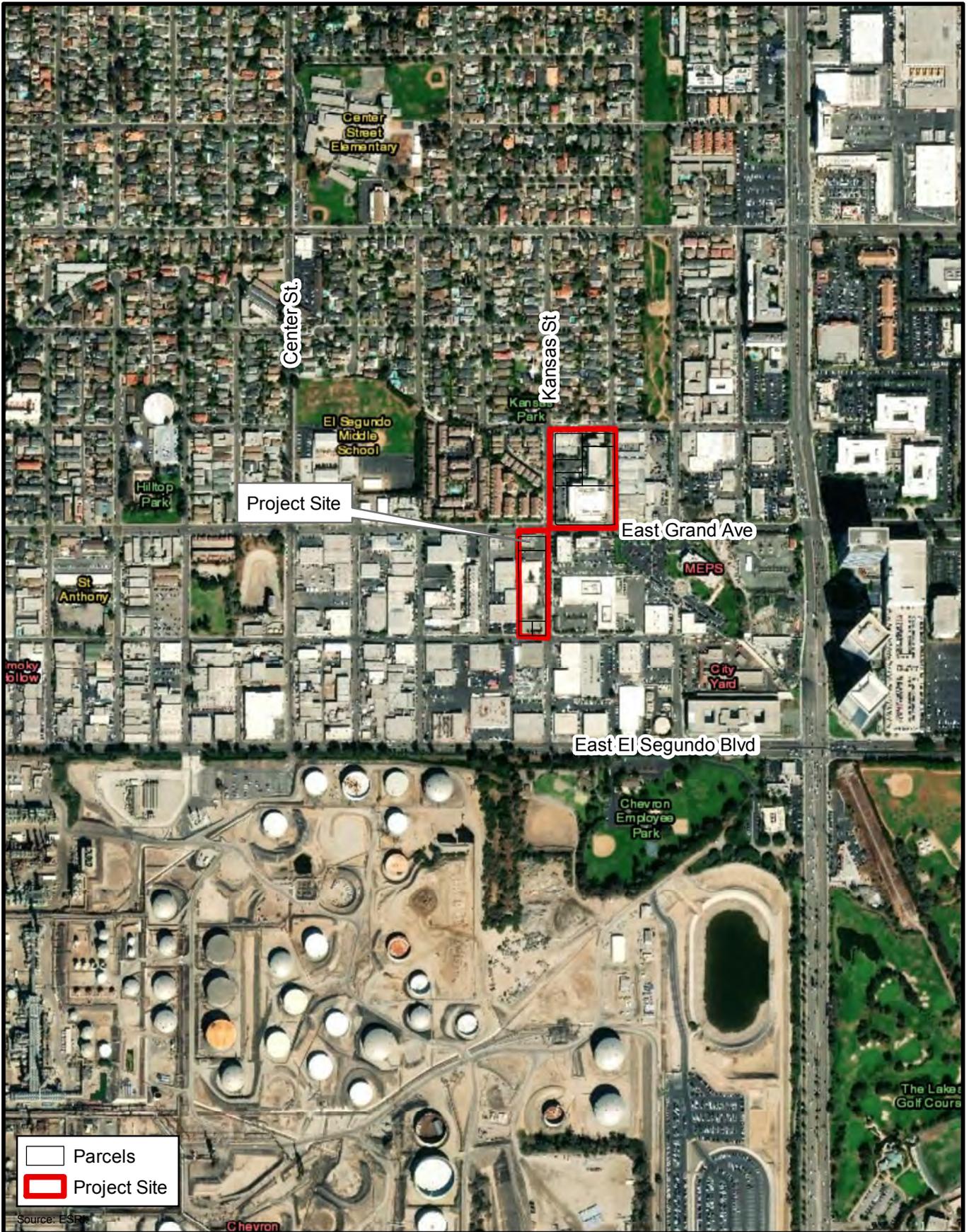
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# **Attachment 1**

## **Figures**



**FIGURE 1**  
Location



**FIGURE 2**  
Project Site



**FIGURE 3**  
Cultural Resources

# **Attachment 2**

## **DPR Forms**

State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

Primary #  
HRI #  
Trinomial  
NRHP Status Code 6Z

Other Listings  
Review Code

Reviewer

Date

Page 1 of 11

\*Resource Name or #: 233 Kansas Street

**P1. Other Identifier:** International Rectifier Executive Offices

\***P2. Location:**  **Unrestricted**

\***a. County** Los Angeles **and**

\***b. USGS 7.5' Quad** Venice, Calif. **Date** 1964 **T** 3S; **R** 15W; Rancho Sausal Redondo S.B.B.M

c. **Address** 233 Kansas Street **City** El Segundo **Zip** 90245

d. **UTM: Zone** 11S, 370513 mE/ 3754027 mN

e. **Other Locational Data:** APN 4139-006-063

\***P3a. Description:**

The approximately 18,208-square-foot building at 233 Kansas Street displays a concrete slab foundation, irregular ground plan, and brick masonry and steel structural system. The north, west, and south elevations display ribbons of fixed metal-framed windows alternating with fixed and hopper windows. The windows are original to the building. The original doors are also extant and include metal frames and glazing. The roof displays two different planes, both of which display a low-pitched and front gable orientation and wide eave overhang. A projecting gable end indicative of the 1950s covers the main entry. Loading docks with large roll-up and metal bay doors are located on the south and north elevations. Decorative elements of the building include an atrium with mature vegetation, entry interior planter beds with storefront windows, and original exterior light fixtures. The building was originally used for offices and light manufacturing.

\***P3b. Resource Attributes:** HP6. 1-3 Story Commercial Building

\***P4. Resources Present:**  Building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



**P5b. Description of Photo:**

Photograph 1: View of 233 Kansas Street, looking southwest. Taken March 21, 2019.

**P6. Date Constructed/Age and Source:**

Historic  
1956 (ParcelQuest 2019)

\***P7. Owner and Address:**

International Rectifier Corp.  
247 Kansas Street  
El Segundo, CA 90245

\***P8. Recorded by:**

Margo Nayyar  
Michael Baker International  
2729 Prospect Park Drive, #220  
Rancho Cordova, CA 95670

\***P9. Date Recorded:**

March 21, 2019

\***P10. Survey Type:** Intensive

\***P11. Report Citation:**

Nayyar, Margo. 2019. "Cultural Resources Identification and Evaluation Memo for The Griffin Capital Redevelopment Project in the City of El Segundo, Los Angeles County, California." Rancho Cordova, CA: Michael Baker International.

\***Attachments:**  Location Map  Continuation Sheet  Building, Structure, and Object Record





**\*B10. Significance (continued):**

Eric’s father Leon, a Holocaust survivor, immigrated to the United States by 1947. The father and son team joined forces to establish the International Rectifier Corporation (IR) in Inglewood, California, in August 1947 (Jarvey 2013). The startup began with a staff of six and focused on advancing the process Lidow had developed for manufacturing selenium rectifiers (rectifiers convert alternating electrical current [AC] to direct electrical current [DC]). The group worked to develop, improve, and manufacture electrical rectifiers, semiconductors, and photoelectric cells. Their specialized technology was “pioneering” and “predated the development of the transistor by more than four months” (though it does not appear that IR was assigned any patents during this period) (Funding Universe 2005; US Patent Office 2019).

Jagdish Chandra Bose invented the earliest “cat’s whisker” semiconductor at the turn of the twentieth century, though it proved unreliable and problematic (a semiconductor is a solid substance with a conductivity level somewhere between that of an insulator and that of a conductor; semiconductors are used to control flows of energy, depending upon conditions). Engineers at Bell Labs began improving the “cat’s whisker” design starting in 1939; they gradually made improvements until the testing material, germanium crystals, had been perfected. As understanding of semiconducting evolved, scientists at labs and universities across the country began developing the technology for mass production. William Shockley, John Bardeen, and Walter Brattain are credited with inventing the first transistor (a semiconductor device) in 1947. Brattain filed three patents for this device in 1946 and early 1947 (US Patent Office, “Light-sensitive electric device,” US2537255A, US2537256A, and US2537257A).

IR presumably coupled Bell Labs’ findings with their own to take a strong foothold in the semiconductor industry. One source notes IR as “the oldest independent power semiconductor manufacturer in the world” prior to its merger with Infineon in 2015 (Funding Universe 2005). One of IR’s inventions at the Inglewood location, in 1948, was selenium plates which were 50 percent larger than existing plates. In 1949, IR introduced selenium photo cells, selenium diodes, and selenium cartridge rectifiers. In 1950, it improved the “single crystal P-N junction technology” to allow rectifiers to be made smaller and withstand greater temperature extremes. It also introduced selenium stack rectifiers (for battery charging) by 1951 (Infineon.com 2019).

In 1951, IR relocated from its original location on Victoria Street in Inglewood, California, to 1521 East Grand Avenue in El Segundo. The address was formerly occupied by Kwikly Inc., a manufacturer of frozen meals (San Bernardino County Sun [SBCS] 1950:14). The building was demolished sometime between 1994 and 2002. In the 1950s, IR gained momentum, and the new home in El Segundo provided greater space for expanding facilities. At the time, the Pacific Electric Railroad fronted IR’s property, making it a strategic location. The company soon owned buildings at over 15 addresses along Kansas Street, East Grand Avenue, Nevada Street, and Center Street.

Known International Rectifier Addresses in El Segundo	
Address	Approximate construction date and notes
120 Kansas Street	1958
145 Kansas Street	1957
222 Kansas Street	1960 - New 80,000-square-foot facility begins production.
223 Kansas Street	1955
233 Kansas Street	1956
247 Kansas Street	1948
318 Kansas Street	Unknown
330 Kansas Street	1979 - IR breaks ground for HEXFET wafer fabrication.
337 Kansas Street	Unknown
340 Kansas Street	Unknown
344 Kansas Street	Unknown
348 Kansas Street	1952
1111 E Grand Avenue	1959 - 8,000 square foot building used by IR’s Astro-Power Division to produce solar energy converters.
1521 E Grand Avenue	1950 - original building; 1997 – new building.
200 Nevada Street	1955 - used as a machine shop.

Known International Rectifier Addresses in El Segundo	
Address	Approximate construction date and notes
201 Nevada Street	1955 - built to produce selenium rectifiers for the radio and television industry.
200 Center Street	1959 - IR opens pilot plant for the manufacture of encapsulated miniature silicon diodes.
<i>(El Segundo Herald 1983:1)</i>	

Innovations during the 1950s included the “technological leap” from selenium to germanium-based rectifiers in 1954, and silicon-based rectifiers in 1959. The silicon-based rectifier was “small[er] than a thimble,” and “replaces other units up to 100 times larger” (Los Angeles Times 1959). The company owned patents to at least 40 inventions during the 1950s, primarily involving rectifiers, photoelectric energy, and selenium photo electric cells (US Patent Office 2019). In 1957, IR built a branch company in Japan, followed by another subsidiary in Great Britain in 1958 (Funding Universe 2005). In 1959, IR was awarded a \$500,000 contract with Lockheed Martin’s Aircrafts, Missiles, and Space Division to work on U.S. space program projects. Specifically, the contract was to build “silicon solar cells that convert sunlight energy into electrical currents” (SBCS 1959:6).

IR debuted “the world’s first” solar-powered car in 1960. Additional international branches were established in Italy in 1961, India in 1965, Canada in 1966, and Mexico in 1973. In the late 1960s, competitors began producing silicon control rectifiers, leading to financial instability. Eric’s sons Derek and Alexander joined IR in 1975 and 1977, at the same time the semiconductor industry was undergoing a substantial transformation in technology. Until this point, rectifiers functioned primarily using bipolar transistors, but the industry was shifting toward using power MOSFETs (metal-oxide-semiconductor-field-effect-transistor), which were “more efficient, faster, and smaller” than bipolars (Funding Universe 2005). Alexander Lidow introduced the HEXFET-Power-MOSFET, with a hexagonal shape, in 1979. The product helped make energy use more efficient; it eventually became IR’s staple product, with IR controlling over half the power-MOFSET market. In 1987, the success of this invention led to construction of HEXFET America, an \$82 million production plant in Temecula, California (Funding Universe 2005).

In 1989, Eric Lidow divided the company, giving control of one half to each son. The split did not provide positive results for the company and its clients; thus, in 1992, the company reunified. Expansion continued as the Temecula plant was enlarged in 1997, followed by the construction of a manufacturing plant in Wales in 1998. Alexander Lidow became the CEO in 1999, which ushered in unprecedented growth. IR began to acquire other companies, giving the company new technology that enabled it to expand its aerospace and defense markets. In 2004, sales surpassed \$1 billion (Funding Universe 2005). Finally, Infineon Technologies, headquartered in Neubiberg, Germany, acquired IR in 2015 for \$3 billion (Mil and Aero Staff 2015).

During its 68-year span, IR was the assignor to over 2,000 patents, many of which now belong to Infineon.

Architecturally, the Contemporary-style building is a modest example of its style. It displays many of the identifying features such as low-pitched gable roof with overhanging eaves, exposed roof beams, and used of natural materials such as brick. However, prominent examples of the Contemporary style are located throughout El Segundo and Los Angeles County including the Scientific Data Systems Corporation (SDS), Manufacturing Building (built 1965-1966) at 555 South Aviation Boulevard in El Segundo (PCAD 2019a). It was designed by the influential architectural firm, Craig Ellwood and Associates, and consisted of 260,000 square feet of manufacturing space, and was:

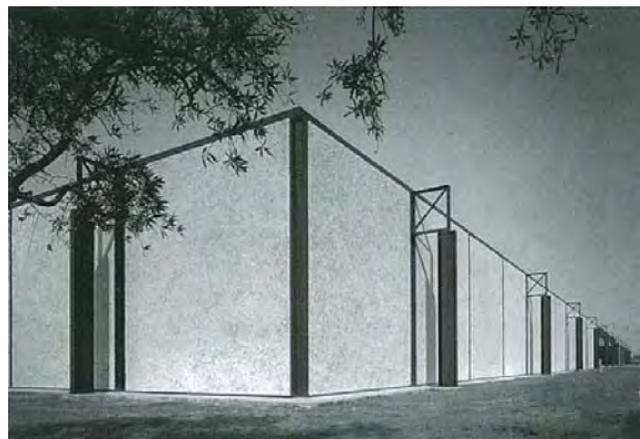
Page 6 of 11

\*Resource Name or # 233 Kansas Street

\*Recorded by: Margo Nayyar, Michael Baker International \*Date: March 21, 2019  Continuation

**\*B10. Significance (continued):**

constructed with tilt-up concrete panels attached to an exposed exterior structural system of steel columns. The administration and factory spaces are unified through similar materials, finishes and design concept based upon structure. Craig Ellwood and Associates designed the SDS Administration Engineering Building, 701 South Aviation Boulevard, El Segundo based on the ideas of the earlier SDS building, but without the exposed structure attached to the exterior. The square floor plan was divided into a grid by structural columns and had a central atrium. Ellwood designed two other buildings for SDS between 1966-1968 using the same materials, finishes, and structure as the first two facilities. The four SDS building all located adjacent to each other form a cohesive campus with a holistic Modern design and without architectural or spatial hierarchy. Other notable Modern factory buildings designed by Craig Ellwood's office are the Xerox Corporation Manufacturing Facility (1967) located at 800 E. Bonita Ave, Pomona, (demolished), and the Torrington Manufacturing Company (1953) located at 16300 Roscoe Boulevard, Van Nuys, (demolished). The Magnavox Building (1960) in Torrance, designed by Torrance Risley and Gould, and the Firestone Store, Offices and Warehouse (1958) in Commerce designed by Pereira & Luckman are also good example of post-World War II Modern factories in the Los Angeles area. (PCR 2009:4-5)



Scientific Data Systems (now Xerox), El Segundo, California, designed by Craig Ellwood and Associates (1965-1966)

A similar contemporary-style manufacturing building was constructed in 1960 at 222 Kansas Street (demolished circa 2009) and designed by the California firm Thonis, Harrison, & Wolfe. Another contemporary-style building located at 247 Kansas Street was constructed circa 1948. Despite the stylistic similarities, it is not known whether all three buildings were designed by the same firm. Even so, Thonis, Harrison & Wolfe does not appear to have gained particular significance during its tenure because it is not listed in the Pacific Coast Architecture Database of significant architectural firms or identified during electronic database searches (PCAD 2019b; google.com 2019).

**California Register Evaluation**

**Criterion 1** – The building at 233 Kansas Street was constructed circa 1956, apparently as a new headquarters building for IR. This date is corroborated by historical aerial photographs and historical mapping, as well as visual inspection. It operated as IR's headquarters until 1968, at which time the company's executives moved to the Charles Luckman & Associates Building (9220 Sunset Boulevard, West Hollywood, CA) in order to be closer to the firms with whom they conducted business (Los Angeles Times 1968:129). The building also served as home to the company's Semiconductor Division for many years. It is not known which, if any, of IR's products were invented or produced in this building.

**\*B10. Significance (continued):**

In its 68-year span, IR had grown into a “worldwide provider of analog, digital, and mixed signal chips that convert electricity into power for electronics, computers, appliance and cars,” among many other inventions. In 2013, the company had almost 5,000 employees and a market cap of \$1.32 billion (Jarvey 2013). IR was also the assignor to over 2,000 patents by the time it merged with Infineon in 2015. While IR was a formidable electronics company, its inventions, patents, and influence over the rectifier and semiconductor niche do not appear to have made a significant contribution to the broad patterns of our history. Other companies, labs, and engineers are credited with introducing the basic concepts of IR’s technologies, including rectifiers, solar cells, and transistors. For example, Bell Labs in New Jersey is credited with introducing the transistor and solar cells were developed by many scientists, including Einstein, since the 1880s.

Further, IR does not appear to have been significant at a local level, within the community of El Segundo. El Segundo began to develop alongside Standard Oil’s second oil refinery, in 1910. In 1928, Mines Field (now known as Los Angeles International Airport) became the airfield to serve the expanding the Los Angeles area. The airport bolstered the community’s aerospace industry, leading to the establishment of many related enterprises. Thus, the oil refinery and the aerospace employed a large percentage of El Segundo’s workers, and anchored the local economy. IR was not a small company, but its presence in El Segundo did not have a significant impact on the town because it is not documented as a significant employer or area business leader.

To be considered eligible for listing under Criterion 1, 233 Kansas Street must be associated with an event important to history, such as the IRs invention of selenium plates, single crystal P-N junction technology, selenium stack rectifiers, silicon solar cells, or the world’s first solar-powered car, mentioned above. However, research failed to conclusively link the building with any of these inventions, and a property cannot eligible if its historic associations are speculative (NPS 1995:12).

Therefore, 233 Kansas Street does not appear eligible for inclusion in the California Register of Historical Resources (California Register) under Criterion 1 because it does not appear to be associated with an event that has made a significant contribution to the broad patterns of history at the local, state, or national level.

**Criterion 2** – The Lidow family (including Leon, Eric, Alexander, and Derek) was instrumental in founding and growing IR into a multinational corporation. However, it is not evident that these individuals made a significant contribution to local, state, or national history. Therefore, 233 Kansas Street does not appear eligible under California Register Criterion 2.

**Criterion 3** –The building at 233 Kansas Street is a modest example of contemporary-style architecture and is not comparable to local resources that represent excellent examples of the style including the Scientific Data Systems Corporation, Manufacturing Building in El Segundo, as described above. Furthermore, 233 Kansas Street is not known to represent the work of a master because the architect is unknown. Therefore, the building at 233 Kansas Street does not display a distinctive type, period, or method of construction; does not represent the work of a master engineer or designer; and is not a superior example of an architectural style. The building is not eligible under California Register Criterion 3.

**Criterion 4** – The property is not likely to yield valuable information that will contribute to our understanding of human history because the property is not and never was the principal source of important information pertaining to subjects such as mid-twentieth century offices. Therefore, the property does not appear eligible for listing under California Register Criterion 4.

Lastly, 233 Kansas Street maintains integrity of location, setting, design, materials, workmanship, feeling, but lacks association with a historic context. It appears largely unchanged since the time of construction.

In conclusion, 233 Kansas Street appears ineligible for listing in the California Register under Criteria 1, 2, 3, and 4 due to lack of association with a historic context. Additionally, the resource was evaluated in accordance with Section 15064.5(a)(2)–(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code, and it is not a historical resource for the purposes of CEQA.

**P5a. Photographs (continued):**



Photograph 2: View showing the east façade, facing northwest. Taken March 21, 2019.



Photograph 3: Detail view of the north façade and metal-framed windows, facing southwest.

**P5a. Photographs (continued):**



Photograph 4. Detail view of the north façade and rear entrance, facing south.



Photograph 5. Detail view of the building's northeast corner, showing the glass atrium and "Executive Office" lettering, facing southwest.

**P5a. Photographs (continued):**



Photograph 6. View of the south façade and east façade, facing northwest.

**\*B12. References (continued):**

- El Segundo Herald*. 1983. "289 Hazardous material sites in El Segundo." August 18, Vol. 72, no. 33. El Segundo, California.
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- SBCS (*San Bernardino County Sun*). 1950. "Kwikly Inc. Contest Rules." June 1950.
- . 1959. "\$500,000 Contracts Awarded by Lockheed." September 17, 1959:6. San Bernardino, California.
- US Patent and Trademark Office. 2019. "USPTO Patent Full-Text and Image Database" Electronic resource, <http://patft.uspto.gov/netahtml/PTO/search-bool.html>, accessed April 4, 2019.

State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

Primary #  
HRI #  
Trinomial  
NRHP Status Code 6Z

Other Listings  
Review Code

Reviewer

Date

Page 1 of 10

\*Resource Name or #: 247 Kansas Street

**P1. Other Identifier:** N/A

\*P2. **Location:**  **Unrestricted**

\*a. **County** Los Angeles **and**

\*b. **USGS 7.5' Quad** Venice, Calif. **Date** 1964 **T** 3S; **R** 15W; Rancho Sausal Redondo S.B.B.M

c. **Address** 247 Kansas Street **City** El Segundo **Zip** 90245

d. **UTM: Zone** 11S, 370507 mE/3754092 mN

e. **Other Locational Data:** APN 4139-006-064

\*P3a. **Description:**

247 Kansas Street was originally constructed circa 1948 as an office building with an attached industrial or manufacturing space. In total, the building is slightly larger than 5,000 square feet. The office portion of the building is rectangular in shape and comprises the northern half of the building. This portion of the building has a heavy, flat roofline, supported on heavy brick masonry walls interrupted by a band of ribbon windows on the side (north) façade, and large, plate-glass, storefront windows on the front (east) façade. The glazing at the front of the building is set in an aluminum frame, while the glazing at the side (north) of the building is fixed, set in a wood frame. The industrial portion of the building is also rectangular in shape and comprises the southern half of the building. This portion of the building has a shed roof, with glazing at the monitor level along the side (north) façade. While the foundation is not visible, the building was likely constructed upon a poured concrete slab. The walls of the office portion of the building (to the north) are clad with red brick and accentuated with modern, concrete quoin detailing. The southern portion of the building is minimally visible due to dense foliage, though it is likely clad with aluminum or vinyl siding. The building was originally used for offices and light manufacturing.

\*P3b. **Resource Attributes:** HP6. 1-3 Story Commercial Building

\*P4. **Resources Present:**  Building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



**P5b. Description of Photo:**

Photograph 1: View of 247 Kansas Street, looking southwest. Taken March 21, 2019.

**P6. Date Constructed/Age and Source:**

Historic  
1948 (ParcelQuest 2019)

\*P7. **Owner and Address:**

International Rectifier Corp.  
247 Kansas Street  
El Segundo, CA 90245

\*P8. **Recorded by:**

Margo Nayyar  
Michael Baker International  
2729 Prospect Park Drive, #220  
Rancho Cordova, CA 95670

\*P9. **Date Recorded:**

March 21, 2019

\*P10. **Survey Type:** Intensive

\*P11. **Report Citation:**

Nayyar, Margo. 2019. "Cultural Resources Identification and Evaluation Memo for The Griffin Capital Redevelopment Project in the City of El Segundo, Los Angeles County, California." Rancho Cordova, CA: Michael Baker International.

\*Attachments:  Location Map  Continuation Sheet  Building, Structure, and Object Record

**State of California - The Resources Agency  
 DEPARTMENT OF PARKS AND RECREATION  
 BUILDING, STRUCTURE, AND OBJECT RECORD**

**Primary #  
 HRI#**

Page 2 of 10

**\*NRHP Status Code 6Z  
 \*Resource Name or # 247 Kansas Street**

- B1. Historic Name: N/A
- B2. Common Name: N/A
- B3. Original Use: Office space and light manufacturing
- B4. Present Use: Vacant

**\*B5. Architectural Style:** Contemporary

**\*B6. Construction History:**

The building was constructed circa 1948 (ParcelQuest 2019). There are no known exterior alterations.

**\*B7. Moved?**  No  Yes  Unknown **Date:** N/A **Original Location:** N/A

**\*B8. Related Features:** N/A

B9a. Architect: Unknown

b. Builder: Unknown

**\*B10. Significance: Theme** Semiconductor technology

**Area:** El Segundo

**Period of Significance** 1948-1968

**Property Type** Office building

**Applicable Criteria** N/A

Eric Lidow was born to a Jewish family in Vilnius, Lithuania, in 1912 during a period of Russian control. He later moved to Berlin, where he completed a master's degree in electrical engineering from the Technical University of Berlin. He reportedly helped several Jews escape Nazi Germany before WWII broke out. Lidow immigrated to New York in 1937, the same year he graduated (Jarvey 2013). Arriving in New York with only \$14 and limited English skills, he found work washing dishes. After two years, Lidow moved to California where he started the Selenium Corporation of America in 1939 or 1940. After growing to over 200 employees, the company was acquired by the Sperry Corporation in 1944 (Sperry went on to become a major electronics and aerospace manufacturer). Lidow continued working with the company until 1946 (Funding Universe 2005; Jarvey 2013) (see continuation sheets).

B11. Additional Resource Attributes: N/A

**\*B12. References:** See continuation sheet.

B13. Remarks: N/A

**\*B14. Evaluator:**

Katherine Molnar, Architectural Historian

Margo Nayyar, Architectural Historian

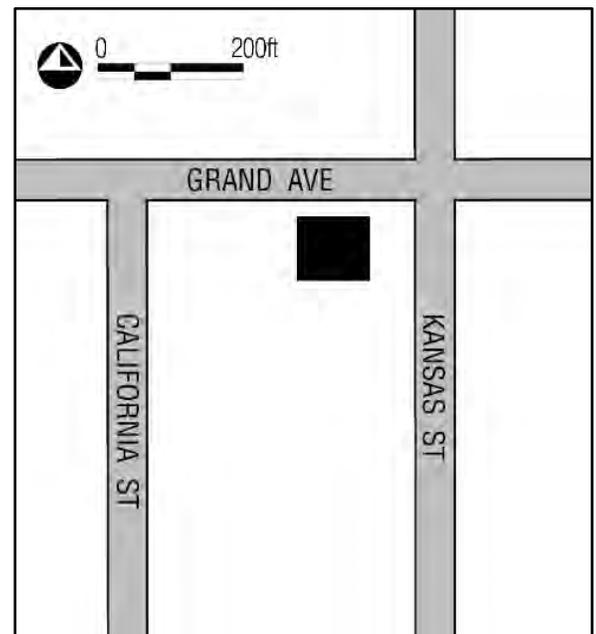
Michael Baker International

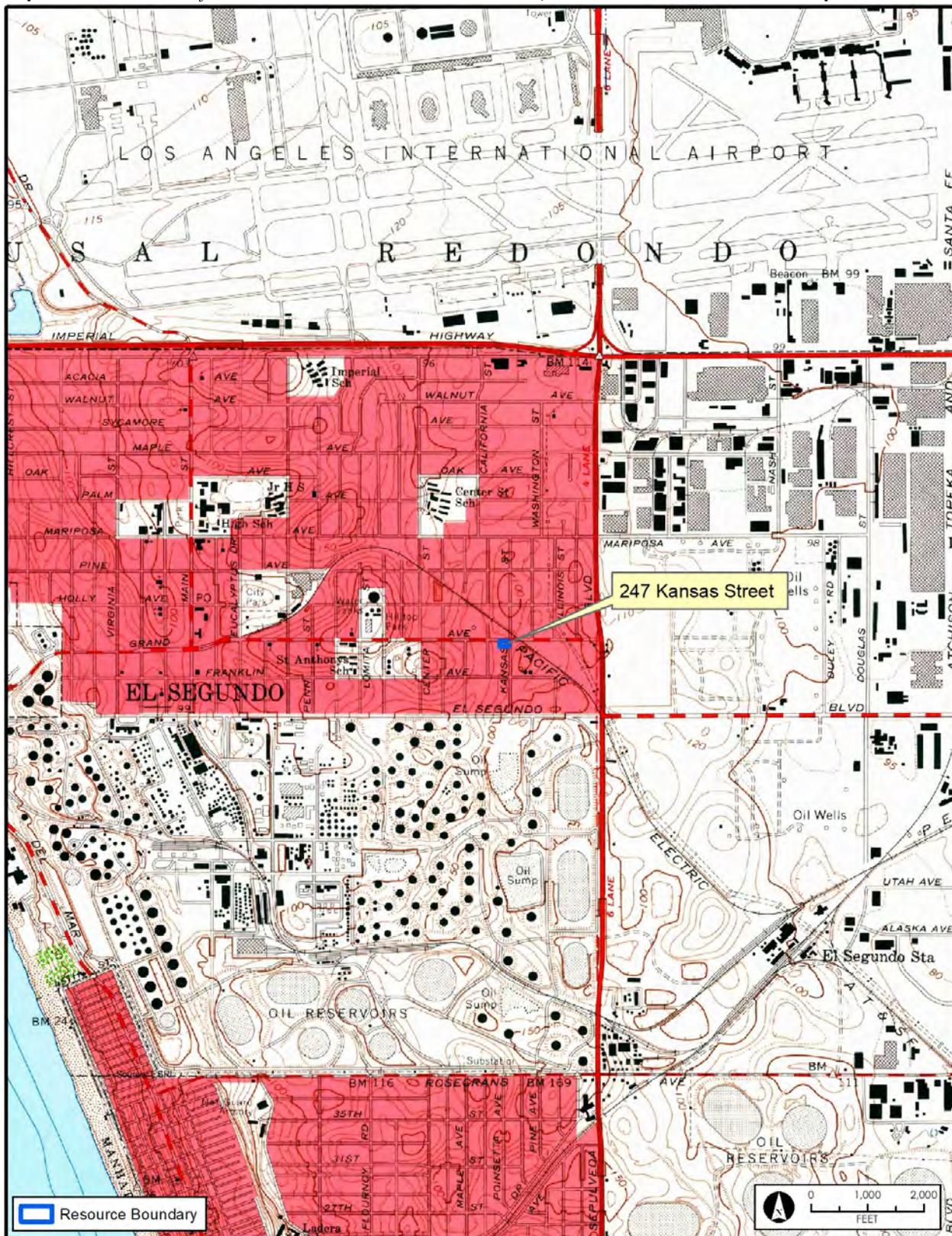
2729 Prospect Park Drive, #220

Rancho Cordova, CA 95670

**\*Date of Evaluation:** March 28, 2019

(This space reserved for official comments.)





**\*B10. Significance (continued):**

Eric’s father Leon, a Holocaust survivor, immigrated to the United States by 1947. The father and son team joined forces to establish the International Rectifier Corporation (IR) in Inglewood, California, in August 1947 (Jarvey 2013). The startup began with a staff of six and focused on advancing the process Lidow had developed for manufacturing selenium rectifiers (rectifiers convert alternating electrical current [AC] to direct electrical current [DC]). The group worked to develop, improve, and manufacture electrical rectifiers, semiconductors, and photoelectric cells. Their specialized technology was “pioneering” and “predated the development of the transistor by more than four months” (though it does not appear that IR was assigned any patents during this period) (Funding Universe 2005; US Patent Office 2019).

Jagdish Chandra Bose invented the earliest “cat’s whisker” semiconductor at the turn of the twentieth century, though it proved unreliable and problematic (a semiconductor is a solid substance with a conductivity level somewhere between that of an insulator and that of a conductor; semiconductors are used to control flows of energy, depending upon conditions). Engineers at Bell Labs began improving the “cat’s whisker” design starting in 1939; they gradually made improvements until the testing material, germanium crystals, had been perfected. As understanding of semiconducting evolved, scientists at labs and universities across the country began developing the technology for mass production. William Shockley, John Bardeen, and Walter Brattain are credited with inventing the first transistor (a semiconductor device) in 1947. Brattain filed three patents for this device in 1946 and early 1947 (US Patent Office, “Light-sensitive electric device,” US2537255A, US2537256A, and US2537257A).

IR presumably coupled Bell Labs’ findings with their own to take a strong foothold in the semiconductor industry. One source notes IR as “the oldest independent power semiconductor manufacturer in the world” prior to its merger with Infineon in 2015 (Funding Universe 2005). One of IR’s inventions at the Inglewood location, in 1948, was selenium plates which were 50 percent larger than existing plates. In 1949, IR introduced selenium photo cells, selenium diodes, and selenium cartridge rectifiers. In 1950, it improved the “single crystal P-N junction technology” to allow rectifiers to be made smaller and withstand greater temperature extremes. It also introduced selenium stack rectifiers (for battery charging) by 1951 (Infineon.com 2019).

In 1951, IR relocated from its original location on Victoria Street in Inglewood, California, to 1521 East Grand Avenue in El Segundo. The address was formerly occupied by Kwikly Inc., a manufacturer of frozen meals (SBCS 1950:14). The building was demolished sometime between 1994 and 2002. In the 1950s, IR gained momentum, and the new home in El Segundo provided greater space for expanding facilities. At the time, the Pacific Electric Railroad fronted IR’s property, making it a strategic location. The company soon owned buildings at over 15 addresses along Kansas Street, East Grand Avenue, Nevada Street, and Center Street.

Known International Rectifier Addresses in El Segundo	
Address	Approximate construction date and notes
120 Kansas Street	1958
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223 Kansas Street	1955
233 Kansas Street	1956
247 Kansas Street	1948
318 Kansas Street	Unknown
330 Kansas Street	1979 - IR breaks ground for HEXFET wafer fabrication.
337 Kansas Street	Unknown
340 Kansas Street	Unknown
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Innovations during the 1950s included the “technological leap” from selenium to germanium-based rectifiers in 1954, and silicon-based rectifiers in 1959. The silicon-based rectifier was “small[er] than a thimble,” and “replaces other units up to 100 times larger” (Los Angeles Times 1959). The company owned patents to at least 40 inventions during the 1950s, primarily involving rectifiers, photoelectric energy, and selenium photo electric cells (US Patent Office 2019). In 1957, IR built a branch company in Japan, followed by another subsidiary in Great Britain in 1958 (Funding Universe 2005). In 1959, IR was awarded a \$500,000 contract with Lockheed Martin’s Aircrafts, Missiles, and Space Division to work on U.S. space program projects. Specifically, the contract was to build “silicon solar cells that convert sunlight energy into electrical currents” (SBCS 1959:6).

IR debuted “the world’s first” solar-powered car in 1960. Additional international branches were established in Italy in 1961, India in 1965, Canada in 1966, and Mexico in 1973. In the late 1960s, competitors began producing silicon control rectifiers, leading to financial instability. Eric’s sons Derek and Alexander joined IR in 1975 and 1977, at the same time the semiconductor industry was undergoing a substantial transformation in technology. Until this point, rectifiers functioned primarily using bipolar transistors, but the industry was shifting toward using power MOSFETs (metal-oxide-semiconductor-field-effect-transistor), which were “more efficient, faster, and smaller” than bipolars (Funding Universe 2005). Alexander Lidow introduced the HEXFET-Power-MOSFET, with a hexagonal shape, in 1979. The product helped make energy use more efficient; it eventually became IR’s staple product, with IR controlling over half the power-MOFSET market. In 1987, the success of this invention led to construction of HEXFET America, an \$82 million production plant in Temecula, California (Funding Universe 2005).

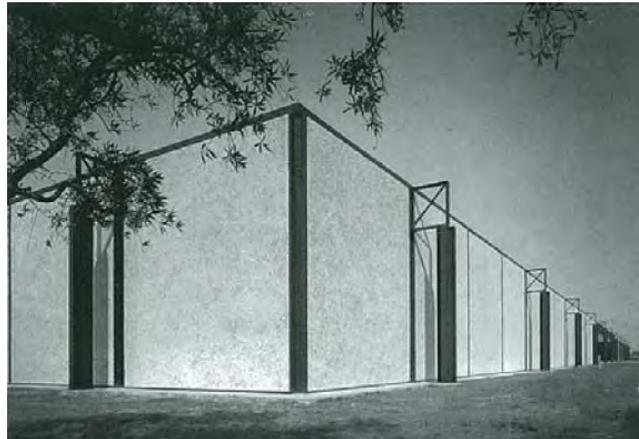
In 1989, Eric Lidow divided the company, giving control of one half to each son. The split did not provide positive results for the company and its clients; thus, in 1992, the company reunified. Expansion continued as the Temecula plant was enlarged in 1997, followed by the construction of a manufacturing plant in Wales in 1998. Alexander Lidow became the CEO in 1999, which ushered in unprecedented growth. IR began to acquire other companies, giving the company new technology that enabled it to expand its aerospace and defense markets. In 2004, sales surpassed \$1 billion (Funding Universe 2005). Finally, Infineon Technologies, headquartered in Neubiberg, Germany, acquired IR in 2015 for \$3 billion (Mil and Aero Staff 2015).

During its 68-year span, IR was the assignor to over 2,000 patents, many of which now belong to Infineon.

Architecturally, the Contemporary-style building is a modest example of its style. It displays many of the identifying features such as low-pitched gable roof with overhanging eaves, exposed roof beams, and used of natural materials such as brick. However, prominent examples of the Contemporary style are located throughout El Segundo and Los Angeles County including the Scientific Data Systems Corporation (SDS), Manufacturing Building (built 1965-1966) at 555 South Aviation Boulevard in El Segundo (PCAD 2019a). It was designed by the influential architectural firm, Craig Ellwood and Associates, and consisted of 260,000 square feet of manufacturing space, and was:

**\*B10. Significance (continued):**

constructed with tilt-up concrete panels attached to an exposed exterior structural system of steel columns. The administration and factory spaces are unified through similar materials, finishes and design concept based upon structure. Craig Ellwood and Associates designed the SDS Administration Engineering Building, 701 South Aviation Boulevard, El Segundo based on the ideas of the earlier SDS building, but without the exposed structure attached to the exterior. The square floor plan was divided into a grid by structural columns and had a central atrium. Ellwood designed two other buildings for SDS between 1966-1968 using the same materials, finishes, and structure as the first two facilities. The four SDS building all located adjacent to each other form a cohesive campus with a holistic Modern design and without architectural or spatial hierarchy. Other notable Modern factory buildings designed by Craig Ellwood's office are the Xerox Corporation Manufacturing Facility (1967) located at 800 E. Bonita Ave, Pomona, (demolished), and the Torrington Manufacturing Company (1953) located at 16300 Roscoe Boulevard, Van Nuys, (demolished). The Magnavox Building (1960) in Torrance, designed by Torrance Risley and Gould, and the Firestone Store, Offices and Warehouse (1958) in Commerce designed by Pereira & Luckman are also good example of post-World War II Modern factories in the Los Angeles area. (PCR 2009:4-5)



Scientific Data Systems (now Xerox), El Segundo, California, designed by Craig Ellwood and Associates (1965-1966)

A similar contemporary-style manufacturing building was constructed in 1960 at 222 Kansas Street (demolished circa 2009) and designed by the California firm Thonis, Harrison, & Wolfe. Another contemporary-style building located at 233 Kansas Street was constructed circa 1956. Despite the stylistic similarities, it is not known whether all three buildings were designed by the same firm. Even so, Thonis, Harrison & Wolfe does not appear to have gained particular significance during its tenure because it is not listed in the Pacific Coast Architecture Database of significant architectural firms or identified during electronic database searches (PCAD 2019b; google.com 2019).

**\*B10. Significance (continued):**

**Criterion 1** – The building at 247 Kansas Street was constructed circa 1948. This date is corroborated by historical aerial photographs and historical mapping, as well as visual inspection. It is not known which, if any, of IR's products were invented or produced in this building.

In its 68-year span, IR had grown into a “worldwide provider of analog, digital, and mixed signal chips that convert electricity into power for electronics, computers, appliance and cars,” among many other inventions. In 2013, the company had almost 5,000 employees and a market cap of \$1.32 billion (Jarvey 2013). IR was also the assignor to over 2,000 patents by the time it merged with Infineon in 2015. While IR was a formidable electronics company, its inventions, patents, and influence over the rectifier and semiconductor niche do not appear to have made a significant contribution to the broad patterns of our history. Other companies, labs, and engineers are credited with introducing the basic concepts of IR's technologies, including rectifiers, solar cells, and transistors. For example, Bell Labs in New Jersey is credited with introducing the transistor and solar cells were developed by many scientists, including Einstein, since the 1880s.

Further, IR does not appear to have been significant at a local level, within the community of El Segundo. El Segundo began to develop alongside Standard Oil's second oil refinery, in 1910. In 1928, Mines Field (now known as Los Angeles International Airport) became the airfield to serve the expanding the Los Angeles area. The airport bolstered the community's aerospace industry, leading to the establishment of many related enterprises. Thus, the oil refinery and the aerospace employed a large percentage of El Segundo's workers, and anchored the local economy. IR was not a small company, but its presence in El Segundo did not have a significant impact on the town because it is not documented as a significant employer or area business leader.

To be considered eligible for listing under Criterion 1, 247 Kansas Street must be associated with an event important to history, such as the IRs invention of selenium plates, single crystal P-N junction technology, selenium stack rectifiers, silicon solar cells, or the world's first solar-powered car, mentioned above. However, research failed to conclusively link the building with any of these inventions, and a property cannot eligible if its historic associations are speculative (NPS 1995:12).

Therefore, 247 Kansas Street does not appear eligible for inclusion in the California Register of Historical Resources (California Register) under Criterion 1 because it does not appear to be associated with an event that has made a significant contribution to the broad patterns of history at the local, state, or national level.

**Criterion 2** – The Lidow family (including Leon, Eric, Alexander, and Derek) was instrumental in founding and growing IR into a multinational corporation. However, it is not evident that these individuals made a significant contribution to local, state, or national history. Therefore, 247 Kansas Street does not appear eligible under California Register Criterion 2.

**Criterion 3** – This building was constructed circa 1948, is a modest example of contemporary-style architecture and is not comparable to local resources that represent excellent examples of the style including the Scientific Data Systems Corporation, Manufacturing Building in El Segundo, as described above. Furthermore, 247 Kansas Street is not known to represent the work of a master because the architect is unknown. Therefore, the building at 247 Kansas Street does not display a distinctive type, period, or method of construction; does not represent the work of a master engineer or designer; and is not a superior example of an architectural style. The building is not eligible under California Register Criterion 3.

**Criterion 4** – The property is not likely to yield valuable information that will contribute to our understanding of human history because the property is not and never was the principal source of important information pertaining to subjects such as mid-twentieth century offices. Therefore, the property does not appear eligible for listing under California Register Criterion 4.

Lastly, 247 Kansas Street maintains integrity of location, setting, design, materials, workmanship, feeling, but lacks association with a historic context. It appears largely unchanged since the time of construction.

In conclusion, 247 Kansas Street appears ineligible for listing in the California Register under Criteria 1, 2, 3, and 4 due to lack of association with a historic context. Additionally, the resource was evaluated in accordance with Section 15064.5(a)(2)–(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code, and it is not a historical resource for the purposes of CEQA.

**P5a. Photographs (continued):**



Photograph 2: View of east (front) and side (north) façades, facing southwest.



Photograph 3: View of east entrance (front façade), facing west.

**P5a. Photographs (continued):**



Photograph 4: View of side (north) façade, facing southeast.

\*Recorded by: Margo Nayyar, Michael Baker International

\*Date: March 21, 2019

Continuation

**\*B12. References (continued):**

El Segundo Herald. 1983. "289 Hazardous material sites in El Segundo." August 18, Vol. 72, no. 33. El Segundo, California.

Funding Universe. 2005. "International Rectifier Corporation History." Electronically reproduced from *International Directory of Company Histories*, Vol. 71. St. James Press, 2005. <http://www.fundinguniverse.com/company-histories/international-rectifier-corporation-history/>, accessed March 28, 2019.

Google.com. 2019. Search for "Thonis, Harrison & Wolf." Electronic resource, [www.google.com](http://www.google.com), accessed multiple.

Infineon. 2019. "Timeline." Electronic resource, <https://www.infineon.com/cms/en/product/promopages/timeline/mobile/>.

Jarvey, Natalie. 2013. "Eric Lidow, Co-Founder of International Rectifier, Dies at 100." *Los Angeles Business Journal*. Electronic resource, <http://labusinessjournal.com/news/2013/jan/21/eric-lidow-co-founder-international-rectifier-dies/>, accessed March 28, 2019.

Los Angeles Times. 1959. "Modern Plant." September 25, 1959: 133. Los Angeles, California.

Mil and Aero Staff. 2015. "International Rectifier becomes wholly owned subsidiary of Infineon Technologies as acquisition closes." Electronic resource, <https://www.militaryaerospace.com/articles/2015/01/ir-joins-infineon.html>.

NPS (National Park Services). 1995. "National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation." Electronic resource, <https://www.nps.gov/nr/publications/bulletins/pdfs/nrb15.pdf>, accessed multiple.

ParcelQuest. 2019. Assessor Parcel Number electronic database, <https://parcelquest.com/>, accessed multiple.

PCAD (Pacific Coast Architectural Database). 2019a. "Scientific Data Systems (SDS) Corporation, Manufacturing Building, El Segundo, CA (1965-1966)." Electronic database, <http://pcad.lib.washington.edu/building/260/>, accessed April 11, 2019.

\_\_\_\_\_. 2019b. search for Thonis, Harrison, & Wolfe. Electronic database, <http://pcad.lib.washington.edu/>, accessed April 11,

PCR. 2009. "Memorandum: Preliminary Historic Assessment: 1681 26<sup>th</sup> Street." Electronic document, [https://www.smgov.net/departments/pcd/agendas/Landmarks-Commission/2009/20090511/pcr%20services%20preliminary%20assessment%20report%20\(1681%2026th%20st\)%20item%2010-c.pdf](https://www.smgov.net/departments/pcd/agendas/Landmarks-Commission/2009/20090511/pcr%20services%20preliminary%20assessment%20report%20(1681%2026th%20st)%20item%2010-c.pdf), accessed multiple.

2019.SBCS (*San Bernardino County Sun*). 1950. "Kwikly Inc. Contest Rules." June 1950.

\_\_\_\_\_. 1959. "\$500,000 Contracts Awarded by Lockheed." September 17, 1959:6. San Bernardino, California.

US Patent and Trademark Office. 2019. "USPTO Patent Full-Text and Image Database" Electronic resource, <http://patft.uspto.gov/netahtml/PTO/search-bool.html>, accessed April 4, 2019.

State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

Primary #  
HRI #  
Trinomial  
NRHP Status Code 6Z

Other Listings  
Review Code

Reviewer

Date

Page 1 of 11

\*Resource Name or #: 348 Kansas Street

**P1. Other Identifier:** N/A

\*P2. **Location:**  **Unrestricted**

\*a. **County** Los Angeles **and**

\*b. **USGS 7.5' Quad** Venice, Calif. **Date** 1964 **T** 3S; **R** 15W; Rancho Sausal Redondo S.B.B.M

c. **Address** 348 Kansas Street **City** El Segundo **Zip** 90245

d. **UTM: Zone** 11S, 370567 mE/ 3754230 mN

e. **Other Locational Data:** APN 4139-008-010

\*P3a. **Description:**

348 Kansas Street was originally constructed as two separate buildings, but by 1963, was merged into one. The approximately 15,000-square-foot building is one story tall, 120 feet deep, and 130 feet wide. The building's foundation is not visible, though is likely a concrete slab foundation. Upon the foundation, the concrete block walls rise to support the flat roof, which is accentuated with multiple mechanical units. The windows on the north façade appear to be fixed picture windows, while those on the south façade are steel, multi-pane fenestrations. The windows are original to the building. Along the front (west) façade, a full-height, metal architectural screen shades the building from unwanted onlookers and provides an entrance through a recessed passageway. A shed roof provides a canopy over the architectural screening material and over the entrance. In contrast to the beige-colored walls and screening, a red-brick knee wall also graces the front (west) façade of the building. The building was originally used for offices and light manufacturing.

\*P3b. **Resource Attributes:** HP6. 1-3 Story Commercial Building

\*P4. **Resources Present:**  Building

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



**P5b. Description of Photo:**

Photograph 1: View of 348 Kansas Street, looking southeast. Taken March 21, 2019.

**P6. Date Constructed/Age and Source:**

Historic  
1952 (ParcelQuest 2019)

\*P7. **Owner and Address:**

International Rectifier Corp.  
247 Kansas Street  
El Segundo, CA 90245

\*P8. **Recorded by:**

Margo Nayyar  
Michael Baker International  
2729 Prospect Park Drive, #220  
Rancho Cordova, CA 95670

\*P9. **Date Recorded:**

March 21, 2019

\*P10. **Survey Type:** Intensive

\*P11. **Report Citation:**

Nayyar, Margo. 2019. "Cultural Resources Identification and Evaluation Memo for The Griffin Capital Redevelopment Project in the City of El Segundo, Los Angeles County, California." Rancho Cordova, CA: Michael Baker International.

\*Attachments:  Location Map  Continuation Sheet  Building, Structure, and Object Record

**State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
BUILDING, STRUCTURE, AND OBJECT RECORD**

**Primary #  
HRI#**

Page 2 of 11

**\*NRHP Status Code 6Z  
\*Resource Name or # 348 Kansas Street**

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- B2. Common Name: N/A
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- B4. Present Use: Vacant

**\*B5. Architectural Style:** Contemporary

**\*B6. Construction History:** The building was constructed in 1952 (ParcelQuest 2019) for an electrical company called Servomechanisms, Inc. Classifieds ads tout the company as “an expanding electronics firm” that is involved with sub-miniature control equipment, aircraft instrumentation, computers, and automatic controls (Los Angeles Times 1953). These advertisements cease in 1953. It is not evident when International Rectifier (IR) acquired the building, or what activities were conducted in the building.

**\*B7. Moved?**  No  Yes  Unknown **Date:** N/A **Original Location:** N/A

**\*B8. Related Features:** N/A

B9a. Architect: Unknown b. Builder: Unknown

**\*B10. Significance:** **Theme** Semiconductor technology **Area:** El Segundo  
**Period of Significance** 1952-1968 **Property Type** Office building **Applicable Criteria** N/A

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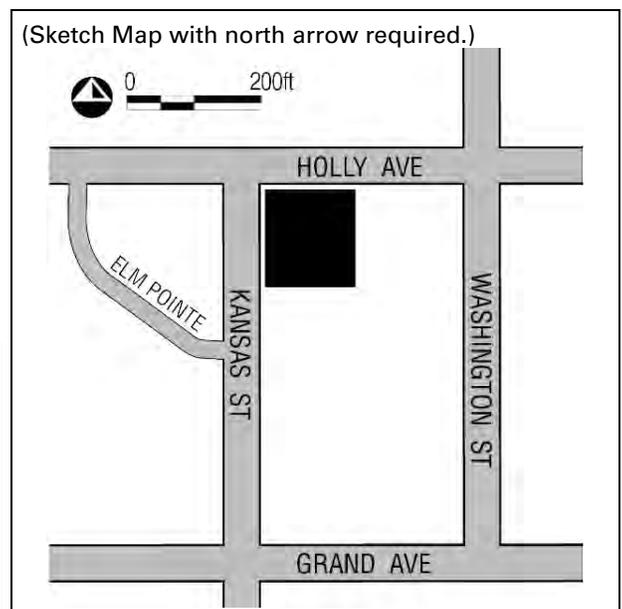
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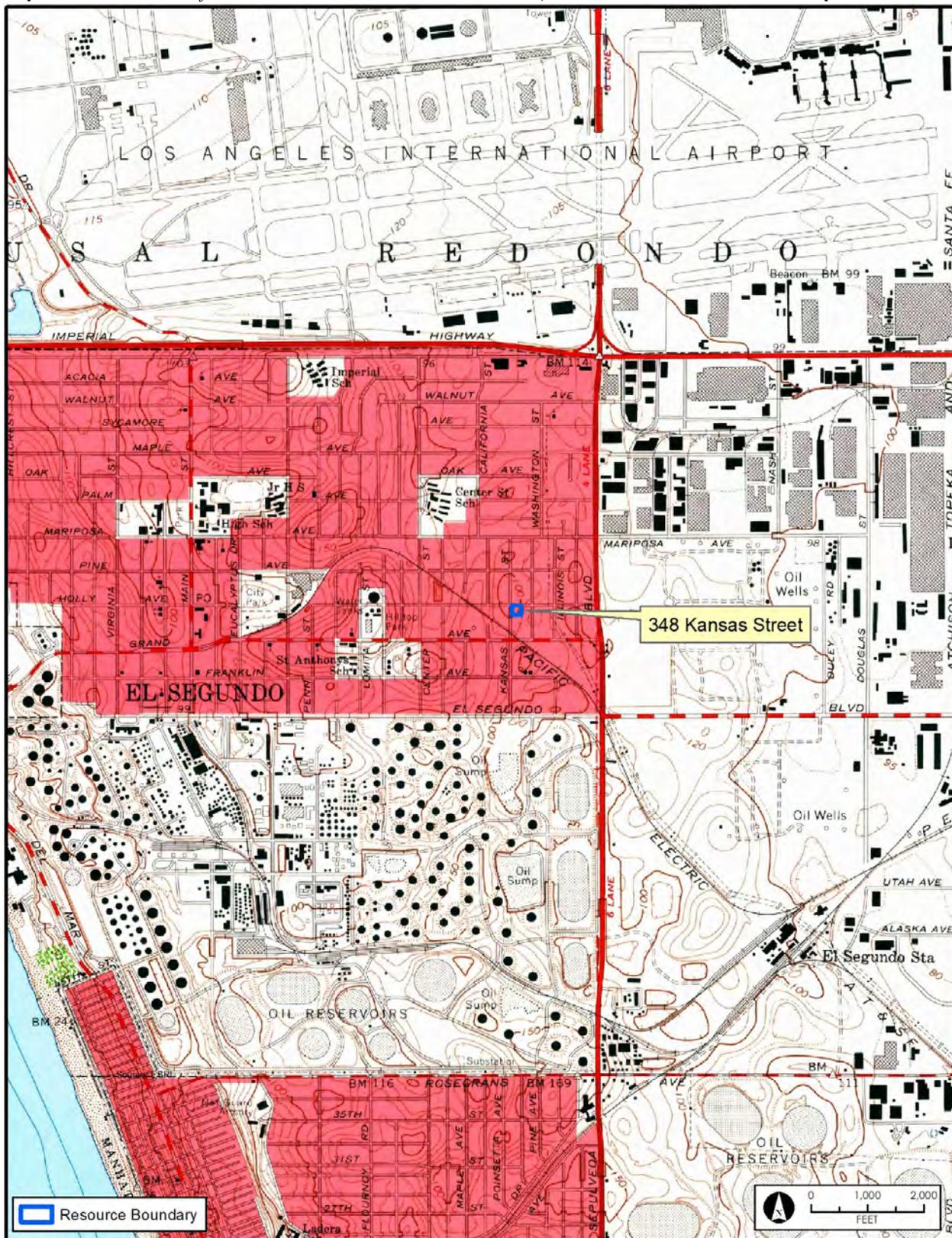
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Michael Baker International  
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**\*Date of Evaluation:** April 11, 2019

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\*Recorded by: Margo Nayyar, Michael Baker International \*Date: March 21, 2019  Continuation

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IR debuted “the world’s first” solar-powered car in 1960. Additional international branches were established in Italy in 1961, India in 1965, Canada in 1966, and Mexico in 1973. In the late 1960s, competitors began producing silicon control rectifiers, leading to financial instability. Eric’s sons Derek and Alexander joined IR in 1975 and 1977, at the same time the semiconductor industry was undergoing a substantial transformation in technology. Until this point, rectifiers functioned primarily using bipolar transistors, but the industry was shifting toward using power MOSFETs (metal-oxide-semiconductor-field-effect-transistor), which were “more efficient, faster, and smaller” than bipolars (Funding Universe 2005). Alexander Lidow introduced the HEXFET-Power-MOSFET, with a hexagonal shape, in 1979. The product helped make energy use more efficient; it eventually became IR’s staple product, with IR controlling over half the power-MOFSET market. In 1987, the success of this invention led to construction of HEXFET America, an \$82 million production plant in Temecula, California (Funding Universe 2005).

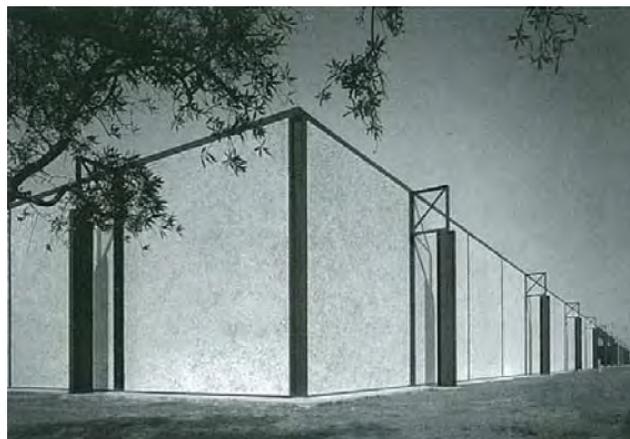
In 1989, Eric Lidow divided the company, giving control of one half to each son. The split did not provide positive results for the company and its clients; thus, in 1992, the company reunified. Expansion continued as the Temecula plant was enlarged in 1997, followed by the construction of a manufacturing plant in Wales in 1998. Alexander Lidow became the CEO in 1999, which ushered in unprecedented growth. IR began to acquire other companies, giving the company new technology that enabled it to expand its aerospace and defense markets. In 2004, sales surpassed \$1 billion (Funding Universe 2005). Finally, Infineon Technologies, headquartered in Neubiberg, Germany, acquired IR in 2015 for \$3 billion (Mil and Aero Staff 2015).

During its 68-year span, IR was the assignor to over 2,000 patents, many of which now belong to Infineon.

Architecturally, the building is a modest example of the contemporary style. It displays many of the identifying features such as a curtain wall. However, prominent examples of the Contemporary style are located throughout El Segundo and Los Angeles County including the Scientific Data Systems Corporation (SDS), Manufacturing Building (built 1965-1966) at 555 South Aviation Boulevard in El Segundo (PCAD 2019a). It was designed by the influential architectural firm, Craig Ellwood and Associates, and consisted of 260,000 square feet of manufacturing space, and was:

**\*B10. Significance (continued):**

constructed with tilt-up concrete panels attached to an exposed exterior structural system of steel columns. The administration and factory spaces are unified through similar materials, finishes and design concept based upon structure. Craig Ellwood and Associates designed the SDS Administration Engineering Building, 701 South Aviation Boulevard, El Segundo based on the ideas of the earlier SDS building, but without the exposed structure attached to the exterior. The square floor plan was divided into a grid by structural columns and had a central atrium. Ellwood designed two other buildings for SDS between 1966-1968 using the same materials, finishes, and structure as the first two facilities. The four SDS building all located adjacent to each other form a cohesive campus with a holistic Modern design and without architectural or spatial hierarchy. Other notable Modern factory buildings designed by Craig Ellwood's office are the Xerox Corporation Manufacturing Facility (1967) located at 800 E. Bonita Ave, Pomona, (demolished), and the Torrington Manufacturing Company (1953) located at 16300 Roscoe Boulevard, Van Nuys, (demolished). The Magnavox Building (1960) in Torrance, designed by Torrance Risley and Gould, and the Firestone Store, Offices and Warehouse (1958) in Commerce designed by Pereira & Luckman are also good example of post-World War II Modern factories in the Los Angeles area. (PCR 2009:4-5)



Scientific Data Systems (now Xerox), El Segundo, California, designed by Craig Ellwood and Associates (1965-1966)

A similar contemporary-style manufacturing building was constructed in 1960 at 222 Kansas Street (demolished circa 2009) and designed by the California firm Thonis, Harrison, & Wolfe. Other contemporary-style buildings located at 233 and 247 Kansas Street were constructed circa 1956 and 1948, respectively. Despite the stylistic similarities, it is not known whether all three buildings were designed by the same firm. Even so, Thonis, Harrison & Wolfe does not appear to have gained particular significance during its tenure because it is not listed in the Pacific Coast Architecture Database of significant architectural firms or identified during electronic database searches (PCAD 2019b; google.com 2019).

**\*B10. Significance (continued):**

**California Register Evaluation**

**Criterion 1** – The building at 348 Kansas Street was constructed circa 1952; this date is corroborated by historical aerial photographs and historical mapping, as well as visual inspection. It is not known which, if any, of IR’s products were invented or produced in this building.

In its 68-year span, IR had grown into a “worldwide provider of analog, digital, and mixed signal chips that convert electricity into power for electronics, computers, appliance and cars,” among many other inventions. In 2013, the company had almost 5,000 employees and a market cap of \$1.32 billion (Jarvey 2013). IR was also the assignor to over 2,000 patents by the time it merged with Infineon in 2015. While IR was a formidable electronics company, its inventions, patents, and influence over the rectifier and semiconductor niche do not appear to have made a significant contribution to the broad patterns of our history. Other companies, labs, and engineers are credited with introducing the basic concepts of IR’s technologies, including rectifiers, solar cells, and transistors. For example, Bell Labs in New Jersey is credited with introducing the transistor, and solar cells were developed by many scientists, including Einstein, since the 1880s.

Further, IR does not appear to have been significant at a local level, within the community of El Segundo. El Segundo began to develop alongside Standard Oil’s second oil refinery, in 1910. In 1928, Mines Field (now known as Los Angeles International Airport) became the airfield to serve the expanding the Los Angeles area. The airport bolstered the community’s aerospace industry, leading to the establishment of many related enterprises. Thus, the oil refinery and the aerospace employed a large percentage of El Segundo’s workers, and anchored the local economy. IR was not a small company, but its presence in El Segundo did not have a significant impact on the town because it is not documented as a significant employer or area business leader.

To be considered eligible for listing under Criterion 1, 348 Kansas Street must be associated with an event important to history, such as the IRs invention of selenium plates, single crystal P-N junction technology, selenium stack rectifiers, silicon solar cells, or the world’s first solar-powered car, mentioned above. However, research failed to conclusively link the building with any of these inventions, and a property cannot eligible if its historic associations are speculative (NPS 1995:12).

Therefore, 348 Kansas Street does not appear eligible for inclusion in the California Register of Historical Resources (California Register) under Criterion 1 because it does not appear to be associated with an event that has made a significant contribution to the broad patterns of history at the local, state, or national level.

**Criterion 2** – The Lidow family (including Leon, Eric, Alexander, and Derek) was instrumental in founding and growing IR into a multinational corporation. However, it is not evident that these individuals made a significant contribution to local, state, or national history. Therefore, 348 Kansas Street does not appear eligible under California Register Criterion 2.

**Criterion 3** – This building at 348 Kansas Street is a modest example of contemporary-style architecture and is not comparable to local resources that represent excellent examples of the style, including the Scientific Data Systems Corporation, Manufacturing Building in El Segundo, as described above. Furthermore, 348 Kansas Street is not known to represent the work of a master because the architect is unknown. Therefore, the building at 348 Kansas Street does not display a distinctive type, period, or method of construction; does not represent the work of a master engineer or designer; and is not a superior example of an architectural style. The building is not eligible under California Register Criterion 3.

**Criterion 4** – The property is not likely to yield valuable information that will contribute to our understanding of human history because the property is not and never was the principal source of important information pertaining to subjects such as mid-twentieth century offices. Therefore, the property does not appear eligible for listing under California Register Criterion 4.

Lastly, 348 Kansas Street maintains integrity of location, setting, design, materials, workmanship, feeling, and association. It appears largely unchanged since the time of construction.

In conclusion, 348 Kansas Street appears ineligible for listing in the California Register under Criteria 1, 2, 3, and 4 due to lack of association with a historic context. Additionally, the resource was evaluated in accordance with Section 15064.5(a)(2)–(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code, and it is not a historical resource for the purposes of CEQA.

**P5a. Photographs (continued):**



Photograph 2: View showing the north (side) and west (front) façades, facing southeast.

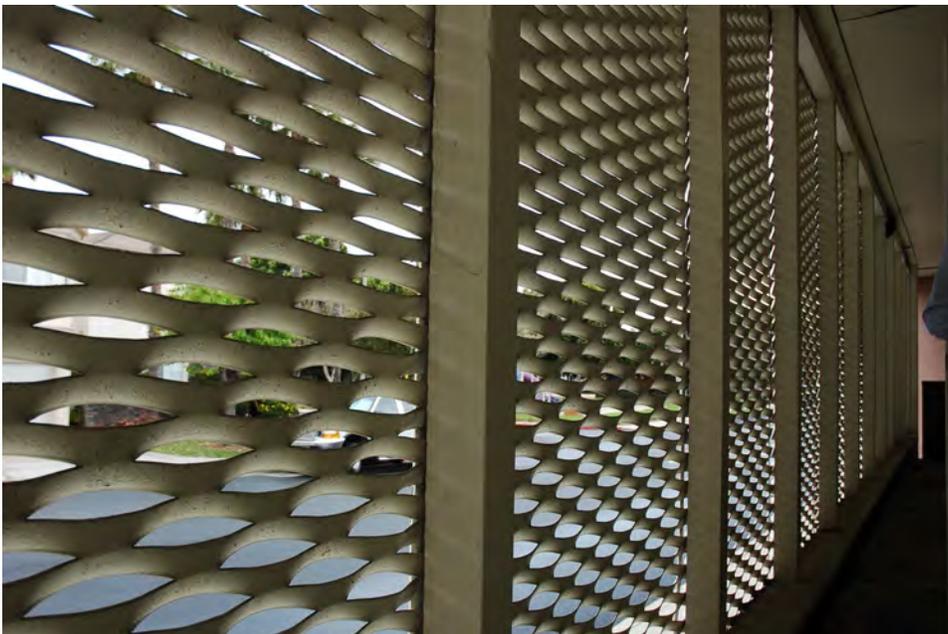


Photograph 3: View showing the west (front) façade, facing northeast.

**P5a. Photographs (continued):**



Photograph 4: View showing the south (side) façade, facing east. Note: 330 Kansas Street is shown in the background.



Photograph 5: Detail view of architectural screening material on west (front) façade.

**P5a. Photographs (continued):**



Photograph 6: Detail view of brick knee wall on west (front) façade.

\*B12. References (continued):

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