6.0 Other CEQA Considerations

6.0 OTHER CEQA CONSIDERATIONS

6.1 LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT

Pursuant to CEQA Guidelines §15126.2, the following is a discussion of short-term uses of the environment and the maintenance and enhancement of long-term productivity. If the proposed Project is approved and constructed, a variety of short- and long-term impacts would occur on a local level. During Project grading and construction, portions of surrounding uses may be temporarily impacted by dust and noise. Short-term soil erosion may also occur during grading. 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 compliance with regulatory rules and requirements, and compliance with the *Burbank Municipal Code* (BMC); refer to Section 5.0, *Environmental Analysis*, and Section 8.0, *Effects Found Not To Be Significant*.

The proposed Project would create long-term environmental consequences associated with the conversion of a partially improved site to a fully improved office development within the existing Media Studios campus. Project development 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 (mechanical, landscaping, etc.) sources, hydrology and water quality impacts, and increased energy and natural resource consumption. Incremental degradation of local and regional air quality would also occur due to 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 BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

According to CEQA Guidelines §§ 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Project be implemented. As stated in CEQA Guidelines §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 likely, 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. Consumption would occur during the Project's construction phase 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 Project site. Project construction would require the consumption of resources that are not

renewable/replenishable 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 of Burbank. Project operations would involve consumption of 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 Project's energy consumption. Nonetheless, the Project's energy requirements would represent a long-term commitment of essentially non-renewable resources.

Limited use of potentially hazardous materials typical of office uses, including minor amounts of cleaning products and waste, along with the occasional use of pesticides and herbicides for landscape maintenance, are the extent of hazardous materials anticipated to be used on-site. The use of these materials would be in small quantities and used, handled, stored, and disposed of in accordance with the manufacturer's instructions and 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 that would limit the availability of these resource quantities for future generations or for other uses during the life of the Project. However, continued use of such resources would 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

As required by the CEQA Guidelines, an EIR must include a discussion of the ways in which a project could directly or indirectly foster economic development or population growth, or the construction of additional housing and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines §15126.2(d)). Growth can be induced in many 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. Under CEQA, induced growth is not considered necessarily beneficial, detrimental, or of little significance to the environment.

In general, a project may 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 §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

Although the Project would increase demands for public services (i.e., fire and police protection) and utilities and service systems (water, wastewater, stormwater, and solid waste), the Project would occur largely as infill development. The City of Burbank and Media Studios campus is already served by utilities and service systems. As discussed in Section 8.0, these facilities can be readily upgraded and/or extended to serve the proposed development. Project demands for utility and service systems would not reduce or impair any existing or future levels of utility services, either locally or regionally, as costs for increases in utility and service systems would be provided through cooperative agreements between the proposed development and servicing agencies. As systems are readily available for expansion and/or extension into the Project site, the proposed Project would not remove an impediment to growth associated with establishment of an essential public service and is not considered growth-inducing in this regard.

The Project would occur as infill development within an urbanized area slated for development and already supported by existing transportation systems. As discussed in Section 5.4, *Transportation/Traffic*, the Media Studios Campus and Project vicinity is currently served by local streets, secondary arterials, and major arterials. Project implementation would not provide new access to an area. Thus, the proposed Project would not remove an impediment to growth associated with 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 of Burbank totals approximately 59,100 persons as of December 2017.[1] The Project would foster construction-related jobs during Project construction. However, these jobs would be temporary and would not be growth-inducing. Project operations would result in a nominal increase in the City's employment base (approximately 503 employees or approximately 0.85 percent greater than December 2017 conditions). The forecast employment growth would slightly increase the City's revenue base resulting from increased employment; however, due to the nature and scale of development, Project implementation is not anticipated to result in significant jobs or economic growth. Additional economic growth opportunities within the City are a beneficial impact and implementing the proposed Project would not conflict with *Burbank2035 General Plan* (Burbank2035).

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 2017, the County of Los Angeles had a population of 10,241,278 people.[2] This represents an increase of approximately 4.3 percent over the County's 2010 population of 9,818,605.[3]

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 will reach 10,326,200 by 2020 and 11,145,100 by 2035.[4]

City of Burbank. Table 6-1, *Population Estimates*, provides a summary of both 2010 and 2017 population estimates for Los Angeles County and the City of Burbank. On a local level, Burbank's January 2017 population was 105,033. This represents an increase of approximately 1.6 percent over the City's 2010 population of 103,340. SCAG projects that the City's population will reach 107,900 by 2020 and 116,500 by 2035.

[1] State of California Employment Development Department, Labor Market Division, *Labor Force and Unemployment Rate for California Sub-County Areas*, December 2017.

[2] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017, With 2010 Benchmark*, Sacramento, California, May 2017.

[3] State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 2000-2010*, Sacramento, California, November 2012.

[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 February 2, 2018.

Table 6-1
Population Estimates

Year	County of Los Angeles	City of Burbank
Population		
2010 Census[1]	9,818,605	103,340
January 2017[2]	10,241,278	105,033
2010 – 2017 Change	+422,673	+1,693
2010 – 2017 % Change	4.1%	1.6%
2020 SCAG Forecasts[3]	10,326,200	107,900
2017 – 2020 Change	+84,922 (0.8%)	+ 2,867 (2.7%)
2035 SCAG Forecasts[3]	11,145,100	116,500
2017 – 2035 Change	+903,822 (8.8%)	+11,467 (9.8%)

Notes:
1. State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 2000-2010*, Sacramento, California, November 2012.
2. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017, With 2010 Benchmark*, Sacramento, California, May 2017.
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 February 2, 2018.

HOUSING

County of Los Angeles. Table 6-2, *Housing Estimates*, provides a summary of housing estimates for Los Angeles County and the City of Burbank. The County's housing stock was estimated to be 3,527,312 units in January 2017. This represents an increase of approximately 2.5 percent over the estimated 3,443,087 housing units reported in 2010. The vacancy rate in January 2017 was estimated to be approximately 5.7 percent, and the persons per household estimate for occupied units was approximately 3.02. SCAG projections indicate that the number of households within the County will increase to 3,493,700 in 2020 and to 3,809,300 in 2035.

Table 6-2
Housing Estimates

Year/Description	County of Los Angeles		City of Burbank	
	Dwelling Units	Households	Dwelling Units	Households
Census 2010[1]	3,443,087	3,239,280	44,309	41,940
January 2017[2]	3,527,312	3,326,188	44,623	41,876
2010 – 2017 Change	+84,225	+86,908	+314	-64
2010 – 2017 % Change	2.5%	2.7%	0.7%	-0.15%
2017 Vacancy Rate[2]	5.7%	--	6.2%	--
2017 Persons per Household[2]	--	3.02	--	2.50
2020 SCAG Forecasts[3,4]	3,692,841	3,493,700	47,047	44,300
2017 – 2020 Change	165,529 (4.7%)	167,512 (5.0%)	+2,424 (5.2%)	+2,424 (5.5%)
2035 SCAG Forecasts[3,4]	4,026,430[4]	3,809,300	50,551	47,600
2017 – 2035 Change	499,118 (14.2%)	483,112 (14.5%)	+5,928 (11.7%)	+5,724 (5.5%)

Notes:
1. State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 2000-2010*, Sacramento, California, November 2012.
2. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017, With 2010 Benchmark*, Sacramento, California, May 2017.
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 February 2, 2018.
4. Dwelling unit forecasts are based on 2017 vacancy rate.

City of Burbank. The City's housing stock was estimated to be 44,623 units in January 2017 with 41,876 households (occupied housing units). This represents an increase of approximately 0.7 percent over the estimated 44,309 housing units reported in 2010 and a reduction in households of 0.15 percent. The vacancy rate in January 2017 was estimated to be approximately 6.2 percent, with the persons per household estimate for occupied units being 2.50. According to SCAG projections, the number of households in the City is expected to be 44,300 in 2020 and 47,600 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 5,126,200 as of December 2017. An estimated 4.2 percent of the County's workforce (214,200 persons) was unemployed.[5] SCAG projections indicate that the number of jobs within the County will be 4,662,500 in 2020 and 5,062,100 in 2035.[6]

City of Burbank. According to the California Employment Development Department, the annual average civilian labor force within the City of Burbank totals approximately 59,100 persons as of December 2017. An estimated 3.4 percent of the City's workforce (2,000 persons) was unemployed.[7] SCAG projections indicate that the number of jobs within the City will be 51,700 in 2020 and 56,700 in 2035.[8]

POPULATION GROWTH

A project could induce 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). The Project would be served by existing local streets and primary and secondary arterials within the Project vicinity and does not involve the extension of roads or other infrastructure into undeveloped areas; refer to the *Removal of an Impediment to Growth* discussion above.

As discussed above, the Project would increase the City's employment as a result of new non-residential development to the area. Employment growth could result in direct growth in the City's population, because future employees (and their families) may relocate to the City. Estimating the number of these future employees who would relocate to the City would be highly speculative, because 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, Project employees may already reside within the City. Conservatively assuming all 503 new employees relocate to Burbank, Project implementation could result in a potential population increase of approximately 1,258 persons.[9] Thus, the Project is considered growth-inducing since it could foster population growth in the City through development of new employment-generating land uses.

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[5] State of California Employment Development Department, Labor Market Division, *Monthly Labor Force Data for Counties*, December 2017.

[6] 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 February 2, 2018.

[7] State of California Employment Development Department, Labor Market Division, *Labor Force and Unemployment Rate for California Sub-County Areas*, December 2017.

[8] 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 February 2, 2018.

[9] Population projection is based on Burbank's estimated 2.50 persons per household (State of California, Department of Finance, E-*5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017, With 2010 Benchmark*, Sacramento, California, May 2017).

Potential growth-inducing impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. Table 6-3, *Proposed Project Compared to Burbank2035 Growth Forecasts*, compares the proposed Project's population and housing growth to Burbank2035's population and housing forecasts for the City at the projected 2035 buildout. The City's housing stock is forecast to total approximately 50,219 dwelling units at buildout, with a resultant population of approximately 116,516 persons; refer to Table 6-3. The Project does not involve the development of new residential uses and therefore, the City's housing stock would remain unchanged. The proposed Project would not cause the City's buildout population forecast to be exceeded. Therefore, Project implementation would induce less than significant population growth in the City with respect to Burbank2035 forecasts.

Table 6-3
Proposed Project Compared to Burbank2035 Growth Forecasts

Description	Dwelling Units	Population
Existing City 2017[1]	44,623	105,033
Proposed Project[2]	*0*	*1,258*
Total City (including Project)	44,623	106,291
Burbank2035		
Burbank2035 Buildout Forecasts	50,219[3]	116,516[3]
Burbank2035 Buildout Compared to City (including Project)	5,596	10,225
Burbank2035 Buildout Compared to City (including Project) Percentage	11.14%	8.78%

Notes:
1. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017, With 2010 Benchmark*, Sacramento, California, May 2017.
2. Anticipated Project-related population increase is based on the Project generating 503 new jobs and Burbank's estimated 2.50 persons per household (State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017, With 2010 Benchmark*, Sacramento, California, May 2017).
3. City of Burbank, *Burbank2035 General Plan*, Table LU-2 (Burbank2035 Development Capacity), page 3-25, February 19, 2013.

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 the City's housing stock would total 50,551 dwelling units, with a resultant population of approximately 116,500 persons by 2035. The City's housing stock is currently 44,623 dwelling units and would not change as a result of the proposed Project. There is potential for the proposed office use to generate new jobs that may result in future employees choosing to relocate to the City. If all 503 new employees associated with the Project relocate to the City, it could result in an additional 1,258 people with a resultant population of approximately 106,291 persons. SCAG forecasts a population of 116,500 by 2035; as such, the proposed Project would not cause SCAG's population forecasts to be exceeded. Therefore, Project implementation would induce less than significant population growth in the City with respect to SCAG's forecasts.

Table 6-4
Proposed Project Compared to SCAG Growth Forecasts

Description	Dwelling Units	Population
Existing City 2017[1]	44,623	105,033
Proposed Project[2]	***0***	***1,258***
Total City (including Project)	44,623	106,291
SCAG 2016 RTP		
SCAG 2035 Forecasts[3,4]	50,551	116,500
SCAG 2035 Compared to City (including Project)	-5,928	-10,209
SCAG 2035 Compared to City (including Project) Percentage	-11.7%	-8.76%

Notes:
1. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017, With 2010 Benchmark*, Sacramento, California, May 2017.
2. Anticipated Project-related population increase is based on Burbank's estimated 2.50 persons per household (State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017, With 2010 Benchmark*, Sacramento, California, May 2017).
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 February 2, 2018.
4. Dwelling unit forecasts are based on Burbank's 2017 vacancy rate of 6.2%.

PRECEDENT SETTING ACTION

The proposed Project would not require a general plan or zoning amendment; thus, the proposed Project would not be considered growth inducing with respect to a precedent setting action.

DEVELOPMENT OR ENCROACHMENT OF OPEN SPACE

The Project site is situated within a highly urbanized area of Burbank and has been partially graded and improved as a surface parking lot; refer to Section 8.0. Thus, the proposed Project would not be growth-inducing with respect to development or encroachment into an isolated or adjacent area of open space.

SUMMARY

Overall, Project implementation would foster economic expansion and population growth. However, it would not be growth inducing, since it would not remove an impediment to growth, would not establish a precedent setting action, and would not develop or encroach into an isolated or adjacent area of open space. The proposed Project would not foster significant unanticipated growth in the Project area or region and would be consistent with Burbank2035. Development within the Project site would not require substantial development of unplanned and unforeseen support uses and services.

6.4 ENERGY CONSERVATION

Public Resources Code §21100(b)(3) and CEQA Guidelines Appendix F require a description (where relevant) of the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Appendix F of the CEQA Guidelines provides guidance for assessing potential impacts that a project could

have on energy supplies, focusing on the goal of conserving energy by ensuring that projects use energy wisely and efficiently.

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 Project construction and operations.

ELECTRICITY/NATURAL GAS SERVICES

Burbank Water and Power (BWP) provides electricity services to the City of Burbank. According to the *Burbank2035 General Plan Environmental Impact Report* (Burbank2035 EIR), BWP power plants generate approximately 40 to 50 percent of their electricity from natural gas obtained from Southern California Gas Company (SCG). The remaining 50 to 60 percent is imported from remote facilities which use a mix of coal, nuclear, hydroelectric, and wind-based resources.

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 megawatts (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).

According to Burbank2035, SCG provides natural gas services to Burbank businesses and residents and to BWP for use in its power plants. 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.[10] 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.[11]

Electricity and natural gas service is available to locations where land uses could be developed. Burbank's ongoing development review process includes a review and comment opportunity for BWP and privately-owned utility companies, including SCG, 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

[10] California Energy Commission, *Supply and Demand of Natural Gas in California*, http://www.energy.ca.gov/almanac/naturalgas_data/overview.html, accessed February 2, 2018.

[11] Ibid.

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 7,676 trillion BTU in 2015 (the most recent year for which this specific data is available), which equates to an average of 197 million BTU per capita.[12] Of California's total energy usage, the breakdown by sector is 39 percent transportation, 24 percent industrial, 19 percent commercial, and 18 percent residential. 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.[13] In 2017, taxable gasoline sales (including aviation gasoline) in California accounted for 12,978,662,861 gallons of gasoline.[14]

The electricity consumption attributable to Los Angeles County from 2006 to 2016 is shown in Table 6-5, *Electricity Consumption in Los Angeles County 2006-2016*. As indicated in Table 6-5, energy consumption in Los Angeles County remained relatively constant between 2006 and 2016, with no substantial increase.

The natural gas consumption attributable to nonresidential land uses in Los Angeles County from 2006 to 2016 is shown in Table 6-6, *Natural Gas Consumption in Los Angeles County 2006-2016*. Similar to energy consumption, natural gas consumption in Los Angeles County remained relatively constant between 2006 and 2016, with no substantial increase.

Table 6-5
Electricity Consumption in Los Angeles County 2006-2016

Year	Electricity Consumption (in millions of kilowatt hours)
2006	70,912
2007	71,227
2008	72,050
2009	69,921
2010	68,227
2011	68,117
2012	69,163
2013	68,364
2014	69,932
2015	69,529
2016	69,614

Source: California Energy Commission, *Electricity Consumption by County*, http://ecdms.energy.ca.gov/elecbycounty.aspx, accessed February 2, 2018.

[12] United States Energy Information Administration, *California State Profile and Energy Estimates*, http://www.eia.gov/state/data.cfm?sid=CA#ConsumptionExpenditures and https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_te.html&sid=US&sid=CA, accessed February 2, 2018.

[13] Ibid.

[14] California Department of Tax and Fee Administration, *Fuel Taxes Statistics and Report: Net Taxable Gasoline Gallons*, http://www.cdtfa.ca.gov/taxes-and-fees/MVF-10-Year-Report.pdf, accessed February 2, 2018.

Table 6-6
Natural Gas Consumption in Los Angeles County 2006-2016

Year	Natural Gas Consumption (in millions of therms)
2006	3,001
2007	2,990
2008	3,011
2009	2,955
2010	3,124
2011	3,061
2012	2,993
2013	3,129
2014	2,858
2015	2,823
2016	2,869

Source: California Energy Commission, *Gas Consumption by County*, http://ecdms.energy.ca.gov/gasbycounty.aspx, accessed February 2, 2018.

GASOLINE/DIESEL FUELS

Automotive fuel consumption in Los Angeles County from 2006 to 2017 is shown in Table 6-7, *Automotive Fuel Consumption in Los Angeles County 2006-2017*, (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 2006. Heavy-duty vehicle fuel consumption dropped from 2006 through 2009 and has steadily risen since.

Table 6-7
Automotive Fuel Consumption in Los Angeles County 2006-2017

Year	On-Road Automotive Fuel Consumption (Gallons)	Heavy-Duty Vehicle/ Diesel Fuel Consumption (Gallons)
2006	4,433,712,497	674,202,215
2007	4,387,344,231	672,794,004
2008	4,207,951,324	617,475,091
2009	4,188,322,607	564,668,251
2010	4,169,713,239	587,354,542
2011	4,096,391,978	598,739,330
2012	4,003,486,947	600,216,552
2013	3,981,445,096	614,575,396
2014	3,995,029,340	630,481,144
2015	3,995,919,751	656,131,383
2016	3,986,927,263	679,846,446
2017	3,951,229,328	696,978,973
2018 (projected)	3,866,914,629	712,059,951

Source: California Air Resources Board, *EMFAC2014 Web Database v1.0.7*, https://www.arb.ca.gov/emfac/2014/, Accessed February 6, 2018.

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 California Energy Commission (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 Standards

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, 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. CALGreen 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. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen 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. Potential impacts requiring EIR discussion include:

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 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, the proposed Project would 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 C, *Air Quality/Greenhouse Gas/HRA Data*. 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 C.

Energy consumption impacts are analyzed below according to topic.

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 0.002 percent increase over Los Angeles County's typical annual electricity consumption and an approximate 0.001

percent increase in the typical annual natural gas consumption in Los Angeles County. The Project-related vehicle fuel consumption would nominally 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	Percentage Increase Countywide[2]
Electricity Consumption	1,670 MWh	69,614,000 MWh	0.002%
Natural Gas Consumption	24,639 therms	2,869,000,000 therms	0.001%
Fuel Consumption			
• Construction (Heavy-Duty Diesel Vehicle) Fuel Consumption[3]	50,857 gallons	575,557,071 gallons	0.009%
• Operational Automotive Fuel Consumption[3]	131,667 gallons	3,866,914,629 gallons	0.003%

Notes:
1. As modeled in CalEEMod version 2016.3.1.
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 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 50,857 gallons, resulting in an increase in fuel use in the County by 0.009 percent. As such, Project 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 Project site. As indicated in Table 6-8, operation of the Project is estimated to consume approximately 131,667 gallons per of fuel per year increasing the Los Angeles County's automotive fuel consumption by 0.003 percent. The Project proposes the construction of a 160,447-adjusted gross square foot office space above subterranean parking. 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.

Electricity Demand

The proposed 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 proposed Project would be required to comply with Title 24 Building Energy Efficiency Standards that 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, BWP, 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 that 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 (i.e., petroleum fuels or natural gas). The Project is not anticipated to increase the peak and base period demand pertaining to electricity and energy, as the electricity and energy usage of the Project would be minimal compared to the County's energy consumption (refer to Table 6-8). As indicated in Table 6-8, operational energy consumption would

represent an approximate 0.002 percent increase in electricity consumption over the current countywide usage. The Project would not result in the inefficient, wasteful, or unnecessary consumption of energy.

As indicated in Table 6-8, operational energy consumption would represent an approximate 0.002 percent increase in electricity consumption and a 0.001 percent increase in natural gas consumption over the current Countywide usage. In addition, the Project would adhere to all Federal, State, and local requirements for energy efficiency, including GGRP Measures E-1.1 and E-2.1 that require projects to exceed Title 24 energy efficiency standards by 15 percent and provide 10 percent of the expected energy needs from on-site renewable sources. As such, the Project would not cause a substantial increase to the County's electricity or natural gas usage (refer to Table 6-8), and would not result in the inefficient, wasteful, or unnecessary consumption of building energy following compliance with all current and future Federal, State, and local energy efficiency requirements. 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 countywide automotive fuel consumption is approximately 0.003 percent and is considered negligible. The Project proposes the construction of a 160,447-adjusted gross square foot office space above subterranean parking. 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. Thus, Project energy consumption impacts would be less than significant in this regard.