6.0 Other CEQA Considerations

6.0 OTHER CEQA CONSIDERATIONS

6.1 LONG-TERM IMPLICATIONS OF THE PROJECT

Pursuant to *CEQA Guidelines* Section 15126.2, this section analyzes short-term uses of the environment and the maintenance and enhancement of long-term productivity. If the Project is approved and constructed, a variety of short- and long-term impacts would occur on a local level. For example, surrounding uses may be temporarily impacted by dust and noise during Project grading and construction. There may also be an increase in vehicle pollutant emissions caused by grading and construction activities. However, these disruptions would be temporary and may be avoided or lessened to a large degree through mitigation cited in this EIR and through compliance with the *City of Azusa Municipal and Development Code* (Municipal Code); refer to Section 5.0, *Environmental Analysis*, and Section 8.0, *Effects Found Not To Be Significant*.

The Project would create long-term environmental consequences associated with a transition in land use from an existing golf course associated with the Azusa Greens Country Club to an independent senior living community, in addition to the golf course use. Approximately 4.48-acres of designated open space (in the form of the existing golf course) would be converted into the Senior Village. Development of the Project and the subsequent long-term effects may impact the physical, aesthetic, and human environments. Long-term physical consequences of development include increased traffic volumes, increased noise from Project-related mobile (traffic) and stationary (landscaping, heating, ventilation, and air conditioning, etc.) sources, loss of 4.48 acres of open space, hydrology and water quality impacts, and increased energy and natural resource consumption. Incremental degradation of local and regional air quality would also occur as a result of mobile source emissions generated from Project-related traffic, and stationary source emissions generated from the consumption of natural gas and electricity.

6.2 IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD OCCUR IF THE PROJECT IS IMPLEMENTED

According to *CEQA Guidelines* Sections 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur should the Project be implemented. As stated in *CEQA Guidelines* Section 15126.2(c):

> *"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."*

The Project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue

throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Site. Project construction would require the consumption of resources that are not renewable, or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: lumber and other forest products; aggregate materials used in concrete and asphalt; metals; and water. Fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment.

The resources that would be committed during Project operation would be similar to those currently consumed within the City. Resources would include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project and the existing, finite supplies of these natural resources would be incrementally reduced. Project operation would occur in accordance with Title 24, Part 6 of the *California Code of Regulations*, which sets forth conservation practices that would limit the amount of energy consumed by the Project. However, the energy requirements associated with the Project would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

Limited use of potentially hazardous materials typical of residential and golf course uses, including minor amounts of cleaning products and occasional use of pesticides and herbicides for landscape and golf course maintenance. Residential and recreational uses such as the Project typically do not generate, store, or dispose of large quantities of hazardous materials. Further, residential and recreational land uses generally do not involve dangerous or volatile operational activity that may expose persons to large quantities of hazardous materials. The proposed Senior Village component of the Project would involve regular visits from trash trucks and delivery service for food, linens, etc. and could potentially introduce hazardous materials associated with medical uses on-site. However, theses trucks and delivery service vehicles would not stay at the Site for long periods of time and would not use, handle, store, or dispose hazardous materials on-Site. The reconfigured golf course component of the Project would utilize minor amounts of pesticides and herbicides for golf course maintenance, similar to existing conditions. Potential use of hazardous materials on the golf course would be required to comply with applicable government regulations and standards. Compliance with these regulations and standards would serve to protect against significant and irreversible environmental change resulting from the accidental release of hazardous materials.

In summary, Project construction and operation would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses during the life of the Project. The Project would involve the use of building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to the Project. Additionally, increasingly efficient building fixtures and automobile engines are expected to offset this demand to some degree. Continued use of such resources would also be on a relatively small scale and consistent with regional and local growth forecasts in the area. As such, although irreversible environmental changes would result from the Project, such changes would not be considered significant.

6.3 GROWTH-INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d) requires that an EIR analyze growth-inducing impacts of a project. Specifically, *CEQA Guidelines* Section 15126.2(d) requires that an EIR:

> *"Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."*

In general, a project could foster spatial, economic, or population growth in a geographic area if it results in any of the following:

- Removal of an impediment to growth (e.g., establishment of an essential public service and provision of new access to an area);
- Fostering of economic expansion or growth (e.g., changes in revenue base and employment expansion);
- Fostering of population growth (e.g., construction of additional housing), either directly or indirectly;
- Establishment of a precedent-setting action (e.g., an innovation, a change in zoning and general plan amendment approval); or
- Development of or encroachment on an isolated or adjacent area of open space (being distinct from an infill project).

Should a project meet any one of the above-listed 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. Note that the *CEQA Guidelines* require an EIR to "discuss the ways" a project could be growth-inducing and to "discuss the characteristics of some projects that may encourage … activities that could significantly affect the environment." However, the *CEQA Guidelines* do not require that an EIR predict (or speculate) specifically where such growth would occur, in what form it would occur, or when it would occur. The answers to such questions require speculation, which CEQA discourages; refer to *CEQA Guidelines* Section 15145.

In accordance with the *CEQA Guidelines* and based on the above-listed criteria, the Project's potential growth-inducing impacts are evaluated below.

IMPACT ANALYSIS

Removal of an Impediment to Growth

As discussed in Section 5.12, *Public Services and Utilities*, Project implementation would increase demands for public services, including fire and police protection services. As an independent senior living community and reconfigured portion of the Azusa Greens Country Club golf course, Project implementation is not expected to involve significant impacts to public services following compliance with existing Federal, State, and local laws, ordinances, regulations, and standards. The Project would also increase demands for utilities and services systems (i.e., water, wastewater treatment, stormwater, and solid waste). Because the Project is currently served by utilities and service systems and based on correspondence with service providers, it is expected that existing utilities and service systems can be readily expanded and/or extended to serve the Project.[1] Therefore, the Project would not remove an impediment to growth associated with the establishment of an essential public service and is not considered growth-inducing in this regard.

The Site is already served by an existing roadway network of principal and secondary arterials (i.e., Foothill Boulevard, Todd Avenue, Sierra Madre Avenue, 10th Street, Irwindale Avenue, and Vernon Avenue) and would not provide new access to an area; refer to Section 5.8, *Traffic and Circulation*. Therefore, the Project would not remove an impediment to growth associated with the provision of new access to an area and is not considered growth-inducing in this regard.

Economic Growth

According to the California Employment Development Department, the annual average civilian labor force within the City totals approximately 25,300 persons as of July 2018.[2] Project implementation would introduce new jobs during construction. However, these jobs would be temporary and would not be growth-inducing in this regard. Project operations would increase the City's employment base with approximately 90 employees, approximately 0.3 percent greater than July 2018 conditions. The projected nominal employment growth would slightly increase the City's revenue base; however, Project implementation is not anticipated to result in significant employment growth based on the nature and scale of development proposed. In fact, this would constitute a beneficial impact as Project implementation would increase the City's local economy by providing jobs and encouraging investment of local resources in local projects.

Population Growth

County of Los Angeles. The County encompasses approximately 4,750 square-miles. It is bordered by Kern County to the north, San Bernardino County to the east, Orange County to the southeast, the Pacific Ocean to the south, and the Ventura County to the west. As of January 2018, the

[1] Written Correspondence: Raza, Adriana, Customer Service Specialist, Facilities Planning Department, Sanitation Districts of Los Angeles County, November 15, 2016.

[2] State of California Employment Development Department, Labor Market Information Division, *Monthly Labor Force Data for Cities and Census Designated Places*, *July 2018 - Preliminary*, August 17, 2018.

County of Los Angeles had a population of 10,283,729 people.[3] This represents an increase of approximately 4.7 percent over the County's 2010 population of 9,818,605.[4]

The Southern California Association of Governments (SCAG) serves as the Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial counties. Generally, SCAG serves as the regional planning organization for growth management, transportation, and a range of additional planning and environmental issues within southern California. SCAG develops, refines, and maintains SCAG's regional and small area socio-economic forecasting/allocation models. The socio-economic estimates and projections are used for Federal and State mandated long-range planning efforts such as the *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS), the *Air Quality Management Plan* (AQMP), the *Federal Transportation Improvement Program* (FTIP), and the *Regional Housing Needs Assessment* (RHNA). As part of its forecasting, SCAG projects that the County's population is forecast to reach 10,326,200 by 2020 and 11,145,100 by 2035.[5]

City of Azusa. Table 6-1, *Population Estimates*, provides a summary of both 2010 and 2018 population estimates for Los Angeles County and the City of Azusa. On a local level, Azusa's January 2018 population was 49,954. This represents an increase of approximately 7.8 percent over the City's 2010 population of 46,361. SCAG projects that the City's population will reach 49,300 by 2020 (less than the City's January 2018 population) and 53,000 by 2035.

Table 6-1
Population Estimates

Year	County of Los Angeles	City of Azusa
Population		
2010 Census[1]	9,818,605	46,361
January 2018[2]	10,283,729	49,954
2010-2018 Change	*+465,124*	*+3,593*
2010-2018 % Change	*4.7%*	*+7.8%*
2020 SCAG Forecasts[3]	10,326,200	49,300
2018-2020 Change	*+42,471*	*-654*
2035 SCAG Forecasts[3]	11,145,100	53,000
2018-2035 Change	*+861,371*	*+3,046*

Sources:
1. State of California, Department of Finance, *E-4 Population Estimates for Cities, Counties, and the State, 2000-2010, with 2000 & 2010 Census Counts*, Sacramento, California, November 2012.
2. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 Benchmark*, Sacramento, California, May 1, 2018.
3. Southern California Association of Governments, *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*, http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed August 29, 2018.

[3] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 Benchmark*, Sacramento, California, May 1, 2018.

[4] State of California, Department of Finance, *E-4 Population Estimates for Cities, Counties, and the State, 2000-2010, with 2000 & 2010 Census Counts*, Sacramento, California, November 2012.

[5] Southern California Association of Governments, *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*, http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed August 29, 2018.

Housing

County of Los Angeles. Table 6-2, *Housing Estimates*, provides a summary of housing estimates for the County of Los Angeles and the City of Azusa. The County's housing stock was estimated to be 3,546,853 units in January 2018. This represents an increase of approximately 3.0 percent over the estimated 3,445,076 housing units reported in 2010. The vacancy rate in January 2018 was estimated to be approximately 5.9 percent, and the persons per household estimate for occupied units was approximately 3.03. SCAG projections indicate that the number of households within the County are forecast to increase to 3,493,700 in 2020 and to 3,809,300 in 2035.

Table 6-2
Housing Estimates

Year	County of Los Angeles		City of Azusa	
	Dwelling Units	Households	Dwelling Units	Households
Census 2010[1,2]	3,445,076	3,241,204	13,386	12,716
January 2018[3]	3,546,853	3,338,658	14,374	13,517
2010-2018 Change	*+101,777*	*+97,454*	*+988*	*+801*
2010-2018 % Change	*3.0%*	*3.0%*	*7.4%*	*6.3%*
2018 Vacancy Rate[3]	5.9%	--	6.0%	--
2018 Persons per Household[3]	--	3.03	--	3.49
2020 SCAG Forecasts[4,5]	3,699,828	3,493,700	14,734	13,900
2018-2020 Change	*+152,975*	*+155,042*	*+360*	*+383*
2035 SCAG Forecasts[4,5]	4,034,049[4]	3,809,300	15,900	15,000
2018-2035 Change	*+487,196*	*+470,642*	*+1,526*	*+1,483*

Sources:
1. U.S. Census Bureau, *DP-1 Profile of General Population and Housing Characteristics: 2010, 2010 Census Summary File 1, Los Angeles County, California*, 2010.
2. U.S. Census Bureau, *DP-1 Profile of General Population and Housing Characteristics: 2010, 2010 Census Summary File 1, Azusa City, California*, 2010.
3. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 Benchmark*, Sacramento, California, May 1, 2018.
4. Southern California Association of Governments, *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*, http://www.scag.ca.gov/Documents/ 2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed August 29, 2018.
5. Dwelling unit forecasts are based on 2018 vacancy rate.

City of Azusa. The City's housing stock was estimated to be 14,374 units in January 2018 with 13,517 households (occupied housing units). This represents an increase of approximately 7.4 percent over the estimated 13,386 housing units reported in 2010 and an increase in households of 6.3 percent. The vacancy rate in January 2018 was estimated to be approximately 6.0 percent, with the persons per household estimate for occupied units being 3.49. According to SCAG projections, the number of households in the City is expected to be 13,900 in 2020 and 15,000 in 2035.

Employment

County of Los Angeles. According to the California Employment Development Department, the annual average civilian labor force within Los Angeles County totals approximately 5,173,800 as of

July 2018. An estimated 5.1 percent of the County's workforce (261,900 persons) was unemployed.[6] SCAG projections indicate that the number of jobs within the County are forecast to be 4,662,500 in 2020 and 5,062,100 in 2035.[7]

City of Azusa. According to the California Employment Development Department, the annual average civilian labor force within the City totals approximately 25,300 persons as of July 2018. An estimated 4.7 percent of the City's workforce (1,200 persons) was unemployed.[8] SCAG projections indicate that the number of jobs within the City are forecast to be 18,500 in 2020 and 19,800 in 2035.[9]

POPULATION GROWTH

A project could induce population growth in an area either directly or indirectly. More specifically, the development of new residences or businesses could induce population growth directly, whereas the extension of roads or other infrastructure could induce population growth indirectly. The Site is located in a developed area of the City and does not involve the extension of roads or other infrastructure into undeveloped areas; refer to the "Removal of an Impediment to Growth" Section above.

Overall, the Project would increase local employment opportunities during construction and operation. The Project's employment opportunities could directly increase the City's population, as employees (and their families) may choose to relocate to the City. Many factors influence personal housing location decisions (i.e., family income levels and the cost and availability of suitable housing in the local area). Further, many Project employees could already live in the City. Thus, it would be highly speculative to estimate the number of future employees who would relocate to the City. Conservatively assuming that all employees and their families relocate to the City, Project implementation could result in a population increase of 314 persons.[10] For this reason, the Project is considered growth-inducing since it would generate population growth through its provision of an employment-generating land use. However, the Project's potential growth-inducing impacts would be considered less than significant since the nominal increase of 90 jobs would unlikely be held by new residents that choose to relocate to the City. For example, some employees may choose to relocate to a surrounding city where housing opportunities are available, or the jobs created by the Project could be filled in part by individuals that are already residing in the City. As such, impacts would be less than significant in this regard.

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[6] State of California Employment Development Department, Labor Market Information Division, *Monthly Labor Force Data for Cities and Census Designated Places, July 2018 - Preliminary*, August 17, 2018.

[7] Southern California Association of Governments, *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*, http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed August 29, 2018.

[8] State of California Employment Development Department, Labor Market Information Division, *Monthly Labor Force Data for Cities and Census Designated Places, July 2018 - Preliminary*, August 17, 2018.

[9] Southern California Association of Governments, *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*, http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed August 29, 2018.

[10] Project operations would employ approximately 90 employees. Population projections are based on Azusa's estimated 3.49 persons per households; refer to State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 Benchmark*, Sacramento, California, May 1, 2018.

Potential growth-inducing impacts are also assessed based on a Project's consistency with adopted local and regional plans that address growth management. Table 6-3, *Proposed Project Compared to General Plan Growth Forecasts*, compares the Project's population growth to the General Plan's population forecasts for the City at buildout. The City's housing stock is forecast to total approximately 16,371 dwelling units at General Plan buildout, with a resultant population of approximately 56,336 persons; refer to Table 6-3. The Project would increase the City's housing stock by 253 dwelling units (12.7 percent increase) and increase the City's population by 303 persons (4.7 percent increase). It should be noted that the Project's population increase is not proportionally as substantial as the increase in dwelling units because senior housing has a lower household size than the City's average household size of 3.49 persons. As shown in Table 6-3, the Project would not cause the City's General Plan buildout population forecast to be exceeded and thus would induce less than significant population growth in the City with respect to General Plan forecasts.

Table 6-3
Proposed Project Compared to General Plan Growth Forecasts

Description	Dwelling Units	Population
Existing City 2018[1]	14,374	49,954
Proposed Project[2]	253	303
Total City (Including Proposed Project)	*14,627*	*50,257*
General Plan		
General Plan Buildout Forecasts	16,371[3]	56,336[4]
Project's Percent Increase Compared to General Plan Buildout Increase Assumption	+12.7%	+4.7%

Notes:
1. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 Benchmark*, Sacramento, California, May 1, 2018.
2. Population projection based on 303 beds provided by the proposed 253-unit Senior Village.
3. 13,000 existing residential units plus 3,371 planned over 20-year General Plan buildout (*City of Azusa General Plan*, Chapter 3 (The Built Environment), pages 3-4 and 3-87, April 2004.
4. Terry A. Hayes Associates LLC, *City of Azusa General Plan & Development Code Draft EIR*, Section 4.12 (Population & Housing), page 4.12-3, 2004.

Table 6-4, *Proposed Project Compared to SCAG Growth Forecasts*, compares the Project's forecast housing and population growth with SCAG's 2035 growth projections for the City. As indicated in Table 6-4, SCAG projects that the City's housing stock would total 15,900 dwelling units with a resultant population of 53,000 persons by 2035. The Project would increase the City's housing stock by 253 dwelling units (16.6 percent increase) and increase the City's population by 303 persons (9.9 percent increase). As stated above, it should be noted that the Project's population increase is not proportionally as substantial as the increase in dwelling units because senior housing has a lower household size than the City's average household size of 3.49 persons. As indicated in Table 6-4, Project implementation would not exceed SCAG 2020 or 2035 growth forecasts for dwelling units and population with the exception of SCAG 2020 population forecasts by 957 persons.

However, the City's current (2018) population of 49,954 already exceeds SCAG 2020 population forecast of 49,300 persons by 654 persons. General Plan buildout projections form the basis of

SCAG's planning and policy documents, including regional growth forecasts.[11] The accuracy of SCAG's 2020 population projections for the City are reduced due to the considerable amount of time that has passed since General Plan adoption (adopted in April 2004). Further, the growth forecasts noted in Table 6-4 are highly conservative, as not all Project employees are expected to move to the City and some employees may already live locally. Additionally, compared to the City's existing population, the project would nominally increase the City's population by approximately 0.6 percent. As a result, the Project would not result in a significant impact related to population growth with respect to SCAG forecasts. Impacts would be less than significant.

Table 6-4
Proposed Project Compared to SCAG Growth Forecasts

Description	Dwelling Units	Population
Existing City 2018[1]	14,374	49,954
Proposed Project[2]	253	303
Total City (Including Proposed Project)	*14,627*	*50,257*
SCAG 2016 RTP		
SCAG 2020 Forecasts[3, 4]	14,734	49,300
Project's Percent Increase Compared to SCAG 2020 Buildout Increase Assumption	+70.3%	*-46.3%*
SCAG 2035 Forecasts[3, 4]	15,900	53,000
Project's Percent Increase Compared to SCAG 2035 Buildout Increase Assumption	+16.6%	+9.9%

Notes:
1. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 Benchmark*, Sacramento, California, May 1, 2018.
2. Population projection based on 303 beds provided by the proposed 253-unit Senior Village.
3. Southern California Association of Governments, *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*, http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed August 29, 2018.
4. Dwelling unit forecasts are based on 2018 vacancy rate.

PRECEDENT SETTING ACTION

Project implementation would require the approval of discretionary actions; however, the Project would not set a precedent for future projects with similar characteristics. The proposed Specific Plan would require the following approvals and adoptions:

- Adoption of the California Grand Village Azusa Greens Specific Plan;
- Approval of a General Plan Amendment (to change the land use designation from Open Space to Specific Plan);
- Approval of a Zone Change (to change zoning from Recreation to Specific Plan);

[11] Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Community Strategy*, Demographics & Growth Forecast Appendix, page 1, December 2015.

- Approval of a Tentative Tract Map (to subdivide the property to create the 4.48-acre parcel for development of the Senior Village); and

- Design Review (to evaluate the Senior Village for consistency with the permitted uses, development/design standards, and requirements per the proposed California Grand Village Azusa Greens Specific Plan).

Additionally, the proposed golf course reconfiguration would require the following approvals:

- Approval of the golf course reconfiguration plan;

- Approval of a Tentative Tract Map (to subdivide the property to separate the 4.48-acre Specific Plan Area from the Golf Course Reconfiguration Area); and

- Design Review (to evaluate the proposed golf course reconfiguration plan for consistency with the Municipal Code).

The approval of these actions would not set a precedent that would make it more likely for other projects in the region to gain approval of similar applications. The Specific Plan would only regulate future land development within the Specific Plan Area and would limit permitted uses and require development of the Senior Village to comply with listed development standards and design guidelines. While the Specific Plan would result in the development of residential uses in a predominantly industrial area (West End Light Industrial District), the Specific Plan Area is also directly adjacent to existing residential uses (Rancho Azusa) to the north across West Sierra Madre Avenue and would be compatible with the neighboring community. The introduction of the proposed Senior Village in the West End Light Industrial District would not be a precedent setting action to allow more residential uses in the West End Light Industrial District. Nearly the entire western portion of Azusa is designated and zoned for industrial use and does not have the typical amenities and uses that residential projects require to ensure a market demand for housing. These amenities and uses include commercial shopping plazas with anchor stores, parks, schools, offices, and neighborhood-serving retail uses. Future residential projects would likely be sited in other areas of the City that are more compatible with residential use. Further, future projects would also be required to complete applicable environmental review on a project-by-project basis. As such, the proposed Project would not involve a precedent setting action that could significantly affect the environment.

DEVELOPMENT OR ENCROACHMENT OF OPEN SPACE

The Project is sited within a highly urbanized portion of Azusa and is currently developed as a golf course and surrounded on all sides by development. Development of the Senior Village would result in the loss of approximately 4.48 acres of designated open space currently developed with a portion of the Azusa Greens golf course. As detailed in Section 5.1, *Land Use and Planning*, the Project would be required to implement Mitigation Measure LU-1, which requires the Project Applicant to allocate sufficient lands as permanent open space for recreation, visual amenity, and/or environmental resources protection by dedication, easement, or other City technique, such as mitigation payment. Compliance with Mitigation Measure LU-1 would reduce impacts in this regard to less than significant levels. Nevertheless, the Project would still result in the loss of 4.48 acres of open space and is considered growth inducing with respect to encroachment on open space.

SUMMARY

Overall, Project implementation would create new jobs and would consequently foster economic expansion and population growth. Development of the Senior Village would result in the loss of 4.48 acres of designated open space and thus, would encroach onto existing open space in the City. However, Project implementation would not be considered growth inducing, inasmuch as it would not remove an impediment to growth and would not establish a precedent setting action. Additionally, the Project would not foster significant unanticipated population growth in the Site vicinity. Project impacts would be less than significant in this regard.

6.4 ENERGY CONSERVATION

Public Resources Code Section 21100(b)(3) and *CEQA Guidelines* Section 15126.4 require EIRs to describe, where relevant, the wasteful, inefficient, and unnecessary consumption of energy caused by a project. In 1975, largely in response to the oil crisis of the 1970s, the California State Legislature adopted Assembly Bill 1575 (AB 1575), which created the California Energy Commission (CEC). The statutory mission of the CEC is to forecast future energy needs, license thermal power plants of 50 megawatts or larger, develop energy technologies and renewable energy resources, plan for and direct state responses to energy emergencies, and perhaps most importantly, promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code Section 21100(b)(3) to require EIRs to consider the wasteful, inefficient, and unnecessary consumption of caused by a project. Thereafter, the State Resources Agency Created Appendix F of the *CEQA Guidelines*.

CEQA Guidelines Appendix F is an advisory document that assists EIR preparers in determining whether a project results in the inefficient, wasteful, and unnecessary consumption of energy. The discussion below, analyzes the Project's effect on energy consumption impacts on energy resources.

6.4.1 PROJECT ENERGY CONSUMPTION

Energy consumption is analyzed in this EIR due to the potential direct and indirect environmental impacts associated with the Project. Such impacts include the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and emissions of pollutants during both construction and operations.

ELECTRICITY/NATURAL GAS SERVICES

Southern California Edison (SCE) provides electrical services in Los Angeles County (and to the City) through State-regulated public utility contracts. Over the past 15 years, electricity generation in California has undergone a transition. Historically, California has relied heavily on oil- and gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system has become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric plants. Unlike petroleum production, generation of electricity is usually not tied to the location of the fuel source and can be delivered great distances via the electrical grid. The generating capacity of a unit of electricity is expressed in megawatt (MW). One MW provides enough energy to power 1,000 average California homes per day. Net generation refers to the gross amount of energy

produced by a unit, minus the amount of energy the unit consumes. Generation is typically measured in megawatt-hours (MWh), kilowatt-hours (kWh), or gigawatt-hours (GWh).

The Southern California Gas Company (SCG) provides natural gas services to the City. Natural gas is a hydrocarbon fuel found in reservoirs beneath the earth's surface and is composed primarily of methane (CH_4). It is used for space and water heating, process heating and electricity generation, and as transportation fuel. Use of natural gas to generate electricity is expected to increase in coming years because it is a relatively clean alternative to other fossil fuels like oil and coal. In California and throughout the western United States, many new electrical generation plants that are fired by natural gas are being brought online. Thus, there is great interest in importing liquefied natural gas from other parts of the world. Nearly 45 percent of the electricity consumed in California was generated using natural gas.[12] While the supply of natural gas in the United States and production has increased greatly, California produces little, and imports 90 percent of its natural gas.[13]

Electricity and natural gas service is available to locations where land uses could be developed. The City's ongoing development review process includes a review and comment opportunity for privately owned utility companies, including SCE, to allow informed input from each utility company on all development proposals. The input facilitates a detailed review of all projects by service purveyors to assess the potential demands for utility services on a project-by-project basis. The ability of utility providers to provide services concurrently with each project is evaluated during the development review process. Utility companies are bound by contract to update energy systems to meet any additional demand.

ENERGY USAGE

Energy usage is typically quantified using the British Thermal Unit (BTU). Total energy usage in California was 7,830.3 trillion BTU in 2016 (the most recent year for which this specific data is available), which equates to an average of 198 million BTU per capita.[14] Of California's total energy usage, the breakdown by sector is 40 percent transportation, 24 percent industrial, 19 percent commercial, and 17 percent residential.[15] Electricity and natural gas in California are generally consumed by stationary users such as residences and commercial and industrial facilities, whereas petroleum consumption is generally accounted for by transportation-related energy use. In 2017, taxable gasoline sales (including aviation gasoline) in California accounted for 15,540,154,774 gallons of gasoline.[16]

The electricity consumption attributable to Los Angeles County from 2007 to 2016 is shown in Table 6-5, *Electricity Consumption in Los Angeles County 2007-2016*. As indicated in Table 6-5, energy consumption in Los Angeles County remained relatively constant between 2007 and 2016, with no substantial increase.

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[12] California Energy Commission, *Supply and Demand of Natural Gas in California*, http://www.energy.ca.gov/almanac/naturalgas_data/overview.html, accessed August 29, 2018.

[13] Ibid.

[14] United States Energy Information Administration, *Table F30: Total Energy Consumption, Price, and Expenditure Estimates, 2016*, https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_te.html&sid=US, accessed August 29, 2018.

[15] Ibid.

[16] California Department of Tax and Fee Administration, N*et Taxable Gasoline Gallons*, http://www.cdtfa.ca.gov/taxes-and-fees/MVF-10-Year-Report.pdf, accessed August 29, 2018.

Table 6-5
Electricity Consumption in Los Angeles County 2007-2016

Year	Electricity Consumption (in millions of kilowatt hours)
2007	71,231
2008	72,063
2009	69,937
2010	68,243
2011	68,133
2012	69,204
2013	68,311
2014	69,886
2015	69,750
2016	69,614

Source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed August 29, 2018.

The natural gas consumption in Los Angeles County from 2007 to 2016 is shown in Table 6-6, *Natural Gas Consumption in Los Angeles County 2007-2016*. Similar to energy consumption, natural gas consumption in Los Angeles County remained relatively constant between 2007 and 2016, with no substantial increase.

Table 6-6
Natural Gas Consumption in Los Angeles County 2007-2016

Year	Natural Gas Consumption (in millions of therms)
2007	2,996
2008	2,965
2009	2,897
2010	3,047
2011	3,055
2012	2,985
2013	3,065
2014	2,793
2015	2,760
2016	2,869

Source: California Energy Commission, *Gas Consumption by County*, http://www.ecdms.energy.ca.gov/gasbycounty.aspx, accessed August 29, 2018.

GASOLINE/DIESEL FUELS

Automotive fuel consumption in Los Angeles County from 2007 to 2017 is shown in Table 6-7, *Automotive Fuel Consumption in Los Angeles County 2007-2017* (projections for the year 2018 are also shown). As shown in Table 6-7, on-road automotive fuel consumption in Los Angeles County has declined steadily since 2007. Heavy-duty vehicle fuel consumption dropped in 2008 and 2009 and since then has steadily risen.

Table 6-7
Automotive Fuel Consumption in Los Angeles County 2007-2017

Year	On-Road Automotive Fuel Consumption (Gallons)	Heavy-Duty Vehicle/ Diesel Fuel Consumption (Gallons)
2007	4,387,344,231	544,064,044
2008	4,207,951,324	492,780,305
2009	4,188,322,607	443,717,592
2010	4,169,713,239	462,501,798
2011	4,096,391,978	474,228,155
2012	4,003,486,947	476,704,241
2013	3,981,445,096	490,206,142
2014	3,995,029,340	502,689,188
2015	3,995,919,751	524,780,208
2016	3,986,927,263	545,516,966
2017	3,951,229,327	560,204,257
2018 (projected)	3,866,914,629	575,557,071

Source: California Air Resources Board, EMFAC2014.

6.4.2 REGULATORY SETTING

The following is a description of State and local environmental laws and policies that are relevant to the CEQA review process.

STATE OF CALIFORNIA

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24)

In 1978, the CEC established Title 24, California's energy efficiency standards for residential and non-residential buildings, in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and non-residential buildings. In 2013, the CEC updated Title 24 standards with more stringent requirements. The 2016 standards substantially reduce electricity and natural gas consumption. Additional savings result from the application of the standards on building alterations. For example, requirements for cool roofs, lighting, and air distribution ducts are expected to save additional electricity. These savings are cumulative, doubling as years go by. The 2016 standards have been approved and went into effect on January 1, 2017. California's energy efficiency standards are updated on an approximate three-year cycle.

CALIFORNIA GREEN BUILDING CODE

The California Green Building Code (California Code of Regulations, Title 24, Part 11), is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. California Green Building Code standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency;

water efficiency and conservation; material conservation and resource efficiency; and environmental quality. The California Green Building Code also provides voluntary tiers and measures that local governments may adopt to encourage or require additional measures in the five green building topics. The most recent update to the California Green Building Code was adopted in 2016 and went into effect January 1, 2017.

RECENT CEQA LITIGATION

In California, *Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173 ("CCEC"), the Court observed that *CEQA Guidelines* Appendix F lists environmental impacts and mitigation measures that an EIR may include. *CEQA Guidelines* Appendix F, Section II(C) states that EIRs may include a discussion of the following energy impacts:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.

3. The effects of the project on peak and base period demands for electricity and other forms of energy.

4. The degree to which the project complies with existing energy standards.

5. The effects of the project on energy resources.

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

6.4.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA

In accordance with the *CEQA Guidelines*, the effects of a project are evaluated to determine whether they would result in a significant adverse impact on the environment. An EIR is required to focus on these effects and offer mitigation measures to reduce or avoid any significant impacts that are identified. The criteria used to determine the significance of impacts may vary depending on the nature of the project. Because Appendix F does not include specific significance criteria, the following threshold is based on the goal of Appendix F. Therefore, a project may have a significant impact related to energy, if it would:

- Develop land uses and patterns that cause wasteful, inefficient, and unnecessary consumption of energy or construct new or retrofitted buildings that would have excessive energy requirements for daily operation.

METHODOLOGY

The impact analysis focuses on the three sources of energy that are relevant to the proposed Project: electricity, natural gas, and transportation fuel for vehicle trips associated with new development as well as the fuel necessary for Project construction. The analysis of electricity/natural gas usage is based on California Emissions Estimator Model (CalEEMod) greenhouse gas (GHG) emissions modeling, which quantifies energy use for occupancy. The results of the CalEEMod modeling are included in Appendix 11.9, *Air Quality/Greenhouse Gas Analysis*. Modeling was based primarily on the default settings in the computer program for Los Angeles County. The amount of operational fuel use was estimated using the California Air Resources Board's Emissions Factor 2014 (EMFAC2014) computer program, which provides projections for typical daily fuel usage in Los Angeles County. The results of EMFAC2014 modeling and construction fuel estimates are included in Appendix 11.9.

6.4.4 ENERGY CONSUMPTION

The Project's estimated energy consumption is summarized in Table 6-8, *Energy Consumption*. As shown in Table 6-8, the electricity usage as a result of the Project would constitute an approximate 0.003 percent increase over Los Angeles County's typical annual electricity consumption and an approximate 0.002 percent increase in the typical annual natural gas consumption in Los Angeles County. The Project-related vehicle fuel consumption would increase Los Angeles County's consumption by 0.003 percent.

Table 6-8
Energy Consumption

Energy Type	Project Annual Energy Consumption[1]	Los Angeles County Annual Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption	1,951 MWh	69,614,000 MWh	0.003%
Natural Gas Consumption	50,487 therms	2,869,000,000 therms	0.002%
Fuel Consumption			
• Construction (Heavy-Duty Diesel Vehicle) Fuel Consumption[3]	60,121 gallons	575,557,071 gallons	0.0001%
• Operational Automotive Fuel Consumption[3]	121,805 gallons	3,866,914,629 gallons	0.003%

Notes:
1. As modeled in CalEEMod version 2016.3.2.
2. The Project increases in electricity and natural gas consumption are compared with the total consumption in Los Angeles County in 2016. The Project increases in automotive fuel consumption are compared with the projected Countywide fuel consumption in 2018.
3. Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board EMFAC2014 model.

CONSTRUCTION-RELATED ENERGY CONSUMPTION

Project construction would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during Site clearing, grading, and construction. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The Project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest in minimizing the cost of doing business.

As indicated in Table 6-8, the Project's fuel from construction would be 60,121 gallons, which would increase fuel use in the County by 0.0001 percent. As such, construction would have a nominal effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. As such, a less than significant impact would occur in this regard.

OPERATIONAL ENERGY CONSUMPTION

TRANSPORTATION ENERGY DEMAND

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Table 6-8 provides an estimate of the daily fuel consumed by vehicles traveling to and from the Site. As indicated in Table 6-8, Project operations is estimated to consume approximately 121,805 gallons of fuel per year, which would increase the Los Angeles County's automotive fuel consumption by 0.003 percent. The Project would not result in any unusual characteristics that would result in excessive operational fuel consumption. Fuel consumption associated with Project-related vehicle trips would

not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. As such, a less than significant impact would occur in this regard.

ELECTRICITY DEMAND

The Project would consume energy for interior and exterior lighting, heating/ventilation and air conditioning (HVAC), refrigeration, electronics systems, appliances, and security systems, among other things. The Project would be required to comply with Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage. Furthermore, the electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources, which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures projects would not result in the waste of the finite energy resources. As indicated in Table 6-8, operational energy consumption would represent an approximate 0.003 percent increase in electricity consumption over the current Countywide usage. Therefore, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy, and impacts in this regard would be less than significant.

As indicated in Table 6-8, operational energy consumption would represent an approximate 0.003 percent increase in electricity consumption and a 0.002 percent increase in natural gas consumption over the current Countywide usage. The Project would adhere to all Federal, State, and local requirements for energy efficiency, including the Title 24 standards, as well as the Project's design features. The Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Additionally, the Project would not result in a substantial increase in demand or transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure.

CONCLUSION

The Project would be subject to compliance with all Federal, State, and local requirements for energy efficiency. As shown in Table 6-8, the increase in electricity and natural gas over existing conditions is minimal. The increase in automotive fuel consumption is approximately 0.003 percent in Los Angeles County as a result of the Project. For the reasons described above, the Project would not place a substantial demand on regional energy supply or require significant additional capacity, or significantly increase peak and base period electricity demand, or cause wasteful, inefficient, and unnecessary consumption of energy during Project construction, operation, and/or maintenance, or preempt future energy development or future energy conservation. Project impacts would be less than significant in this regard.