



6.0 Other CEQA Considerations



6.0 OTHER CEQA CONSIDERATIONS

6.1 LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT

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 mitigation cited in this EIR and through compliance with the City of Azusa Municipal Code; refer to [Section 5.0, *Environmental Analysis*](#).

Ultimate development of the project site would create long-term environmental consequences that may impact the surrounding physical, aesthetic, and human environments. Long-term physical consequences of development include increased traffic volumes, increased noise from project-related mobile (traffic) and stationary (parking lots, mechanical and landscaping) sources, 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 BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

Approval of the proposed project would cause irreversible environmental changes, resulting in the following:

- Physical alteration of the project site through grading, excavation, and building activities;
- Soil erosion due to grading and construction activities;
- Alteration of the human environment as a consequence of the development process and the project's commitment to an industrial/warehousing development, which intensifies land uses in the project area;
- Utilization of various new raw materials, such as lumber, sand and gravel for construction;
- Consumption of energy to develop and maintain the project, which may be considered a permanent investment; and



- Incremental increases in vehicular activity in the surrounding circulation system, resulting in associated increases in air pollutant emissions and noise levels.

6.3 GROWTH-INDUCING IMPACTS

Section 15126 of the *CEQA Guidelines* requires that an EIR discuss the project’s potential to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The *CEQA Guidelines* also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. This section analyzes such potential growth-inducing impacts, based on criteria suggested in the *CEQA Guidelines*.

In general terms, a project may foster spatial, economic, or population growth in a geographic area if it meets any one of the following criteria:

- Removal of an impediment to growth (e.g., establishment of an essential public service and provision of new access to an area);
- Fostering 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 development, as is the case with the proposed project).

Should a project meet any one of the above-listed criteria, it may be considered growth inducing. The potential growth-inducing impacts of the proposed project are evaluated below.

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).

POPULATION, HOUSING, AND EMPLOYMENT

Population

County of Los Angeles. The County of Los Angeles encompasses approximately 4,084 square miles. It is bordered by Ventura County to the northwest, Kern County to the north, the Pacific Ocean to the south, Orange County to the southeast, and Riverside County to the east. Los Angeles



County also includes the islands of San Clemente and Santa Catalina. As of January 1, 2013, the County of Los Angeles had a population of 9,958,091.¹ This represents an increase of approximately 1.4 percent over the County's April 2010 population of 9,818,605.

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. As part of its *2008 Regional Transportation Plan* (RTP) growth forecast, SCAG projects that the County's population will reach 11,678,552 by 2025 and 12,338,620 by 2035.²

City of Azusa. As of January 1, 2013, the City of Azusa's population was 47,586.³ This represents an increase of approximately 2.6 percent over the City's April 2010 population of 46,361. SCAG projects that the City's population will reach 53,784 by 2025 and 56,460 by 2035.⁴ Table 6-1, Population Estimates, provides a summary of both 2010 and 2013 population estimates for Los Angeles County and the City of Azusa.

**Table 6-1
Population Estimates**

Year	Los Angeles County	City of Azusa
Population		
2010	9,818,605	46,361
2013	9,958,091	47,586
Change	1.4%	2.6%

Source: State of California, Department of Finance, *E-5 Population Estimates for Cities, Counties and the State, 2011-2013, with 2013 Benchmark*. Sacramento, California, May 2013.

Project Site. The site is situated within an urbanized industrial area. The site was formerly occupied by Criterion Catalysts, a chemical engineering company that manufactured, shipped, and received catalyst supplies for refining applications. The site has been disturbed and is currently unoccupied with the exception of a small vacant single-story office building along the North Todd Avenue frontage. All structures and facilities associated with the Criterion Catalysts facility have been demolished (with the exception of the vacant office building noted above, foundation pads located in the central portion of the site, and concrete remnants of the former shipping/receiving facility). Therefore, there is currently no population associated with the project site.

¹ State of California, Department of Finance: *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011- 2013, with 2010 Benchmark*. Sacramento, California, May 2013.

² *Adopted 2008 Regional Transportation Plan Growth Forecast, By City*, <http://www.scag.ca.gov/forecast/index.htm>, accessed December 11, 2013.

³ State of California, Department of Finance: *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011- 2013, with 2010 Benchmark*. Sacramento, California, May 2013.

⁴ *Adopted 2008 Regional Transportation Plan Growth Forecast, By City*, <http://www.scag.ca.gov/forecast/index.htm>, accessed December 11, 2013.



Housing

County of Los Angeles. The County’s housing stock was estimated to be 3,463,382 units in January 2013. This represents an increase of approximately 0.6 percent over the estimated 3,443,087 housing units reported in April 2010. The vacancy rate in January 2013 was estimated to be approximately 5.9 percent, with approximately 3.0 persons per household.⁵ SCAG projections indicate that the number of housing units within the County will increase to 3,788,732 in 2025 and 4,003,501 in 2035.⁶

City of Azusa. The City’s housing stock was estimated to be 13,643 in January 2013. This represents an increase of approximately 1.9 percent over the estimated 13,386 housing units reported in April 2010. The vacancy rate in January 2013 was estimated to be approximately 5.0 percent, with 3.5 persons per household.⁷ According to SCAG projections, the number of housing units in the City is expected to be 14,637 in 2025 and 15,268 in 2035.⁸ Table 6-2, *Housing Estimates*, provides a summary of both 2010 and 2013 housing estimates for Los Angeles County and the City of Azusa.

Table 6-2
Housing Estimates

Year	Los Angeles County	City of Azusa
Housing		
2010	3,443,087	13,386
2013	3,463,382	13,643
Change	0.6%	1.9%
Source: State of California, Department of Finance, <i>E-5 Population Estimates for Cities, Counties and the State, 2011-2013, with 2013 Benchmark</i> . Sacramento, California, May 2013.		

Project Site. The project site currently consists of vacant disturbed land. No housing is associated with the property.

Employment

County of Los Angeles. According to the California Employment Development Department, the civilian labor force within Los Angeles County totaled approximately 4,991,700 as of October 2013. An estimated 9.5 percent of the County’s workforce (471,800 persons) was unemployed.⁹ SCAG

⁵ State of California, Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011- 2013, with 2010 Benchmark*. Sacramento, California, May 2013.

⁶ *Adopted 2008 Regional Transportation Plan Growth Forecast, By City*, <http://www.scag.ca.gov/forecast/index.htm>, accessed December 11, 2013.

⁷ State of California, Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011- 2013, with 2010 Benchmark*. Sacramento, California, May 2013.

⁸ *Adopted 2008 Regional Transportation Plan Growth Forecast, By City*, <http://www.scag.ca.gov/forecast/index.htm>, accessed December 11, 2013.

⁹ *Los Angeles–Long Beach–Glendale MD Labor Force Data*, California Employment Development Department, November 22, 20103.



projections indicate that the number of employees within the County will be 4,847,436 in 2025 and 5,041,172 in 2035.¹⁰

City of Azusa. According to the California Employment Development Department, the civilian labor force within the City of Azusa totaled approximately 21,800 persons as of October 2013. An estimated 10.3 percent of the City's workforce (2,200 persons) was unemployed.¹¹ SCAG projections indicate that the number of employees within the City will be 19,296 in 2025 and 19,833 in 2035.¹²

Project Site. As stated above, the project site is currently vacant and does not generate employment.

IMPACT ANALYSIS

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 project site is located within a fully developed industrial area. The proposed project would be consistent with the City's existing General Plan and Development Code designations for the site.

Based on the factors discussed below, project implementation would not result in significant growth-inducing impacts:

- Removal of an Impediment to Growth. The project site and surrounding area are fully developed and urbanized. Transportation and infrastructure exist to serve the range of industrial, commercial, recreational, and residential uses in the project vicinity. Given the built-out nature of the project area and developed infrastructure, the proposed project would not represent a removal of an impediment to growth.
- Economic Growth. As stated above, the project involves the construction of an industrial/warehousing development. Economic growth of this nature would be consistent with the goals and policies of the Azusa General Plan. Thus, the proposed project would not be considered growth inducing in this respect, as the project is consistent with the City's plans for economic growth at the project site. Moreover, the project represents the reuse of a former industrial site, which itself was a source of economic growth within the City prior to facility closure. Therefore, the project would not result in significant economic growth in the area.

¹⁰ *Adopted 2008 Regional Transportation Plan Growth Forecast, By City*, <http://www.scag.ca.gov/forecast/index.htm>, accessed December 11, 2013.

¹¹ *Monthly Labor Force Data for Cities and Census Designated Places (CDP)*, California Employment Development Department, November 22, 2013.

¹² *Adopted 2008 Regional Transportation Plan Growth Forecast, By City*, <http://www.scag.ca.gov/forecast/index.htm>, accessed December 11, 2013.



- Population Growth.* Although the proposed project does not include housing, it has the potential to induce growth within the project area due to the creation of employment opportunities. The proposed project would include 342,629 square feet of light industrial and warehousing development. Based on employment estimates generated by SCAG, it is projected that the proposed project would result in a total of approximately 780 employees; refer to Table 6-3, *Estimated Project Employment.* Although SCAG’s employment generation estimates for “Light Manufacturing” and “Warehouse” both potentially apply to the project, the “Light Manufacturing” category was utilized (439 square feet per employee), since it represents a higher (more conservative) number of employees projected to be generated by the project.

Table 6-3
Estimated Project Employment

Land Use	Square Feet	Square Feet/Employee	Estimated Employment
Proposed			
Light Manufacturing	342,629	439	780
Source: The Natelson Company, Inc., <i>Employment Density Study Summary Report</i> , prepared for Southern California Association of Governments, October 31, 2001.			

Estimating the number of future employees generated by the project who would choose to relocate to the City would be highly speculative, since many factors influence personal housing location decisions (e.g., family income levels and the cost and availability of suitable housing in the local area). Due to the uncertainty which exists regarding the number of new employees who may choose to relocate to the City, a conservative analysis of impacts associated with the City’s permanent population is provided. For analysis purposes, it is conservatively estimated that 30 percent of the future employees would relocate to the City, and each future employee would have a household of 3.46 persons.¹³ This would result in a potential increase of approximately 810 persons.¹⁴

The proposed Tenth Street Center Industrial Park Project would foster population growth within the City through employment generation. As the City’s population is estimated at 47,586 persons, this increase of approximately 810 persons represents a 1.7 percent increase in the total population within the City as of January 2013. As the potential growth associated with the proposed project would represent a minor increase over existing conditions and is consistent with the General Plan designation for the site, the project would not result in substantial growth-inducement impacts within the City.

- Precedent-Setting Action.* The proposed project would not require a precedent-setting action, such as a General Plan or Development Code Amendment. As discussed in Section 3.0, *Project Description,* the proposed project would be consistent with the General Plan

¹³ State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State, 2011-2013, with 2010 Benchmark.* Sacramento, California, May 2013.

¹⁴ The project’s potential population increase was calculated as follows: 780 employees x 30 percent (0.30) x 3.46 persons per household = 810 persons.



designation of Light Industrial and Development Code designation of DWL (District West End Light Industrial). Thus, the project is not considered growth-inducing in this regard.

- *Development or Encroachment of Open Space.* The proposed project would not be growth-inducing with respect to development or encroachment into an isolated or adjacent area of open space, and has been previously disturbed.

Overall, project implementation would not be considered growth inducing, inasmuch as it would not foster significant unanticipated economic expansion and growth opportunities. The project would not remove an existing impediment to growth and would not develop or encroach into an isolated or adjacent area of open space. The proposed project would not foster significant unanticipated population growth in the project area, as described above. Development within the project area would not require substantial development of unplanned and unforeseen support uses and services.

In addition to inducing growth, a project may create a significant environmental impact if it would displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere and/or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. Implementation of the proposed project would not displace any housing or persons, as the project site is currently vacant and void of any housing. Therefore, the project would not result in an impact with regard to the displacement of persons, housing, and businesses.

6.4 ENERGY CONSERVATION

Public Resources Code Section 21100(b)(3) and *CEQA Guidelines* Appendix F requires a description (where relevant) of the wasteful, inefficient, and unnecessary consumption of energy caused by a project. In 1975, the California State Legislature adopted Assembly Bill 1575 (AB 1575) in response to the oil crisis of the 1970s. Appendix F of the State 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. Because Appendix F does not include specific significance criteria, this threshold is based the goal of Appendix F. Therefore, an energy impact is considered significant if the proposed project 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.

6.4.1 PROJECT ENERGY CONSUMPTION

SHORT-TERM CONSTRUCTION

In 1994, the U.S. Environmental Protection Agency (EPA) adopted the first set of emission standards (Tier 1) for all new off-road diesel engines greater than 37 kilowatts (kW). The Tier 1 standards were phased in for different engine sizes between 1996 and 2000, reducing NO_x emissions from these engines by 30 percent. The EPA Tier 2 and Tier 3 standards for off-road diesel engines are projected to further reduce emissions by 60 percent for NO_x and 40 percent for particulate matter from Tier 1 emission levels. Construction would consist of demolition, site clearing and



grading, paving, and building activities. *Table 6-4, Construction Fuel Consumption*, provides an estimate of construction fuel consumption based on information provided by the CalEEMod air quality computer model; refer to *Appendix 13.4, Air Quality/Greenhouse Gas Emissions Data*.

**Table 6-4
Construction Fuel Consumption**

Equipment	Quantity	Horsepower	Load Factor	Fuel Consumption Rate ¹ (gallons per hour)	Duration ² (total hours)	Total Fuel Consumption ^{3,4} (gallons)
Demolition						
Concrete/Industrial Saws	3	81	0.73	2.37	480	1,138
Crawler Tractors	2	208	0.43	3.58	240	859
Excavators	1	162	0.38	2.46	160	393
Cranes	1	226	0.29	2.62	80	210
Graders	1	174	0.41	2.85	80	228
Crushing/Processing Equipment	1	85	0.78	2.65	80	213
Grading						
Excavators	1	162	0.38	2.46	544	1,338
Rubber Tired Dozers	1	255	0.40	4.08	408	1,665
Scrapers	6	361	0.48	6.93	2,448	16,965
Crawler Tractors	2	208	0.43	3.58	816	2,921
Off-Highway Trucks	2	400	0.38	6.08	544	3,308
Rubber Tired Loaders	1	199	0.36	2.87	272	781
Paving						
Pavers	1	125	0.42	2.10	56	118
Paving Equipment	1	130	0.36	1.87	56	105
Rollers	2	80	0.38	1.22	112	137
Building Construction						
Cranes	1	226	0.29	2.62	1260	3,301
Forklifts	2	89	0.20	0.71	2,880	2,045
Generator Sets	1	84	0.74	2.49	1440	3,586
Tractors/Loaders/Backhoes	2	97	0.37	1.44	2520	3,629
Welders	1	46	0.45	0.83	1440	1,195
Concrete/Industrial Saws	1	81	0.73	2.37	720	1,706
Crawler Tractors	1	208	0.43	3.58	720	2,578
Excavators	1	162	0.38	2.46	720	1,771
Trenchers	1	100	0.40	1.60	720	1,152
TOTAL⁴						20,963
Notes:						
1. Derived using the following equation: Fuel Consumption Rate = Horsepower x Load Factor x Fuel Consumption Factor Where: Fuel Consumption Factor for a diesel engine is 0.04 gallons per horsepower per hour (gal/hp/hr) and a gasoline engine is 0.06 gal/hp/hr.						
2. Total hours of duration derived from CalEEMod modeling results; refer to <i>Appendix 11.4, Air Quality/Greenhouse Gas Emissions Data</i> .						
3. Total Fuel Consumption calculated using the following equation: Total Fuel Consumption = Duration in Hours x Fuel Consumption Rate						
4. Values may be slightly off due to rounding.						
Source: Refer to <i>Appendix 13.4, Air Quality/Greenhouse Gas Emissions Data</i> , for CalEEMod assumptions used in this analysis.						

As indicated in *Table 6-4*, project construction would consume a total amount of approximately 20,963 gallons of fuel. 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. Mitigation Measure AQ-1 would implement dust control techniques (i.e., daily watering), limitations on stockpiling, and adherence to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track out requirements, etc). Mitigation Measure AQ-2 would require all off-road diesel-powered construction equipment greater than 50 horsepower to meet Tier 3 off-road emissions standards, and requires all construction equipment to be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Therefore, it is



expected that construction fuel consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

LONG TERM OPERATIONS

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NHTSA) 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 6-5, Operational Fuel Consumption, provides an estimate of the annual fuel consumed by vehicles traveling to and from the proposed project site. As indicated in Table 6-5, operation of the proposed project is estimated to consume approximately 342,719 of fuel annually. The project would not result in any unusual characteristics that would result in excessive long-term operational fuel consumption. Additionally, the proximity of the project site to existing transit stops would result in reduced fuel consumption. Fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar residential developments in the region.

**Table 6-5
Operational Fuel Consumption**

Vehicle Type	Percent of Vehicle Trips ¹	Daily Trips ²	Annual Vehicle Miles Traveled ³	Average Fuel Economy (miles per gallon) ⁴	Annual Fuel Consumption (gallons) ⁵
Passenger Cars	65	950	3,359,454	21.6	155,530
Light/Medium Trucks	20	293	1,033,678	17.2	60,098
Heavy Trucks/Other	15	219	775,259	6.1	127,092
TOTAL⁶	100	1,462⁷	5,168,391	--	342,719

Notes:

1. Percent of Vehicle Trip distribution based on trip characteristics within the CalEEMod model.
2. Daily Trips calculated by multiplying the total daily trips by percent vehicle trips (i.e., Daily Trips x percent of Vehicle Trips).
3. Annual Vehicle Miles Traveled (VMT) calculated by multiplying percent vehicle trips by total VMT (i.e., VMT x percent of Vehicle Trips).
4. Average fuel economy derived from the Department of Transportation.
5. Total Annual Fuel Consumption calculated by dividing the daily VMT by the average fuel economy (i.e., VMT/Average Fuel Economy).
6. Values may be slightly off due to rounding.
7. Based upon data within the *10th Street Center Master Plan Traffic Report (Traffic Impact Study)*, prepared by Stantec Consulting Services, dated December 2013; refer to [Appendix 13.3, Traffic Impact Analysis](#).
8. Total VMT are the reduced VMT (from project design features) obtained from the CalEEMod model.

Source: Refer to [Appendix 11.4, Air Quality/Greenhouse Gas Emissions Data](#), for CalEEMod assumptions used in this analysis.



Other Non-Motorized Transportation Options

The project vicinity is currently served by bus transit lines operated by Foothill Transit (Routes 185, 187, and 494). The nearest bus stop is located approximately 0.4-mile to the south of the project site along Foothill Boulevard. The proximity of the project site to existing transit would reduce the number of trips to and from the project site. The proposed project would not result in the inefficient, wasteful, or unnecessary consumption of transportation energy.

Building Energy Demand

The proposed project would be expected to demand 2,664 megawatt hours (MWh) of electricity per year and 2,092 million British Thermal Units (MBTU) of natural gas. As concluded in [Section 5.6, *Public Services and Utilities*](#), Southern California Edison (SCE) is currently able to supply enough electricity to accommodate the needs of the region. Any land use that would demand enormous amounts of electricity could have significant impacts on the electrical network. The proposed project would not demand a significant amount of electricity. Therefore, it is anticipated that SCE could adequately supply the proposed project.

The project would involve operations typical of an industrial/warehousing development, requiring electricity and natural gas for typical lighting, climate control, mechanical equipment, and day-to-day activities. Additionally, the proposed project would incorporate several water, energy, solid waste, and land use efficiency measures. Therefore, the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar residential subdivisions within the region.

Energy Efficiency Measures

Title 24, California's Energy Efficiency Standards for Residential and Non-residential Buildings, was established by the CEC in 1978 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 2010, the CEC updated Title 24 standards with more stringent requirements. The 2010 Standards are expected to substantially reduce the growth in electricity and natural gas use. 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 about additional of electricity. These savings are cumulative, doubling as years go by.

Additionally, implementation of the project's design features (i.e., high efficiency lighting, energy efficient appliances, low-flow faucets, toilets, and showers, and water-efficient irrigation systems) would further reduce energy consumption.

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 proposed project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.