

5.0 OTHER CEQA CONSIDERATIONS

The proposed Project would result in significant and unavoidable impacts to aesthetic and visual resources and transportation. The Project would not result in any impacts to agricultural or traditional forestry resources or mineral resources due to the absence of such resources at the Project site, and would not significantly affect population and housing within the City or surrounding cities of Burbank and Glendale. In addition, the Project would result in significant irreversible environmental impacts associated with the commitment of non-renewable energy resources, human resources, and natural resources. The Project would not result in the removal of obstacles to growth within the Los Angeles region and is not expected to substantially induce growth

This section presents an analysis not covered in other sections of this Environmental Impact Report (EIR) regarding significant and unavoidable effects of the proposed Los Angeles Zoo and Botanical Gardens (Zoo) Vision Plan (Vision Plan; Project), significant irreversible effects, growth inducing impacts, removal of obstacles to growth, and resources areas that are found not to be significant. In particular, Section 15126 of the CEQA Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Accordingly, in addition to the analysis provided in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, this EIR must identify growth inducing impacts and significant irreversible environmental changes that would potentially result from the proposed implementation of the Project.

5.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. As analyzed in this EIR, the proposed Project would result in potentially significant and unavoidable adverse impacts to aesthetics, and transportation (refer to Section 3.1, *Aesthetics and Visual Resources*, and Section 3.15, *Transportation*).

Specific significance thresholds were defined for each potential impact associated with each resource area. Based on the environmental impact assessment presented in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, of this EIR, the resource areas of aesthetics and visual resources, land use and planning, and transportation would result in significant impacts even after mitigation is applied to reduce the level of impact.

Under CEQA Guidelines Section 15065, when an EIR demonstrates that implementation of a proposed project will cause significant and unavoidable impacts, the agency must issue a Statement of Overriding Considerations before approving the project. A Statement of Overriding Considerations is a report of the lead agency's findings regarding the merits of

approving a proposed project despite its significant environmental impacts and reflects the balancing of competing public objectives. Therefore, the City will be required to adopt a Statement of Overriding Considerations to address the significant impacts identified above and discussed in detail in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*. In this instance, the City may weigh the long-term benefits of the Project, such as improving the quality and extent of animal habitats within the Zoo, against potentially adverse impacts created by the Project. To facilitate consideration of these issues, this EIR discloses potential impacts and provides a range of Project alternatives that could more fully alleviate environmental concerns. In addition, Section 3.11, *Land Use and Planning*, provides an overview of the City's policy context, which provides information on how the Project meets several important City policy objectives and where it may raise concerns over consistency with other City policies. All this information should be reviewed when considering this Project.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS

CEQA Guidelines, Section 15126.2(d) requires a discussion of “significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.”

Analysis of environmental impacts of the proposed Project considers effects on the environment from future development anticipated under the proposed Vision Plan through the year 2040. Construction and operation of new development in the Zoo would entail the commitment of (1) non-renewable energy resources; (2) human resources; and (3) natural resources, such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, and water resources, most of which are non-renewable or locally limited natural resources. Resources that would be permanently and continually consumed during the life of the proposed Vision Plan include water, electricity, natural gas, and fossil fuels, as well as landfill space; however, the amount and rate of consumption of these resources would not result in the inefficient or wasteful use of resources. Compliance with all applicable building codes, as well as General Plan and Hollywood Community Plan policies, standard conservation features, and current City programs would ensure that natural resources are conserved to the maximum extent feasible. Additionally, it is possible that new technologies or systems will emerge in the future, or will become more cost-effective or user-friendly, to further reduce the reliance on nonrenewable natural resources. While future construction activities and operational activities anticipated to occur under the proposed Project would result in the irretrievable commitment of nonrenewable energy resources (primarily in the

form of fossil fuels, including fuel oil, natural gas, and gasoline for automobiles and construction equipment, as well as commitment of limited landfill space), consumption of such resources is associated with any development in the region, and are not unique or unusual to the City or the Zoo (refer to Section 3.5, *Energy*).

The proposed Project would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment. While development anticipated to occur under the proposed Vision Plan would result in the limited use, transport, storage, and disposal of hazardous materials, all activities would comply with applicable state and federal laws related to hazardous materials transport, use, and storage, which would significantly reduce the likelihood and severity of accidents that could result in irreversible environmental damage (refer to Section 3.9, *Hazards and Hazardous Materials*).

5.3 GROWTH-INDUCING IMPACTS

As required by the CEQA Guidelines (CEQA Guidelines Section 15126.2[e]), this EIR must include a discussion of the ways in which the proposed Project could cause growth inducing impacts. A project may be growth inducing if it directly proposes the construction of additional housing or if it indirectly fosters economic or population growth by removing obstacles to population growth. Increases in population growth may increase the demand for community service facilities, requiring the construction of new facilities that could cause significant environmental effects. Additionally, a project may encourage or facilitate other activities that could cause significant environmental effects. Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence.

In general, a project may foster physical, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project proposes the construction of new housing
- The project results in the urbanization of land in a remote location (leapfrog development)
- The project removes an impediment to growth (e.g., the provision of new roads to a remote area that would otherwise be unreachable)
- The project establishes a precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment (e.g., a change in zoning or general plan amendment approval for conversion of undeveloped land)
- Significant economic expansion or growth occurs in an area in response to the project (e.g., establishment of employment centers, etc.)

If a project meets any one of these 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.

To comply with CEQA, an EIR must discuss the ways in which the proposed project could promote economic or population growth in the vicinity of the project area and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2(e)). Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth is considered a significant impact only if it affects (directly or indirectly) the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

Removal of Obstacles to Growth

The proposed Project would be confined entirely to property currently owned by the Zoo or City and largely within fully urbanized areas of the City. The cities of Los Angeles, Burbank, and Glendale are almost entirely built out with little to no opportunity for additional future development within the Project vicinity. Both the Zoo and surrounding areas are well-served by existing infrastructure. Implementation of the Project include minor improvement of existing utility systems or connection to utility services to serve the Zoo and improvement of existing roadways and intersection to reduce congestion around the Zoo. Major improvements to water, sewer, and circulation systems and drainage connection infrastructure or the extension of this infrastructure would not be needed. Because the proposed Project constitutes redevelopment within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, Project implementation would not remove an obstacle to growth.

Population and Housing Generation

Growth in the Los Angeles region is projected based on long-term trends in natural births, immigration, and changes in demographic patterns. Planning documents such as the local Los Angeles General Plan, Hollywood Community Plan, and the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) provide the regulatory framework for guiding how this growth is to occur.

The Project may induce growth within the City and region due to the creation of short- and long-term employment opportunities which draw newcomers to the region and increase economic growth. For the purposes of this EIR, implementation of the Vision Plan is anticipated to result in the creation of an additional 531 full-time equivalent (FTE) jobs. It is assumed that a large portion of the 531 FTE jobs would be absorbed by existing working-class residents of the City and surrounding region. Therefore, the proposed Project would not be considered growth inducing as it would not substantially affect long-term employment opportunities. Additionally, even if a portion of the 531 new employees were to move to the City or surrounding vicinity, a total increase of 531 new residents to the City would represent

an insignificant increase in the overall population of the cities of Los Angeles (population 3,979,576), Burbank (population 102,511), and Glendale (population 199,303) (U.S. Census Bureau 2020). The proposed Project's potential population increase would represent less than 0.5 percent of each of these cities total populations and would not significantly increase the population of the region. Further, the proposed Project would not have significant economic or social effects that would result in adverse physical changes or deterioration of the surrounding area.

Potential impacts associated with population, housing, and economic growth anticipated to result from implementation of the proposed Project are further addressed in Section 5.4, *Resource Areas Found Not to Be Significant*.

5.4 RESOURCE AREAS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines state that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and, therefore, are not discussed in detail in the EIR (Section 15128).

Agriculture and Traditional Forestry Resources

The Project site does not contain traditional forestry resources or lands which are classified as Prime Farmland, Unique Farmland, Farmland of statewide Importance, or designated for agricultural or timber extraction. There are no lands within the City under the Williamson Act contracts. The Project does not propose any actions that would substantially affect such resources within the City or surrounding region. Therefore, implementation of the proposed Project would not result in impacts to these resource areas.

Mineral Resources

There are no mineral extraction operations within the Project site or anywhere in the nearby vicinity. The Project site is not designated as an existing mineral resources extraction area by the State, and because the Project site is already highly disturbed, the potential for unknown, recoverable mineral resources to occur on-site is low. Therefore, implementation of the proposed Project would not result in impacts to mineral resources.

Population and Housing

The Project would not have the potential for significant impacts associated with population and housing (refer to Section 5.3, *Population and Housing Generation*). The Project would not result in the demolition, construction, or renovation of any residential uses or units within the City or surrounding cities of Burbank and Glendale. As such, the Project would not directly increase the population of these cities. The Project would, however, provide an unknown amount of short-term employment opportunities during construction as well as approximately 531 FTE jobs over the course of Vision Plan implementation. Short-term Project construction employment would draw from the existing regional workforce and would

not significantly increase the population of these cities. Although a majority of Zoo employees would be anticipated to come from the existing regional workforce, the Project could attract workers from other localities, increasing the resident population of those cities. However, assuming all 531 new FTE employees would move from outside the region to live near the Zoo, these increases would represent less than 0.5 percent of the existing population of the cities of Los Angeles, Burbank, and Glendale, and therefore would not be considered to result in substantial population growth. Therefore, potential impacts of the Project associated with population and housing would be considered *less than significant*. Further analysis of this issue is not required.