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 construction, portions of surrounding uses may be temporarily impacted by dust and noise. 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 SEIR and through compliance with the *Town of Mammoth Lakes Municipal Code* (Municipal Code); refer to Section 5.0, *Environmental Analysis*, and Section 8.0, *Effects Found Not To Be Significant*.

Ultimate development of the project site would create long-term environmental consequences associated with the proposed district zoning amendment and conditional use permit. Development of the proposed project and the subsequent long-term effects may impact the physical, aesthetic, and human environments. Long-term physical consequences of development include increased traffic volumes, increased noise from project-related mobile (traffic) and stationary (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 propane/natural gas and electricity.

6.2 IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

According to Sections 15126(c) and 15126.2(c) of the CEQA Guidelines, 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 Section 15126.2(c):

> *"[uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter 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. This consumption would occur during the construction phase of the project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site. Project construction would require

the consumption of resources that are not 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 Town. These would include energy resources such as electricity and propane/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 limit the amount of energy consumed by the project. However, the energy requirements associated with the project would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

Limited use of potentially hazardous materials typical of hotel uses, including minor amounts of cleaning products along with the occasional use of pesticides and herbicides for landscape maintenance are the extent of materials anticipated to be utilized 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. Although the proposed hotel operations are not anticipated to result in any releases of hazardous materials, compliance with these regulations and standards would ensure that significant and irreversible environmental change would not occur.

In summary, project construction and operation would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses during the life of the project. 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

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 in-fill 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 Mono. The County encompasses approximately 3,030 square miles.[1] It is bordered by the State of Nevada to the northeast, Inyo County to the south, and the Counties of Fresno, Madera, Mariposa, Tuolumne, and Alpine to the west. As of January 2013, Mono County had a population of 14,493.[2] This represents an increase of approximately 10.4 percent over the County's January 2000 population of 12,853[3]; refer to Table 6-1, *Population Estimates*.

Table 6-1
Population Estimates

Year	Mono County	Town of Mammoth Lakes
Population		
2000[1]	12,853	7,093
2013[2]	14,493	8,307
Change	10.4%	17.1%

Source:
1. State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000*, http://www.dof.ca.gov/research/demographic/reports/estimates/e-8/, accessed April 30, 2014.
2. 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.

[1] Mono County Website, http://www.monocounty.ca.gov/information.html, accessed April 30, 2014.

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

[3] State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000*, http://www.dof.ca.gov/research/demographic/reports/estimates/e-8/, accessed April 30, 2014.

Town of Mammoth Lakes. The Town of Mammoth Lakes (Town) was incorporated in 1984 and remains the only incorporated jurisdiction within Mono County. The Town's Municipal Boundaries include approximately 25 square miles of land. Approximately 4.5 square miles are within the Urban Growth Boundary (UGB). The Towns' population differs from other cities in that the majority of the Town's population consists of seasonal residents or visitors. The *Final Program Environmental Impact Report for the Town of Mammoth Lakes 2005 General Plan Update* (2007 General Plan PEIR), dated May 2007, considers the people at one time (PAOT) to account for seasonal residents, second homes, and visitors along with the permanent residents. Due to the resort nature of the Town, the actual population of the Town is always greater than the permanent population, particularly during peak season (winter).

The Town's permanent 2000 population was an estimated 7,093 persons. As of January 2013, the Town's population reached an estimated 8,307 persons[4], an approximate 17.1 percent increase over the 2000 population. During the winter months, an average peak population of 34,264 is normal, which is over four times the permanent population.[5] The growth in PAOT is expected to continue in the Town, with and estimated PAOT increase reaching 60,700 persons by 2024.[6]

Project Site. The site is situated within the NVSP area (a developed area of the Town). The project site currently consists of a parking structure. Therefore, there is no population associated with the project site.

Housing

County of Mono. The County's housing stock was estimated to be 13,972 in January 2013. This represents an increase of approximately 18.8 percent over the estimated 11,757 housing units reported in January 2000.[7] The vacancy rate in January 2013 was estimated to be approximately 58.5 percent, with approximately 2.44 persons per household.[8] The high vacancy rate is reflective of the resort nature of the area and seasonal residents. Table 6-2, *Housing Estimates*, provides a summary of both 2000 and 2013 housing estimates for Mono County and the Town of Mammoth Lakes.

Town of Mammoth Lakes. The Town's housing stock was estimated to be 9,643 in January 2013. This represents an increase of approximately 21.1 percent over the estimated 7,960 housing units reported in January 2000. The vacancy rate in January 2013 was estimated to be approximately 66.5 percent.[9] Although it appears an excess supply of housing units exist in the Town, in actuality, a majority of the housing units are short-term seasonal units. Additionally, overcrowding conditions occur as a result of high rents and limited housing opportunities for permanent residents and the seasonal workforce. This is a reflection of the resort nature of the Town, and the fact that seasonal, recreational, and occasional use units account for a majority of the total housing units. According to

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

[5] Town of Mammoth Lakes, *Final Program Environmental Impact Report for the Town of Mammoth Lakes 2005 General Plan Update*, May 2007.

[6] Ibid.

[7] State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000*, April 30, 2014.

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

[9] Ibid.

the Department of Finance (January 2013), the number of persons per household for permanent residents in the Town is 2.52. The 2007 General Plan PEIR uses 4.0 persons per unit to account for the population occupying seasonal, visitor, lodging, and second home units. The number of housing units in the Town is expected to increase to 16,710 units by 2024 (General Plan buildout). This represents an approximately 73 percent increase in housing between 2013 and 2024.

Table 6-2
Housing Estimates

Year	Mono County	Town of Mammoth Lakes
Housing		
2000[1]	11,757	7,960
2013[2]	13,972	9,643
Change	18.8%	21.1%

Source:
1. State of California, Department of Finance, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 1990-2000*, http://www.dof.ca.gov/research/demographic/reports/estimates/e-8/, accessed April 30, 2014.
2. State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011 – 2013, with 2010 Benchmark*, May 2013.

Project Site. The project site is currently developed with a parking podium. No housing is currently associated with the property.

Employment

County of Mono. According to the California Employment Development Department, the annual average civilian labor force within Mono County totals approximately 8,110 as of March 2014. An estimated 8.0 percent of the County's workforce (650 persons) was unemployed.[10]

Town of Mammoth Lakes. According to the California Employment Development Department, the annual average civilian labor force within the Town of Mammoth Lakes totals approximately 4,720 persons as of March 2014. An estimated 5.3 percent of the Town's workforce (250 persons) was unemployed.[11] Recreation and tourism-based jobs and support services for workers and visitors account for the majority of the Town's employment. The majority of the Town's operating revenue is from Transient Occupancy Tax (TOT) and sales tax. The TOT is generated from the rental of a lodging facility for stays fewer than 30 days. In fiscal year 2012-2013, TOT revenues were 58 percent of General Fund revenues.

Project Site. As stated above, the project site currently consists of a parking podium and does not generate employment.

[10] California Employment Development Department, L*abor Force and Unemployment Rate for Cities and Designated Places*, March 2014.
[11] Ibid.

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 is located in a developing area with the Town. Project implementation would result in the development of a 67-room hotel; refer to Section 3.0, *Project Description*. Based on the factors discussed below, project implementation would not result in significant growth-inducing impacts:

- *Removal of an Impediment to Growth*. The proposed project is the last phase of a three-phase development. The first two phases have been completed, as well as the 136-space parking structure. The project would be located atop the parking podium, adjoining the existing buildings. The project site is within the North Village District. Although the project would increase density on the site, it would accommodate the increase by transferring 30 rooms from one of the Mammoth Crossing sites. Therefore, the project would not result in overall growth beyond what is anticipated in the North Village Specific Plan (NVSP) and the 2007 General Plan.

  As the project site is already developed, transportation and infrastructure exist to serve the existing on-site and surrounding uses. The project would not require new roadways, sewer lines, or storm drain facilities to serve the project site and would not represent a removal of an impediment to growth.

- *Economic Growth*. As stated above, the project involves the development of a 67-room hotel with associated commercial square footage. During project construction, construction-related jobs would be created. However, these jobs would be temporary and would not be growth-inducing. During project operation, economic growth associated with the hotel rooms and commercial uses would be consistent with the 2007 General Plan with respect to the planned land use for the project site.

- *Population Growth*. A project could foster population growth in an area either directly (through the development of new homes) or indirectly (through the development of employment-generating land uses). The project proposes 67 hotel rooms above an existing parking podium. Therefore, the proposed project would foster both direct and indirect growth in the Town's population. As concluded above, transportation and infrastructure exist to serve the range of recreational, commercial, and residential uses in the project vicinity. The project does not involve the extension of roads or other infrastructure into undeveloped areas. Therefore, the project would not foster population growth through the extension of roads or other infrastructure. Given the proposed project would occur in accordance with the 2007 General Plan and 1999 SPEIR's anticipated development (with implementation of the proposed density transfer from one of the Mammoth Crossing sites), project implementation would be consistent with the Town's growth forecasts and would result in no greater impacts associated with population growth than previously analyzed. Therefore, the project would not result in substantial population growth in the Town.

- *Precedent-Setting Action*. As demonstrated in Section 5.1, *Land Use and Relevant Planning*, the proposed project would require a District Zoning Amendment to allow development of the proposed project. However, the amendments proposed would apply solely to the project site. Further, due to the nature of the project and minimal amount of population growth anticipated to be generated, the proposed project would not be considered growth inducing with respect to a precedent-setting action.

- *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. The proposed project would be developed on top of an existing parking structure podium. Additionally, development of the project site has been identified in the 1999 SPEIR and anticipated by the Town's 2007 General Plan. The project site is zoned North Village Specific Plan (NVSP), Resort General (RG), according to the Town's *Official Zoning Map* and the *North Village Specific Plan Zoning*. According to the 2007 General Plan, the NVSP is intended to create a visitor-oriented entertainment retail and lodging district anchored by a pedestrian plaza and a gondola connection to Mammoth Mountain Ski Area. Proposed development would be contained within the project site and would not encroach into surrounding areas or any areas designated as Open Space. No impacts would result with regard to development or encroachment of open space.

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 site 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 substantial numbers of existing housing or persons, as no dwelling units are currently located at the project site. 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 on 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. As the project proposes the development of 67 hotel rooms and accessory uses on top of the existing parking structure podium, construction would primarily involve building, paving, and painting activities. Table 6-3, *Construction Fuel Consumption*, provides an estimate of construction fuel consumption for the project based on information provided by the California Emissions Estimator Model (CalEEMod); refer to Appendix 11.4, *Air Quality and Greenhouse Gas Emissions Data*.

Table 6-3
Construction Fuel Consumption

Phase	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	1	81	0.73	2.37	56	132
	Rubber Tired Dozers	1	255	0.40	4.08	56	228
	Tractors/Loaders/Backhoes	3	97	0.37	1.44	168	241
Grading	Graders	1	174	0.41	2.85	176	502
	Rubber Tired Dozers	1	255	0.40	4.08	176	718
	Tractors/Loaders/Backhoes	2	97	0.37	1.44	308	442
Building	Cranes	1	226	0.29	2.62	1,760	4,614
	Forklifts	2	89	0.20	0.71	3,080	2,193
	Generator Sets	1	84	0.74	2.49	1,760	4,376
	Tractors/Loaders/Backhoes	1	97	0.37	1.44	1,320	1,895
	Welders	3	46	0.45	0.83	5,280	4,372
Paving	Cement and Mortar Mixers	1	9	0.56	0.20	32	6
	Pavers	1	125	0.42	2.10	32	67
	Paving Equipment	1	130	0.36	1.87	32	60
	Rollers	2	80	0.38	1.22	64	78
Architectural Coating	Air Compressors	1	78	78	0.48	1.50	366
TOTAL							***20,520***

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 Appendix 11.6, *Air Quality and Greenhouse Gas Data*.
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 Appendix 11.4, *Air Quality and Greenhouse Gas Data*, for CalEEMod assumptions used in this analysis.

As depicted in Table 6-3, project construction would consume a total of approximately 20,520 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. Additionally, the 1999 SPEIR Mitigation Measure 5.5-1b requires compliance with CARB anti-idling regulations to reduce unnecessary emissions. 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. Since 1990, the fuel economy standard for new passenger cars has been 27.5 miles per gallon (mpg). Since 1996, the fuel economy standard for new light trucks (gross vehicle weight of 8,500 pounds or less) has been 20.7 mpg. Heavy-duty vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) are not currently subject to fuel economy standards. In 2009 the fuel economy standards were updated to 39 mpg for cars and 30 mpg for trucks for model year 2016. 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.

Trip generation rates and the daily vehicle miles traveled (VMT) provided in Appendix 11.4, *Air Quality and Greenhouse Gas Data*, were used to estimate vehicle fuel consumption associated with trips generated by the proposed project. Table 6-4, *Project Operational Fuel Consumption*, provides an estimate of the daily fuel consumed by vehicles traveling to and from the proposed project.

Table 6-4
Project Operational Fuel Consumption

Vehicle Type	Percent of Vehicle Miles Traveled[1]	Daily Trips[2]	Daily Vehicle Miles Traveled[3]	Average Fuel Economy (miles per gallon)[4]	Total Daily Fuel Consumption (gallons)[5]
Passenger Cars	75	141	1,112	21.6	51
Light/Medium Trucks	14	26	208	17.2	12
Heavy Trucks/Other	11	21	163	6.1	27
Total[6]	***100***	***188[7]***	***1,483***	**--**	***90***

Notes:
1. Percent of Vehicle Trip distribution based on trip characteristics within CalEEMod.
2. Daily Trips calculated by multiplying the total daily trips by percent vehicle trips (i.e., Daily Trips x percent of Vehicle Trips).
3. Daily 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 Daily 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 *Inn at the Village Project – Traffic Study*, prepared by LSA Associates, Inc., dated May 8, 2014; refer to Appendix 11.2, *Traffic Study*.
8. Total VMT are the reduced VMT (from project design features) obtained from the CalEEMod model.

Source: Refer to Appendix 11.4, *Air Quality and Greenhouse Gas Data*, for trip generation rates and VMT used in this analysis.

As indicated in Table 6-4, the operation of project is estimated to consume approximately 90 gallons of fuel daily. However, the project would not result in any unusual characteristics that would result in excessive long-term operational fuel consumption. The project is located in close proximity to existing transit. Fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Alternative Transportation Options

The project site is served by bus transit lines operated by the Eastern Sierra Transit Authority (ESTA) along various roadways surrounding the project site including Main Street/Lake Mary Road, Minaret Road, and Canyon Boulevard. The proximity of the project site to ESTA routes would reduce the number of trips to and from the project. 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 approximately 827 megawatt hours (MWh) of electricity per year and approximately 2,434,050 kilo British Thermal units (kBTU) of propane/natural gas per year. These figures were obtained from Appendix 11.4, *Air Quality and Greenhouse Gas Data*.

The project would involve operations typical of hotel uses, requiring electricity and natural for typical lighting, climate control, and day-to-day activities. Additionally, as stated in Section 5.6, *Greenhouse Gas Emissions*, the proposed project would incorporate several energy efficiency measures, including a LEED certifiable structure. Therefore, the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in 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 2013, the CEC updated Title 24 standards with more stringent requirements. The 2013 Standards are incorporated within the California Building Code and are expected to substantially reduce the growth in electricity and propane/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, water-efficient irrigation systems, and exclusion of hearths) 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.