

LAX Transpacific Cable Landing Project

DRAFT Initial Study

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Acronyms and Abbreviations

AQMP	Air Quality Management Plan
Applicant	Hood 1703, LLC
BMH	beach manhole
BMP	Best Management Practice
BOE	Bureau of Engineering
CAAQS	California Ambient Air Quality Standards
CDFW	California Department of Fish and Wildlife
CDPR	California Department of Parks and Recreation
CEQA	California Environmental Quality Act
CGS	California Geological Survey
City	City of Los Angeles
cm	centimeter(s)
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
CPS	Coastal Pelagic Species
CRHR	California Register of Historical Resources
dBA	A-weighted decibels
DC	direct current
DPS	Distinct Population Segment
DTSC	Department of Toxic Substances Control
EFH	Essential Fish Habitat
EIR	Environmental Impact Report
ESBB	El Segundo Blue Butterfly
ESHA	Environmentally Sensitive Habitat Area
FAA	Federal Aviation Administration
FC	Federal Candidate
FE	Federally Endangered
ft	foot/feet
FT	Federally Threatened
GHG	greenhouse gas
GWP	global warming potential

HCP	habitat conservation plan
HDD	horizontal directional drilling
HDPE	high-density polyethylene
IS	Initial Study
km	kilometer(s)
LAX	Los Angeles International Airport
LHMP	Local Hazard Mitigation Plan
LT 47	lifeguard tower 47 (Dockweiler State Beach)
LUST	leaking underground storage tank
m	meter(s)
MLD	Most Likely Descendent
MRZ-2	Mineral Resource Zone
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
ND	Negative Declaration
NL	not listed
NM	nautical mile(s)
NOA	Notice of Availability
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetland Inventory
OGB	ocean ground bed
PFE	power feed equipment
ROV	remotely operated vehicle
ROW	right-of-way
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SE	(California) State Endangered
SLR	sea level rise
SSC	Species of Special Concern
ST	(California) State Threatened

SWRCB	California State Water Resources Control Board
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
TSS	Traffic Separation Scheme
USACE	United States Army Corps of Engineers
USCG	United States Coast Guard
USGS	United States Geological Survey
USFWS	United States Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zones
VMT	vehicle miles traveled

1 Introduction

The City of Los Angeles (City) Department of Public Works, Bureau of Engineering (BOE) has prepared this Initial Study (IS) as the lead agency for the LAX Transpacific Cable Landing Project (herein referred to as “proposed Project” or “Project”) as proposed by Hood 1703, LLC (Applicant). The Project site is located within an existing surface parking lot at Dockweiler State Beach in Los Angeles, California. The City has determined that the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of this IS is required. This IS includes a description of the Project and evaluates the potential environmental impacts that could result from the construction, implementation, and operation of the Project.

1.1 Purpose of This Document

The California Environmental Quality Act (CEQA) was enacted in 1970 for the purpose of providing decision makers and the public with information regarding environmental effects of proposed projects, identifying means of avoiding significant environmental impacts by requiring changes in projects through the use of feasible alternatives or mitigation measures, and disclosing to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

An IS is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the IS shows that there is no substantial evidence, considering the whole of the record before the agency, that the project may have a significant effect on the environment, the lead agency must prepare a Negative Declaration (ND). If the IS identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a level of insignificance, a Mitigated Negative Declaration (MND) may be adopted by the lead agency. If the IS concludes that neither an ND or MND is appropriate, an environmental impact report (EIR) is normally required.

This IS has been prepared in accordance with CEQA (*Public Resources Code* § 21000 et seq.), the State CEQA Guidelines (*Title 14 California Code of Regulations*, § 15000 et seq.).

1.2 Document Format

This IS is organized into eight sections as follows:

- Section 1: Introduction
- Section 2: Project Description
- Section 3: Existing Environment
- Section 4: Environmental Effects/Initial Study Checklist
- Section 5: Preparation and Consultation
- Section 6: Environmental Determination
- Section 7: References

1.3 CEQA Process

To begin the CEQA process, the lead agency defines a proposed project. The lead agency then prepares an IS to identify the preliminary environmental impacts of the proposed project. This IS has determined that the Project could have significant environmental impacts that require further study (see Chapter 6, Determination). Therefore, the City, as lead agency, must prepare an EIR. A Notice of Preparation (NOP) has been prepared to notify public agencies and the public that the lead agency is starting the development of an EIR for the proposed Project. The NOP and IS will be circulated for a minimum 30-day public review and comment period. During this review period, the City will request comments from agencies, interested parties, stakeholders, and the public on the scope and content of the environmental information to be included in the EIR.

After the close of the 30-day review and comment period, the City, as lead agency, will prepare a Draft EIR and any associated technical studies. Once the Draft EIR is complete, a Notice of Availability (NOA) will be prepared to inform public agencies and the public of the document and where it can be reviewed. The Draft EIR and NOA must be circulated for a minimum 45-day public review and comment period. The purpose of this review and comment period is to provide public agencies and the public an opportunity to review the Draft EIR and comment on the adequacy of the analysis and the findings of the lead agency regarding potential environmental impacts of the proposed project. After the close of the 45-day review and comment period, responses to all comments received on the Draft EIR will be prepared.

The City, as the lead agency, will then prepare a Final EIR, which incorporates the Draft EIR and any revisions to the Draft EIR, comments received on the Draft EIR and list of commenters, and a response to comments discussion. In addition, the lead agency must prepare findings of fact for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring and reporting program to ensure that all proposed mitigation measures are implemented.

The Board of Public Works will consider the Final EIR, together with any comments received during the public review process and refer to the Final EIR and project with the Board's recommendation to the Los Angeles City Council, as the governing body of the City, regarding whether to certify the Final EIR and approve the project. The City Council may then consider the Final EIR, together with any comments received during the review and comment process, in making a decision regarding whether to certify the Final EIR and approve the project.

{Public notification of agenda items for the Board of Public Works, Council committees, and City Council is posted 72 hours prior to the public meeting. The Council agenda can be obtained by visiting the Council and Public Services Division of the Office of the City Clerk at City Hall, 200 North Spring Street, Suite 395; by calling 213/978-1133; or via the Internet at <https://clerk.lacity.gov/calendar>.

Within five days of project approval, the City will file a Notice of Determination (NOD) with the County Clerk. Within 24 hours of receipt, the County Clerk will post the NOD. This post begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those who objected to the project's approval and to issues presented to the lead agency by anyone, either orally or in writing, during the public comment period.

2 Project Description

2.1 Project Scope and Purpose

Hood 1703, LLC (the Applicant) seeks to further the Los Angeles region's continued growth as a digital technology hub and is proposing to develop undersea (subsea) fiber optic telecommunications cable landing infrastructure that could receive up to four future submarine cable systems and connect this infrastructure to a terrestrial landing site and terrestrial conduits installed along public rights of way (ROWs) to existing data center(s) in the region, including the El Segundo area (the Project). As described in detail below, each of the Project's cable systems would include a marine fiber optic cable to be laid and/or buried on the seafloor, crossing the Pacific Ocean to connect the United States to the western Pacific Rim. Each cable would enter a bore pipe that extends approximately 1,219 m (4,000 ft) offshore. The bore pipes would enter the seafloor until they reach a subterranean landing site. The Project's landing site would be within an existing surface parking lot at Dockweiler State Beach. From the landing site, the Project's terrestrial conduit systems would be installed within public ROWs to connect the cables to existing data centers within the El Segundo area.

2.2 Project Location

Landing Site

The landing site for the proposed Project would be located on an existing paved public parking lot at the south end of Dockweiler State Beach (approximate coordinates- Latitude: 33.9318° / Longitude: -118.4364°). The Project's landing site was selected due to its proximity to existing offshore infrastructure and onshore telecommunications infrastructure. This landing site would also provide minimally invasive terrestrial routes to the existing data center via public ROWs.

To identify the proposed Project landing site, a detailed site assessment was conducted, analyzing the coastal area within the Santa Monica Bay region. Considerations included offshore, nearshore, and terrestrial routes and potential limitations, including:

- Terrestrial and marine habitats
- Public and residential areas near potential construction
- Cable crossings and reducing risks to existing subsea cable systems
- Offshore restrictions and hazards
- Sea floor topology
- Proximity to existing infrastructure and data centers
- Existing terrestrial fiber routes, restrictions, and city street moratoria

Terrestrial Conduit Systems

From the landing site, a subterranean terrestrial conduit system would be installed within public ROWs within the cities of Los Angeles and El Segundo.

Offshore

Submarine cables would be installed on submerged land within the City of Los Angeles's jurisdiction, out through state and federal waters. From the horizontal directional drilled (HDD) exit hole off Dockweiler State Beach, these cables would be buried to approximately 1 meter (m; 3.3 feet [ft]) below the seabed, where feasible, in state and federal waters of less than 1,097.3-m (3,600-ft) water depth. In deeper waters, it is not feasible to bury cables in the seafloor; instead, they would be laid on the seafloor.



Figure 1. Vicinity Map

2.3 Project Objectives

The Project has been designed to achieve the following objectives:

- Provide for increased telecommunication pathways and reliability, including network redundancy, between the United States and the Pacific Rim countries while avoiding historically seismically unstable zones;
- Respond to the increasing demand for connectivity between Asia and the United States;
- Encourage and increase the economic benefit and reputational standing of the greater Los Angeles area as a major industrial and employment center and telecommunications leader;
- Attract new technological/industrial uses to the Los Angeles area; and
- Connect to existing resources and data infrastructure within Los Angeles County.

2.3.1 Project Benefits

As landing submarine fiber optic cables are part of the nation's infrastructure that transmits 99% of all intercontinental digital traffic, the Project would provide the following benefits:

- Enables economic growth and investment through tech hub expansion which strengthens LA's position as a global internet and data hub, attracting cloud providers, data centers, and enterprises.
- Lower latency and higher bandwidth provide direct international connections, reduces bottlenecks, and diversifies global internet traffic routes reducing reliance on long-haul terrestrial networks.
- Enables and supports AI and cloud services growth for faster access to AI processing, hyperscale cloud computing, and data-intensive applications.
- Direct links to Asia-Pacific Region strengthens global trade relationships with key economies like Japan, South Korea, and Mexico.
- Boosts financial and media industries business competitiveness with improved real-time trading capabilities benefiting fintech sectors, Hollywood and media content distribution such as the 2028 Olympics.
- Attracts Multinational Corporations and encourages global companies to establish or expand West Coast operations.
- Supports 5G and IoT expansion with potential backhaul capacity for smart city infrastructure, including autonomous vehicles and smart grids.
- Enhanced connectivity available for defense & aerospace sectors companies like SpaceX, Boeing, and Northrop Grumman operating in LA area.

2.4 Project Components

The Project would include construction offshore, at the Dockweiler State Beach landing site, and along public ROWs to install the following components:

- Installation of four (4) transpacific fiber optic subsea cables along the sea floor connecting to four (4) offshore bore pipes.
- Four (4) offshore bore pipes using HDD and extending approximately 1,219 m (4,000 ft) offshore.
- Two (2) beach manholes (BMHs) would be installed at Dockweiler State Beach at approximately 122 m (400 ft) landward of the mean high water (MHW) line to serve as a terminus point for HDD bores.
- Up to four (4) ocean ground beds (OGBs) at Dockweiler State Beach.

- One (1) HDD bore from one BMH to the intersection of Imperial Highway and Vista Del Mar.
- Approximately 7.2 kilometers (km; 4.5 miles) of open trenched terrestrial route to and throughout El Segundo.

The Applicant proposes to install the landing infrastructure (e.g., BMHs, bore pipes) in one phase, with cable(s) installation occurring in a subsequent phase based on planning timelines, regulatory approval, and installation availability. Once construction is complete, the landing site and conduit along the ROWs to the data center would be restored to pre-construction condition. While no subsea cables are currently proposed to be installed or operated as part of the Project's initial construction phase, the Applicant proposes to evaluate the environmental impacts associated with subsea cable installation to be comprehensive.

2.4.1 Offshore Components

The offshore Project components refer to those components between the MHW line and the outer limit of the continental shelf (i.e., areas where seawater depth is no greater than approximately 5,904 feet). Anticipated components to be installed in this area are listed below.

- Marine conduit, also known as the HDD bore pipes
- Submarine cables
- Cable regenerators

HDD Bore Pipes

Four (4) 15-centimeter (cm; 5 $\frac{7}{8}$ - inch) diameter rattled steel offshore bore pipes would be installed via HDD from Dockweiler State Beach to beyond the surf zone, approximately 1,219 m (4,000 ft) offshore. The use of HDD would avoid disturbance to the seafloor within the surf zone and is generally considered the most environmentally friendly installation method as it avoids trenching through the beach (**Figure 4**). This method is widely used to install conduits across beaches and the nearshore area.

The bore pipes, installed via HDD, would include four 10-cm (4-inch) diameter high-density polyethylene (HDPE) ducts, each with three 3.175-cm (1.25-inch) diameter HDPE inner ducts for the fiber-optic, power, and ground cables. The bore depths would range from approximately 2 m (6.5 ft) below grade at the BMH entry points to a maximum depth of approximately 37 m (120 ft). The borehole would continue until it reaches a predetermined exit point on the seabed planned for approximately 1,219 m (4,000 ft) seaward of the mean high-water line. This exit location would be carefully chosen to minimize environmental impact and ensure the stability of the installation. The bore would exit beyond the surf zone in water depths of approximately 13.7 m (45 ft). Once completed, each bore would contain a steel conduit within the bore that would be capped and remain in place for future cable installations.

Directional bores would be guided by a drill head fitted with a steering tool using magnetometers and inertial devices to track the direction of advance (horizontal and vertical) and the absolute location. The steel conduit would be advanced in 9.1-m (30-ft) sections through the boreholes as they are created. Surveys would be conducted in 4.57- and 9.1-m (15- and 30-ft) increments to verify the drill position and path. The directional bore machine occupies the bore entry site and drills steel casing into the ground at an angle. Once the bore casing reaches the desired depth, it would be leveled out as the drilling continues to push the pipe horizontally through the ground. Once it reaches the appropriate distance offshore, the drill head would be guided to the surface and the bore would be complete. This operation would be repeated a total of four times for the Project resulting in four capped bore pipes for future cable installation.

Prior to directional bore operations, a detailed engineering plan and profile drawings would be produced. These drawings would depict the horizontal and vertical alignment that would best fit the landing site conditions based on previous surveys of the land and seafloor. In addition, a soil boring

sample would be taken to determine the subsurface geology; this information is used to select the correct depths, mud mixes, and drilling head types. The sub-bottom profile of the ocean floor and the proposed bore path alignment would also be used to verify the depths provided are correct and to establish a true running line and elevation for the drill path.

At the proposed exit point, (i.e., where the HDD operation would “daylight” on the seabed offshore), a marine support crew would set a temporary buoy at the exit and this distance would be measured and verified. The buoy would be removed once a cable is installed. The depth of the bore path is also intended to hinder the release of drilling mud to the surface, while remaining above unknown subterranean formations that may occur at greater depths.

Offshore Cables

Leading from the HDD bore pipes further offshore, marine cable routes would be buried at a depth of up to approximately 3.3 feet below the seabed in waters of less than 3,600-feet deep; in deeper waters, the cables would lay on the ocean floor. The cables would traverse coastal submerged lands under the City of Los Angeles’s jurisdiction (MWH to 3 nautical miles [NM] offshore) and offshore waters to the continental shelf (3 NM, to a distance where the seawater depth is approximately 5,904 feet). Cable routes likely could cross several offshore basins, ridges, and escarpments before reaching the edge of the outer continental shelf.

Submarine Cables: Submarine cable specifications depend upon site-specific conditions. Armoring of cables is used to provide an appropriate degree of protection for the cable from geologic and sedimentary conditions encountered during installation, as well as from potential interactions with fishing gear. Generally, a cable design involves surrounding a core of optical fibers with rings of wires, copper sheathing, and polyethylene insulation.

The greatest degree of protection would be provided by the double-armored design, which is used in areas of rocky or coarse substrate and where protection from fishing gear or shipping operations may be warranted. The double-armored cable incorporates two surrounding layers of galvanized wires coated with tar, two layers of polypropylene sheathing, and an outer layer of tar-soaked nylon yarn to reduce corrosion. The second type is a light-weight-armored cable. This cable is like a double-armored cable but with only a single surrounding polypropylene sheath and ring of galvanized wires. The lightweight armored cable would be used where the risk of damage due to substrate conditions or fishing is reduced by the burial of the cable in soft-bottom sediments using a cable plow or remotely operated vehicle (ROV). Both cable types would be less than 5 cm (2 inches) in diameter and stable in the marine environment.

Cable Regenerators. Light pulses can only be transmitted approximately 80 km (50 miles) along the cable before they need to be regenerated. Therefore, regenerators would be required to help transmit signals along the cable route. A regenerator (approximately 4.27 m [14 ft] long and 25.4 cm [10 inches] wide), sits on the seafloor and restores the optical signal along the fiber optic cable to its full amplitude. This regeneration would be done using regenerator equipment attached to the cable at the appropriate intervals. The regeneration equipment would operate from 48 volts of direct current (DC) electricity. The marine cable would contain a copper conductor to transmit the DC electrical power to the regenerators. The DC generates a magnetic field on the order of 5 milligauss at about 1 m (3.3 ft) from the cable. The field diminishes with distance from the cable such that at 10 m (33 ft) it would be approximately 0.5 milligauss (i.e., indistinguishable from background measurements).

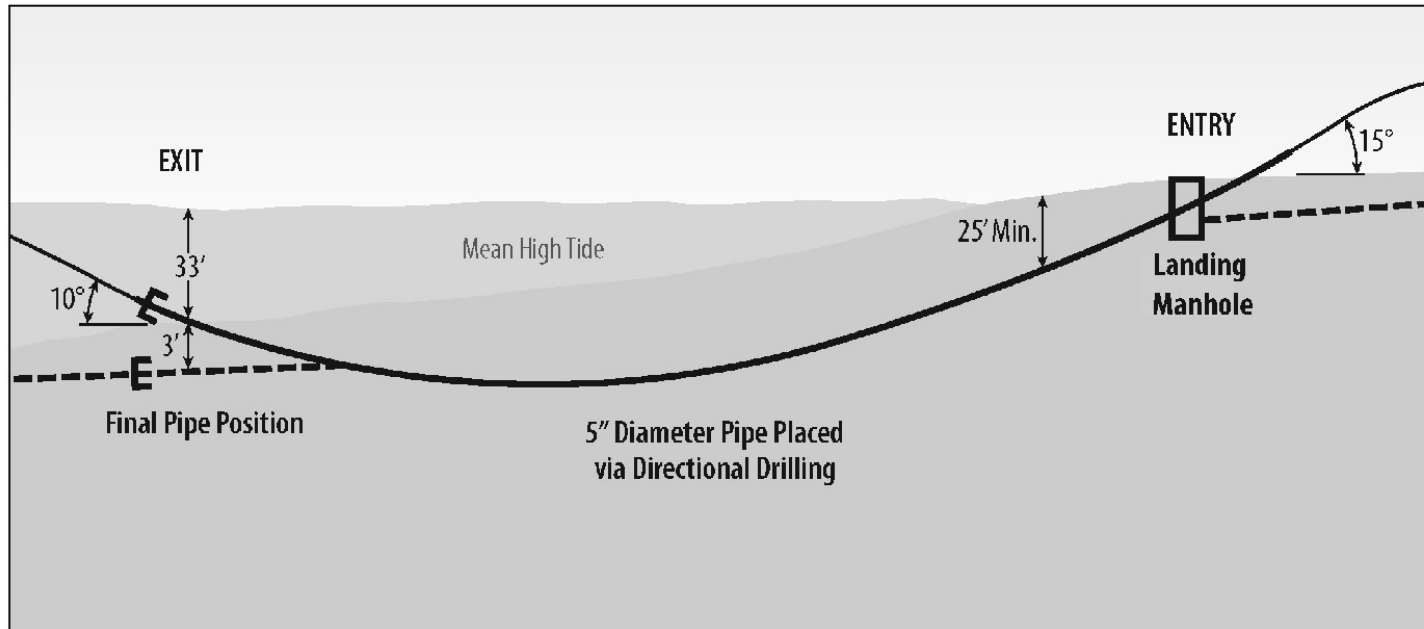


Figure 2. Typical Directional Bore Profile View

2.4.2 Onshore Components

Beach Landing

The development of the landing site at Dockweiler Beach would include installation of two BMHs (BHM 1 and BMH 2) at the landward end of the directional bores. BMH 1 would accommodate three bore pipes and BMH 2 would accommodate one bore pipe. The BMHs would house the connection between the terrestrial and submarine cables. The BMHs would be installed approximately 3 m (10 ft) apart and below ground level, accessed via a secure manhole. These BMHs are underground vaults generally measuring approximately 3.65 m (12 ft) in length, 1.83 m (6 ft) wide, and 2.13 m (7 ft) deep. A manhole cover would be appropriately marked and secured (locked and bolted) as per the requirements of the County of Los Angeles, which operates Dockweiler State Beach. As the BMHs would be buried, there would be temporary impacts (loss of parking spaces) during construction only; however, no parking spaces would be permanently lost.

Each cable would carry electricity and would need to be grounded through an OGB system. OGBs consisting of 3 to 5 buried anodes, would be installed below the existing parking lot to access the water table below the beach surface. An electrode array would be installed for each future cable system to provide cathodic protection, control erosion, and ground the electricity powering the submarine cable repeaters. Each OGB would consist of a single row of three to five anodes, buried at a depth necessary to achieve acceptable resistance, typically between 3 to 5.18 m (10 to 17 ft). The anodes would be installed horizontally with approximately 3 to 4.57 m (10 to 15 ft) of separation between each anode. The end of each anode would connect to a submarine cable.

After installing the OGBs, trenches would be excavated from the OGBs to the BMH to accommodate the installation of an OGB conduit. This conduit would be placed at the bottom of the trench at a depth of approximately 2 m (6.6 ft), backfilled with native soils, and the surface restored to its original or better condition. Concrete pavers would be positioned 30 cm (12 inches) above the bottom of the trench and warning tape would be placed over the OGB ground field and trench line at a depth of approximately 1 m (3.3 ft) below grade. Geographic positioning system points would be collected for OGB positions to generate an accurate as-built document of the OGB infrastructure.

A temporary staging area for construction operations would be established within the existing paved surface parking lot surrounding the proposed landing site at Dockweiler State Beach for approximately 120 days during Project construction, which would be scheduled during offseason months (October – April). The staging area would be approximately 2,787 square meters (m²) (30,800 square feet [ft²]) around the proposed BMHs and directly north of the main park entrance to the surface parking lot, encompassing approximately 80 parking spaces (**Figure 3**). The staging area would be fenced and secured during Project construction, and all fencing would be removed at the conclusion of construction activities.

Equipment, materials, and workers would ingress/egress Dockweiler State Beach through the South Marine Avenue/Imperial Highway entrance (**Figure 4**). Equipment would include trucks, trailers, excavator, bore machine, multiple mixing and recycling units, handheld tools, and a vibratory compactor.



Figure 3. Conceptual Staging Area Plan View

Terrestrial Cable Route

Terrestrial conduit systems would be constructed to connect the BMHs to existing data centers in the region, including in the City of El Segundo. This subsurface terrestrial conduit system would be constructed from the BMH at Dockweiler State Beach to facilities that will require conveyance through public ROWs jurisdictions of California Department of Transportation, the City of Los Angeles, and the City of El Segundo (**Figure 6**). The precise location of the power feed equipment (PFE) facilities and the associated conduit routes within the ROWs would be determined during final design and in consultation with the cities of Los Angeles and El Segundo.

To connect the BMHs to the existing data center(s), an approximately 6.4-km- (4-mile-) long conduit (i.e., fronthaul system) consisting of four (4) HDPE conduits, would be installed. The conduits would be installed via an open trench along most of the route (**Figure 5**), which would consist of excavating a trench about 45.72 cm (18 inches) wide and 1.37 m (4.5 ft) deep. Spoils from the trench excavation would be stockpiled adjacent to the excavation. The conduits would be fused together and installed in the trench. The trench would then be backfilled with either compacted native soils or flowable fill. Marking tape would be installed approximately 30.48 cm (12 inches) above the conduits and the rest of the trench would be backfilled to the existing grade. The trench would be paved to match the existing thickness of the surrounding paved areas and restored upon completion. Trenches would not be left open overnight. If excess spoils from excavation remain after backfilling, they would be properly disposed of offsite.



Figure 4. Proposed Terrestrial Fronthaul Route

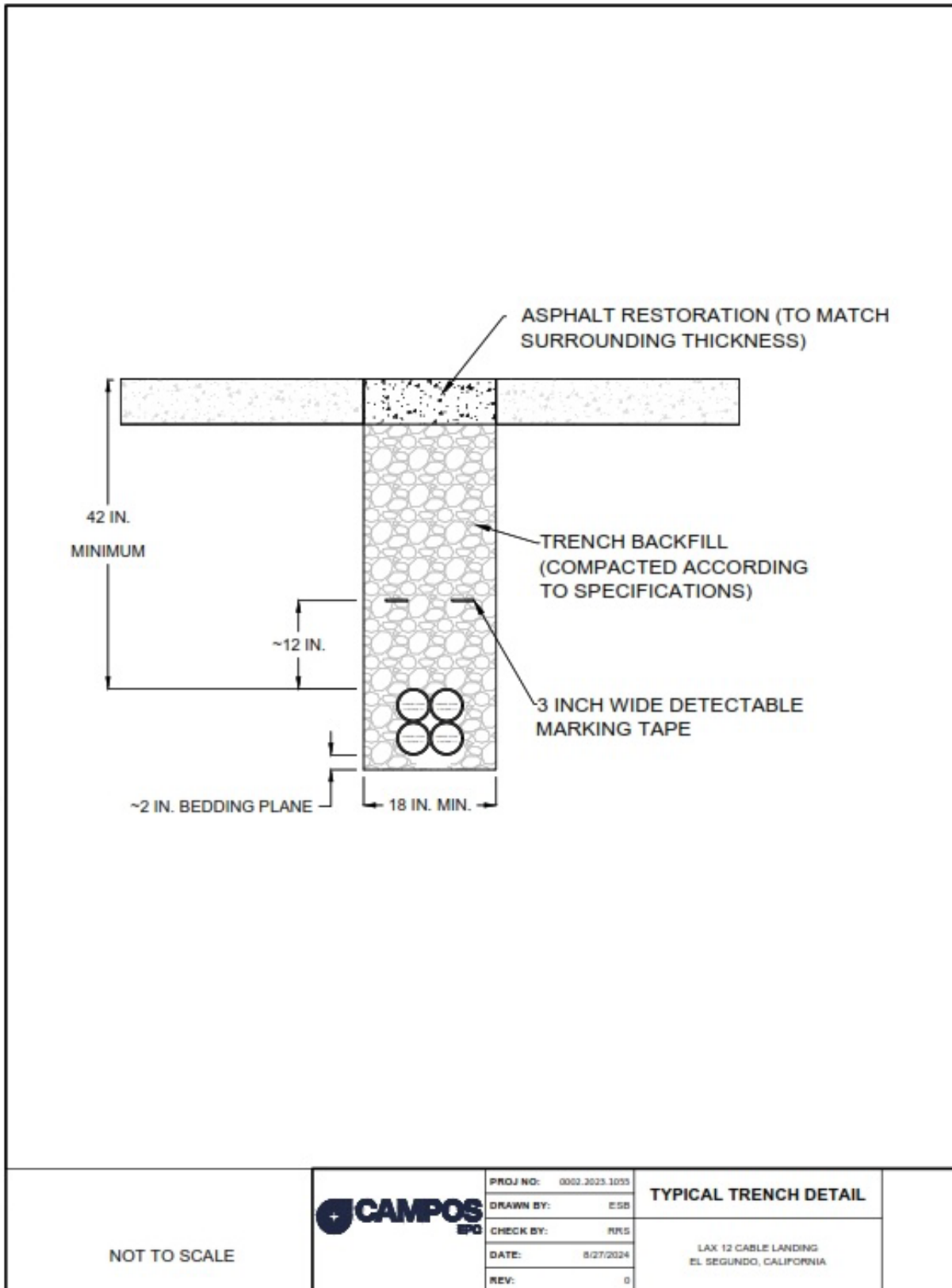


Figure 5. Typical Trench Detail

Along the proposed route, manholes would be installed every 243.84 to 304.8 m (800 to 1,000 ft) along the route (for a total of approximately 28 to 30 manholes) to allow for pulling and splicing of the cables. Each manhole along the ROW would be approximately 1.83 m (6 ft) long, 1.22 m (4 ft) wide, and 1.22 m (4 ft) deep. It is anticipated that there would be several locations where the proposed conduit route would need to cross existing utilities. Based on the depth of the existing utilities, the conduits would either be installed above them if there is enough clear distance or placed below the existing utilities. Prior to construction activities, all known underground utilities that occur along the proposed terrestrial cable routes would be identified.

Terrestrial construction activities would entail delivery of staging materials and equipment, surface preparation, trenching, HDPE and steel conduit placement, backfilling, trenchless installation, directional boring, open trenching, BMH installation, innerduct and cable pulling, and surface restoration. Terrestrial activities that would require excavations or ground disturbance would include boring, trenching, and manhole placement.

To complete the open trenching installation, temporary workspace(s) would be required. For these workspaces, the Applicant would prepare a traffic plan that would allow workspace in a portion of the roadway. Typically, this would block one lane of traffic but there may be locations where a second lane could require closure to allow for access beneath adjacent utilities. Alterations to traffic patterns would only be required during working hours in locations where open trenching is performed.

2.4.3 Applicant Design Features and BMPs Incorporated in the Project

The Project will incorporate certain design features and best management practices (BMPs) (**Table 1**).

Table 1. Incorporated Features/BMPs

Project Component	Measure	Description
Design and Pre-Planning	Marine route planning	Desktop study and marine survey to identify and avoid constraints and sensitive resources
	Navigation	Consult with U.S. Coast Guard (USCG) and US Army Corps of Engineers (USACE)
	Terrestrial route planning	Consult with California Department of Parks and Recreation (CDPR) and Los Angeles Recreation and Parks Dept.
	Consultation with offshore infrastructure ownership	Incorporate discussions with pipeline ownership into route planning
Regulatory Requirements/BMPs	Stormwater Pollution Prevention Plan (SWPPP)	Control measures for terrestrial construction to prevent erosion and stormwater runoff
	Soil and Waste Management Plan	Control measures for managing potentially contaminated soils encountered during construction, and management of oil and other hazardous materials onsite
	Geotechnical assessment	Engineering study of embankment to determine suitable construction techniques, if applicable
	Drilling Fluid Management Plan	Control measures and response to be implemented during HDD to detect and respond to potential inadvertent return

	Oil Spill Contingency Plan	State- and federal-required plan for vessels to avoid and respond to vessel oil spills
	Notice to Mariners	Coordination with and notifications to the U.S. Coast Guard (USCG) for vessel activity
	Site access and control	Designated work areas and controlled public access during construction for public safety
	Site restoration	Restore all work areas to pre-construction condition
	As-built plans and route coordinates	Provide as-built plans to the City of Los Angeles and the City of El Segundo, and offshore coordinates to the USCG and National Oceanographic and Atmospheric Administration (NOAA) for identification on navigational charts
	Air quality	Comply with local and regional air quality requirements for vessels and construction equipment
	Greenhouse Gas (GHG) emissions	Tracking all applicable and measurable GHG emissions, as required
Onshore Features	Seasonal restrictions	Avoidance of nesting season for snowy plover in the Project beach area
	Pre-construction surveys	Confirm absence of nesting birds in vicinity of work areas prior to construction
	Unanticipated Finds Procedures	Actions for potential cultural resources encountered during construction, including state requirements related to finds of human remains
	Traffic control plan	Traffic control measures for construction at beach and along the terrestrial route to manage traffic
	Coordination with agencies, businesses, and residents	Pre-construction coordination with agencies, businesses, and Neighborhood Councils/residents to reduce disruption and maintain emergency access routes during construction
	On-site security	Private security service to be used to make sure construction sites are secured
Notes: BMP = Best Management Practice; CDPR = California Department of Parks and Recreation; GHG = greenhouse gas; HDD = horizontal directional drilling; NOAA = National Oceanic and Atmospheric Administration; USACE = U.S. Army Corps of Engineers; USCG= U.S. Coast Guard		

2.5 Additional BMPs

Additional BMPs may include, but are not limited to:

- Work would follow all applicable federal, state, and local construction requirements.
- Work is limited to within the ROW and would use HDD methods to reduce impacts.
- Work vehicles would stay on existing roads or previously disturbed areas to the maximum extent practical.
- All unnecessary lighting would be turned off at night, and if nighttime lighting would be required, motion sensor security lights would be used.
- Minimal or no sodium vapor lights would be used at site facilities to reduce attraction of migratory birds.

- Work would not impact any significant vegetation. No tree removal is proposed.
- Work would use site-appropriate native plants and invasive-free materials (e.g. seed mixes, rock, mulch, soil) to fully restore all disturbed areas to their natural state.
- Work would be conducted from existing roadways adjacent to the work areas.
- Work would minimize soil disturbance to the extent practicable.
- No changes to existing ground elevations would occur.
- The current Base Flood Elevation would be maintained.
- No new effective impervious surfaces would be constructed.

2.6 Operation, Repair, and Maintenance

Operation and maintenance of the landing system would be managed by the Applicant's staff who are trained in the specific type of cable proposed to land at this site. They would be responsible for the ongoing, long-term maintenance of the system, including the land route between the BMHs and the existing data center(s), which potentially includes inspection and repairing the terrestrial land cables, if required. There would be quarterly scheduled inspections and maintenance of the BMHs and cable vaults located within each manhole to validate it is in good standard. The Applicant's staff would supervise all system equipment on a 24-hour/7-day basis and oversee implementing repairs, restoration plans, and monitoring the performance of the system.

Offshore, differential geographic positioning system navigation would be used during installation of the cable systems. Extensive records would be maintained to track the exact location of the cable-lay ship, cable plows, or remotely operated vehicles (ROVs) during the installation process. After installation, the data would be compiled into a standard-format cable record. The record would be distributed to all cable maintenance zone ships, government charting agencies, and other data users. Records may then be used to locate the cables on the seabed when a cable repair is needed. These records would be maintained throughout a cable system's life and after the cable is retired.

Other than ensuring that the power feed and transmission equipment are in proper working order, no additional routine maintenance would be planned for the offshore segments of the cable network. The cable owner would be responsible for coordinating any offshore cable maintenance. These cables typically operate for 25 years or longer. However, a cable could be damaged by saltwater intrusion into the conduit or by anchors or fishing gear that could snag the cable and cause a fault. For a typical shallow-water repair, the location of the fault (the point at which transmission is interrupted) can usually be pinpointed using low frequency electroding (i.e., sending a low electrical charge through the cable). The means of repairing the damage would be determined based on the depth of water and whether it is buried at that location. Options for executing such repairs include use of divers, grapnel, or a remote operating vehicle. Once repaired, the section of cable may either be buried or laid on the seafloor for self-burial.

2.6.1 Retirement, Abandonment, or Removal of Offshore Cables

Offshore cables would have a life of 25 years or longer. Within 90 days of either taking the cable out of service or the expiration of an applicable lease, the cable owner would advise the relevant agencies with jurisdiction over the cable of the status and proposed disposition of the inactive cable. The cable owner would also work with the applicable agencies to determine if removal of cables would be necessary. All other Project components, including the bore pipes, BMHs, and terrestrial conduit systems, would remain in place and available for future use.

If the terrestrial cable is removed after Project retirement, it is anticipated that the cables would be accessed from the existing manholes and pulled out from the conduit using a truck with a reel puller, leaving the conduit in place and available for new cable to be installed. The other buried components of the terrestrial system are expected to be abandoned in place. As a result, no additional excavation or ground disturbance would be required.

2.7 Proposed Schedule

The Applicant intends to perform and complete the entirety of BMH installation and bore drilling construction during one off-season, the period of October to April. This component of Project construction is expected to be completed in approximately 120 days. The schedule for the terrestrial route would be in conjunction with the BMH construction, dependent on successful negotiations with the California Department of Transportation, and the cities of Los Angeles and El Segundo. A complete project schedule would be provided as discussions with each agency progress towards finalized easement, fiber routes, and construction agreements.

The Applicant is proposing to work during daylight hours seven days per week. Construction associated with the BMH and HDD operations during the weekends would primarily be conducted between 9:00 a.m. to 4:00 p.m. on Saturday. The only construction activity planned on Sunday would be circulation of the marine directional bore pump for 30 minutes, two times a day. Work after hours during the evening may be required as the bore pump could require circulation if the contractor believes there is a risk of the bore pipe seizing. Work along the existing ROWs through the cities of Los Angeles and El Segundo would typically occur during daylight hours, Monday to Friday. Additional scheduling options may be negotiated by jurisdiction.

The anticipated construction schedule for the proposed work is provided in **Table 2**.

Table 2. Provisional Landing Site Construction Schedule by Activity

Activity	Target Start Date	Proposed Hours (PST)	Duration
Terrestrial installation through El Segundo	April 2026	M-F 8:00AM-5:00PM	180 days
HDD site setup	October 2026	M-F 8:00AM-5:00PM	10 days
HDD directional bores - marine	October 2026	M-F 8:00AM-5:00PM	120 days
HDD site restoration	January 2027	M-F 8:00AM-5:00PM	10 days
BMH installation	January 2027	M-F 8:00AM-5:00PM	30 days
Terrestrial conduit installation at the beach to the intersection	February 2027	M-F 8:00AM-5:00PM	30 days
Notes: BMH = beach manhole; F = Friday; HDD = horizontal directional drilling; M = Monday; PST = Pacific Standard Time			

3 Existing Environment

The proposed Project would be located within Dockweiler State Beach, a recreational state beach located in the City and managed by the County of Los Angeles, and otherwise within the jurisdiction of the City and City of El Segundo. The landing site has been located outside of critical habitat for the western snowy plover and other special status species (see Sections 4.4 Biological Resources and 4.19 Mandatory Findings of Significance' for more information). The El Segundo Dunes Environmentally Sensitive Habitat Area (ESHA) is located between Vista del Mar and South Pershing Drive and includes the El Segundo Blue Butterfly (ESBB) Preserve, which is adjacent to the north end of Imperial Highway (**Figure 6**).

A subsurface terrestrial conduit duct system would be constructed from the BMH infrastructure constructed at Dockweiler State Beach (**Figure 7**) to an existing data center located at 2260 E El Segundo Boulevard, El Segundo, CA 90245. Construction and installation of the terrestrial conduit system requires conveyance through public street ROWs within Dockweiler State Beach, a portion of the City, and the City of El Segundo. The public ROWs include South Marine Ave (parallel to Vista del Mar and Dockweiler State Beach), Imperial Highway, Hillcrest Street, West Acacia Avenue, Loma Vista Street, West Mariposa Avenue, and North Douglas Street.

The land use designations of the properties adjacent to the proposed terrestrial conduit corridor are composed primarily of recreation/open space, industrial, single family residential, schools, and commercial land uses. Dockweiler State Beach and Vista del Mar provide popular vantage points for sightseers and recreationalists.

The project components in the offshore environment would occur within Santa Monica Bay. Several subsea cables are in the vicinity of the proposed Project (**Figure 8**). Within the proposed Project area, Essential Fish Habitat (EFH) exists for Pacific Groundfish, Coastal Pelagic Species (CPS), and Highly Migratory Species. The offshore location where HDD would occur is north of and does not cross the boundary of a marine restricted area. The HDD alignments would, however, cross through an active nearshore placement site (**Figure 9**). The US Army Corps of Engineers (USACE) has been coordinated with regarding this site.

HDD activities would not occur in or near any Marine Protected Areas (MPAs) or Habitats of Particular Concern. The Project also does not cross any areas included in the California Coastal National Monument (i.e., islands, rocks, exposed reefs, or pinnacles above mean high tide within 12 NM of the shoreline of the State of California). Marine uses within the Project area include recreation and transit for commercial, industrial, and recreational vessels.

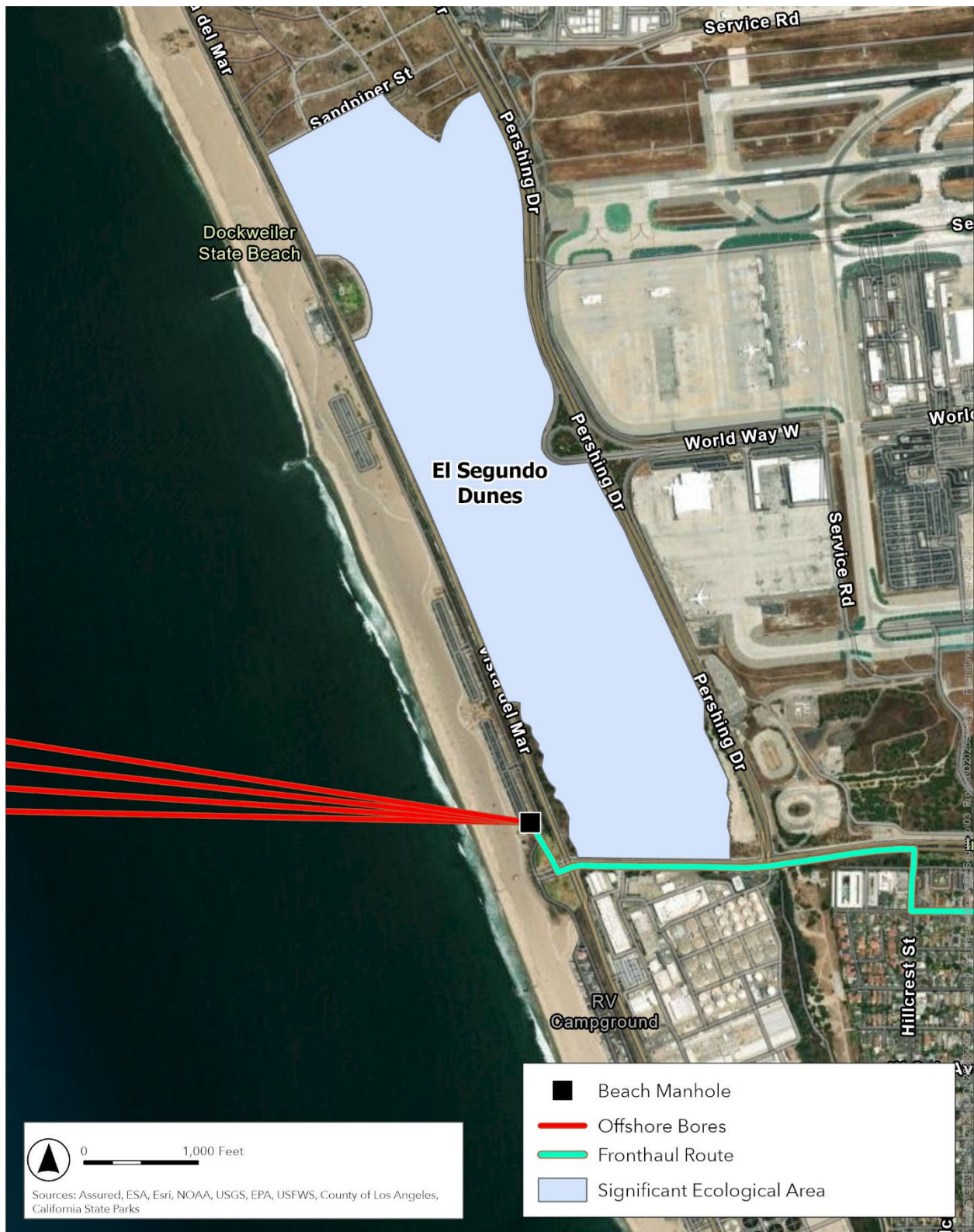


Figure 6. El Segundo Dunes Environmentally Sensitive Habitat Area in Relation to Project

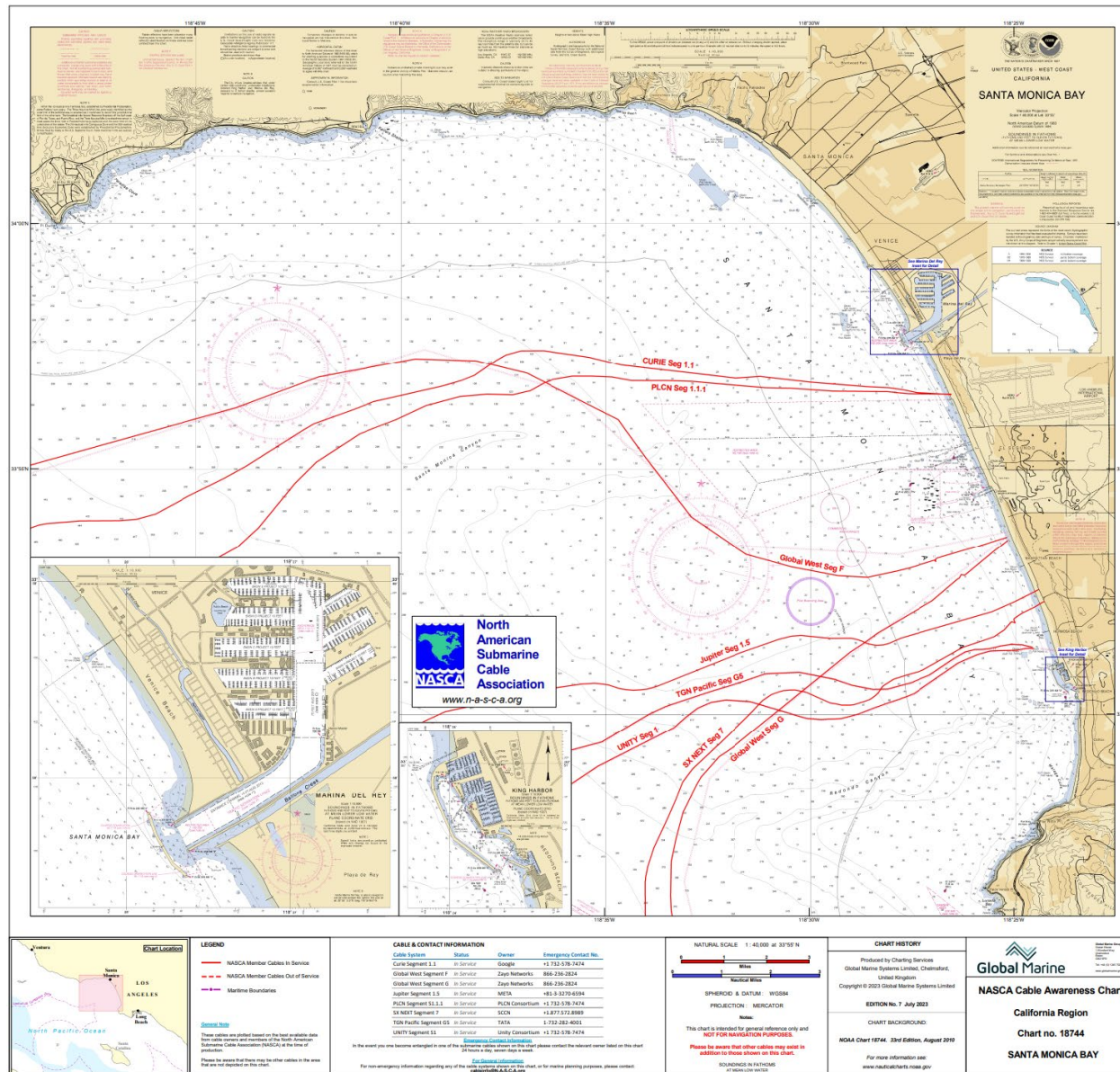


Figure 8. Existing Subsea Cables in Project Vicinity

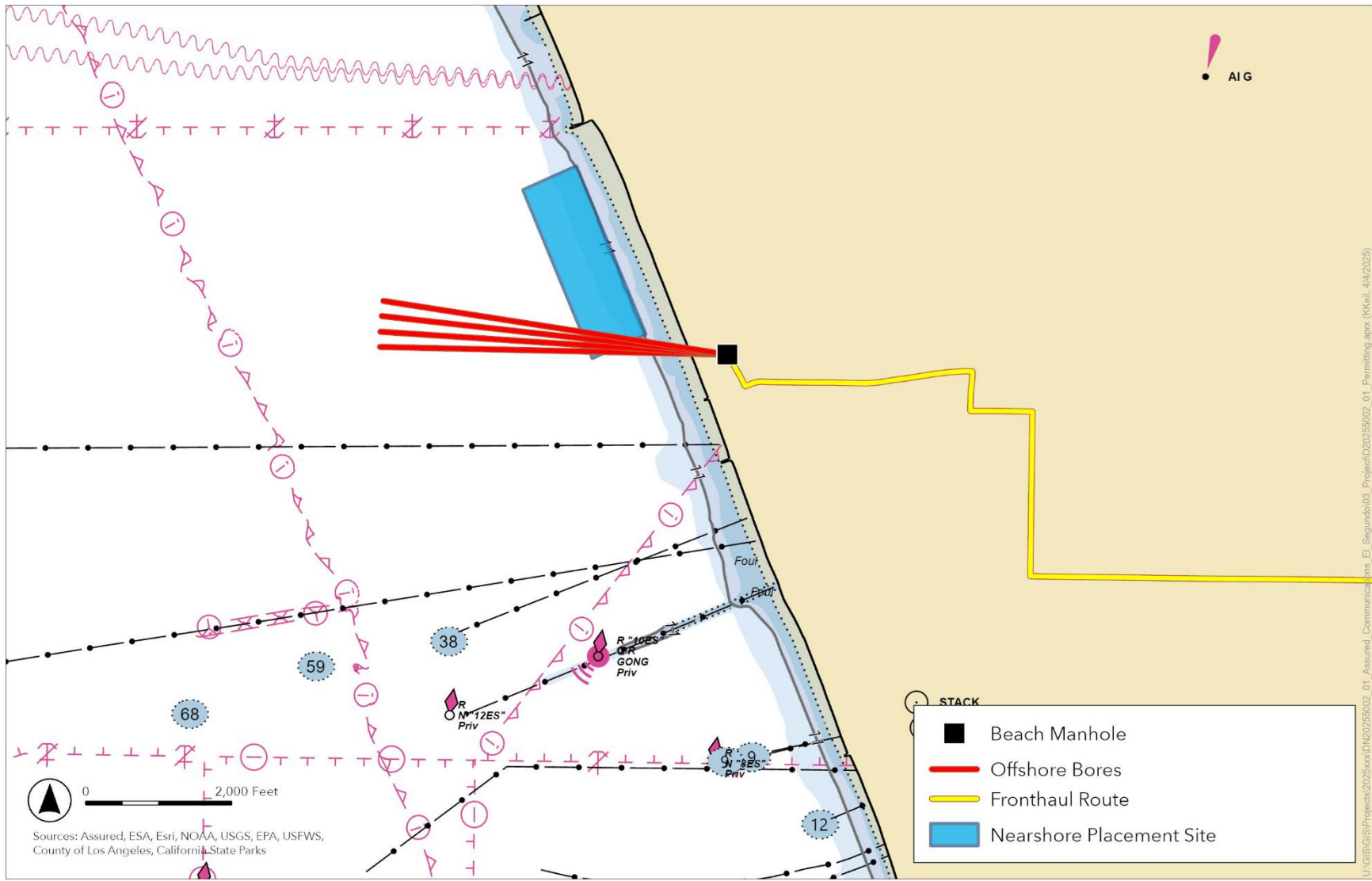


Figure 9. Proposed Landing Site overlaid NOAA Nautical Chart

4 Environmental Effects/Initial Study Checklist

The questions presented in this section are derived from the Environmental Checklist Form in Appendix G of the 2024 State CEQA Guidelines except where noted. Information provided in response to the Environmental Checklist questions is derived from multiple sources, including environmental information submitted by the Applicant, information obtained during site visits, databases, and other publicly available information. Other sources are noted in the answers to Checklist questions and full references are provided in Section 7.

This section presents information on the regulatory and existing environmental setting in the project area and examines the potential environmental impacts of the Project for the following resource areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

Impacts are separated into the following categories:

- **No Impact.** This category applies when a project would not create an impact in the specific environmental issue area. A “No Impact” finding does not require an explanation when the finding is adequately supported by the cited information sources (e.g., exposure to a tsunami is clearly not a risk for projects not near the coast). A finding of “No Impact” is explained where the finding is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- **Less Than Significant Impact.** This category is identified when the project would result in impacts below the threshold of significance and would therefore not result in any significant impacts.
- **Less Than Significant After Mitigation.** This category applies where the incorporation of mitigation measures would reduce a “Potentially Significant Impact” to a “Less Than Significant Impact.” The mitigation measures are described briefly along with a brief explanation of how they would reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be incorporated by reference.

- Potentially Significant Impact.** This category is applicable if there is substantial evidence that a significant adverse effect might occur, and no feasible mitigation measures could be identified to reduce impacts to a less than significant level. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.

Sources of information that adequately support these findings are referenced following each question. All sources so referenced are available for review at the offices of the Bureau of Engineering, 1149 South Broadway, Suite 600, Los Angeles, California 90015. *Please contact Daniel Kim at (213) 485-1411 for information regarding the environmental document and the proposed Project.*

Based on the following analysis, the proposed Project may have a potentially significant impact in the areas of Air Quality, Biological Resources, Noise, and Tribal Cultural Resources, and may result in certain Mandatory Findings of Significance. The proposed Project’s effects on the Aesthetics, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Public Services, Recreation, Transportation and Traffic, Utilities and Service Systems, and Wildfire resource areas would be less than significant or less than significant with mitigation incorporated. The proposed Project would have no impact on the Agriculture and Forestry Resources, Mineral Resources, and Population and Housing resource areas.

4.1 Aesthetics

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<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"/>

a) *Would the Project have a substantial adverse effect on a scenic vista?*

Less than Significant Impact. No officially designated scenic vistas, roadways or highways are present in the vicinity of the Project, including the landing site (CALTRANS 2024). Dockweiler State Beach provides views of the water, shoreline, and inland areas, and both Dockweiler State Beach and Vista del Mar provide popular vantage points for sightseers and recreationalists. Slopes along the beach side of Vista del Mar have been identified as providing vista points in all directions (CDPR 1992). Additionally, the El Segundo Dunes ESHA and ESBB Preserve, which are scenic areas, lie within a narrow strip between Vista del Mar and South Pershing Drive adjacent to the Project area.

Construction of subsurface infrastructure—marine offshore bore pipes, BMHs, and terrestrial conduit corridor—would occur at Dockweiler State Beach and along the proposed subsurface terrestrial conduit corridor to data center(s) in the region. Onshore construction equipment would be visible for temporary periods at these locations for the durations identified in Table 2. Offshore, project construction vessels may be visible temporarily from the shoreline and by other offshore recreationalists for the durations identified in Table 2.

Once in place and operational, BMHs, subsurface conduit, and any fiber optic cables would not be visible and would have no effect on any scenic resources or a scenic vista. Onshore, the only visible evidence of operational maintenance would be a small truck next to the BHM periodically. Similarly, offshore, the only Project equipment or vessels that would be visible after construction is completed would be a small boat with a diver periodically checking the borehole pipe exit.

Because potential visual impacts would be temporary, short term, and primarily limited to the Project's construction phase, impacts to scenic vistas are anticipated to be less than significant.

- b) *Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Less than Significant Impact. The Project is not anticipated to damage or degrade any scenic resources because there are no trees, rock outcroppings, historic buildings, or designated scenic highways located within the anticipated vicinity of the Project area. Therefore, impacts are anticipated to be less than significant.

- c) *In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Less than Significant Impact. Portions of the proposed Project would be located offshore and underwater, as well as beneath a paved parking area on Dockweiler State Beach. Construction of the proposed onshore BMHs and offshore HDD for bore pipes would be visible and could have minor, short-term (approximately four months) temporary impacts to the visual character and quality of the project area. Apart from any required crane, construction equipment is anticipated to be relatively small in the context of the surrounding landscape. This includes the stretch of The ESBB Preserve and El Segundo Dunes ESHA, which lies adjacent to the north of Imperial Highway (between Vista del Mar and South Pershing Drive). The portion of the Project within Dockweiler State Beach would be located within the City of Los Angeles Coastal Transportation Corridor Specific Plan area, the Specific Plan does not impose any zoning requirements or regulations related to scenic quality. Although construction activity at the beach could have minor, temporary visual impacts during the construction phase, the Project is not anticipated to significantly impact views or the overall quality of the landscape.

Construction of the subsurface terrestrial conduit system route would occur along public ROWs on the route described in Section 2.4.2 (Project Description). The section along Imperial Highway would be located north of an area designated as Open Space by the City of El Segundo General Plan before turning south into an area designated as single family residential by the City of El Segundo General Plan. The route would pass areas designated by the City of El Segundo General Plan as Public Facility, Parks, Two Family, Multi Family, Neighborhood Commercial, Corporate Office, Urban Mixed-

Use North, and Corporate Campus Specific Plan. The Project could have temporary impacts to localized visual quality for residents in these areas during periods of the project’s construction phase. However, the Project is not anticipated to violate any Aesthetics Goals and Policies applicable to each affected land use designation as set forth in the City of El Segundo General Plan or the Corporate Campus Specific Plan. Therefore, any visual or aesthetic impacts in these areas is anticipated to be temporary, minor, and less than significant.

Once construction is completed, no portion of the Project (other than BMH covers) would be visible from at or above the ground level. Accordingly, the Project would not result in any long-term impacts to the visual character or quality either on the beach, offshore, or in the inland cable corridor area.

- d) *Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less than Significant Impact. Construction equipment used for HDD and BMH installation at the Dockweiler State Beach, within the staging and construction area, would require a secured, fenced area for operation 24 hours per day during construction activities. Project lighting would only be required intermittently as construction would generally occur during daylight hours. Any additional glare created by Project construction lighting would be difficult to distinguish from the existing glare from the Los Angeles metropolitan area. Other light sources include residences, industrial facilities, lights from aircraft landing at or departing from Los Angeles International Airport (LAX), and lights from other vessels visible from the beach (including tankers near the Chevron refinery). The beach area where Project activities would occur is approximately 10 m (33 ft) below grade from Vista del Mar, however, lighting on construction equipment is anticipated to be visible from most surrounding areas including the road, the beach area and bicycle path. Limited nighttime lighting associated with security of the Project construction site would not permanently alter night-sky conditions. Project lighting would be in the same location(s) as lighting for the beach’s existing parking lots. As such, any Project-related change in nighttime lighting conditions would be nominal. Lighting on Project vessels could be perceived as new sources of light, although these vessels would be relatively far offshore and consistent with similar lighting seen on other vessels seen in the Project area.

Once in place and operational, the landing site, conduit, and fiber optic cable would have no external lighting. Any offshore maintenance would be conducted during daylight hours so no vessel lighting would be required.

Given the lighting conditions in existence at the site, the short-term lighting required for construction of the project at Dockweiler State Beach, and the absence of lighting required for operations, the proposed Project would not create a new source of substantial light or glare, and impacts are therefore anticipated to be less than significant. Potential effects of lighting on terrestrial and marine wildlife are analyzed in Section 4.4, Biological Resources.

4.2 Agriculture and Forestry Resources

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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"/>

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 the 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"/>

a) *Would the Project 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?*

No Impact. According to California Department of Conservation’s (DOC) mapping of Important Farmland for Los Angeles County, there is no designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in the vicinity of the Project (DOC 2024). Therefore, the Project would have no impact on these types of areas.

b) *Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. According to the California DOC’s mapping of Important Farmland, the Project site and adjacent land parcels are in areas designated as “Urban and Built-up” land (DOC 2024). The Project would have no impact on any land zoned for agricultural purposes and is not subject to a Williamson Act contract.

c) *Would the Project 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))?*

No Impact. The Project site and adjacent parcels are not in an area zoned for forest land, timberland, or timberland zoned Timberland Production. Therefore, implementation of the Project would have no impact related to any such zoning designations.

d) *Would the Project result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. There is no forest land on or near the Project, therefore the Project would not impact forest land or result in the conversion of forest land.

- e) *Would the Project 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?*

No Impact. The Project is not located on or near farmland or forest land and, therefore, would not result in conversion of farmland or forest land to a different use.

4.3 Air Quality

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

- a) *Would the Project conflict with or obstruct implementation of the applicable air quality plan?*

Potentially Significant. The Project area is located within the cities of Los Angeles and El Segundo, each of which are located within the South Coast Air Basin (SCAB) and subject to the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project is in an area that exceeds federal and state ozone standards, the state PM10 standard, and the federal and state PM2.5 standards. Ambient air quality in the Project area meets federal and state CO, NO2, and SO2 standards.

The 2022 SCAB Air Quality Management Plan (AQMP) (CARB 2022a) proposes reduction measures that are designed to bring the South Coast Air Basin into attainment of the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). The SCAQMD adopts AQMP control measures which are then used to regulate sources of air pollution in the SCAB. The primary objective of the 2022 AQMP is to address attainment of the 2015 8-hour ozone standard of 70 parts per billion (ppb). Attainment strategies for the other ozone standards were discussed in the previous SCAB AQMP, published in 2016. The Project is anticipated to comply with these regulatory requirements.

The proposed Project would involve the use of construction equipment such as backhoes, trucks, excavators, boring equipment (for HDD), and diesel-powered generators. The equipment used during construction would generate short-term emissions subject to the AQMP. Similarly, Project vessels would also generate emissions during completion of the HDD and during cable installation. The Project could produce temporary construction phase emissions of nonattainment pollutants – ozone, PM10 and PM2.5 – from diesel-powered marine vessels, on-road vehicles, and construction

equipment (e.g., backhoes, excavators, and HDD boring equipment). These emissions would be modeled and analyzed as part of the Air Quality Impact Analysis that would be prepared for the Project as part of the EIR. If the Analysis demonstrates that Project emissions could conflict with the 2022 or 2016 AQMP, impacts could be potentially significant.

Once construction of the Project is complete, the Project would be managed remotely and regular access to the terrestrial and marine elements of the Project would not be needed. Therefore, routine operation is not anticipated to result in any meaningful air emissions.

Upon the conclusion of Project operations in approximately 25 years, the disposition of the cables would be determined in consultation with the respective cities and applicable agencies. At that time, the potential method(s) and impacts would be evaluated by the city and applicable Agencies.

- b) *Would the Project 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?*

Potentially Significant. As discussed previously, the CAAQS and NAAQS have been developed at the state and federal level. The SCAQMD has developed regional- and local-scale emission thresholds in the AQMP. Impacts from a proposed project are measured against these to determine whether a project would have significant impacts on air quality.

The proposed Project would increase emissions during construction and installation on a short-term basis. The increase in emissions during construction and installation may result in localized impacts that could contribute to existing or projected quality violations and be considered potentially significant impacts. These emissions would be modeled and analyzed as part of the Air Quality Impact Analysis prepared for the Project as part of the EIR.

The proposed Project would not generate meaningful emissions during the operational phase.

- c) *Would the Project expose sensitive receptors to substantial pollutant concentrations?*

Potentially Significant. Populations particularly sensitive to air pollution include children, the elderly, persons with pre-existing respiratory or cardiovascular illnesses, and athletes and others who engage in frequent exercise. Structures that house these people or places where they gather are defined as “sensitive receptors.” These may include long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers and athletic facilities (CARB 2024). For the air quality analysis, the nearest sensitive receptors within 152.4 m (500 ft) of the Project site are members of the public recreating at Dockweiler State Beach and residents on the streets where the terrestrial conduit would be installed.

The operation of equipment during the construction of the proposed Project would increase emissions of criteria air pollutants (Co, NO_x, PM₁₀, and PM_{2.5}) and diesel particular matter (a toxic air contaminant in California) and may expose nearby sensitive receptors on Dockweiler State Beach to these pollutants. Accordingly, impacts to nearby sensitive receptors may be potentially significant and will be evaluated in more detail in the EIR.

The proposed Project would not generate meaningful emissions during the operational phase.

- d) *Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Less than Significant. The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. Project construction equipment and vessels would generate emissions from combustion of diesel, gasoline, and marine fuel. In addition, soil disturbance may result in odors depending on its contents. Project construction activities, including soil disturbance, is anticipated to be generally consistent with construction and earth-disturbing activities taking place throughout urban areas. As such, odor impacts are anticipated to be less than significant.

The Project is not anticipated to generate any meaningful emissions during the operational phase.

4.4 Biological Resources

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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 Wildlife 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 Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands (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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the Project 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 Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?*

The following sources were drawn upon to evaluate the environmental setting in the Project vicinity. Project-related documentation was reviewed for site-specific data regarding habitat suitability for special-status species. This information was supplemented by a review of existing literature and analyses for similar projects in the region, consultation with technical experts, and reconnaissance surveys of the study area. Finally, preliminary database searches were performed on the following websites to identify special-status species with the potential to occur in the area:

- U.S. Fish and Wildlife Service's (USFWS) Information Planning and Conservation (IPaC) System (2024a)
- USFWS Critical Habitat Portal (2024b)
- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database QuickView Tool in BIOS 5 (2024)
- California Native Plant Society (CNPS) Inventory of Rare, Threatened, and Endangered Plants of California (2024a)

4.4.1 Terrestrial

State

Special status species under CDFW's jurisdiction potentially occurring in or proximate to the Project area include the Crotch's bumble bee (*Bombus crotchii*; state-endangered [SE]) and Belding's Savannah sparrow (*Passerculus sandwichensis beldingi*).

Federal

According to the Information for Planning and Consultation (IPaC) resource list (USFWS 2024a), Endangered Species Act-listed species under USFWS jurisdiction that could occur in the Project area or vicinity include the western snowy plover (*Charadrius alexandrinus nivosus*) (also Federally Threatened [FT] and CDFW Species of Special Concern [SSC]), California least tern (*Sternula antillarum browni*) (Federally Endangered [FE]/SE), coastal California gnatcatcher (*Polioptila californica californica*) (Federally Threatened [FT]/SSC), Hawaiian petrel¹ (*Pterodroma sandwichensis*) (FE/State not listed [NL]), Least Bell's vireo (*Vireo bellii pusillus*) (FE/SE), short-tailed albatross (*Phoebastria (Diomedea) albatrus*) (FE/NL), ESBB (*Euphilotes batooides allyni*) (FE/NL), Monarch butterfly (*Danaus plexippus*) (Federal Candidate [FC]/NL), southwestern pond turtle (Proposed Threatened [PT]/SSC), western spadefoot (PT/SSC), marsh sandwort (FE/SE), and Nevin's barberry (FE/SE).

Western snowy plover and the California least tern are known to inhabit the region. Designated Critical Habitat (SubunitCA45D) for the Western snowy plover is located approximately 1.6 km (1 mile) north of the Project area. Dockweiler State Beach contains two Western snowy plover roosting areas, LT 47 and LT 58. LT 58 is the closest roosting area, located approximately 800 m (0.5 miles) south of the Project area (CDFW 2017) (**Figure 9**).

¹ Also known as the Dark-rumped Petrel, it is not listed by the state of California and is very unlikely to appear within the project area. However, the USFWS recognizes its potential range in waters off California's coast (USFWS 2023).

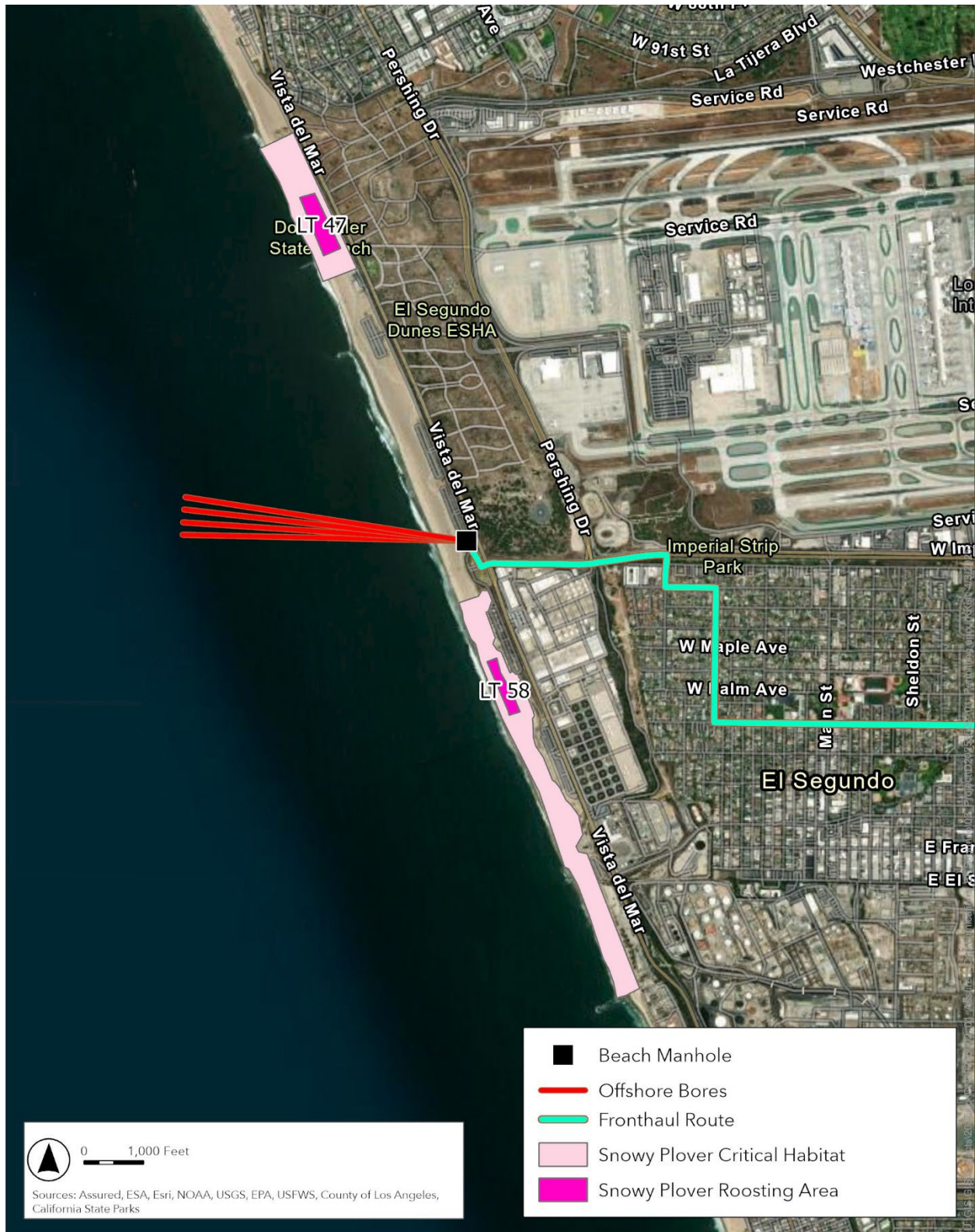


Figure 10. Western Snowy Plover Critical Habitat and Known Roosting Areas

4.4.2 Marine

In the offshore Project area, there may be several special status species of marine mammals, sea turtles, fish, and invertebrates under the jurisdiction of the National Marine Fisheries Service. These include the humpback whale (threatened Mexico Distinct Population Segment [DPS]; endangered Central America DPS) (*Megaptera novaeangliae*), threatened green sea turtle (East Pacific DPS) (*Chelonia mydas*), endangered steelhead trout (Southern California DPS; *Oncorhynchus mykiss*), and endangered black abalone (*Haliotis cracherodii*).

4.4.3 Analysis

Less than Significant with Mitigation Incorporated. The terrestrial portion of the proposed Project would be constructed on an asphalt parking lot, degraded area between the parking lot and roadway, city streets, bikeways, residential communities, and commercial properties. HDD would be conducted under open sandy beach at a depth of at least 3.1 m (10 ft). Although construction would involve above-ground activities, the OGBs would be buried below grade. As such, any terrestrial impacts would be temporary and limited to the construction phase. The marine portion of the proposed Project would be constructed out to the 4.8-km (3-mile) territorial limit of State waters. Although special-status and regional species of concern have been documented in the vicinity of the proposed Project, the proposed Project's terrestrial and marine footprints are not anticipated to overlap with any designated critical habitats for any such species and would avoid hard-bottom habitat to the maximum extent feasible.

The Project is not anticipated to have an impact on special status species and regional species of concern from maintenance activities during the operational phase due to the minor amount of activity anticipated.

Protective BMPs proposed by the Applicant and standard mitigation measures are expected to be required by resource agencies (e.g., CDFW, USFWS) to avoid or reduce Project effects on special status species, including pre-construction surveys, biological monitoring, worker environmental awareness training, and seasonal restrictions. As such, impacts from Project construction and operation are anticipated to be less than significant with mitigation incorporated.

- b) *Would the Project 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 Wildlife or US Fish and Wildlife Service?*

Less than Significant with Mitigation Incorporated. No direct impacts to any riparian habitat or other sensitive natural community are anticipated. Project construction could result in indirect impacts to birds nesting in the vicinity of the proposed Project due to construction noise or lighting. Avoidance and minimization mitigation measures such as pre-construction surveys, on site biological monitoring, worker environmental awareness training, and seasonal restrictions shall be implemented to reduce impacts to a less than significant level.

The El Segundo Dunes ESHA and the ESBB Preserve are located to the north/east of the Project area, in a narrow stretch between Vista del Mar Boulevard and South Pershing Drive of LAX. The proposed Project activities would not have a direct impact to these locations since there would be no ground disturbing activities within these areas (**Figure 6**). However, the proposed Project activities could result in indirect impacts to these areas from light and noise. Avoidance and minimization mitigation measures would be developed and implemented to reduce any impacts to a less than significant level. This may include completing installation activities outside of the roosting periods of sensitive species such as the western snowy plovers (September through March), or having a qualified biologist approved by the City survey/monitor the project area and coordinate with the City, state and federal wildlife agencies, as needed.

The Project will avoid Marine Protected Areas (MPAs) and National Marine Sanctuaries. However, Project activity may occur within Essential Fish Habitat (EFH) for Pacific Groundfish, CPS, and Highly

Migratory Species. An in-depth EFH assessment will be prepared to evaluate the potential effects resulting from the Project to such species as part of the EIR. Pending the results of that assessment and the implementation of mitigation measures, impacts are anticipated to be less than significant with mitigation incorporated.

The Project is not anticipated to have any impact on riparian habitat or other sensitive natural communities from maintenance activities during the operational phase due to the minor amount of activity anticipated.

- c) *Would the Project have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. According to USFWS' National Wetland Inventory (NWI), there are no federally protected terrestrial wetlands within the proposed Project area, therefore the Project would have no impact on federally protected wetlands.

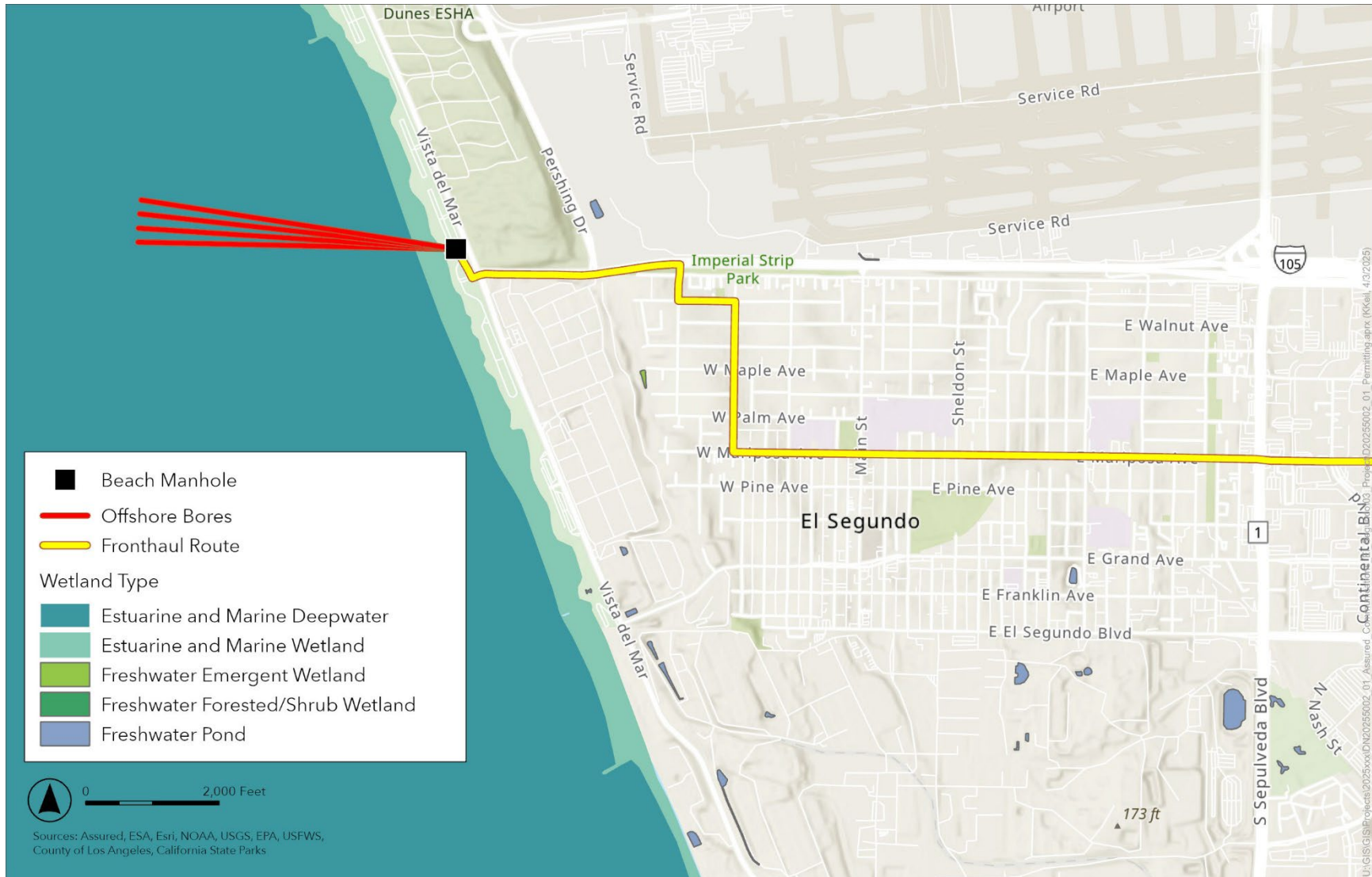


Figure 11. National Wetland Inventory Wetlands in Proximity to Project Components

- d) *Would the Project 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?*

Potentially Significant. Once constructed, all onshore and most offshore components of the proposed Project would be located subsurface and would not interfere with movements of migratory fish or wildlife or impede wildlife corridors. During the construction and installation phase (e.g., offshore HDD), Project equipment and vessels may temporarily effect on- and offshore migratory patterns. Such impacts could be potentially significant and will be evaluated as part of the EIR.

The Project is not anticipated to have any impact on the movement of native resident or migratory fish or wildlife species or wildlife corridors from maintenance activities during the operational phase due to the minor amount of activity anticipated.

- e) *Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Less than Significant with Mitigation Incorporated. The Project design avoids protected areas and habitats of special status species and was designed to be consistent with policies and ordinances to protect biological resources, including California Coastal Act policies. However, certain aspects of Project construction, such as installation of the terrestrial cable route, could impact protected resources like existing trees. Avoidance and minimization mitigation measures would be implemented to comply with all applicable policies and ordinances protecting such resources. As such, impacts are anticipated to be less than significant with mitigation incorporated.

The Project is not anticipated to have any impact local policies or ordinances from maintenance activities during the operational phase due to the minor amount of activity anticipated.

- f) *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Less than Significant. CDFW maintains an active shapefile of all habitat conservation plans (HCPs) and natural community conservation plans (NCCP) that are either adopted or in process. This layer was viewed via the BIOS 5.43.27 online mapping tool to determine if any adopted HCPs and/or NCCPs overlap with the proposed Project. No adopted or in-process HCPs/NCCPs overlap the proposed Project area. As such, impacts are anticipated to be less than significant.

The Project is not anticipated to have any impact on habitat or natural community conservation plan from maintenance activities during the operational phase due to the minor amount of activity anticipated.

4.5 Cultural Resources

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the Project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?*

Less than Significant with Mitigation Incorporated. A historical resource is defined as a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript a lead agency determines to be historically significant (CEQA Guidelines Section 15064.5[a][1-3]). The analysis of potential impacts to historical resources under this threshold is limited to resources in the built environment. Archaeological resources, including those that may be considered historical resources pursuant to CEQA Guidelines Section 15064.5 and those that may be considered unique archaeological resources pursuant to Public Resource Code (PRC) Section 21083.2, are considered under threshold (b) of this section.

The proposed Project could potentially have an adverse effect on historic structures if trenching, vibration, or other construction activity dilutes or destroys attributes that contribute to the significance of a historic resource. A cultural resources inventory will be prepared to identify the presence of resources designated (or eligible for designation) by CRHR or local registers that could be affected by the proposed Project. Their relationship to ground disturbing activity will be evaluated in the EIR. Mitigation measures would be implemented to avoid or minimize impacts to any such resources.

The proposed Project’s marine cable route does not cross any known submerged shipwrecks or other marine historical resources, and a survey for submerged shipwrecks and other unidentified obstructions would be performed in the vicinity of the proposed route. The results of the marine cable route survey and other available information will be used to assess potential impacts on marine historical resources in the EIR. Mitigation measures would be implemented to avoid or minimize impacts to any such resources.

The Project is not anticipated to cause a substantial adverse change in the significance of a historical resource from maintenance activities during the operational phase due to the minor amount of activity anticipated.

Impacts are anticipated to be less than significant with mitigation incorporated.

b) *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*

Less than Significant Impact. As described above, this discussion covers archaeological resources, including those that may be considered historical resources pursuant to CEQA Guidelines Section 15064.5 and those that may be considered unique archaeological resources pursuant to PRC Section 21083.2. A historical resource is one that is listed in, or determined to be eligible for listing in, the CRHR; a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript a lead agency determines to be historically significant (CEQA Guidelines Section 15064.5[a][1-3]). A unique archaeological resource, as defined in PRC Section 21083.2, is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Potential impacts to archaeological resources will be evaluated as part of the EIR. Because the proposed Project’s terrestrial components are located within areas that have either been subjected to significant ground disturbance or are dynamic sandy beach areas, and because no previously identified submerged archaeological resources have been identified within one mile of the proposed submarine cable route, impacts associated with construction are anticipated to be less than significant.

The Project is not anticipated to cause a substantial adverse change in the significance of a archaeological resource from maintenance activities during the operational phase due to the minor amount of activity anticipated.

- c) *Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?*

Less than Significant Impact. Because the Project’s onshore components will be located within already disturbed ROWs or dynamic beach sand, there is little potential for Project construction to encounter or impact human remains (either historic or prehistoric).

In the event human remains are inadvertently encountered during ground-disturbing activities, they would be treated consistently with State and local regulations, including California Health and Safety Code Section 7050.5, PRC Section 5097.98, and CEQA Guidelines Section 15064.5(e).

The Project is not anticipated to disturb any human remains, including those interred outside of dedicated cemeteries from maintenance activities during the operational phase due to the minor amount of activity anticipated.

Therefore, with compliance with applicable existing regulatory requirements, potential Project impacts to human remains are anticipated to be less than significant.

4.6 Energy

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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"/>

- a) *Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operations?*

Less than Significant with Mitigation Incorporated. The consumption of nonrenewable energy resources releases criteria air pollutant and GHG emissions into the atmosphere. Project

construction would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery and generators. Energy use during construction would be temporary in nature and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would also be subject to the U.S. Environmental Protection Agency Construction Equipment Fuel Efficiency Standard, and water and haul trucks would be subject to CARB's Advanced Clean Trucks regulation, both of which would also minimize inefficient, wasteful, or unnecessary fuel consumption. These regulations would result in efficient use of energy necessary to construct the Project. Furthermore, in the interest of cost-efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary, such as scheduling unnecessary deliveries of materials or operating diesel fueled equipment while not in use.

During Project operations a regenerator would be required to provide power to the cables. The power would come from the Cable Landing Station and regenerators would be located approximately every 80 kilometers. While no regenerators would be located within the Project area, power would be transmitted through the Project's conduits to the regenerators. No energy would be required for operating the terrestrial equipment. The only other energy resources related to maintenance activities would be limited to a small number of vehicles in the parking lot and boats in the water a limited number of times per year as necessary to maintain the facilities. With the implementation of the measures described above, it is anticipated that the Project would not result in wasteful, inefficient, or unnecessary consumption of energy, and that impacts would be less than significant.

Once construction is complete, regeneration would be done using regenerator equipment attached to the cable at the appropriate offshore intervals as described above. The regeneration equipment would operate inside the Cable Landing Station providing 48 volts of direct current (DC) electricity. The marine cable would contain a copper conductor to transmit the DC electrical power to the regenerators.

b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. Because energy use during construction of the proposed Project would be temporary in nature and construction equipment used would be typical of similar-sized construction projects in the region and energy use during operations would be low, there are no State renewable energy or energy efficiency plans that apply to the proposed Project. The City's General Plan (City of Los Angeles 2024a) and Sustainable City Plan (City of Los Angeles 2016) include several goals and policies related to renewable energy and energy efficiency. The proposed Project would only require limited amounts of electricity during operations for maintenance activities and the Project's regenerators and would not require natural gas consumption. As such, the Project is not anticipated to result in an increased reliance on fossil fuels or a decreased reliance on renewable energy sources. Therefore, the proposed Project would not conflict with the renewable energy targets and energy efficiency goals and policies of these plans, and impacts are anticipated to be less than significant.

4.7 Geology and Soils

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 geological feature.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the Project 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.

Less than Significant Impact. According to the California Geological Survey's (CGS) Earthquake Zones Application (EQZApp) (CGS 2023a), the Project site is not located within a designated Alquist-Priolo Earthquake Fault Zone. However, it is located within a seismically active area and could experience the effects of rupture on nearby Alquist-Priolo Earthquake faults. The nearest fault is the Charnock Fault, just east of LAX and El Segundo, approximately 3.8 km (2.5 miles) east of the Project site. The Palos Verdes Fault lies approximately 3.8 km (2.5 miles) offshore to the west of where the proposed Project would be located (CGS 2023a). Construction would involve the presence of equipment for a short duration, and seismic activity in the area is unlikely to result in substantial adverse effects from Project-related construction equipment. Permanent Project structures would be subsurface and would not expose people to substantial hazards. Operational activity would not involve any permanent, onsite personnel. Potential impacts because of the Project are therefore expected to be less than significant. The Project's geotechnical report would investigate the potential for impacts from known earthquake faults and this analysis would be included in the EIR.

ii. Strong seismic ground shaking?

Less than Significant Impact. The Project site is located within a seismically active area and may experience strong seismic ground shaking due to events along active faults within the region (CGS 2024). The Project would involve the presence of construction equipment for only a short duration (approximately 3 months), and its use is unlikely to result in seismic activity that would cause substantial adverse effects, such as ground shaking. Permanent Project structures (i.e., terrestrial conduit system) would be subsurface and therefore would not expose people to substantial seismic hazards. Operational activity would not involve any permanent, onsite personnel. Potential seismic impacts because of the Project are therefore expected to be less than significant. The Project's geotechnical report would investigate the potential for strong seismic ground shaking and this analysis would be included in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant with Mitigation Incorporated. According to the City of Los Angeles's GeoHub portal (City of Los Angeles 2024c) and CGS's Seismic Hazard Zones Maps and EQZApp (2023a), the onshore portion of the Project located at Dockweiler State Beach is located within a liquefaction zone found west of Vista del Mar. Liquefaction occurs in saturated soils, when loosely packed, water-logged sediments at or near the ground surface lose their strength in response to strong ground shaking (USGS 2023a). Therefore, submarine sediments in the offshore area of the Project may also be susceptible to liquefaction due to their saturated nature. The Project's geotechnical report would evaluate the potential for liquefaction in these areas, recommend mitigation measures (if needed) to minimize the risk associated with liquefaction, and this analysis would be included in the EIR.

Construction would involve the presence of heavy equipment for a limited period, and seismic-related ground failure in the area is unlikely to result in substantial adverse effects from Project-related construction equipment. Permanent Project structures would be subsurface (e.g., onshore terrestrial conduit system) and not anticipated to expose people to seismic hazards. Operational activity would not involve any permanent, onsite personnel. Potential impacts from the Project are, therefore, expected to be less than significant with mitigation incorporated.

iv. Landslides?

Less than Significant Impact. According to the City of Los Angeles (2024c), there is an identified landslide hazard zone along a section of the proposed subsurface terrestrial conduit on the northern side of Imperial Highway, between Vista del Mar and Pershing Drive within the ESBB preserve (**Figure 12**). This is adjacent to the worker ingress/egress to Dockweiler State Beach from Imperial Highway, for the onshore portion of the Project construction of the BMH. However, as previously mentioned, construction would involve the presence of equipment for a short duration (approximately 3 months)

and seismic activity in the area is unlikely to result in substantial adverse effects due to Project-related construction equipment. Additionally, permanent Project structures would be subsurface (e.g., terrestrial conduit system) and would not expose people to substantial landslide hazards. The offshore portions of the Project may be in areas susceptible to landslides on the seafloor, but submarine landslide potentially affecting bore pipes would not expose people or structures to substantial adverse effects. Operational activity would not involve any permanent, onsite personnel. The Project's geotechnical report would investigate the potential for landslides and this analysis would be included in the EIR. Potential impacts as a result of the Project are therefore expected to be less than significant.

b) *Would the Project result in substantial soil erosion or the loss of topsoil?*

Less than Significant with Mitigation Incorporated. The Project involves the following earth disturbance activities that could result in soil erosion or the loss of topsoil:

- Excavations for BMH installation;
- HDD for the offshore installation of four (4) bore pipes approximately 4,000 feet each;
- Shallow trenching from the end of the borehole to the continental shelf. The trench would be approximately 0.9 m (3 ft) deep out towards the outer continental shelf minimally 40 miles up to 133 miles; and
- A combination of HDD and trenching for installation of the terrestrial conduit system, which may include trenching across a steep embankment to access the public street ROWs.

HDD avoids trenching through the beach and allows for installation of bore pipes without disruption of the beach and surf zone, which would minimize ground-disturbing activities for both the onshore and offshore portions of the Project. Most of the terrestrial portions of the Project would be located within the paved public ROW, and the ground surface would be paved after Project installation to match the surrounding grade. Standard engineering practices in the California Building Code, applicable permit requirements and standard BMPs would be applied to reduce the potential for erosion and topsoil loss. In unpaved areas within Dockweiler State Beach and the adjacent embankment, restoration would include grading to restore original contours and installing erosion control devices at locations susceptible to erosion. Application of required measures and standard BMPs incorporated into the Project would avoid substantial soil erosion and loss of topsoil. The Project's geotechnical report would investigate the potential for soil erosion and soil loss, recommend mitigation measures (if needed) to minimize soil erosion or the loss of topsoil, and this analysis would be included in the EIR. With the implementation of these measures, potential impacts are expected to be less than significant.

c) *Would the Project 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?*

Less than Significant with Mitigation Incorporated. A project specific Geotechnical Evaluation Report for the proposed Project would be prepared as part of the EIR. The geotechnical evaluation would include an assessment of the soil and geologic conditions at the Project site to provide geotechnical recommendations for design of the proposed Project.

Portions of the Project site are located within geologic hazard zones related to soil stability (see answers to thresholds (a) i-iv). Soils underlying Dockweiler State Beach are susceptible to liquefaction (see threshold (a) iii). Additionally, according to CGS, an onshore portion of the Project lies adjacent to the edge of a landslide zone (within the ESBB Preserve), just to the north of the ingress/egress to Dockweiler State Beach along Imperial Highway (**Figure 11**) (see (a) iv). The offshore portions of the Project (bore pipes and trenching), which would be buried under the seafloor, may be located in areas that are subject to landslides on the seafloor. However, these portions of the Project would not cause the soil itself to become unstable or result in offsite instability.



Figure 12. Landslide Zones Adjacent to the Project Area

HDD across the beach embankment reduces the risk of potentially creating unstable geologic or soil conditions that may occur if trenching were used instead. Standard engineering and seismic safety design techniques can be applied to reduce the instability potential. The Project geotechnical report would investigate the potential for impacts from unstable soils, recommend mitigation measures (if needed) to minimize the risk associated with soil instability, and this analysis would be included in the EIR. With the implementation of any such mitigation measures, potential impacts are expected to be less than significant.

- d) *Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?*

Less than Significant Impact. Expansive soils contain a significant percentage of clay materials and have a high shrink-swell potential that is dependent on changes in the amount of moisture and water in the soil. The majority of the soil types underlying the onshore portion of the Project (Urban land-Abaft-Marina complex, 0 to 15 percent slopes) consist of sandy substrates. Sandy soils have a low potential for expansion. A short section of the terrestrial cable alignment (approximately 1.6 km [1 mile]) crosses Urban land-Thums-Windfetch complex, 0 to 2 percent slopes, which has a high shrink-swell potential, and could therefore experience impacts related to expansive soils. The Project’s geotechnical report would investigate the potential for impacts from expansive soils and this analysis would be included in the EIR.

The Project’s permanent structures would be located subsurface, minimizing any substantial risks associated with any expansive soils to people or structures. The offshore portion of the Project would be under the seafloor where sediments are saturated and would not undergo changes in moisture content, therefore, the offshore portion of the Project would not be impacted by risks associated with expansive soils. Operational activity would not involve any permanent, onsite personnel. Accordingly, potential Project impacts related to expansive soils are anticipated to be less than significant.

- e) *Would the Project 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?*

No Impact. No sewer systems, septic tanks, or alternative wastewater disposal systems are proposed as part of this Project and, therefore, the Project is anticipated to have no impact related to such systems.

- f) *Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

Less than Significant Impact. There are no unique paleontological resources or site or geological feature are known to exist in the Project area. Accordingly, impacts are anticipated to be less than significant.

4.8 Greenhouse Gas Emissions

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>

- a) *Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less than Significant. Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of GHG emissions contributing to the "greenhouse effect," a natural occurrence which takes place in Earth's atmosphere and helps regulate the temperature of the planet. Most of the radiation from the sun hits Earth's surface and warms it. The surface, in turn, radiates heat back towards the atmosphere in the form of infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions.

GHG emissions occur both naturally and from human activities, such as burning fossil fuels, decomposition of landfill wastes, raising of livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO₂), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Different types of GHGs have varying global warming potential (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (e.g., CO₂) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO₂e), which is the amount of a specific GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO₂ on a molecule-per-molecule basis (Intergovernmental Panel on Climate Change 2021).

Anthropogenic activities since the beginning of the industrial revolution (approximately 250 years ago) have been adding to the natural greenhouse effect by increasing the concentration of GHGs in the atmosphere that trap heat. Since approximately 1750, estimated concentrations of CO₂, methane, and nitrous oxide in the atmosphere have increased by over 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity (Forster et al. 2007). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature. Potential climate change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (State of California 2018).

The proposed Project could result in a temporary increase of GHG emissions during construction and installation activities. During construction, direct emissions would occur from the combustion of fuel for construction equipment and Project vessels. During operations, direct emissions would occur from the combustion of fuel for Project maintenance vehicles. Indirect emissions, while expected to be limited, may result from the use of electricity for electric-powered equipment during construction as well as during operations, including the use of the Project's regenerators. Future subsurface fiber-optic cable operation within the constructed conduit system is not anticipated to result in an increase in direct GHG emissions.

The SCAQMD has developed GHG emission thresholds to evaluate whether a proposed Project may have significant impacts. The Air Quality Technical Report would assess the quantity and type of any

Project-associated GHG emissions. Because any GHG emissions associated with the Project would be temporary and limited primarily to the construction phase, impacts are anticipated to be less than significant.

- b) *Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less than Significant. Implementation of the proposed Project would not introduce new permanent, long-term sources of GHG emissions to the City. The proposed Project does not involve the development of a typical residential, commercial, retail, or other land use that would generate vehicle trips. Regional land use planning strategies are predominantly focused on reducing aggregate average vehicle miles traveled through effective infill planning in areas well-served by transit, as well as enhancing the energy efficiency of building structures and expanding the accessibility of infrastructure serving zero- and near-zero-emission vehicles. The proposed Project would not interfere with these high-level growth strategies. Therefore, the proposed Project is not anticipated to interfere with adopted GHG emissions reduction plans such as the statewide 2022 Scoping Plan (CARB 2022b) and the Southern California Association of Governments' Connect SoCal 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (Southern California Association of Governments 2024). The proposed Project would also be required to comply with local, state, and federal requirements associated with GHG emissions. As such, impacts are anticipated to be less than significant.

4.9 Hazards and Hazardous Materials

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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"/>

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) 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"/>
g) Expose people or structures 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"/>

a) *Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Less than Significant Impact. Project construction would involve the use of potentially hazardous materials such as vehicle fuels and fluids. These materials would be contained within vessels specifically engineered for safe storage and would not be transported, stored, or used in quantities that would pose a significant hazard to the public or construction workers themselves. In addition, the use of potentially hazardous materials during construction of the proposed Project would be required to comply with all local, state, and federal regulations regarding the handling of hazardous materials, which would minimize the potential for the Project to create a significant hazard to the public or the environment. Routine transport and use of hazardous materials, including gasoline or diesel fuels, and small volumes of oils and lubricants, are anticipated during both on- and offshore construction activities related to operation of construction vehicles, vessels, and equipment. Offshore, Project vessels would be fueled at port and would not involve water fuel transfers. Project operations would involve the use of a small number of vehicles on land and vessels for diving operations for borehole inspections and maintenance.

The Project would be conducted in compliance with regulatory requirements and standard industry best practices, which include preparation and implementation of procedures outlining hazardous materials transport, use, and disposal practices. Standard procedures typically included in such plans are readily implemented and are effective in reducing the potential for hazards to the public or environment. Potential impacts because of the Project are therefore anticipated to be less than significant.

b) *Would the Project 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?*

Less than Significant Impact. Small quantities of hazardous materials used during Project construction activities, including but not limited to ground-disturbing activities such as trenching, excavation, and drilling, could result in an accidental upset or release of hazardous materials if they are not properly stored and secured. Some hazardous materials, such as gasoline, diesel fuels, and

small volumes of oils and lubricants, would be used during both on- and offshore construction activities for the operation of construction vehicles, vessels, and equipment. There is always the potential (albeit small) for an accidental release of these materials during refueling activities, equipment operation, and/or vehicle or vessel collisions. Hazardous materials used during Project construction would be disposed of off-site in accordance with all applicable laws and regulations, including but not limited to the regulations of the federal and state Occupational Safety and Health Administrations. Additionally, the Project construction contractor(s) would be required to develop and implement a SWPPP, which would include good housekeeping BMPs to reduce the risk of hazardous material spills or leaks.

To minimize the release of hazardous materials to the surrounding environment, the Project would be conducted in compliance with regulatory requirements and standard industry best practices. These include requirements during construction activities for personnel training and procedures for (1) managing hazardous materials to avoid spills and accidental exposures to hazardous materials by site workers and offsite receptors, and (2) cleanup of accidental spills. Standard procedures typically included in such plans are readily implemented and are effective in reducing the potential for accidental releases of hazardous materials that could cause a hazard to the public or environment. Project operations would involve the use of a small number of vehicles on land and vessels for diving operations for borehole inspections and maintenance. With the implementation of these measures, potential impacts are anticipated to be less than significant.

- c) *Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Less than Significant Impact. The terrestrial conduit route passes within one-quarter mile of three (3) schools: El Segundo High School, Richmond Street Elementary School, and Center Street Elementary School. As described under threshold (b), small volumes of hazardous materials such as gasoline, oils, and lubricants will be used during construction activities, and there is always a small potential that an accidental release of one of these materials could occur. Project operations would involve the use of a small number of vehicles on land and vessels for diving operations for borehole inspections and maintenance. Standard procedures and compliance with regulatory requirements are effective in reducing the potential for accidental releases of hazardous materials that could cause a hazard to the public or environment. Potential impacts because of the Project are therefore anticipated to be less than significant.

- d) *Would the Project 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?*

Less than Significant Impact. According to the California State Water Resources Control Board (SWRCB) (State Board) “GeoTracker” database and the Department of Toxic Substances Control’s (DTSC) Hazardous Waste and Substances Site database “EnviroStor,” previous (i.e., now “closed”) hazardous materials sites are located in close proximity to the terrestrial conduit route (DTSC 2024, EPA 2024, SWRCB 2024). These include the following closed case Leaking Underground Storage Tank (LUST) cleanup sites: Hyperion Treatment Plant [T0603701355]; Rockwell International Corporation (T0603703443); Richmond Street Elementary School [T0603791344]; UNOCAL #5866 [T0603703539]; Los Angeles Air Force Base – Area B (T0603797082). These LUST sites were mainly closed in the 1990s, with the most recent closing in 2006 (SWRCB 2024). Other sites include Northrop Corp/Aircraft Div [CAD000627216] (closed as of Sept. 30, 1991) (EPA 2024). Historical operations at these sites may have resulted in the presence of contaminated soil or groundwater that could be encountered while performing HDD/trenching along the route. Because each of these cases has been closed for several years, however, it is anticipated that soil and groundwater is no longer contaminated at these sites.

In accordance with regulatory requirements and BMPs, the Project would prepare and implement a soil management plan that outlines procedures for handling and disposing of potential contaminated

soil and groundwater. Standard procedures typically included in such plans are readily implemented and are effective in reducing the potential to create a significant hazard to the public or environment. Potential impacts because of the project are therefore anticipated to be less than significant.

- 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 or excessive noise for people residing or working in the project area?*

Less than Significant Impact. Portions of the Project are located within the *Los Angeles County Airport Land Use Plan (2004b)* footprint for LAX, which abuts Imperial Highway to the north. The Federal Aviation Administration (FAA) requires notice of construction for developments over 61 m (200 ft) tall within these zones (FAA Reg. 77.13(c)(1)). Equipment used during Project activities would be below this height and all Project infrastructure and features would be installed underground (i.e., no structures would be constructed above ground, thereby avoiding the 61-m [200-ft] threshold). The Project is not expected to result in a significant safety hazard and impacts would be less than significant.

- f) *Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less than Significant Impact. The City of Los Angeles maintains a Local Hazard Mitigation Plan (LHMP) that is updated and adopted every five years (City of Los Angeles 2024b). The intent of the LHMP is to identify and assess the risks posed by natural and human-made hazards and to develop strategies and actions to reduce or eliminate the long-term risks to life, property, and the environment. The plan aims to enhance the city’s resilience by mitigating the impacts of disasters, improving public safety, protecting critical infrastructure, and promoting sustainable development. The 2024 LHMP does not identify any designated evacuation routes (City of Los Angeles 2024b).

Construction activities for the subsurface terrestrial conduit system, which would primarily be within public road ROWs, would affect access to and from, and within those roads. Some of these roadways may be used for tsunami evacuation routes, particularly because the entirety of Dockweiler State Beach and South Marine Avenue lie within the tsunami hazard zone. No road closures would be needed during Project construction activities; however, it is likely that temporary selected lane closures would be required during the terrestrial conduit installation along public ROWs. The Project would include traffic control measures to be employed during roadwork that would conform to local jurisdiction specifications, incorporating input from local agencies to avoid interference with emergency access routes. Project operations would involve the use of a small number of vehicles on land and vessels for diving operations for borehole inspections and maintenance. Potential impacts on adopted emergency response and evaluation plans are therefore anticipated to be less than significant.

- g) *Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

No Impact. Wildlands are not present within or near the Project area. There are no substantial plots of vegetation nor are there any structures that are susceptible to fire in the vicinity of the Project area. Therefore, there would be no impact on people or structures related to wildland fires.

4.10 Hydrology and Water Quality

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
substantially degrade surface or ground water quality?				
b) Substantially decrease 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 checked="" type="checkbox"/>	<input 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 or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
I) Result in substantial erosion or siltation on or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on /off site.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
III) Create or contribute runoff water which would exceed the capacity of existing stormwater damage systems or provide substantial additional sources of polluted runoff, or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV) Impeded or redirect flood flow.	<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable ground water management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the Project violate any water quality standards or waste discharge requirements or otherwise degraded surface or groundwater quality?*

Less than Significant Impact. Grading, excavation, HDD and other construction activities associated with the Project could adversely affect surface water quality due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment

fluids. Soil disturbance associated with site preparation and grading activities would result in looser, exposed soils, which are more susceptible to erosion. Additionally, spills, leakage, or improper handling and storage of substances such as oils, fuels, chemicals, metals, and other substances from vehicles, equipment, and materials used during Project construction could contribute to stormwater pollutants or leach to underlying groundwater.

The Project's total disturbance area would be greater than one acre; therefore, the Project would be subject to compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which would require the development of a Storm Water Pollution Prevention Plan (SWPPP) to reduce erosion during construction activities.

Compliance with the requirements set forth in the NPDES Construction General Permit would require the construction contractor(s) to implement BMPs for erosion control during construction. With adherence to the requirements of the Construction General Permit, polluted stormwater runoff would be minimized to the extent feasible.

Upset or accident conditions could result in the unanticipated spill or release of hazardous materials such as vehicle and equipment fuels during Project construction. However, the Project-specific SWPPP would include BMPs that would reduce the risk of hazardous material spills or leaks. With adherence to the required SWPPP, Project construction would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Potential violations of water quality standards or waste discharge requirements could occur if there are accidental releases of hazardous materials (e.g., gasoline and diesel fuels, oils, and lubricants), drilling fluid (consisting of drilling mud and freshwater), or commercial runoff. Potential releases of these types of materials could occur during both on- and offshore operation of construction vehicles, vessels, and equipment. Additionally, HDD operations for installing offshore bore pipes under the seafloor may temporarily increase suspended sediments in the water column and disturb potentially contaminated sediments on the seafloor.

For the terrestrial portions of the Project, fuel would be stored onsite in fuel storage tanks and refueling would be completed onsite. Offshore, Project vessels would be fueled at port and would not involve on-water fuel transfers.

The Project is not anticipated to have an impact to any water quality standards or waste discharge requirements or otherwise have an impact to surface or groundwater quality from maintenance activities during the operational phase due to the minor amount of activity anticipated. Standard procedures included in the measures noted above are readily implemented and effective in reducing the potential for violations of water quality standards and waste discharge requirements. Potential impacts are therefore anticipated to be less than significant.

- b) *Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less than Significant Impact. Water supply for Project construction activities, including mixing of drilling fluid, potential dust control, construction of concrete pads, and equipment washing would be provided by a fire-hydrant near the worksite location or other municipal source of water, and would not use groundwater from the site. The water required for Project construction would represent a short-term (up to 3 months) demand and is not likely to result in significant depletion of groundwater supplies.

Due to the Project's proximity to the shoreline, shallow groundwater may be encountered during onshore excavations for BMH installation at Dockweiler State Beach and trenching for installing the terrestrial conduit system along South Marine Avenue. Dewatering of excavations/trenches may be required for some construction locations.

The Project would not increase the amount of impervious surfaces since BMH construction would occur within a previously paved parking area of Dockweiler State Beach. These small, localized features are not anticipated to interfere substantially with groundwater recharge. The other onshore portions of the Project (i.e., terrestrial conduit construction within the City of El Segundo) will primarily occur within already-paved public ROWs and not introduce new impervious surfaces.

The Project is not anticipated to have an impact to groundwater resources from maintenance activities during the operational phase due to the minor amount of activity anticipated. Therefore, potential impacts are anticipated to be less than significant.

c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

i) *Result in substantial erosion or siltation on- or off-site?*

Less than Significant Impact. The onshore portions of the Project would primarily occur within urbanized areas with existing municipal storm water drainage systems. No streams or rivers are present within the Project area, therefore there would be no alteration of the course of any stream or river.

Construction of the Project would install subsurface terrestrial conduit infrastructure to house future fiber-optic telecommunications cables. It would not have a surface expression and as such would not alter existing drainage patterns. Onshore ground disturbance activities – such as excavations for BMH installation and trenching for installing the subsurface terrestrial conduit system – may temporarily alter drainage patterns, but any affected original drainage patterns would be restored after ground surface restoration. While the Project includes installing a new impervious structure in the BMH, due to its relatively small size (3.65 m [12 ft] x 1.83 m [6 ft] x 2.13 m [7 ft]), its features are not anticipated to substantially interfere with the rate or volume of infiltration or of surface water flow, nor would it result in substantial erosion or siltation.

It is a regulatory permitting requirement and standard industry practice to prepare and implement project plans that outline control measures for storm water runoff and spills during construction. Standard procedures typically included in such plans are readily implemented and are effective in reducing impacts on existing drainage patterns.

The Project is not expected to result in erosion or siltation because of maintenance activities during the operational phase due to the minor amount of maintenance activity anticipated. With the implementation of these measures, potential impacts are anticipated to be less than significant.

ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on /off site?*

Less than Significant Impact. As discussed in threshold (b), construction of the Project would use water for the mixing of drilling fluid, potential dust control, and equipment washing. Water used for these activities that would be applied to, or that would reach the ground surface (e.g., dust control or equipment washing), would not be used in quantities capable of resulting in flooding. Runoff generated by these activities would flow into the existing municipal storm water drainage system.

As discussed in threshold (ci), Project-associated onshore ground disturbance activities from construction, namely HDD and trenching, may temporarily alter drainage patterns, but original drainage patterns would be restored after the ground surface restoration. The Project does include installation of a new impervious structure (i.e., the BMH), but this small feature is not anticipated to interfere substantially with the rate or volume of surface water flow or result in flooding.

It is a regulatory permitting requirement and standard industry practice to prepare and implement project plans that outline control measures for storm water runoff. Standard procedures typically

included in such plans are readily implemented and are effective at minimizing impacts on existing drainage patterns.

The Project is not anticipated to have an impact to surface water runoff from maintenance activities during the operational phase due to the fact there would be no new impervious surface added and only a minor amount of activity is anticipated. With the implementation of these measures, potential impacts related to on or off-site flooding are anticipated to be less than significant.

III) Create or contribute runoff water which would exceed the capacity of existing stormwater drainage systems or provide substantial additional sources of polluted runoff, or

Less than Significant Impact. As discussed in threshold (cii), water used for Project-related construction activities that would be applied to or would reach the ground surface (e.g., dust control or washing equipment) would not be used in substantial quantities. Runoff generated by these activities would flow into the existing municipal storm water drainage system, which is expected to be able to accommodate these quantities. The Project is not expected to generate wastewater, other than drilling fluids associated with HDD activities. Drilling fluids would be containerized, labeled, profiled, and disposed of offsite at appropriate facilities in compliance with federal, state, and local regulations.

As discussed in threshold (a), potential accidental releases of hazardous materials could occur both on- and offshore during operation of construction vehicles, vessels, and equipment. It is a regulatory permitting requirement and standard industry practice to prepare and implement project plans that outline control measures for storm water runoff and spills during Project construction. Standard procedures typically included in such plans are readily implemented and are effective in reducing the potential for offsite flow and the migration of sediment entrained in surface water runoff into the storm sewer system or offsite.

The Project is not anticipated to contribute runoff water to stormwater drainage systems from maintenance activities during the operational phase due to the minor amount of activity anticipated. Potential impacts from polluted runoff are therefore anticipated to be less than significant.

IV) Impede or redirect flood flow.

Less than Significant Impact. The Project is not located within a dam inundation area, however, the area around the MHW mark and offshore is marked as Zone VE which is a Special Flood Hazard Area with a high flood risk. Since an onshore portion of the Project occurs on Dockweiler State Beach along the California coast, there is a risk of exposure to continued sea-level rise (SLR) that will be evaluated in detail as part of the EIR. However, all permanent Project structures would be located subsurface. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death due to levee or dam failure during construction or operations. Potential flooding impacts as a result of the Project are therefore expected to be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than Significant Impact. The Project is not located in an area that is likely to be subject to seiches, as there are no major landlocked bodies of water within or near the Project area.

The Project would primarily occur in developed areas with flat topography; however, an approximate 9.1-m (30-ft) high embankment exists between the BMH location and public ROW, which could potentially be subject to mudflows, as it lies within a landslide zone (CGS 2023b) (see Section 3.6 Geology and Soils (a) iv). Depending on the method chosen to install the conduit across the embankment, the Project could present a risk of exposure to mudflows for people working on or below the embankment during the construction period. Given the brief work period in this area and the sandy substrate of the embankment, any potential impact is expected to be less than significant.

The Project has portions located in areas where a tsunami and seiche hazard exists (City of Los Angeles 2024b). All Project-related features in this area would be at grade or subsurface. Although Project structures may be subject to tsunami events, the only construction equipment that would be affected by a tsunami would be a vessel used for conduit laying and any onshore construction equipment. During Project operations, no potential pollutants are anticipated to be involved or located in any permanent onshore or offshore Project infrastructure such that tsunami inundation could result in any pollutant releases.

- e) *Conflict with or obstruct implementation of a water quality control plan or sustainable ground water management plan?*

Less than Significant Impact. The applicable water quality control plan for the Project site is the Los Angeles Regional Water Quality Control Board’s Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (2020). Operation and maintenance of the proposed Project would involve the conveyance and infiltration of stormwater. As discussed under threshold (a) of this section, contaminated soils associated with the known and potential hazardous materials releases discussed above may be present in the vicinity of the proposed drywells. If contaminated soil is present, the stormwater capture, and infiltration conducted as part of the proposed Project may have the potential to mobilize and spread contaminants to the underlying groundwater and adversely affect groundwater quality. In addition, stormwater runoff captured and infiltrated under the proposed Project has the potential to contain pollutants such as nutrients (phosphorus and nitrogen), bacteria from human and animal wastes, oil and grease, sediment, pesticides, herbicides, fertilizers, litter, and heavy metals and organic chemicals from industrial facilities and surrounding roads. Therefore, the Project would be required to prepare and implement a SWPPP in compliance with a NPDES Construction General Permit under Clean Water Act Section 402 because the proposed Project would disturb more than one acre. The SWPPP would include the stormwater pollution mitigation measures to minimize or avoid adverse effects to water quality. The SWPPP would include a description of all construction activities, a description of the BMPs that would be used to control discharge, and any other pollution prevention techniques that are necessary to minimize or avoid discharges to state or federal waters.

The Basin is an adjudicated basin in which all water rights have been defined by a court. As a result, no sustainable groundwater management plan has been adopted for this groundwater basin.

As discussed under threshold (a) through (e), compliance with standard permit conditions and regulations, standard erosion and sediment control procedures, and implementation of project procedures that outline control practices for storm water runoff and spills during construction would minimize the potential for the Project to substantially degrade water quality or interfere with the Regional Board’s Water Quality Control Plan. Potential impacts are therefore anticipated to be less than significant.

4.11 Land Use and Planning

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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"/>

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>

a) *Would the Project physically divide an established community?*

No Impact. The proposed Project would be installed entirely subsurface and would not divide an established community.

b) *Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

Less than Significant Impact. Dockweiler State Beach is under the jurisdiction of California Department of Parks and Recreation (CDPR) and is part of the Westchester-Playa Del Rey Community Plan area; however, Dockweiler State Beach itself is managed by the Los Angeles County Department of Beaches and Harbors. The parking lot where the BMH would be located is managed by the Los Angeles County Department of Beaches and Harbors. The City of Los Angeles General Plan and Westchester-Playa Del Rey Community Plan further specify land use policies related to Dockweiler State Beach.

The Project would comply with the stated policies related to utility installation and upgrades. As specified for utilities installed near scenic highways, the proposed terrestrial conduit system would be installed underground, with a portion of installed along South Marine Avenue. There would be no change in zoning as a result of the proposed subsurface terrestrial conduit installation.

Construction of the BMH at Dockweiler State Beach and subsurface terrestrial conduit system would require designated areas for equipment staging and construction. Public access would be controlled for public safety and traffic controls would be implemented. Limited public parking in the beach parking lot would be temporarily occupied by project equipment, and work areas and access to the beach via public roads may be temporarily disrupted. Because any such disruptions beach areas would be short-term and temporary in nature, the Project is not anticipated to conflict with local coastal plans or related land use policies. Outside of the proposed BMH construction and staging areas, the beach and pedestrian paths would not be affected.

Offshore HDD activities would require Project vessels to be in place for limited periods of time (approximately 10-14 days). During offshore activities, outside marine activities would be restricted within a limited area of Project vessels. Coordination with the USCG, commercial and recreational fishing associations, and other marine users would be implemented to reduce disruption due to marine construction activities. The Project would be developed to be consistent with the Chapter 3 policies of the California Coastal Act.

With the implementation of project controls, Project construction is not expected to result in conflicts with any applicable land use plans or policies. Project operations would involve the use of a small number of vehicles on land and vessels for diving operations for borehole inspections and maintenance. Therefore, potential impacts from the Project are anticipated to be less than significant.

4.12 Mineral Resources

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the Project 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?*

No Impact. According to the United States Geological Survey (USGS) Mineral Resource Data System, the Project is not located within any area of known mineral deposits, mineral resources, U.S. mines, or critical materials (USGS 2024). Therefore, construction and operation of the proposed Project would not result in the loss of, nor would it impact, the availability of mineral resources.

b) *Would the Project 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?*

No Impact. The proposed Project site is not located within a locally important mineral resource discovery site or Mineral Resource Zone (MRZ-2s) delineated in the Conservation Element of the Los Angeles General Plan (City of Los Angeles 2001). Therefore, the Project would not result in the loss or availability of mineral resource recovery site and there would be no impact.

4.13 Noise

Would the Project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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) Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the Project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

a) *Would the Project result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Potentially Significant. According to the City of Los Angeles Noise Element, the following land uses are considered noise sensitive: e.g., single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses, houses of worship, hospitals, libraries, schools, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, and parks (City of Los Angeles 1999).

The nearest noise-sensitive receptors to the Project site consist of the following:

- Dockweiler State Beach;
- El Segundo Dunes ESHA;
- ESBB Preserve; and
- Single and multi-family residences, parks and schools proximate to where the terrestrial conduit would be routed.

The proposed Project activities will involve the use of construction equipment such as an excavator, bore machine, multiple mixing and recycling units, handheld tools, a vibratory compactor, as well as offshore vessels for HDD of the bore pipes. The terrestrial portion of the Project would be located at Dockweiler State Beach, in the City of Los Angeles, and in the City of El Segundo. The equipment used for construction of the terrestrial conduit route would primarily be operated adjacent to LAX, residential areas, commercial and industrial areas, public roads, and open space areas. Project vessels and equipment used during construction and installation would generate potentially significant short-term noise during allowed construction hours. A noise analysis would be conducted as part of the EIR to assess any such impact and potential mitigation measures.

The cities of Los Angeles and El Segundo have noise policies and standards as part of their general plans and ordinances. Construction activities would be undertaken in accordance with local noise ordinances, which limit noise levels in commercial areas to 85 A weighted decibels (dBA), with one potential exception: HDD activities associated with the offshore marine boring often require 24-hour operation, which are limited to noise levels of 70dBA between 8:00 pm and 7:00 am. The HDD equipment would be located on the parking lot of Dockweiler State Beach. Thus, recreational beach users would be exposed to noise from the boring equipment. A noise analysis would be conducted as part of the EIR to assess any such impact and potential mitigation measures.

Any future telecommunication fiber-optic cable operations that use the constructed infrastructure from this proposed Project would not generate noise. Maintenance activities during the operational phase has the potential to generate minimal noise.

b) *Would the Project result in exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?*

Less than Significant Impact. Vibration-sensitive receptors, which are similar to noise-sensitive receptors, include residences and institutional uses, such as schools, churches, and hospitals.

Vibration-sensitive receptors also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels that may be well below those associated with human annoyance (e.g., recording studios or medical facilities with sensitive equipment). The nearest vibration-sensitive receptors to the Project site consists of the following:

- Dockweiler State Beach;
- El Segundo Dunes ESHA;
- ESBB Preserve; and
- Single and multi-family residences, parks and schools proximate to where the terrestrial conduit would be routed.

Short-term vibration may be generated by boring activities and the use of other large equipment and trucks during construction. However, the proposed Project would not use equipment during construction that generates excessive ground-borne vibration (such as pile driving), nor would the large construction activities, such as the HDD, be sited near infrastructure. Construction of the terrestrial conduit from the BMH to the Cable Landing Station would be along existing ROWs. Therefore, vibration impacts are expected to be less than significant. Operation of the Project would not result in the generation of excessive vibration due to the minor amount of activity anticipated.

- c) *For a project within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?*

Less than Significant Impact. The proposed Project is adjacent to LAX, therefore associated construction workers would be exposed to noise from airport activities. However, this exposure would be temporary during Project construction and consistent with noise levels experienced by existing noise sensitive receptors in the area – including by beachgoers who recreate on Dockweiler State Beach. Operation activities would be limited to routine repair and maintenance activities and exposure to noise from airport activities would therefore be extremely limited. As a result, impacts to Project-associated construction workers are anticipated to be less than significant.

4.14 Population and Housing

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the Project induce substantial 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)?*

No Impact. Given the small-scale nature of Project construction activities, it is likely that construction workers would be drawn from the existing, regional workforce and the Project would not indirectly result in the relocation of people to Los Angeles. In addition, no City or contractor employees would be required to operate and maintain the Project. The Project would be operated from an existing data center and not require a substantial number of permanent personnel. Therefore, the proposed Project would not induce substantial unplanned population growth in the Project area, either directly or indirectly, and no impact would occur.

b) *Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The proposed Project does not involve demolition of existing housing and would not result in displacement of existing people. Therefore, the Project would not displace substantial numbers of existing people or housing. As mentioned throughout the IS, onshore installation of the subsurface terrestrial conduit system would primarily occur within city streets and public ROWs, with the preferred BMH installation site being located on Dockweiler State Beach. Therefore, proposed Project construction activities would not have an impact on the displacement of existing housing, nor would it necessitate the construction of replacement housing.

4.15 Public Services

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1. Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *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:*

1. *Fire protection?*

No Impact. The closest fire station is the El Segundo Fire Department Station #19, located at 314 Main Street in the City of El Segundo approximately 1,900 m (1.3 miles) southeast of the Project site and less than 400 m (0.25 miles) south of the closest part of the terrestrial conduit. The proposed Project would not result in increased demand for fire protection services because no population

growth would occur because of construction or operation of the proposed Project, as discussed in Section 4.14, Population and Housing. The Project would not require additional or unusual fire protection resources beyond those required for the existing infrastructure on the Project site. Therefore, construction and operation of the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives. No impact would occur.

2. Police protection?

No Impact. The nearest police station is the El Segundo Police Department, located at 348 Main Street in the City of El Segundo approximately 1,900 m (1.3 miles) southeast of the Project site and less than 400 m (0.25 miles) south of the closest part of the terrestrial conduit. The proposed Project would not result in increased demand for police protection services because the proposed Project would not result in population growth, as discussed in Section 4.14, Population and Housing. Therefore, construction and operation of the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives. No impact would occur.

3. Schools?

No Impact. The proposed Project would not result in increased demand for schools because the proposed Project would not result in population growth, as discussed in Section 4.14, Population and Housing. Therefore, construction and operation of the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios or other performance objectives. No impact would occur.

4. Parks?

Less than Significant Impact. The proposed Project would not result in increased demand for parks because the proposed Project would not result in population growth, as discussed in Section 4.14, Population and Housing. Therefore, construction and operation of the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios or other performance objectives.

The proposed BMH would be constructed during winter months in a public parking lot, which is operated by the City's Department of Recreation and Parks, serving Dockweiler State Beach, which is owned by CDPR and operated by the Los Angeles County Department of Beaches and Harbors. While no adverse physical impacts are anticipated, a portion of the parking lot that is currently used by the public would be used for staging and development of the proposed BMH (**Figure 3**). The adjacent sand area would be used to bury OGBs below grade. Constructing and installing the BMH would require controlled access to this parking lot for public safety for a period of approximately 3 months. The proposed terrestrial conduit route would include installation of conduit across South Marine Avenue which also functions as a pedestrian and bicycle pathway and is used by the Dockweiler State Beach maintenance department and lifeguards. This could result in short-term access restrictions by the public to the bicycle path. Once construction is complete, restrictions on all aforementioned areas would be removed and areas restored. The only potential operational effect would be related to temporary onshore and offshore maintenance activities. There would be no impacts to access to the actual beach.

The proposed Project route for the subsurface terrestrial conduit system is adjacent to two (2) local parks: (1) Acadia Park on West Acacia Avenue between Hillcrest Street and Loma Vista Street; (2) Library Park on West Mariposa Avenue between Main Street and Richmond Street; and (3) Freedom Park to the south of East Mariposa Avenue, on the southwest corner of the intersection with Illinois Street. The route is also adjacent to four (4) athletic fields: (1) Richmond Street Field north of West Mariposa Avenue (west of Richmond Street Elementary); (2) Campus El Segundo Athletic Fields on the northeast corner of the intersection between East Mariposa Avenue and North Nash Street; (3) Center Street Elementary School athletic field; and (4) El Segundo High School athletic fields at the northeast corner of East Mariposa Avenue and Main Street.

Construction of the conduit along these portions of the route would involve a combination of HDD and trenching methods, depending on engineering constraints, City preference, and outcomes of the scoping process. Depending on where staging and laydown areas are located and the specific locations of HDD and trenching, access to the parks or lane closures may be required. This could result in the need for detoured traffic for a period of up to 1 week from each park. Construction activities would progress in a linear fashion along the proposed terrestrial conduit route and public ROWs; therefore, impacts on any given section of the park would occur for a shorter period. Maintenance activities associated with operation of the proposed Project would be limited and only involve a small number of vehicles in the parking lot. Accordingly, impacts are anticipated to be less than significant.

5. Other public facilities?

No Impact. Construction and operation of the proposed Project would not change existing demand for other public facilities because the proposed Project would not result in population growth, as discussed in Section 4.14, Population and Housing. The proposed Project’s terrestrial conduit installation route is briefly adjacent to the El Segundo Public Library on the northwest corner of the intersection between Main Street and East Mariposa Avenue and the El Segundo Performing Arts Center on the Northeast Corner of the same streets as the library. Proposed construction activities would not result in any adverse physical impacts to the public library or result in the need for new or physically altered library facilities. Therefore, it is anticipated that the Project would have no impact on the El Segundo Public Library or Performing Arts Center.

The Project would not require expanding the use of other public facilities; however, as with any proposed construction activity, construction crews would be aware of the location of hospitals and emergency centers (of which there are none located along the proposed route). Although no additional demand is anticipated to occur on these facilities, as a safety precaution work crews would be brought to the nearest facility. It is anticipated there would be no Project effects on other public facilities (e.g., public library, hospital, or emergency center).

4.16 Recreation

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>

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?*

Less than Significant Impact with Mitigation Incorporated. The proposed Project would not increase the use of parks or draw additional populations to the area that might result in substantial deterioration to the parks and facilities. As stated in Section 4.15 (Public Services), proposed construction activities both in the Dockweiler State Beach parking lot and along the terrestrial conduit installation route, which is adjacent to multiple city parks and athletic fields within the City of El Segundo, may result in short-term impacts to access to these areas. These temporary, short-term impacts are anticipated to be less than significant. Once construction is complete, these areas would be restored and there would be no long-term restrictions or access limitations to these parks' areas.

As stated under Section 4.11 (Land Use and Planning), threshold (b), proposed construction activities may temporarily disrupt recreational activities in the vicinity of Project vessels. Offshore activities would require Project vessels for limited periods for the HDDs. Offshore construction activities would be restricted to within a limited area of Project vessels but may temporarily impact marine recreational activity such as recreational fishing. Coordination with the USCG, commercial fishing associations, and other marine users would be implemented to reduce disruption to marine users and recreation. These offshore limitations would only occur during the period of HDD construction and would not continue in the long term once completed. Operation of the proposed Project would have no impact on existing recreational facilities. With implementation of these measures, impacts are anticipated to be less than significant.

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?*

No Impact. The proposed Project does not include the construction or expansion of any recreational facility. Once construction is complete the area of Dockweiler State Beach parking lot would be restored to its original condition. Therefore, no impact is anticipated.

4.17 Transportation/Traffic

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

a) *Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Less than Significant with Mitigation Incorporated. The City of Los Angeles Transportation Assessment Guidelines provides guidance for reviewing conflicts with transportation-related plans, programs, ordinances, or policies. A project does not need to be in perfect conformity with every policy. Under CEQA, a project is considered to not conflict with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals.

The onshore component of the Project would be constructed within existing streets within the City of Los Angeles and the City of El Segundo. The affected streets have pedestrian facilities (e.g., sidewalks) and bus transit service with pedestrian stops. The proposed construction method (open trenching and/or HDD within the transportation ROW) could temporarily interrupt these modes of transportation. Such interruptions could create short-term conflicts with established transportation plans, ordinances, and policies. Similarly, the Project could temporarily affect access to air cargo functions at LAX. Construction along the terrestrial route at the intersection of West Imperial Highway and Pershing Drive (which leads to World Way West, an entrance to cargo and airport service areas), could affect access to airport-related businesses and functions. Offshore installation out to three nautical miles (State waters) could also cause a temporary interruption for the Los Angeles Traffic Separation Scheme (TSS) lanes as the construction vessels may transit near or through the TSS. Given the temporary nature of any such disruptions, and with terrestrial traffic control mitigation measures incorporated into the Project (such as traffic, pedestrian, and transit management strategies, as well as notification of and coordination with appropriate authorities) and marine control measures (such as working with the US Coast Guard; issuance of a temporary Notice to Mariners) any impacts related to such conflicts are anticipated to be less than significant. Operational maintenance activities would have no impact on traffic circulation due to the limited number of vehicles and vessels involved.

b) *Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?*

Less than Significant Impact. CEQA Guidelines Section 15064.3(b) identifies criteria for evaluating transportation impacts. Specifically, the guidelines state vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. According to CEQA Guidelines Section 15064.3(b)(3), a lead agency may include a qualitative analysis of operational and construction traffic. Such a qualitative analysis would evaluate factors such as the availability of transit and proximity to other destinations. The City has adopted VMT thresholds, but these do not include thresholds for construction-phase VMT impacts.

Any incremental VMT increase during Project construction would be temporary and short-term in nature. As such, the proposed Project's construction phase would not conflict with or be inconsistent

with CEQA Guidelines Section 15064.3(b), and VMT impacts are anticipated to be less than significant.

The City’s guidance also indicates that public services, such as public utilities, do not generally generate substantial VMT and that these land uses can be presumed to have less-than-significant impacts on VMT (Los Angeles Department of Transportation 2020). Like public utilities, the Project is not anticipated to generate any vehicle trips and will therefore have no impact on VMT during the operational phase.

- c) *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less than Significant Impact. The Project would not alter the design of any existing roadways or infrastructure and therefore would not substantially increase hazards on land. Offshore, the Project would not result in permanent features that would impact marine traffic patterns or increase navigation hazards. Therefore, the Project is anticipated to have a less than significant impact related to new hazards or incompatible uses.

- d) *Would the Project result in inadequate emergency access?*

Less than Significant Impact. Construction activities associated with the proposed Project could result in temporary road lane closures and associated traffic impacts. The Project contractor would maintain one available lane in each direction around work areas where feasible; however, full road closures in the vicinity of the active work areas may be required on a temporary basis. As a result, alternative routing and detours would be identified and marked in accordance with Los Angeles Department of Transportation standards and the 2019 *Work Area Traffic Control Handbook*.

Although construction of the Project could require temporary lane closures, any such effects would be localized and temporary. To the degree that any such impacts affect traffic, the Project could also impact response times for emergency services and limit emergency access to homes, businesses, and portions of LAX. However, the proposed terrestrial conduit installation route does not overlap with known designated emergency routes. With traffic control measures incorporated into the Project, any such impacts are anticipated to be less than significant. Operational maintenance activities would have no impact on emergency access due to the limited number of vehicles and vessels involved.

4.18 Tribal Cultural Resources

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 the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. 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 set forth 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

PRC Section 21074 (a)(1)(A-B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

1. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

Assembly Bill (AB) 52 also establishes a formal consultation process for California Native American tribes regarding those resources. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.”

Native American tribes to be included in the process are those that have previously requested in writing to be notified of projects proposed within the jurisdiction of the lead agency. Consultation begins with a written notification that must include a brief description of the proposed Project, the Project location, the CEQA lead agency contact information, and notification that the California Native American Tribe has 30 days to request consultation. Upon receipt of a written response from a California Native American Tribe requesting consultation, the CEQA lead agency must begin the AB 52 process with the California Native American Tribe requesting consultation prior to the release of a negative declaration, mitigation negative declaration, or environmental impact report.

- a) **Potentially Significant.** To date, no tribal cultural resources as defined in PRC Section 21074 have been identified because of ongoing consultations with the Consulting Tribes. Consulting Tribes have expressed concerns over the sensitivity of the Project site for buried cultural materials that could potentially qualify as tribal cultural resources under CEQA and have

requested protective measures including Native American monitoring to reduce the potential for significant impacts. However, because consultation is ongoing, impacts to tribal cultural resources are potentially significant and will be discussed further in the EIR.

4.19 Utilities and Service Systems

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or 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 and 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 statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Less than Significant Impact. During the onshore construction period, produced water associated with the HDD boring would be contained in a settling tank and disposed of at an approved facility. Other minimal quantities of wastewater would be contained within portable toilet facilities and disposed of at an approved site or facility. During operation, the proposed Project would not generate wastewater. Construction of the project would allow for the introduction of fiberoptic cables to the project site, however, introduction of these cables would not have significant environmental effects. Operational maintenance activities would have no impact on utility systems due to the limited number of vehicles and vessels involved. As such, impacts are anticipated to be less than significant.

- b) *Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

Less than Significant Impact. As noted in Section 4.14, threshold (b) above, water supply for the Project activities, including mixing of drilling fluid, potential dust control, and equipment washing would be provided by a fire-hydrant near the worksite location or other municipal source of water, and would not use groundwater from the site. The water required for Project construction would represent a short-term (duration) demand and is not likely to result in significant depletion of groundwater supplies. Water would not be required for operations. Therefore, impacts are anticipated to be less than significant.

- c) *Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project that has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less than Significant Impact. As noted in threshold (a) above, wastewater generated from boring activities would be contained in a settling tank and disposed of at an approved facility. Given the short-term nature of construction, the Project is not expected to exceed capacity at available wastewater treatment facilities. The Project would identify a wastewater treatment provider that can accommodate the additional volume. After construction, the Project would not generate wastewater. Therefore, impacts are anticipated to be less than significant.

- d) *Would the Project 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?*

Less than Significant Impact. The Project would produce relatively small amounts of solid waste during the construction phase and any disposal would comply with applicable statutes and regulations. Therefore, impacts are anticipated to be less than significant.

- e) *Would the Project comply with federal, state, and local statutes and regulations related to solid waste?*

Less than Significant Impact. As standard practice, the BOE complies with all applicable laws and regulations related to solid waste generation, collection, and disposal, such as Assembly Bill 939 (AB 939), the California Integrated Waste Management Act of 1989, and the Citywide Construction and Demolition Debris Recycling Ordinance. The Project would result in a short-term and temporary increase in solid waste generation during construction but would not substantially affect standard solid waste operations of local landfills. During operation and maintenance activities, the proposed Project would generate minor amounts of solid waste. As such, the proposed Project would comply with all federal, state, and local statutes and regulations related to solid waste and impacts are anticipated to be less than significant.

4.20 Wildfire

Does the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<p>c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A) *Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Less than Significant Impact. The Project site is not located within a mapped wildfire severity zone hazard area (City of Los Angeles 2024d). The nearest mapped wildfire severity zone hazard area is located approximately two miles north of the Project site. The Project site is separated from this mapped wildfire severity zone hazard area by substantial urban development and has minimal presence of combustible materials, such as wildland vegetation.

The Project does not involve any permanent above grade development that would impede emergency access, and all temporary construction activities would be coordinated with applicable City agencies to ensure vehicle access would not be obstructed during an emergency event. Therefore, the Project would not conflict with or substantially impair any emergency response plan or evacuation plan adopted by the City and would not conflict with the Safety Element of the City’s General Plan. As such, the Project is anticipated to result in less than significant impacts.

B) *Would the Project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

No Impact. The Project site is not located within a designated VHFHSZ or SRA and is separated from the nearest VHFHSZ by substantial urban development. The Project site and surrounding vicinity also have minimal presence of combustible materials, such as wildland vegetation. As such, no impact would occur.

C) *Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

No Impact. The Project site is not located within a designated VHFHSZ or SRA and is separated from the nearest VHFHSZ by substantial urban development. The proposed Project also does not require the installation or maintenance of ignition-prone infrastructure (e.g., power lines or other utilities) that may exacerbate fire risk or wildfire mitigation infrastructure (e.g., roads, fuel breaks, emergency water sources) that may result in temporary or ongoing impacts to the environment. Therefore, no impact would occur.

D) *Would the Project, expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

No Impact. The Project site is not located within a designated VHFHSZ or SRA and is separated from the nearest VHFHSZ by substantial urban development. Therefore, no impact would occur.

4.21 Mandatory Findings of Significance

Does the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Have the potential to substantially 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, substantially 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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"/>

- a) *Does the Project have the potential to substantially 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, substantially 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?*

Less than Significant with Mitigation Incorporated. As discussed in Section 4.4, the proposed Project could result in impacts to coastal and marine habitats that support sensitive species, specifically the western snowy plover (FT/SSC) which has designated critical habitat (subunit CA45B) proximate to the proposed Project location on Dockweiler State Beach (76 FR 16046). Subunit CA45B (near lifeguard tower 47 [LT47]) is an annual roosting site used by western snowy plovers, which exhibit high site fidelity (e.g., some individual plovers have been observed returning to LT47 every year for up to six (6) years) (Ryan Ecological Consulting 2009; Ryan et al. 2014, 2016, 2017). Applicant measures and local, state, and federal regulatory requirements would reduce the potential for significant impacts, and mitigation measures (e.g., construction outside of breeding season windows) are available to reduce remaining effects to less than significant with mitigation incorporated.

As discussed in Sections 2.3.3 and 2.4, Applicant Measures and regulatory requirements would reduce the potential for significant impacts to cultural resources and mitigation measures are available to reduce remaining effects to less than significant levels.

- b) *Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

Less than Significant with Mitigation Incorporated. Cumulative impacts are defined as two or more individual (and potentially less than significant) project effects which, when considered together or in concert with other projects, combine to result in a significant impact within an identified geographic area. Cumulatively considerable impacts could occur if the construction of other projects occurs at the same time as the proposed Project and in the same vicinity, such that the effects of similar impacts of multiple projects combine to expose adjacent sensitive receptors to greater levels of impact than would occur under the proposed Project. For example, if the construction of other projects in the area occurs at the same time as construction of the proposed Project, potential impacts associated with noise and traffic in the Project area may be more substantial. **Table 3** lists the cumulative development in the vicinity of the Project site.

As discussed in the preceding sections, most of the potential impacts of the proposed Project would occur during construction, with minimal ongoing operational effects. Because the construction-related impacts of the proposed Project would largely be temporary and localized, they would only have the potential to combine with similar impacts of other projects if they occur at the same time and in proximity to the proposed Project. Temporary construction impacts caused by the proposed Project (primarily related to aesthetics, air quality, biological resources, noise, and traffic) could combine with similar effects of other projects being built in the area, if any. Because it is unknown what other projects could be developed at the same time as the proposed Project, and the proposed Project's contribution to any resulting cumulative impacts would be short-term and temporary in nature, cumulative impacts are anticipated to be less than significant.

- c) *Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Potentially Significant Impact. In general, impacts to human beings are associated with such issues as air quality, hazards and hazardous materials, and noise. As detailed under Section 4.9, Hazards and Hazardous Materials, and Section 4.20 (a-c), Wildfire, the proposed Project, would not result, either directly or indirectly, in substantial adverse effects related to hazards and hazardous materials or wildfire. However, as noted in Section 4.3 (a-c), Air Quality, and Section 4.13 (a-b), Noise, the proposed Project has the potential to result in significant impacts to human beings during Project construction. The following topics will be evaluated in the EIR as they could have adverse effects on human beings:

- Air pollutants emitted during construction activities (see Air Quality);
- Exposure to potential hazards and hazardous emissions (see Hazards and Hazardous Materials);
- Noise and/or vibration generated by Project construction and operation (see Noise);
- Potentially adverse impacts to fire and police protection services (see Public Services); and
- Construction related traffic (see Transportation and Traffic).

These are primarily temporary impacts associated with Project construction activities. Each type of impact with the potential to cause substantial adverse effects on human beings has been evaluated, and this Initial Study concludes that these impacts may be significant. Therefore, these potentially significant impacts associated with the proposed Project will be evaluated in the EIR.

Table 3. Cumulative Projects

Project	Expected Dates	Description
City of Los Angeles		
Venice Pier Rehabilitation	2026-2027	Repair and maintenance of existing pier at Venice Beach.
City of El Segundo		
2180 East Grand Ave	Building permit COM-24-13 issued June 6, 2024; under construction expected completion in 2025.	A new 10-story building consisting of 8 levels of parking with 2 levels of office above. The parking garage will accommodate over 900 parking spaces, and the upper two levels will accommodate approximately 49,500 square feet of office space.
Beach Cities Media Campus	On September 14, 2023, the El Segundo Planning Commission conditionally approved the Beach Cities Media Campus Project.	Construct a new seven-story, 182,654 square-foot (gross floor area) office and a five-level 703-space parking structure. The proposed project effectuates both the Primary Project and Alternative 3 development scenario of the DA approved through EA-1201 which also certified EIR for the development of the property.
1950-1960 E. Grand Ave	On June 29, 2022, the El Segundo Planning Commission conditionally approved the 1950-1960 E Grand Avenue Project.	The approved Project includes construction of a new 5-story commercial office building (4-story with mezzanine) and a new 23-space surface parking lot at 1950 East Grand Avenue, and a 4-level, 258-space parking structure at 1960 East Grand Avenue. The new office building will be located at the front of the parcel, replacing the existing surface parking spaces.
650-700 North Pacific Coast Highway	On May 23, 2024, the Planning Commission approved a second one-year time extension to the previously approved Vesting Tentative Parcel Map. The map was extended to expire on May 18, 2025.	Consolidation of seven parcels into a single lot and construction of a new 70,921 square-foot 7-story office building with an integrated 1,185-space parking structure.

<p>Standard Works</p>	<p>Approved by City Council on March 15, 2022, the North site is currently under construction; and the South site is pending permit issuance.</p>	<p>The approved development for the South Site (located at 1475 East El Segundo Boulevard) includes a 44,604 square foot two-story addition to an existing one-story brick building, resulting in a 63,915 square foot three-story building with an overall height of 59'-6".</p> <p>The North Site is located on a 1.07-acre portion of a larger property at 1320-1330 East Franklin Avenue). The approved development includes a 44,802 square foot two-story addition to an existing one-story brick building, resulting in a 65,061 square foot three-story building with an overall height of 59'-6"; a new 766 square foot coffee pavilion with a maximum height of 23'-8"; and a new 5,000-square foot public outdoor park with park seating, picnic tables, shade trees and landscaping. The City's project approvals also include community benefits and improvements, which include the following:</p> <ul style="list-style-type: none"> • Underground utilities (all electric power and low voltage phone and data lines) currently serve the buildings on the North and South Sites; • Architectural public seating along the sidewalk area within the public right-of-way (ROW) facing E. Franklin Avenue and Kansas Street; • Coffee Pavilion/Public Café on the North Site, including an associated outdoor dining area immediately adjacent to the E Franklin sidewalk to activate the street and provide a convenient break location for local neighbors; • A landscaped pocket park/open space area measuring 5,000 square feet serves as a focal point of the Project and of the surrounding area; • Architecture that enhances building character; • Open space that facilitates gathering; and • Landscaping and environmental design.
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Pacific Coast Commons	<p>On March 15 and April 19, 2022, the City Council approved the Pacific Coast Commons project. To date the developer has not started construction of the project.</p>	<p>The approved mixed-use project includes a total of 257 apartment units, 6 townhome condominium units, 11,252 square feet of commercial uses, and three parking structures containing 825 parking spaces in various districts/subareas along PCH. Of the total 263 residential units, 32 are approved as affordable housing units.</p> <p>To implement the development of the project, a Specific Plan was approved for the area bounded by PCH, Holly Avenue, Indiana Street, and Palm Avenue, and bisected by Mariposa Avenue. The specific plan created five land use districts (or subareas) for the area as illustrated below and includes carefully tailored land use regulations within each district.</p> <p>PCC-South (PCC MU-1 District/Subarea) is bordered by PCH, Holly Avenue, Indiana Street, and the Aloft Hotel to the north. The approval at PCC-South includes a mixed-use 6-story building with 120 apartment units (105 market rate units and 15 affordable housing units), 5,756 gross square feet of commercial space, and an 8-level parking structure containing 336 parking spaces.</p> <p>Fairfield Parking (PCC COM-3 District/Subarea) is bordered by PCH, Indiana Street, Mariposa Avenue, and the Aloft Hotel to the south. The approval at PCC COM-3 includes a 5-level parking structure accommodating 215 parking spaces and 3,273 gross square feet of commercial space.</p> <p>PCC-North (PCC MU-2 District/Subarea) encompasses the existing surface parking lot and fire lane in the area north of Mariposa Avenue generally bounded by Carl's Jr. and the 7-Eleven/Union 76 Gas Station. The approval at PCC MU-2 includes a 6-story mixed-use building with 137 apartment units (120 market rate units and 17 affordable housing units), 2,223 gross square feet of commercial space, and a 6-level parking structure containing 252 parking spaces. Six townhomes with 2-car garages are also approved on a separate lot within PCC-North.</p>
Los Angeles World Airports		
LAX Landside Access Modernization Program	2017-2035	Approved improvements within and east of the CTA, including an APM system, ITFs, CONRAC, and roadway improvements. Additionally, certain parcels in the local area would become available for redevelopment with new uses because of the LAX Landslide Access Modernization Program.
Terminal 4 Modernization	2021-2026	Proposed renovation and/or replacement of portions of the existing concourse and ticketing building, realignment of Taxiway C9, and reconstruction of the apron to improve passenger level of service, accommodate modern aircraft fleets and operational support equipment, and provide seismic resiliency and structural safety.

Various Water Pipeline Projects	2020-2027	Includes replacement of domestic water pipelines throughout the CTA, replacement of chilled water and heating hot water pipelines feeding Terminal I, and completion of recycled water pipelines on the LAX campus to receive and distribute reclaimed water to be produced at the Hyperion Water Reclamation Plant. Within the CTA, the recycled water pipelines will stub-outs near Terminal 1.5 and Terminal 6 that will allow for future connections to the east. Some of these pipeline projects have been approved; environmental documentation for other projects is pending.
Miscellaneous Projects and Improvements	Ongoing	A wide variety of smaller miscellaneous projects and improvements mostly related to repair/replacement of, and upgrades to, existing facilities at LAX, including, but not limited to, runway repair/rehabilitation; elevators/escalators replacement; terminal taxi lanes and aprons rehabilitation; passenger boarding bridge replacements; terminal electrical plumbing, and facilities upgrades; utility infrastructure improvements; miscellaneous demolitions; and other improvements.

5 Preparation and Consultation

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6 Environmental Determination – Recommended Environmental Documentation

A. Summary

The proposed Project may have a significant effect on the environment, and further study is required.

B. Recommended Environmental Documentation

On the basis of this initial evaluation, I find that the Project may have a significant effect on the environment, and an Environmental Impact Report should be prepared.

Reviewed by:



Daniel Kim
Environmental Supervisor I
Date: June 17, 2025

Approved by: *Norman Mundy* for

Maria Martin
Environmental Affairs Officer
Date : June 25, 2025

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