
**Addendum to Mitigated Negative Declaration
(SCH# 2008081036) for
Environmental Assessment No. 844**

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1. INTRODUCTION

On September 25, 2008, the City of El Segundo Planning Commission adopted an Initial Study/Mitigated Negative Declaration (IS/MND) for *Environmental Assessment No. 773 (Aloft Hotel – EA 773/CUP 07-07, 101 Continental Boulevard)*. The proposal consisted of the construction of a six-story, 61,104 square-foot hotel on a 10.58-acre site located at 101 Continental Boulevard. The project was approved for a total of 167 rooms at a maximum floor area ratio (FAR) of 0.80.

Since then, the project has undergone minor modifications. This Addendum addresses modifications to the site design, in accordance with the California Environmental Quality Act (CEQA).

2. STATUTORY BACKGROUND

Under CEQA, an Addendum to an adopted Negative Declaration or Mitigated Negative Declaration is needed if minor technical changes or modifications to the proposed project occur (CEQA Guidelines §15164). An addendum is appropriate only if these minor technical changes or modifications do not result in any new significant impacts or a substantial increase in the severity of previously identified significant impacts. The Addendum need not be circulated for public review (CEQA Guidelines §15164[c]); however, an addendum is to be considered by the decision-making body prior to making a decision on the project (CEQA Guidelines §15164[d]).

This Addendum to the previously adopted Mitigated Negative Declaration demonstrates that the environmental analysis, impacts, and mitigation requirements identified in the *2008 IS/MND for Environmental Assessment No. 773* remain substantively unchanged despite project revisions described herein, and supports the finding that the proposed project does not raise any new issues and does not exceed the level of impacts identified in the previous Mitigated Negative Declaration.

3. SUMMARY OF ORIGINAL PROJECT DESCRIPTION

As stated above, the original project description analyzed under the *2008 IS/MND for Environmental Assessment No. 773* consisted of a hotel facility located on a 10.58-acre site along Continental Boulevard. The project included a lot line adjustment within the site to allow for the hotel facility under existing City FAR requirements. Thus, accounting for the lot line adjustment, the project would occur on a 1.75-acre parcel within the larger 10.58-acre site.

The project proposed the construction of 167 guest rooms, a 566 square-foot conference room, 700 square-foot café, 1,059 square-foot restaurant/bar area, 579 square-foot fitness center, and an outdoor patio area/pool. The structure was proposed to be six stories, with a maximum height of 77 feet, 8 inches.

Site access was proposed via two driveways: 1) primary access from Continental Boulevard to the east; and 2) secondary access from El Segundo Boulevard to the south. The project proposed 110 new parking spaces surrounding the hotel facility. In order to meet City parking requirements, the project included a Reciprocal Access Agreement with the owners of the Northrop Grumman Tower (immediately southeast of the project site) to allow for the use of 40 existing parking spaces, bringing the total number of parking stalls for the project to 150.



Landscaping was proposed to include a mix of trees, shrubs, vines, and ground cover throughout the site. Specifically, palm trees and shade canopy trees of various species would be planted along the access drives, throughout the parking lot, and surrounding the hotel structure. Evergreen shrubs and ground cover are proposed to be used for property perimeter areas, building perimeter areas, and used for screening or hedging around the hotel, parking lot, and pool area. Evergreen flowering vine and ground cover are also proposed surrounding the hotel structure, within the parking lot, and along the access driveways.

The original project description resulted in a FAR of 0.80 and lot coverage of 20.8 percent of the 1.75-acre parcel.

4. PROJECT REVISIONS

The revised project description includes a hotel facility on the same project site and incorporates minor modifications to site design that would result in a larger hotel with fewer rooms and a smaller footprint. A lot line adjustment was approved by the City on September 18, 2008, resulting in construction of the project on a 1.75-acre parcel. Primary and secondary access would remain the same, from Continental Boulevard and El Segundo Boulevard, respectively. In addition, landscaping would be incorporated throughout the site in accordance with City standards.

The primary revisions to the project description consist of the following:

- The assignment of a new address (199 North Continental Boulevard) to the project site. The location of the project site would not change; only the street address would be revised;
- The number of hotel rooms would be reduced from 167 to 152, due to an overall increase in room size;
- The hotel square footage would increase from 61,104 to 71,005 (primarily due to increases in the size of hotel rooms, fitness area, restaurant/bar, and additional conference rooms);
- The average hotel room size would increase from 304 square feet to 344 square feet;
- The building footprint would decrease from 15,885 to 14,744, with a corresponding decrease in building mass and visibility;
- The number of parking stalls would decrease from 150 (plus 2 loading spaces) to 139 (plus 2 loading spaces);
- A Specific Plan, General Plan Amendment, Zone Change, Zoning Text Amendment, and Development Agreement applicable to the 1.75-acre parcel would be included with the project to allow for an increased FAR of 0.92;
- The hotel facility would be constructed to be Leadership in Energy and Environmental Design (LEED)-certified to maximize energy efficiency and sustainability; and
- The project would include a contribution to the City's Recreation and Parks Department for capital project improvements that will benefit children.



These revisions to the project are outlined below within Table 1, Summary of Project Revisions.

**Table 1
 Summary of Project Revisions**

PROJECT FEATURE	ORIGINAL PROJECT	REVISED PROJECT	NET CHANGE
Hotel Rooms	167 Rooms	152 Rooms	-15 Rooms
Square Footage	61,104 SF	71,005 SF	+9,901 SF
Average Room Size	304 SF	344 SF	+40 SF
Parcel Size	1.75 Acre	1.75 acre	N/A
Building Footprint	15,885 SF	14,744 SF	-1,141 SF
Building Height	77 feet, 8 inches	76 feet, 11 inches	-9 inches
FAR	0.80	0.92	+0.12
Parking Spaces	150 (plus 2 loading) Spaces	139 (plus 2 loading) Spaces	-11 Spaces
Fitness Area	579 SF	1,257 SF	+678 SF
Conference Rooms	1 Room @ 690 SF	3 Rooms @ 1,307 SF	+617 SF
Restaurant/Bar	1,059 SF	1,625 SF	+566 SF
Energy Efficiency	N/A	LEED Certified	As Noted
SF: Square Feet			
LEED: Leadership in Energy and Environmental Design			

5. IMPACT COMPARISON

Through the course of evaluating the revised project description, the City of El Segundo determined that no new significant impacts or substantial increase in the severity of impacts would occur upon project implementation. A comparison of impacts between the original project description (as analyzed in the *2008 IS/MND for Environmental Assessment No. 773*) and the revised project description is provided below.

Aesthetics

The revised project description would result in a hotel facility with an increased square footage and FAR, but with a reduced building footprint. Based on a rendering comparing the original structure versus the revised structure (refer to Figure 1, Project Rendering), the revised project would result in a reduced building mass and aesthetic impact.

The revised project description would include similar contemporary architectural features, landscaping, and nighttime lighting. In addition, potential impacts related to the short-term construction process would be reduced in comparison to the original project description. Although the type of building would be similar to the original project description, the duration of construction would be reduced from approximately 16 months to 14 months. Moreover, the implementation of Mitigation Measures AES-1 through AES-5 as identified in the *2008 IS/MND for Environmental Assessment No. 773* would remain applicable to the revised project.



Figure 1
Project Rendering



Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to aesthetics as a result of project revisions.

Air Quality

The revised project involves an overall reduction in the building footprint, and would result in similar demolition, site preparation, construction, and project operation activities similar to those identified in the previously analyzed project description. Additionally, the revised project description would result in a reduction of hotel rooms from 167 to 152, thereby resulting in a lower trip generation and reduced operational air quality emissions. As a result, construction-related and project-level long-term operational air quality impacts would be similar to those identified for the original project description. However, since the methodology and significance criteria for the analysis of greenhouse gas emissions has changed since the preparation of the *2008 IS/MND for Environmental Assessment No. 773*, an updated analysis has been provided below.

The previous methodology for the analysis of greenhouse gas emissions utilized in the *2008 IS/MND for Environmental Assessment No. 773* included the quantification of CO₂ emissions from construction and operations (indirect, area, and mobile sources) of the project. At the time of the preparation of the 2008 IS/MND, a greenhouse gas threshold of significance was not applied to the project emissions. The current methodology for a quantitative threshold of significance for greenhouse gas emissions utilizes a non-zero project specific threshold, as



recommended by the California Air Pollution Control Officers Association (CAPCOA).¹ According to CAPCOA's *Threshold 2.3, CARB Reporting Threshold*, 10,000 metric tons of carbon dioxide equivalents² per year (MTCO₂eq/yr) is recommended as a quantitative non-zero threshold.³ This threshold is being considered by the California Market Advisory Committee, whose mandate under the California Environmental Protection Agency is to develop market-based compliance mechanisms for reducing greenhouse gases. This approach is estimated to capture over half of the future residential and commercial development projects, and is designed to ensure the reduction goals of Assembly Bill 32 are not hindered. As seen in Table 1, *Estimated Annual Greenhouse Gas Emissions*, the total annualized construction, direct, and indirect operational emissions would be below the CAPCOA recommended threshold.

Table 1
Estimated Annual Greenhouse Gas Emissions

Source	CO ₂	N ₂ O		CH ₄	
	Metric tons/yr	Metric tons/yr	Metric Tons of CO ₂ eq/yr ⁴	Metric tons/yr	Metric Tons of CO ₂ eq/yr ⁴
Construction Emissions	712.88	0.02	0.39	0.11	32.64
<i>Annualized Construction Emissions</i>	23.76	0.00	0.013	0.004	1.09
Operational Emissions					
<i>Direct Emissions</i>					
Area Source ¹	222.74	0.00	1.27	0.00	0.09
Mobile Source ²	1,790.10	0.11	33.43	0.10	2.18
Total Direct Emissions⁶	2,012.84	0.11	34.7	0.10	2.27
<i>Indirect Emissions</i>					
Electricity Demand ³	247.40	0.00	0.65	0.01	0.27
Water Demand	12.43	0.00	0.04	0.00	0.02
Total Indirect Emissions⁵	259.83	0.00	0.69	0.01	0.29
Total Project-Related Operational Emissions⁵	2,335.47 MTCO₂eq/yr				
CAPCOA GHG Threshold	10,000 MTCO₂eq/yr				
Is Threshold Exceeded?	No				
Notes:					
1. Emissions calculated using the SCAQMD's <i>CEQA Handbook</i> .					
2. Emissions calculated using URBEMIS 2007 computer model and EMFAC 2007, <i>Highest (Most Conservative) Emission Factors for On-Road Passenger Vehicles and Delivery Trucks</i> .					
3. Electricity Demand emissions calculated using the SCAQMD's <i>CEQA Handbook</i> .					
4. CO ₂ Equivalent values calculated using the U.S. Environmental Protection Agency Website, <i>Greenhouse Gas Equivalencies Calculator</i> , http://www.epa.gov/cleanenergy/energy-resources/calculator.html , accessed February 2010.					
5. Totals may be slightly off due to rounding.					
6. Refer to <u>Attachment A, <i>Air Quality Data</i></u> , for detailed model input/output data.					

¹ California Air Pollution Control Officers Association, *CEQA & Climate Change White Paper*, January 2008.
² Carbon dioxide equivalent is a quantity that describes, for a given mixture and amount of greenhouse gas, the amount of CO₂ that would have the same global warming potential, when measured over a specified timescale (generally 100 years).
³ It should be noted that CARB has also recommended 10,000 MTCO₂eq/yr as the "de minimus greenhouse gas emission threshold" in their *Climate Change Proposed Scoping Plan*, which was approved by CARB's Board on January 11, 2009.



Greenhouse gas emissions would also be reduced as the hotel facility would be LEED-certified and constructed to maximize energy efficiency and sustainability. Therefore, impacts related to greenhouse gas emissions under the revised project would continue to be less than significant.

As a result, air quality impacts from the proposed project would be similar to those identified in the *2008 IS/MND for Environmental Assessment No. 773*. In addition, Mitigation Measures AQ-1 through AQ-6 from the *2008 IS/MND for Environmental Assessment No. 773* would remain applicable to the project.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to air quality and global climate change as a result of project revisions.

Biological Resources

The revised project description would be constructed on the same 1.75-acre parcel as the original project. The project site is completely disturbed and exists within a fully urbanized area. No sensitive plants, animals, or habitats exist on-site. The revised project would not conflict with any local policies or ordinances relating to biological resources, and no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved plans apply to the site.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to biological resources as a result of project revisions.

Cultural Resources

Environmental analysis for the original project description concluded that impacts to historical resources would not occur, since no existing structures would be impacted by the project. It was also determined that the project could affect archaeological resources, paleontological resources, and human remains during the grading and excavation process for hotel construction. Thus, Mitigation Measures CUL-1 through CUL-3 were included within the *2008 IS/MND for Environmental Assessment No. 773* to minimize these potential impacts to cultural resources.

The revised project description would occur on the same 1.75-acre parcel as the original project. However, the revised project would result in slightly less grading and excavation, due to a smaller building footprint. Although the revised project would result in a slightly lower potential for impacts to cultural resources, Mitigation Measures CUL-1 through CUL-3 from the *2008 IS/MND for Environmental Assessment No. 773* would apply.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to cultural resources as a result of project revisions.

Geology and Soils

The revised project description would be located on the same project site as the original project description. Thus, on-site geologic conditions related to earthquake faulting, seismicity, liquefaction, erosion, soil instability, and expansive soils would remain the same. Since the proposed use and general arrangement/design of on-site facilities would also remain the same,



the revised project description would result in impacts similar to those described within the 2008 *IS/MND for Environmental Assessment No. 773*.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to geology and soils as a result of project revisions.

Hazards and Hazardous Materials

The 2008 *IS/MND for Environmental Assessment No. 773* included an examination of potential sources of hazardous materials on the project site and in the surrounding vicinity. The analysis concluded that, although sources of hazardous materials are known to occur on and surrounding the site, adherence to Federal, State, and local standards and Mitigation Measure HAZ-1 would minimize impacts to a less than significant level. Since the original and revised project descriptions would share the same project site and be constructed with similar techniques, the revised project would also result in a less than significant impact in regards to the potential disturbance of existing hazardous materials during construction.

Similar to the original project description, the revised project would involve the storage, use and transport of common household cleaning products, in addition to the limited use of pesticides and/or herbicides for landscape maintenance. The proposed hotel facility would also require the use of chemicals for swimming pool maintenance. These chemicals would be utilized in limited quantities on-site, in compliance with Federal, State, and local standards and Mitigation Measure HAZ-1. The revised project would also result in less than significant impacts during project operations.

In addition, since the revised project would be constructed on the same site, the project would not affect any existing or proposed school within one-quarter mile of the site, an airport land use plan, or a private airstrip in the vicinity. Since primary and secondary site access would remain the same, no impacts to emergency response would occur. In addition, the project would not result in any additional impacts related to wildland fires.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to hazards and hazardous materials as a result of project revisions.

Hydrology and Water Quality

The original and revised project descriptions would affect the same project site, consist of the same type of land use and operations, affect similar project footprints, and would be constructed using similar grading/building practices. In addition, the same water quality standards (including implementation of Mitigation Measure HYD-1 from the 2008 *IS/MND for Environmental Assessment No. 773*) would be applicable to the revised project.

Thus, the revised project is anticipated to continue to result in less than significant impacts during the project construction process, upon adherence to National Pollutant Discharge Elimination Systems (NPDES) standards and implementation Best Management Practices (BMPs). Moreover, the requirement for a Water Quality Management Plan (WQMP) to minimize impacts during long-term hotel operations would remain applicable to the revised project. In addition, given the developed and impervious nature of the existing project site, the revised project description would not result in any increased impacts related to off-site drainage or flooding.



Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to hydrology and water quality as a result of project revisions.

Land Use and Planning

The revised project would consist of a hotel facility on the same project site as the original project description, which is designated Corporate Office (CO) by both the City's *General Plan* and *Zoning Ordinance*. Given the developed nature of the site vicinity, neither the original or revised projects would result in the division of an established community, nor would they result in conflicts with an established Habitat Conservation Plan or Natural Community Conservation Plan.

The revised project would require approval of a Specific Plan, General Plan Amendment, Zone Change, Zoning Text Amendment, and Development Agreement. These new project approvals would be required to allow for the increased FAR of 0.92, and would be applicable only to the 1.75-acre parcel to be affected by the proposed hotel facility. The proposed Specific Plan, General Plan Amendment, Zone Change, Zoning Text Amendment, and Development Agreement would be subject to City review through the land use entitlement process, to ensure that development guidelines for the project site are consistent with adjacent land uses. Thus, upon approval of these land use entitlements, the revised project would be consistent with the City's land use plan, policies, and regulations applicable to the site.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to land use and planning as a result of project revisions.

Mineral Resources

Since the revised project would occur on the same site as the original project description, the project would not interfere with the availability of a mineral resource or result in the loss of a mineral recovery site.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to mineral resources as a result of project revisions.

Noise

The revised project involves an overall reduction in the building footprint, and would result in similar demolition, site preparation, construction, and project operation activities similar to those identified in the previously analyzed project description. The revised project description would result in a reduction of average daily trips along the City's roadway network, consequently resulting in a decrease in traffic noise levels. The on-site uses would remain similar (i.e., hotel use, parking, mechanical equipment, etc.), thus creating a similar level of on-site stationary noise. As a result, noise impacts from the proposed project would be similar to those identified in the *2008 IS/MND for Environmental Assessment No. 773*. In addition, Mitigation Measures NOI-1 through NOI-3 would remain applicable to the proposed project.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to noise as a result of project revisions.



Population and Housing

The revised project would result in a hotel facility similar in nature to the original project description. In regards to population growth, the proposed project would have the potential to induce growth within the City due to the need for employees for hotel staff. Based on the *2008 IS/MND for Environmental Assessment No. 773*, the original project description would require approximately 40 employees. Given that the revised project would also be a hotel facility with a smaller number of hotel rooms and similar amenities, the revised project is not anticipated to result in a substantial increase in employment. Thus, the revised project would not induce substantial population growth within the City, either directly or indirectly.

In addition, given the lack of structures on the proposed project site, the revised project would not result in the displacement of housing or people.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to population and housing as a result of project revisions.

Public Services

As stated above, the revised project would consist of a hotel facility of a similar size/layout, equipped with similar amenities, and located at the same site. The *2008 IS/MND for Environmental Assessment No. 773* concluded that impacts related to fire protection, police protection, schools, parks, and other public facilities would be less than significant. None of the revisions to the project would result in an increase in the need for these public services or facilities in comparison to the original project description.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to public services as a result of project revisions.

Recreation

The proposed project could generate demand for recreational facilities through the use of such facilities by hotel guests or employees. As shown within the *2008 IS/MND for Environmental Assessment No. 773*, as a transient lodging facility the project is not expected to result in a substantial increase in the use of neighborhood or regional parks or other recreational facilities. Since the revised project description would not result in a change in land use or a substantial increase in hotel guests or employees, impacts to recreational facilities would be similar in comparison to the original project description.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to recreational facilities as a result of project revisions.

Transportation/Traffic

The *2008 IS/MND for Environmental Assessment No. 773* included a *Traffic Impact Analysis (TIA)* assessing the original project description's effects on the surrounding roadway network. Based on the results of the TIA, it was determined that the original project description would not significantly affect roadways surrounding the site (i.e., Sepulveda Boulevard, El Segundo Boulevard, and Continental Boulevard) upon implementation of recommended mitigation. The



mitigation would consist of improvements at the El Segundo Boulevard/Continental Boulevard intersection.

Within the TIA, the trip generation for the original project description was calculated utilizing a standard multiplier based on the number of hotel rooms. Since the revised project description would result in a reduction of hotel rooms from 167 to 152, the revised project would result in a lower trip generation under the methodology of the TIA. Daily trips for the proposed hotel project would generate a net trip increase of 995 daily trips (98 fewer trips than the 1,093 daily trips for the previously approved project). The total trips for the morning peak hour would drop from 87 trips to 79 trips (with 47 inbound trips and 32 outbound trips) and the total trips for the evening peak hour would drop from 94 trips to 85 trips (with 51 inbound trips and 34 outbound trips). Thus, the revised project's impacts related to the local roadway system would be reduced in comparison to the original project description. Likewise, since the overall trip generation would be decreased, the revised project would not exceed any level of service standard established by the Los Angeles County Congestion Management Program (CMP).

Mitigation Measure TR-1 would remain applicable to the revised project. However, since the *2008 IS/MND for Environmental Assessment No. 773* was prepared, a minor modification to Mitigation Measure TR-1 has become necessary. Originally, Mitigation Measure TR-1 required that the applicant contribute its fair share towards conversion of the westbound through/right-turn lane to a dedicated right-turn lane along El Segundo Boulevard at Continental Boulevard. However, since the applicant would be fully responsible for implementation of this mitigation measure, a fair-share funding mechanism is no longer required. Thus, Mitigation Measure TR-1 has been revised as follows (deleted text is shown in ~~strikeout~~, and new text is underlined):

"TR-1	<p><u>El Segundo Boulevard at Continental Boulevard:</u> The project applicant must contribute its fair share toward conversion of fund and install the re-striping of the westbound through/right-turn lane to a dedicated right-turn lane <u>and must fund the manufacturing and installation of the associated signage, as calculated</u> subject to approval by the City's traffic consultant and as approved by the Director of Public Works/City Engineer. <u>The City reserves the right at City's expense, as determined by the Director of Public Works, to remove the dedicated right-turn lane in the future if it is unnecessary, as reasonably determined by the Director of Public Works, or if a similar improvement can be substituted."</u></p>
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Similar to the original project description, the revised project would not have the capability to affect air traffic patterns at Los Angeles International Airport, located approximately 0.5-mile north of the project site. In addition, the revised project would not result in any hazardous design features or inadequate emergency access, since ingress and egress would be provided by the same access points as the original project description.

As shown in Section 4, Project Revisions, the number of parking stalls, required for the revised project would decrease from 150 (plus 2 loading spaces) to 139 (plus 2 loading spaces). Despite this reduction, the revised project would still require implementation of Mitigation Measure TR-2, which would necessitate a reciprocal agreement between the applicant and the owners of the Northrop Grumman Tower (immediately southeast of the project site) to allow for the use of surplus parking spaces. Upon implementation of mitigation, parking impacts under the revised project would remain less than significant.



In addition, similar to the analysis provided within the *2008 IS/MND for Environmental Assessment No. 773*, the revised project would not conflict with policies, plans, or programs supporting alternative transportation. The project area is served by multiple forms of bus and rail transport, and the revised project would not result in a conflict with any polices or facilities related to alternative transportation.

Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to transportation and traffic as a result of project revisions.

Utilities and Services Systems

As stated above, the revised project would consist of a hotel facility of a similar size/layout, equipped with similar amenities, and located at the same site as the original project description. The *2008 IS/MND for Environmental Assessment No. 773* concluded that impacts related to fire protection, police protection, schools, parks, and other public facilities would be less than significant. Mitigation measures were required for impacts related to sewer and solid waste service.

Given the similar nature of the revised project description, none of the project revisions would result in a substantial increase in the need for these public services or facilities in comparison to the original project description. In addition, two mitigation measures (UTL-1 and UTL-5) within the *2008 IS/MND for Environmental Assessment No. 773* have either been completed or deemed unnecessary and are no longer required. Mitigation Measure UTL-1 has previously been satisfied upon completion of a Sewer Flow Study for the proposed project. Based upon the findings of the Sewer Flow Study, Mitigation Measure UTL-5 has been determined to be unnecessary. Thus, the following revisions related to wastewater utility mitigation are required:

UTL-1	An analysis of sewer service to the proposed development must be prepared before the City issues building permits to identify new sewer infrastructure required to serve the development.
UTL-21	Before the City issues building permits, the project site must be annexed into the Los Angeles County Sanitation District No. 5.
UTL-32	Before the City issues building permits, the project applicant must obtain a sewer connection permit from the Los Angeles County Sanitation District to obtain sanitary sewer service. Prior to obtaining a connection permit, the applicant must also pay a sewer connection fee as determined by the County Sanitation District of Los Angeles County.
UTL-43	Before the City issues building permits, the project applicant must provide additional local sewer infrastructure as necessary to connect the project site to existing sewer infrastructure. This provision must be coordinated with the project applicant and may be the partial responsibility of the applicant, as determined by the City.
UTL-5	The applicant is required to replace or upgrade the sewer infrastructure on or adjacent to the project site.
UTL-64	The project applicant must comply with Title 12 of the ESMC regarding Sewer Facilities.



UTL-75 Before the City issues building permits, the project applicant must submit the Final Working Drawings to the City's Planning and Building Safety Department and the Public Works Department for review and approval."

Mitigation Measure UTL-7 would remain applicable to the revised project. However, since the 2008 IS/MND for Environmental Assessment No. 773 was prepared, a minor modification to Mitigation Measure UTL-7 has become necessary. Originally, Mitigation Measure UTL-7 required that the applicant work with the City's franchise hauler, Consolidated Disposal, to coordinate recycling efforts for the development. However, the City's franchise hauler, Consolidated Disposal, does not have a contract to provide commercial hauling services. Therefore, Mitigation Measure UTL-7 has been revised as follows (deleted text is shown in strikeout, and new text is underlined):

"~~UTL-7 The applicant must work with the City's franchise hauler, Consolidated Disposal, to coordinate recycling efforts for the entire development.~~ The applicant must work with a commercial hauler licensed to operate in the City of El Segundo, to coordinate recycling efforts for the entire development."

All other mitigation measures related to solid waste would remain applicable to the project. Thus, no new significant impacts or substantial increase in the severity of impacts would occur in regards to utilities and service systems as a result of project revisions.

Mandatory Findings of Significance

Based on the impact comparison provided above, the revised project would not result in new significant impacts or a substantial increase in the severity of impacts under CEQA. Thus, in comparison to the analysis provided in the 2008 IS/MND for Environmental Assessment No. 773, the revised project would not: a) result in increased impacts related to degradation of the environment or impacts to biological or cultural resources; b) result in increased cumulative impacts; or c) result in increased substantial adverse effects on human beings, either directly or indirectly.

6. CONCLUSION

§15073.5 of the CEQA Guidelines states that a lead agency is required to recirculate an IS/MND when a document has been substantially revised after public notice of its availability has previously been given. However, recirculation is not required when new information is added to the IS/MND, which merely clarifies, amplifies, or makes insignificant modifications to the document. The project revisions described above in Section 4, Project Revisions do not result in significant modifications. In addition, the impact comparison provided above demonstrates that no new significant impacts or substantial increase in the severity of impacts would occur upon implementation of the revised project description. Therefore, no recirculation is required.

While the proposed changes do not warrant the recirculation of the IS/MND, this document should be made part of the administrative record and transmitted to the City's decision-making body along with the previously-approved IS/MND to provide clarification regarding proposed changes outlined above and to comply with CEQA Guidelines §15164.