

# CHAPTER 1 Introduction

This environmental impact report (EIR) examines the potential environmental effects of the proposed 540 East Imperial Avenue Specific Plan Project (proposed project) for the City of El Segundo. The proposed project's background and the legal basis for preparing an EIR are described below.

## 1.1 PROJECT SITE BACKGROUND

The proposed project is located at 540 East Imperial Avenue in the northern portion of the City of El Segundo, in west Los Angeles County. The City is bound by the Los Angeles International Airport to the north, Los Angeles County and the City of Hawthorne to the east, the City of Manhattan Beach to the south, and the City of Los Angeles and the Pacific Ocean to the west. The 5.65-acre (246,114-square-foot) project site is comprised of six lots and bordered by East Imperial Avenue to the north, multiple-family residential uses to the east, multiple-family residential uses and East Walnut Avenue to the south, and single-family residential uses and a mortuary to the west.

The 5.65-acre 540 East Imperial Avenue Specific Plan Project site (project site) is currently developed with the Imperial Avenue Elementary School. The now unoccupied elementary school was built in 1956 and due to the decline in enrollment in the El Segundo Unified School District (ESUSD), the school campus was closed in 1975. In 1984, the site was used as an employee training facility for the Hughes Aircraft Company. In 1997, the school campus was re-opened under a lease to the Los Angeles Unified School District (LAUSD) as a special needs school, but was closed again a few years later. The proposed project site is currently owned by the ESUSD. Between March 2008 and May 2009, the ESUSD held a series of meetings to establish the best use of the property and decided on a plan to re-entitle the site for lease or sale and to redevelop the property for a new use.

The proposed project would result in the development of one of two conceptual project options. Specific Plan Site Plan (SPSP) Option 1 (Option 1) would include a maximum of 150 assisted/independent living units, 150 senior apartments/townhomes (for ages 55 and older) and four townhomes. SPSP Option 2 (Option 2) would include residential development with a mix of 24 single-family dwelling units and 34 multiple-family dwelling units. Chapter 3 (Project Description) of this EIR describes the project, its environmental setting, zoning, land use designation, amendments, and proposed uses in greater detail.

## 1.2 PURPOSE AND LEGAL AUTHORITY

The proposed project requires the discretionary approval of the El Segundo City Council. Therefore, this EIR was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 21000, *et seq.*), the CEQA Guidelines (California Code of Regulations, Title 14, Sections 15000, *et seq.*), and the City of El Segundo's Environmental Guidelines (City Council Resolution No. 3805, adopted March 16, 1993). The determination that the City of El Segundo is the lead agency for purposes of CEQA is made in accordance with CEQA Guidelines Section 15367, which

defines the lead agency as the public agency with the principal responsibility for carrying out or approving a project and conducting the environmental review. The lead agency is also responsible for preparing the environmental documents for the project pursuant to CEQA.

As required by CEQA, this EIR serves to (1) assess the expected direct, indirect, and cumulative impacts of the proposed project's physical development; (2) identify means of avoiding or minimizing potential adverse environmental impacts; and (3) evaluate a reasonable range of alternatives to the proposed project, including the No Project Alternative.

In accordance with PRC Section 21002.1, the City prepared this EIR for the following purposes:

- To inform the general public, the local community, responsible and interested public agencies, the decision making bodies, and other organizations, entities, and interested persons of the scope of the proposed project, its potential environmental effects, possible measures to reduce potentially significant environmental impacts, and alternatives that could reduce or avoid the significant effects of the proposed project.
- To enable the City to consider environmental consequences when decided whether to approve the proposed project.
- To satisfy the substantive and procedural requirements of CEQA.

The EIR was prepared as a Project EIR pursuant to CEQA Guidelines Section 15161. A Project EIR is appropriate for a specific development project. As stated in the CEQA Guidelines:

... this type of EIR should focus on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction and operation.

This EIR is intended to serve as an informational document for the public and City of El Segundo decision-makers. The City will consider approval of the project as part of the City's development review process and would certify the project's Final EIR concurrently with project approval.

### 1.3 SCOPE OF THE EIR

The scope of the EIR includes assessment and evaluation of potentially significant environmental issues which were determined through preparation of the Initial Study/Notice of Preparation (IS/NOP), comments in response to the IS/NOP, and scoping discussions among consulting staff and the City of El Segundo. The IS/NOP, and comment letters received during the 30-day public review period are included in Appendix A1. The IS/NOP process identified potentially significant impacts for the following issue areas associated with the construction and/or operation of the proposed project, which are addressed in detail in this EIR:

- Air Quality
- Greenhouse Gas Emissions
- Noise
- Recreation
- Transportation/Traffic

This EIR addresses each of these environmental issues in Chapter 4 (Environmental Analysis) of this document. The environmental analysis was conducted in accordance with the provisions set forth in the CEQA Guidelines. The analysis identifies potentially significant environmental impacts, including both the site-specific and cumulative effects of the project; evaluates the direct, indirect, and cumulative impacts resulting from the construction and operation of the proposed project; and recommends feasible mitigation measures, where appropriate, that would serve to reduce or eliminate the project's identified adverse environmental effects. Issue areas such as recreation and traffic were not identified as having potentially significant environmental impacts during the IS/NOP process, and therefore, would not typically be included as part of the EIR. However, in consideration of the community's concerns about the loss of the existing approximately 0.50-acre baseball field on the school campus currently utilized by the community, and increased traffic in the surrounding neighborhoods, recreation and traffic are analyzed in greater detail in this EIR. All project-related mitigation measures identified in both the IS/NOP and this EIR are listed in Appendix A2 for ease of reference.

In accordance with Section 15128 (Effects Not Found to Be Significant) of the CEQA Guidelines, the IS/NOP (Appendix A1) provides reasons why each of the following environmental issue areas was not considered significant, and therefore, not analyzed further in the EIR:

- Aesthetics
- Agriculture/Forestry Resources
- Biological Resources
- Cultural Resources
- Geology/Soils
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Population/Housing
- Public Services
- Utilities/Service Systems

In preparing the EIR, pertinent City policies and guidelines, existing EIRs, and background documents prepared by the City were all evaluated for their applicability to the proposed project. A list of references is provided at the end of each section.

Chapter 6 (Alternatives) of the EIR was prepared in accordance with CEQA Guidelines Section 15126.6, which requires an evaluation of a reasonable range of alternatives, including the No Project Alternative. It also identifies the “environmentally superior” alternative among the alternatives assessed.

### **1.3.1 Environmental Setting/Definition of the Baseline**

According to CEQA Guidelines Section 15125, an EIR must include a description of the existing physical environmental conditions in the vicinity of the project to provide the “baseline condition” against which project-related impacts are compared. Normally, the baseline condition is the physical

condition that exists when the NOP is published. The NOP for the proposed project was published on July 7, 2011. The CEQA Guidelines recognize that the date for establishing an environmental baseline cannot be rigid. Because physical environmental conditions may vary over a range of time periods, the use of environmental baselines that differ from the date of the NOP is reasonable and appropriate when doing so results in a more accurate or conservative environmental analysis. The baseline year of 2011 is used for all impact areas analyzed in this EIR to determine the potential impacts of the proposed project. For analytical purposes, impacts associated with implementation of the proposed project are derived from the environmental setting in 2011.

## 1.4 INTENDED USE OF THE EIR

This EIR was prepared to analyze potentially significant environmental impacts associated with the construction and operation of the proposed project. It also addresses appropriate and feasible mitigation measures or project alternatives that would minimize or eliminate these identified impacts. This EIR is intended to serve as an informational document and will be the primary source of environmental information which the Lead Agency would consider when exercising its discretionary decision-making related to implementation of this project.

To accomplish its purpose, this EIR identifies significant or potentially significant environmental effects, as well as the ways in which those impacts can be reduced to less-than-significant levels, whether through imposing mitigation measures or by implementing specific alternatives to the project. In a practical sense, EIRs function as a technique for fact-finding, allowing an applicant or developer, concerned citizens, and agency staff an opportunity to collectively review and evaluate baseline conditions and project impacts through a process of full disclosure.

To gain the most value from this report, certain key points recommended in the CEQA Guidelines should be kept in mind:

- This report should be used as a tool to give the reader an overview of the possible ramifications of the proposed project. It is designed to be “early warning system” with regard to potential environmental impacts and subsequent effects on the local community’s environmental resources.
- A specific environmental impact is not necessarily irreversible or permanent. Most impacts, particularly in urban, more developed areas, can be wholly or partially mitigated by incorporating changes recommended in this report during the design and construction phases of project development.
- This report, while a summary of facts, reflects the professional judgment of the author. Therefore, the reader will have to individually weigh the facts that it reports.

## 1.5 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

Per the CEQA Guidelines, this EIR defines lead, responsible, and trustee agencies. The City of El Segundo is the lead agency for the project because it holds principal responsibility for approving the project. A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. A trustee agency is a state agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the state. The proposed project

contemplates a specific development plan. Responsible agency approvals for the proposed project will be required by the City and (depending on the development proposal) other public agencies. In addition to the City of El Segundo (Lead Agency), there are federal, state, and regional agencies that have discretionary or appellate authority over the project and/or specific aspects of the project. The responsible agencies will also rely on this EIR when acting on such projects. Those federal, state, or local agencies that would rely upon the information contained in this EIR when considering approval include, without limitation, the following:

- California Department of Toxic Substance Control (DTSC) Public Review
- California Department of Transportation (Caltrans)
- California Regional Water Quality Control Board (Permit for dewatering during construction and National Pollutant Discharge Elimination System [NPDES] permit)
- El Segundo Unified School District (ESUSD)
- Division of the State Architect (DSA)
- Federal Aviation Administration (FAA)
- Los Angeles County Airport Land Use Commission (ALUC)
- Los Angeles World Airport (LAWA)
- State Water Resources Control Board (General Construction Activity Stormwater Permit)

## 1.6 ENVIRONMENTAL REVIEW PROCESS

As a first step in complying with the procedural requirements of CEQA, the City prepared an IS to determine which, if any, aspect of the project, either individually or cumulatively, may cause a significant effect on the environment. Based on that determination, the City could narrow the focus (or scope) of the subsequent environmental analysis. For this project, the IS process found that this EIR should focus on the environmental issues listed in Section 1.3, above.

After completing the IS, the City filed a NOP with the California Office of Planning and Research, providing official notice that an EIR would be prepared for this project. Subsequently, the NOP was distributed to involved public agencies and interested parties for an extended public review period of 30 days, beginning on July 7, 2011. The purpose of the public review period was to solicit comments on the scope and content of the environmental analysis to be included in the EIR. Agencies or interested persons who did not respond during the public review period of the NOP will have an opportunity to comment on the project's environmental effects during the public review period required for the EIR, as well as at subsequent Planning Commission and City Council hearings on the project. In addition to the filing of the NOP, the City held a public scoping meeting on July 14, 2011, to encourage and solicit comments from the general public on the proposed project. During the scoping period, the City received six written comment letters on the IS/NOP in addition to the verbal comments received at the scoping meeting. The IS/NOP, as well as the scoping comment letters and verbal comments, are included in Appendix A1 of this EIR.

During preparation of the EIR, agencies, organizations, and persons who the City believed might have an interest in this project were identified and specifically contacted. Information, data, and observations derived from these contacts are included in the EIR.

Moving forward, this EIR will be distributed to affected agencies, surrounding cities, involved public agencies, and interested parties for a 45-day review period in accordance with CEQA Guidelines Section 15087. During the 45-day public review period, this EIR is available for general public review on the City’s website (<http://www.elsegundo.org/depts/planningsafety/planning/default.asp>) and at the following locations:

City of El Segundo  
 Planning and Building and Safety Department  
 350 Main Street  
 El Segundo, CA 90245

City of El Segundo Library  
 111 West Mariposa Avenue  
 El Segundo, CA 90245

Interested parties may provide comments on the EIR in written form. Comments should be addressed to the City of El Segundo at the following address:

Kimberly Christensen, AICP, Planning Manager  
 City of El Segundo  
 Planning and Building Safety Department  
 350 Main Street  
 El Segundo, CA 90245  
 Phone: (310) 524-2340  
 Fax: (310) 322-4167  
 Email: [kchristensen@elsegundo.org](mailto:kchristensen@elsegundo.org)

Upon completion of the 45-day public review period, written responses to all comments raised with respect to environmental issues discussed in the EIR will be prepared and incorporated into the Final EIR (FEIR). Furthermore, written responses to comments received from any public agencies will be made available to these agencies at least 10 days prior to the public hearing during which the certification of the FEIR will be considered. These comments, and their responses, will be included in the FEIR for consideration by the City of El Segundo Planning Commission and City Council, as well as any other public decision-makers.

According to PRC Section 21081, the Lead Agency must make specific Findings of Fact (“Findings”) before approving the FEIR when the EIR identifies significant environmental impacts that may result from a project. The purpose of the Findings is to establish the link between the contents of the FEIR and the action of the Lead Agency with regards to approval or rejection of the project. Before approving a project, the City must make one of three findings:

- Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the FEIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the FEIR.

Additionally, according to PRC Section 21081.6 the Lead Agency must include a mitigation monitoring and reporting program (MMRP) as part of the FEIR for projects in which significant impacts will be

avoided by mitigation measures. The purpose of the MMRP is to ensure compliance with required mitigation during implementation of the project.

However, environmental impacts may not always be mitigated to a less-than-significant level. When this occurs, impacts are considered significant and unavoidable. If a public agency approves a project that has significant and unavoidable impacts, the agency shall state in writing the specific reasons for approving the project, based on the FEIR and any other information in the public record. This is termed a “Statement of Overriding Considerations” and is used to explain the specific reasons why the benefits of a proposed project make its unavoidable environmental effects acceptable. The statement is prepared, if required, after the FEIR is completed, yet before action to approve the project is taken. Ultimately, the lead agency must certify the FEIR, prior to approving a specific project. In the case at hand, the City of El Segundo (as the lead agency), would need to certify the FEIR prior to approving the proposed project.

## 1.7 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

During the environmental review process, NOP comment letters were received from various parties that raised issues of concern. These comment letters and verbal comments received at the public scoping meeting (Appendix A1) were used to determine areas of potential controversy and issues to be resolved in the EIR. These issues are discussed within the technical sections of this document, and summarized below.

- Impacts to air quality
- Impact to greenhouse gas emissions
- Impacts to noise
- Impacts to recreation
- Impacts to traffic

The discussion of environmental effects, mitigation measures, and alternatives, as summarized in Table 2-1 (Summary of Environmental Effects and Project Requirements/Mitigation Measures), and evaluated in detail in this EIR, constitutes the identification of issues to be resolved and areas of controversy, as required for compliance with CEQA Guidelines Section 15123(b)(2).

## 1.8 DOCUMENT ORGANIZATION

This EIR was designed for easy use and reference. To help the reader locate information of particular interest, a brief summary of the contents of each section of the EIR is provided. References are contained at the end of each respective chapter. The following chapters are contained within the EIR:

- **Chapter 1: Introduction**—This chapter describes the purpose, approach, intended use, and scope of the EIR, a summary of the environmental and public review process, agencies relevant to the proposed project, the availability of the EIR, documents incorporated by reference, and a brief outline of this document’s organization.
- **Chapter 2: Executive Summary**—This chapter contains a summary of the proposed project, as well as a summary of environmental impacts, proposed mitigation, level of significance after mitigation, and unavoidable impacts.

- **Chapter 3: Project Description**—This chapter provides a detailed description of the proposed project, including a description of the project location, environmental setting and regulations, project background, project objectives, and project characteristics.
- **Chapter 4: Environmental Analysis**—This chapter describes and evaluates the environmental issue areas, applicable environmental thresholds, environmental impacts (both short-term and long-term), policy considerations related to the particular environmental issue area under analysis, mitigation measures capable of minimizing environmental harm, and a discussion of cumulative impacts. Where additional actions must be taken to ensure consistency with environmental policies, recommendations are made, as appropriate.
- **Chapter 5: Other CEQA Considerations**—This chapter provides analysis, as required by CEQA, regarding impacts that would result from the proposed project, including effects found not to be significant, growth-inducing impacts, significant irreversible change to the environment, and significant and unavoidable impacts.
- **Chapter 6: Project Alternatives**—This chapter analyzes feasible alternatives to the proposed project, including Alternative 1 (Senior Townhome and Single-Family Alternative), Alternative 2 (Senior Assisted Living Facility and Single-Family Alternative), and Alternative 3 (No Project/Reasonably Foreseeable Development Alternative).
- **Chapter 7: Report Preparers**—This chapter identifies all individuals responsible for the preparation of this EIR.