

CHAPTER 5 Other CEQA Considerations

This chapter presents the evaluation of other types of environmental impacts required by CEQA that are not covered within the other chapters of this EIR. In particular, Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must also identify (1) significant environmental effects of the proposed project, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, (4) growth-inducing impacts of the proposed project, (5) mitigation measures proposed to minimize significant effects, and (6) alternatives to the proposed project.

5.1 GROWTH-INDUCING IMPACTS

As required by the CEQA Guidelines, an EIR must include a discussion of the ways in which the proposed project could directly or indirectly foster economic development, population growth, or the construction of additional housing, and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2(d)). Growth can be induced in a number of ways, including the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of removal of obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval.

In general, a project may foster physical, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area)
- The project results in the urbanization of land in a remote location (leapfrog development)
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval)
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.)

If a project meets any one of these criteria, it may be considered growth inducing. Generally, growth-inducing projects are either located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or encourage premature or unplanned growth.

To comply with CEQA, an EIR must discuss the ways in which the proposed project could promote economic or population growth in the vicinity of the project and how that growth will, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2(d)). Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth is

considered a significant impact only if it affects (directly or indirectly) the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

Growth can be induced in a number of ways, including the direct construction of new homes and businesses, the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of the removal of obstacles to growth relates directly to the removal of infrastructure limitations (typically through the provision of additional capacity or supply), or the reduction or elimination of regulatory constraints on growth that could result in growth unforeseen at the time of project approval.

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

5.1.1 Economic and Population Growth

■ Population Generation and Housing

The proposed 540 East Imperial Avenue Specific Plan Project (proposed project) would result in the development of one of two conceptual project options. Option 1 would include a maximum of 150 assisted/independent living units, 150 senior apartments/townhomes (for ages 55 and older), and four townhomes. Option 2 would include a residential development with a mix of 24 single-family dwelling units and 34 multiple-family dwelling units.

According to the state Department of Finance, the City of El Segundo's population totaled approximately 16,664 in 2010.³⁷ According to the Southern California Association of Governments (SCAG), the population for the City of El Segundo is projected to be 17,293 by 2015,³⁸ thereby increasing by 629 residents. Due to the residential nature of the project, the proposed project would result in a permanent increase in population in the area. Based on the persons per household (pph) size for the City of El Segundo, the residential component of Option 1 would generate approximately 409 residents.³⁹ Option 2 of the proposed project would result in approximately 130 residents.^{40,41} As such, the project is considered growth inducing. However, using the worst-case population increase scenario of Option 1, the additional 409 residents generated by the proposed project would increase the existing population of the City of El Segundo from 16,664 residents to 17,073 residents. The maximum

³⁷ City of El Segundo, *City of El Segundo Housing Element* (July 2009), p. 2-1.

³⁸ Southern California Association of Governments, *City Projections*, (April 2004).

³⁹ Option 1: (150 assisted living units x 1 person per household (pph) = 150 residents) + ([15 studio x 1.5 pph = 22.5 residents] + [112 one-bedroom x 1.5 pph = 168 residents] + [23 two-bedroom x 2.5 pph = 57.5 residents]) + (4 townhomes x 2.78 pph = 11.12 residents) = 409 residents.

⁴⁰ Option 2: (34 multiple-family units x 1.85 pph = 62.9 residents) + (24 single-family units x 2.78 pph = 66.72 residents) = 129.62 residents (rounded up to 130 residents).

⁴¹ City of El Segundo, *El Segundo Public Facilities Impact Fee Study* (August 30, 2010), p. 14.

population increase scenario of 409 residents would still be less than the projected increase of 629 residents by 2015.

■ Short-Term Employment Generation

Development of the proposed project would generate some short-term, construction-related employment opportunities during construction activities. Given the ample supply of construction workers in the regional work force of Southern California, which is the area from which the workers would be drawn, the proposed project would not be considered growth inducing from a short-term employment perspective.

■ Long-Term Employment Generation

Implementation of the proposed project would result in additional permanent employees on-site for Option 1 only. For Option 1, the assisted/independent living related positions are anticipated to be filled by the local labor force. The jobs associated with the new uses of the project site are not the types that typically attract new residents to the area. Consequently, little if any population growth is expected to occur as a result of the development of this project. This economic activity can also be considered a benefit to the community by providing needed medical service for area residents.

5.1.2 Removal of Obstacles to Population Growth

The proposed project is an infill development in an existing, urbanized community, which would develop an assisted/independent living and senior apartments/townhomes use (Option 1) or a single- and multiple-family residential use (Option 2) on the project site, replacing existing, vacated congregate former school structures. Supportive infrastructure (sewer, water, storm drain, dry utilities, and roads/highways) already exists, and is sufficient to support the proposed project. Accordingly, the addition of housing is not an obstacle to growth so there is no impediment to growth that would need to be removed.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts, and particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Construction of the proposed project would entail the commitment of energy and human resources. Labor will also be committed for the construction of the proposed project. Operation of the project would entail a further commitment of energy resources in the form of petroleum products (diesel fuel and gasoline), natural gas, and electricity. Long-term impacts would also result from an increase in

vehicular traffic, and the associated air pollutant and noise emissions. Implementation of the proposed project would involve the following irreversible environmental changes:

- Commitment of energy and water resources as a result of the construction, operation and maintenance of the proposed development
- Decrease in ambient air quality

5.3 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. The following significant, unavoidable adverse impacts would result from project implementation.

■ Air Quality

- > **Project-Specific**—Both project Options would increase concentrations of criteria air pollutants in the project vicinity during construction activities, which would exceed emissions allowed under the localized significance thresholds.
- > **Cumulative**—Construction of the proposed project would exceed SCAQMD thresholds for the pollutants and precursors of ozone for which the Basin is in non-attainment, the proposed project would make cumulatively considerable contributions of these pollutants during construction of the proposed project.

■ Noise

- > **Project-Specific**—Both project Options would result in temporary construction related noise that may not be reduced or mitigated to a level generally considered acceptable for residential land uses near the project site.
- > **Project-Specific**—The exterior noise levels at the project site currently exceed noise levels considered normally or conditionally acceptable for residential uses (ranging from 50 to 70 dB for single-family and multiple-family residential uses). Both project Options would result in the 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. The proposed project occurs within the 65 dBA and 75 dBA contours of Los Angeles International Airport (LAX). Both Options would not be reduced or mitigated to a level that would be considered normally acceptable for residential land uses.
- > **Project-Specific**—Neither project Option would result in a substantial, permanent increase in exterior noise levels during operation that would exacerbate the existing condition. However, both project Options would increase the permanent, noise-sensitive residential population on the project site. The exterior noise level could not be reduced or mitigated to a level that would be considered normally acceptable for residential land uses on the project site.
- > **Cumulative**—Future development within the 65 dBA and 75 dBA contours of LAX may still occur. As development of the proposed project would result in the exposure of on-site noise sensitive uses to an increase in noise levels, the contribution would be considered cumulatively significant.
- > **Cumulative**—Future residential projects may be developed by the City of El Segundo that are also located within the 70 dBA CNEL contour of LAX, and these residential uses would

also be exposed to noise levels that exceed the normally acceptable development standard. As development of the proposed project would result in the exposure of on-site noise sensitive uses to an increase in noise levels, the contribution would be considered cumulatively significant.

