IV. OTHER ENVIRONMENTAL CONSIDERATIONS

A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(b) requires that any significant impacts, including those that can be mitigated but not reduced to a less than significant level, be described and their implications discussed in an EIR. Impacts of the project are analyzed throughout Section III, Environmental Impact Analysis, of this Draft EIR. As discussed therein, the project-level significant unavoidable impacts that would occur are related to traffic:

TRAFFIC

The project would significantly impact two intersections in the future plus project condition:

- Corbin Avenue and Plummer Avenue in the PM peak hour
- Corbin Avenue and Prairie Street in the AM peak hour

No other significant unmitigated impacts would occur with the proposed project.

B. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) requires that an EIR analyze significant irreversible environmental changes that would be caused by the proposed project. This includes the use of nonrenewable resources during construction and operation of a project to such a degree that the use of the resources thereafter is unlikely. It also includes significant and irreversible environmental changes that could result from environmental accidents associated with the project.

Construction of the proposed project would result in a commitment of limited, slowly renewable, and nonrenewable resources. Such resources would include certain types of lumber and other forest products; metals such as steel, copper, and lead; aggregate materials used in concrete and asphalt (e.g., stone, gravel, and sand); and other construction materials such as plastic. In addition, fossil fuels used in construction vehicles would also be consumed during construction of the project.

Operation of the proposed project would involve the continued consumption of limited, nonrenewable, and slowly renewable resources similar to other mixed-use projects. These resources would include natural gas and electricity, petroleum-based fuels, fossil fuels, and water. Energy resources would be used for heating and cooling of buildings, transporting people and goods to and from the site, heating and refrigeration for food storage and preparation, heating and cooling of water, and lighting. Operation of the project would occur in accordance with Title 24, Part 6 of the California Code of Regulation, which sets forth conservation practices that would limit the amount of energy consumed by the project. In addition, the project would be subject to energy efficient planning and construction guidelines set forth by the City of Los Angeles and will pursue Energy Efficiency points consistent with LEED v. 3 and will meet or exceed 2013 Title 24 requirements. Nonetheless, the use of such resources would still continue to represent a long-term, irreversible commitment of these resources.

In addition, it is anticipated that the project would result in limited use of common hazardous materials on the project site, including cleaning agents and pesticides for landscaping. Such materials would be used, handled, stored, and disposed of in accordance with applicable regulations and standards. Thus, the project would not result in a significant and irreversible environmental change associated with the accidental release of hazardous materials.

C. GROWTH-INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d) requires that an EIR discuss growth-inducing impacts of a proposed project. Growth-inducing impacts are ways in which the project could "…foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." This includes projects that would remove obstacles to growth. However, as stated in the Guidelines, "it must not be assumed that growth in any areas is necessarily beneficial, detrimental, or of little significance to the environment."

The proposed project would involve the construction and operation of a mixed-use project on the project site. The proposed project would be an urban-scale mixed-use development located in a developed area of the City of Los Angeles. As the proposed project would include a residential component, the project would directly result in a permanent, full-time population growth in the area. LAPD has indicated that the increase in residential population in this industrially designated area would result in increased calls for police services; the impact on LAPD of these increased calls would be reduced to a less than significant level with project design features and identified mitigation measures. The proposed project, would not significantly impact existing schools or other community services in the area. It is anticipated that the project would result in population growth in the area, but it is anticipated that the project units would meet existing demand and would not result in people moving to the general area.

The project would be generally consistent with applicable plans and polices. The project would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. The proposed project would be considered an infill project that would be located in an urban area within the City of Los Angeles. The proposed project would include approximately 435 employees and would introduce up to 1,027 residents onto the site. Additionally, it would be located in close proximity to various public transportation opportunities in addition to providing a transit plaza and encouraging public transit use. The Project requires a General Plan Amendment to a more flexible industrial land use designation under the Chatsworth-Porter Ranch Community Plan that permits the Campus Project's mix of integrated employment and housing uses. Adoption of the General Plan Amendment would support smart growth principles by locating jobs near existing and new housing coupled with on-site transit service.

With mitigation, the project would not result in an increase in the population that could significantly tax existing community service facilities, or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulatively. Thus, the project would not result in significant growth-inducing impacts.

D. ENERGY CONSERVATION

Energy consumption including electricity, by new buildings in California, is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations (CCR). The efficiency standards apply to new construction of both residential and

non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided that these standards meet or exceed those provided in Title 24 guidelines.

Title 24 of the CCR comprises the State Building Standards Code. Part 6 of Title 24 is the California Energy Code that includes the building energy efficiency standards. The standards include provisions applicable to all buildings, residential and non-residential, which describe requirements for documentation and certificates that the building meets the standards. These provisions include mandatory requirements for efficiency and design of the following types of systems, equipment and appliances:

- Air conditioning systems
- Heat pumps
- Water chillers
- Gas and oil-fired boilers
- Cooling equipment
- Gas fired equipment including furnaces and stoves/ovens
- Windows and exterior doors
- Joints and other building structures openings
- Insulation and cool roofs
- Lighting control devices
- Water heaters and equipment
- Pool and spa heaters and equipment

The City of Los Angeles GREEN LA Plan. On May 15, 2007, Los Angeles Mayor Antonio Villaraigosa released the "GREEN LA – An Action Plan to Lead the Nation in Fighting Global Warming" (GREEN LA Plan) that has an overall goal of reducing the City of Los Angeles' GHG emissions by 35 percent below 1990 levels by 2030. This goal exceeds the targets set by both California and the Kyoto Protocol, and is the greatest reduction target of any large United States City. The cornerstone of the GREEN LA Plan is increasing the City's use of renewable energy to 35 percent by 2020. Key strategies listed in the GREEN LA Plan related to energy and water include the following:

Green the Power from the Largest Municipal Utility in the United States

- Meet the goal to increase renewable energy from solar, wind, biomass, and geothermal sources to 20 percent by 2010;
- Increase use of renewable energy to 35 percent by 2020;
- Let contracts for power imports from coal-fired power plants expire;
- Increase the efficiency of natural gas-fired power plants; and
- Increase biogas co-firing of natural gas-fired power plants.

Make Los Angeles a Worldwide Leader In Green Buildings

- By July 2007, present a comprehensive set of green building policies to guide and support private sector development;
- Transform Los Angeles Into the Model of an Energy Efficient City; and
- Reduce energy use by all city departments to the maximum extent feasible.

Los Angeles Green Building Code. On January 1, 2011 the Los Angeles Green building Code (LAGBC) became applicable to all new buildings, additions, alterations valued at $200,000 or more and residential alterations that increase building conditioned volume. The LAGBC is based on the 2013 California Green Building Standards Code (CALGreen) that was developed and mandated by the State to attain consistency among the various jurisdictions within the

State; reduce the building's energy and water use; reduce waste; and reduce the carbon footprint. Requirements address: storm water drainage and retention during construction; light pollution reduction; electrical vehicle wiring, pre-wiring to allow future installation of solar system, reductions in water use of 20 percent from an established baseline, irrigation controllers, construction waste reduction, bicycle parking, light pollution reduction, exceedance of 2008 Energy Efficiency Standards by 15 percent, use of Energy Star appliances, reduced emissions from certain flooring materials, aerosol paints and coatings adhesives, sealants and caulks. The Code also addresses voluntary measures including reuse of materials, topsoil protection, window shading, use of pre-finished materials and materials from renewable sources, enhanced construction waste reduction, exceeding 2008 Energy Efficiency Standards by 30 percent.

Estimated fossil fuel use during the construction period would be approximately 77,598 gallons of diesel from construction/heavy equipment operation, 32,797 gallons of gasoline from construction worker travel, 37,503 gallons of diesel from construction vendors (i.e., materials delivery), and 2,257 gallons of diesel from haul truck trips.[1] The short-term energy consumption would not be significant due to the temporary duration of construction activities.

Long-term energy consumption would result from heating, cooling, lighting, driving, and other operational needs associated with the commercial, office, and residential land uses. **Table III.L-10** shows annual electrical consumption for the proposed project. Existing electrical consumption is minimal. Under the proposed project, electrical consumption is calculated to be approximately 9.75 million KWh/y using gross, dated (from 1993) assumptions for energy use. A more precise, project-specific, assessment of total energy consumption using more recent consumption factors indicates that the project could use 11.6 million kWh/yr before mitigation (Business as Usual assumptions) and 9.3 million kWh/yr with proposed energy savings.[2]

The proposed project would include electricity reduction measures, such as a roof mounted solar photovoltaic system (solar panels) not accounted for in **Table III.L-10**.

Under the proposed project, using gross, dated (from 1993) assumptions the project could consume 39.48 million cubic feet per year (cfy). A more precise, project-specific assessment of natural gas consumption, using more recent energy consumption data, indicates that the project could use 96,743 Therms (9.7 million cubic feet) and 91,653 Therms (9.1 million cubic feet) with proposed energy saving measures.[3]

During project operation, trips associated from the proposed mixed-use development would result in fossil fuel use of approximately 579,419 gallons of gasoline per year; vendor trips (e.g., truck deliveries) would result in fuel use of approximately 11,382 gallons of diesel per year.[4]

SCAG provides an estimate of the expected fossil fuel consumption within the region in 2011 and 2035.[5] According to SCAG, projected transportation fuel consumption was 6.8 billion

1 Construction assumptions were derived from CalEEMod, which utilizes the OFFROAD2011 model. Vehicle fuel use was estimated using the EPA fuel economy values.

2 *MGA Campus Building Greenhouse Gas Emissions Summary,* Brummitt Energy Associates Inc, April 2014. See **Appendix K**.

3 Ibid

4 Assumptions were derived from CalEEMod, which utilizes the OFFROAD2011 model. Vehicle fuel use was estimated using the EPA fuel economy values. CalEEMod 2013 Appendix D and California's Water – Energy Relationship, California Energy Commission, November 2005- Assumed 13,021 kWh per million gallon water.

5 SCAG, *2012-2035 RTP/SCS Final Program Environmental Impact Report*, April 2012.

gallons of fuel per year for 2011 and is projected to be 5.6 billion gallons of fuel per year for 2035. The total fossil fuel use during project operation would be less than 0.009 percent of the region's 2011 fuel consumption.

The project would be consistent with applicable energy conservation requirements and would include features not required by current regulations (solar power, shuttles and TDM measures). Therefore, the project project would not involve the inefficient use of energy resources.

E. POTENTIAL SECONDARY EFFECTS

CEQA Guidelines Section 15126.4(a)(1)(D) states that, "If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measures shall be discussed but in less detail than the significant effects of the project as proposed." In accordance with the Guidelines, the following provides a discussion of the potential impacts that could occur from implementation of the proposed mitigation measures.

AESTHETICS

The project would not have aesthetic impacts and no mitigation measures are required, therefore no secondary impacts are anticipated.

AIR QUALITY

Regulatory compliance measures to reduce dust would require use of water. Such water use would be done periodically and would be temporary (during project construction only). Thus, no significant impacts from implementation of these measures would occur. In addition, low emission architectural coatings are required, no secondary impacts from use of such coatings are known.

BIOLOGICAL RESOURCES

Mitigation measures to reduce impacts on biological resources involve protecting nests and roosts, reducing dust (as required under air quality), retaining on-site trees and surveying for legless lizards. None of these measures would cause secondary impacts.

GEOLOGY AND SOILS

The regulatory compliance measure required in Section III.D, Geology and Soils, involve specific construction-related measures that address soil conditions and are design-specific. These measures are considered part of the construction phase of the project and, thus, have been analyzed as part of the project. This would not result in significant secondary impacts.

GREENHOUSE GAS EMISSIONS

Measures to reduce greenhouse gas emissions would involve installation of energy efficient equipment and prohibition of banned substances as well as compliance with applicable regulations. None of these measures would cause additional impacts.

HAZARDS

Regulatory compliance requires remediation activities during demolition activities that have been analyzed for the project. These measures would not result in significant secondary impacts.

HYDROLOGY AND WATER QUALITY

Regulatory compliance requirements address specific construction-related measures related to stormwater runoff. These measures are considered part of the construction phase of the project and, thus, have been analyzed as part of the project. This would not result in significant secondary impacts.

LAND USE

The proposed project would require a General Plan Amendment and Zone change and would comply with land uses plans and polices of the City of Los Angeles as well as applicable plans and policies of regional agencies. No significant secondary impacts would occur.

NOISE

Regulatory compliance would restrict hours of construction and notice placed on the site regarding contractor and applicant information. Construction materials capable of reducing sound are also required. These measures would not result in significant secondary impacts.

PUBLIC SERVICES

Fire Services

Regulatory compliance measures involve consultation and compliance with applicable local and state fire guidelines and regulations. These measures would not result in secondary impacts.

Police Protection

Regulatory compliance requirements include consultation and compliance with LAPD security and design features. These measures would not result in a change to the physical environment. No secondary impacts would occur.

Schools

Regulatory compliance requires the payment of required developer school fees to LAUSD pursuant to Government Code Section 65995, as amended by Senate. No secondary impact would result.

Parks

Regulatory compliance would include in-lieu fees or on-site improvements. This would not result in a significant secondary impact.

Libraries

The mitigation measure requires payment of a fee that would not result in secondary impacts.

TRANSPORTATION AND CIRCULATION

Regulatory compliance requires notification, signage and compliance with applicable regulations relating to hauling. Mitigation requires restriping to allow installation of a new westbound turn lane at Winnetka and Parthenia and a new southbound right-turn only lane at Corbin Avenue and Plummer Street. These changes are not anticipated to result in secondary impacts.

UTILITIES

Wastewater

No wastewater-specific measures are required. Measures to reduce water consumption would also reduce demand for wastewater services.

Water

Regulatory compliance involves the implementation of water conservation measures and consultation with LADWP to identify feasible and reasonable measures that reduce water consumption. These measures would not inherently result in physical impacts that could result in significant secondary impacts.

Solid Waste

Regulatory compliance requires waste diversion and recycling that would not be expected to result in significant secondary impacts.

Energy

Regulatory compliance requires installation of energy efficient equipment and consultation with LADWP and The Gas Company. These measures would not inherently result in physical impacts that could result in significant secondary impacts.

F. EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines requires that an EIR contain a brief statement indicating the reasons that certain possible significant effects of a project were determined to be less than significant and thus, were not analyzed in the EIR. Discussions of those impacts found not to be significant is provided in Chapter II and below:

AGRICULTURAL RESOURCES

The project site is developed and zoned for urban uses and is not currently used for agricultural purposes. Implementation of the proposed project would not result in the conversion of farmland. No loss of farmland would result from the proposed project. No Williamson Act contracts are currently applicable on the site.

CULTURAL RESOURCES

Archaeological/historical and paleontological records searches were conducted for the project area to identify all previously recorded cultural resources (prehistoric and historic archaeological sites, historic buildings, structures, objects, or districts). The records search includes review of all previously recorded prehistoric and historic archaeological sites located within a half-mile radius of the project site, as well as a review of all cultural resource survey and excavation reports. The records search was conducted on April 18, 2014, at the South Central Coastal Information Center (SCCIC), California State University, Fullerton (see **Appendix D**). In addition, Los Angeles County Museum (LACM) recorded paleontological (fossil) sites were reviewed to determine if any significant fossil finds have been reported in the search radius.

No archaeological sites have been recorded at or within a half-mile radius of the project site. Nine area-specific survey/excavation reports are on file for the project vicinity none of these addressed the project site and none of them revealed resources that would have implications for the project site. Based on a review of existing databases, no historic buildings have been identified on the project site.

No known paleontological resources have been recorded within a half mile of the project site. According to the Los Angeles County Museum, the closest fossil localities are located in the Santa Monica Mountains nearly four miles to the south. The geological formation occurring beneath the subject parcel is composed of Recent Age alluvium (Qal) deposits, consisting of clays, silts, sands, and gravels. These soils are unconsolidated and poorly to well stratified. These include flood-plain and streambed deposits.

The absence of recorded archaeological or paleontological resources at the project address rates a Low sensitivity rating and therefore no cultural resources monitoring is required during ground disturbance or other construction activities.

MINERAL RESOURCES

The project site is currently paved and developed with a substantially vacant industrial use. No mineral resources are known to occur within the project site and no mining activities are known to have taken place on the site. According to the City of Los Angeles General Plan Safety Element Exhibit E, Oil Field and Oil Drilling Areas, the project site is not located within or near any oil field or major oil drilling area.[6] The project site is not zoned for oil extraction or drilling or mining of mineral resources. Additionally, proposed site development would occur over a fully improved property with grading limited to a depth necessary to accommodate subterranean parking levels. Project construction could result in the limited consumption of aggregate and other resources, if such local products are utilized.

POPULATION AND HOUSING

The proposed project would include the development of a mixed-use project that would include residential, commercial, retail, theatre and hotel uses. Implementation of the proposed project is anticipated to accommodate 435 employees (250 MGA employees and 143 employees in the leased creative office space and 33 retail employees and 9 restaurant employees) and 1,027 residents. The number of residents and employees would be within SCAG forecasts for the

[6] http://www.lacity.org/PLN/Cwd/GnlPln/SaftyElt.pdf. Accessed August 27,2014

employees and residents anticipated for this area of the City of Los Angeles. Furthermore, the project would also support smart growth principles in that it would locate jobs near existing housing, develop a mixed-use project near a transit opportunities and provide residential units on the site. Therefore, the proposed project is not expected to induce substantial unanticipated population growth or generate the need to expand existing urban infrastructure. No impacts related to growth inducement would occur.