

# Section 4

## Other Environmental Considerations

### 4.1 Introduction

This section evaluates the potential growth-inducing effects of the Project Alternatives, discusses the long-term versus short-term considerations, discusses the potential for impacts related to the irreversible commitments of resources, and identifies the environmentally superior Alternative.

### 4.2 Growth-Inducing Impacts

This section presents an overview of the CEQA Guidelines relevant to evaluating growth inducement, discusses the types of growth that typically can occur in the City of Los Angeles, discusses existing obstacles to growth in the HSA, and evaluates the potential for the Project Alternatives (see Section 2.3 and Section 3) to induce growth.

Because each of the Project Alternatives would provide additional wastewater treatment capacity to accommodate future projected wastewater flows in 2020 and would offset some potable water demand with recycled water, this discussion applies to each of the four Project Alternatives.

#### 4.2.1 CEQA Growth-Inducing Guidelines

According to the State CEQA Guidelines (Section 15126.2[d]), an EIR must evaluate the growth-inducing impacts of a proposed action. Growth-inducing impacts are defined by the State CEQA Guidelines as:

*The ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth. Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects... [In addition,] the characteristics of some projects... may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It is not assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. (State CEQA Guidelines, Section 15126.2[d])*

Growth inducement indirectly could result in adverse environmental effects that might not otherwise occur if the induced growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Local land use plans provide for land use development patterns and growth policies that encourage orderly urban development supported by adequate public services, such as water supply, roadway infrastructure, sewer services, and solid waste disposal services. A project that would induce “disorderly” growth

(i.e., conflict with the local land use plans) could indirectly cause additional adverse environmental impacts, including impacts to public services.

Public works projects that are developed to address future unplanned needs (i.e., that would not accommodate planned growth) could result in removing obstacles to population growth. Direct growth inducement would result if, for example, a project involved the construction of new wastewater treatment facilities to accommodate populations in excess of those projected by local or regional planning agencies. Indirect growth inducement would result if a project accommodated unplanned growth and indirectly established substantial new permanent employment opportunities (for example, new commercial, industrial, or governmental enterprises) or if a project involved a construction effort with substantial short-term employment opportunities that indirectly would stimulate the need for additional housing and services. Growth inducement also could occur if the project would affect the timing or location of either population or land use growth, or create a surplus in infrastructure capacity.

## 4.2.2 Types of Growth

The primary types of growth that occur within the City are land use development and population growth. Economic growth, such as the creation of additional job opportunities, also could occur; however, such growth generally would lead to population growth and, therefore, is included indirectly in population growth.

### 4.2.2.1 Land Use Growth

Land use growth is the physical development of residential, commercial, and industrial structures in the City and other jurisdictions that fall within the HSA. Land use growth is subject to land use controls in general plans, community plans, parcel zoning, and applicable entitlements and is dependent on adequate infrastructure (for example, electricity, water, wastewater, and transportation) to support development. Section 3.12 of this EIR presents general information on City land use plans.

### 4.2.2.2 Population Growth

Population growth is growth in the number of persons that live and work in the City and other jurisdictions within the boundaries of the HSA. Population growth occurs from natural causes (births minus deaths) and net emigration to or immigration from other geographical areas. Emigration or immigration can occur in response to economic opportunities, life style choices, or for personal reasons. Natural population growth is a function of the existing population, its average fertility rate, and its average death rate. As discussed in Section 3.13, the population of the City is projected to grow by 19 percent by 2020 (from the 2000 level) according to the 2001 SCAG projections, and by 13 percent according to the 2004 SCAG projections.

Although land use growth and population growth are interrelated, land use and population growth could occur independently from each other. This has occurred in the past where the housing growth is minimal, but population within the area continues to increase. Such a situation results in increasing population densities with a corresponding demand for services, despite minimal land use growth.

### 4.2.3 Existing Obstacles to Growth

Obstacles to growth could include inadequate infrastructure, such as an inadequate water supply that results in rationing, or inadequate wastewater treatment capacity that results in restrictions in land use development. Policies that discourage either natural population growth or immigration also are considered to be obstacles to growth.

Currently, DWP encourages water conservation through programs that increase the installation and replacement of inefficient water-using devices with more efficient low-flow devices to lower per capita water consumption. This ongoing water conservation program is identified in the DWP Urban Water Management Plan, as required by California Water Code Division 6, Part 2.6, Sections 10610 to 10656. The Urban Water Management Plan is a 5-year plan that identifies short-term and long-term water demand management measures to meet growing water needs during normal, dry, and multiple dry years and must include conservation measures. DWP, with assistance from the Metropolitan Water District of Southern California (Metropolitan), has met the immediate water needs of its customers and will take appropriate measures to do so in the future (DWP, 2003). Although the City is encouraging water conservation, no policies, ordinances, or restrictions are in place; consequently, no existing water-related barriers inhibit growth.

In 1987, the City was required to expand Hyperion to full secondary treatment process through an amended consent decree. While the upgrades were underway, the City temporarily limited connections to the sewer system (and, therefore, the treatment system) through the Sewer Permit Allocation Ordinance (Ordinance No. 166,060) to restrict wastewater flow increases while upgrades occurred, thus limiting the amount of land use development that could occur in the City and HSA. As a result of the improvements to Hyperion, the sewer connection restrictions were removed and no sewer connection restrictions exist. Hyperion currently has a treatment capacity of 450 mgd and treats approximately 340 mgd. Therefore, the City currently has adequate capacity to treat wastewater from the current and near-term population and employment base within the HSA, and existing treatment capacity does not constitute an obstruction to land use growth.

Overall development in the City is governed by the General Plan, which is intended to direct land use development in an orderly manner. The General Plan is the framework under which development occurs, and, within this framework, other land use entitlements (such as variances and conditional use permits) can be obtained. Because the General Plan guides land use development and allows for entitlements, it does not represent an obstacle to land use growth. The City currently does not have policies that discourage immigration.

### 4.2.4 Growth Evaluation

As discussed above, growth inducement can be direct or indirect, and both types are evaluated below. The following conditions were considered in assessing the direct and indirect growth-inducing effects of the Proposed Project Alternatives.



- If the Alternative: (1) results in the construction of additional housing, either directly or indirectly, (2) fosters economic growth that results in increased population growth, or (3) removes obstacles to population growth, the Alternative would be considered to cause growth-inducing effects. These effects must be considered because of their potentially taxing effect on existing community service facilities.
- Growth in any area is not assumed to be beneficial, detrimental, or of little significance to the environment.

#### 4.2.4.1 Direct Growth Inducement

Alternatives 1 through 4 provide various wastewater treatment, wastewater conveyance, recycled water distribution, and runoff management facilities to meet future wastewater treatment needs and regulations. None of the alternatives would result in the construction of new housing and, therefore, would not directly induce growth.

#### 4.2.4.2 Indirect Growth Inducement

Two areas of potential indirect growth inducement are relevant to a discussion of the Alternatives: (1) the potential for the IRP to generate economic opportunities that could lead to additional immigration, and (2) the potential for the Project Alternatives to remove an obstacle to land use or population growth.

Construction of any of the Alternatives would occur over a 15-year time period (through 2020). (The triggers for determining sequencing of facility construction are discussed in Section 2.4.) Draft financial projections were prepared as part of the IRP Facilities Plan process. These projections show that implementation of the Alternatives could require annual capital spending ranging from \$179 million to \$212 million. Construction spending for the Project Alternatives would generate jobs throughout the region and elsewhere where goods and services are purchased or used to construct the project. Based on the above annual construction cost estimates, the alternatives would result in up to 2,745 direct jobs and 1,446 indirect jobs. The creation of up to 4,191 total jobs in the region is considered a benefit.

Although the construction of an Alternative would increase the economic opportunities in the area and region, construction is not expected to result in or induce substantial or significant population or land use development growth because the majority of the new jobs that would be created by construction of an Alternative are expected to be filled by persons already residing in the area or region, based on the existing surplus of unemployed persons in the area and region. SCAG estimates that the City of Los Angeles had 117,000 unemployed persons in 2000, while the SCAG region had over 405,000.

The second area of potential indirect growth inducement is through the removal of obstacles to growth. As discussed above, no obstacles exist to land use or to population growth in the City. The Project Alternatives propose increasing treatment plant capacity to accommodate anticipated wastewater flows in 2020. The expansions and upgrades of the treatment plants proposed in each Alternative are based on wastewater flow projections that, in turn, are based on population and employment

projects prepared by SCAG and applied to the HSA. Volume 1 of the IRP Facilities Plan contains detailed information on the development of wastewater flow projections (City of Los Angeles, 2004). Thus, the proposed treatment capacities for Hyperion, Tillman, and LAG described in the Project Alternatives are sized to safely accommodate only the projected future flows.

In addition, implementation of these facility improvements would be based on trigger flows that would use demand or regulatory drivers to trigger the time of the improvements (see Section 2.4.1). Consequently, implementation of the selected Alternative is not expected to result in a substantial surplus of wastewater treatment capacity because the implementation will be linked closely to the incremental need via the triggers discussed in Section 2.4. Furthermore, on the basis of the success of water conservation efforts by DWP, the City currently has some surplus treatment capacity that has not been identified as having induced growth. Because the treatment capacity under the Project Alternatives is based on SCAG population projections and because the Project Alternatives would not remove an existing barrier to growth, significant growth-inducing impacts are not anticipated.

The Regional Board has issued NPDES permits for treatment plant discharges to the Santa Monica Bay and the LA River. The City must comply with the effluent quality requirements set forth in the permits. In addition, the NPDES permits prohibit the City from discharging wastewater from any point other than those specifically allowed in the permits. Therefore, the City must provide adequate wastewater conveyance capacity to safely convey the flow to the treatment plants without spills, and must provide adequate treatment capacity to treat the wastewater adequately prior to discharge. The Alternatives represent key infrastructure upgrades intended to ensure that wastewater generated from the SCAG-projected growth in the HSA does not result in threats to public health and safety or in detrimental effects to the environment related to wastewater spills or inadequate treatment.

In addition, the Alternatives would result in additional recycled water usage that would offset current potable water use. This would have the effect of making the offset potable water available for other potable water uses. Water recycling is an integral aspect of meeting the potable water needs of its customers. DWP also uses water purchased from Metropolitan to meet the needs that are not met by other sources. To the extent that the Alternatives make additional potable water available by offsetting its use with recycled water, and the offset potable water is not used by additional demand as a result of projected population growth, less water would have to be purchased from Metropolitan. Thus, given that water demand would increase in the future as a result of projected population growth and given that the potential to lessen future water purchases from Metropolitan exists, none of the Alternatives is expected to result in a potable water surplus that could induce population growth.

The No Project Alternative, in contrast to the Proposed Project Alternatives (Alternatives 1 through 4), would not implement a wastewater facilities plan at this time. Under the No Project Alternative, if no additional treatment or conveyance capacity is provided, treatment capacity could become constrained over time as the population and wastewater flows increase. Restrictions in land use growth or development could be implemented as the treatment capacity becomes constrained in

an attempt to keep wastewater flows at volumes manageable by the treatment plants. Although the No Project Alternative could result in an obstacle to land use growth in the future, there is no guarantee that it would present an obstacle to population growth because natural population increases are not entirely dependent on the creation of new housing. In other words, the existing housing stock is capable of supporting some further population growth; therefore, population growth could continue despite potential future land use development restrictions. Such a situation could lead to threats to public health and safety and the environment due to potential wastewater spills and/or inadequate treatment.

### **4.3 Long-Term Versus Short-Term Considerations**

The purpose of the IRP Facilities Plan is to provide various wastewater treatment, wastewater conveyance, recycled water distribution, and runoff management facilities to meet future wastewater treatment needs and regulations (City of Los Angeles, 2004). Each Project Alternative meets the long-term goals of protecting public health and safety, providing adequate wastewater treatment and conveyance capacity, and protecting the environment (Section 1 provides further details on the project goals and objectives). Although all the Project Alternatives assessed in this EIR would involve short-term or temporary construction impacts, each Project Alternative would result in long-term benefits associated with adequate wastewater conveyance and treatment, increased recycled water use, and improved runoff water quality.

As described in detail in Section 2, the facilities under the Project Alternatives would be implemented in a manner and sequence as required to protect public health and safety. Various triggers (see Section 2.4) would be considered prior to designing or constructing each IRP Facilities Plan component of the Alternative selected for implementation). These triggers would provide a mechanism for timing the implementation of individual IRP components only when they are needed. The alternatives would contribute to the long-term benefit of a healthy, livable, and more sustainable community.

The No Project Alternative would not implement a wastewater facilities plan that integrates future wastewater, recycled water, or runoff needs. In the short term, the No Project Alternative would not result in temporary construction-related impacts, as would the Project Alternatives. Under the No Project Alternative, modifications to the City treatment plants and other infrastructure are likely to be implemented in the future, but these modifications would be done in a manner that does not integrate complementary components or consider the entire system. In addition, needed upgrades might not occur in the timeframe to address system needs adequately and safely. Consequently, although implementing the No Project Alternative would not result in short-term construction impacts, it would likely result in a wastewater system that does not operate as efficiently as the integrated system components reflected in the Proposed Project Alternatives. In addition, the No Project Alternative could result in long-term threats to public health and safety and likely would result in the expenditure of increased public funds to correct system inefficiencies or mitigate public health and safety threats, compared to implementing the Proposed Project Alternatives.

## 4.4 Significant Irreversible Impacts

Section 15126.2(c) of the State CEQA Guidelines requires a discussion of potential significant, irreversible environmental changes that could result from a proposed project. Examples of such changes include commitment of future generations to similar uses, irreversible damage that may result from accidents associated with a project, or irretrievable commitments of resources.

Although the Project Alternatives would require numerous resources (raw materials, nonrenewable resources, labor, energy, and money) to construct and operate, it does not represent a substantial irreversible commitment of resources. The Alternatives are intended to benefit the residents of the City and other jurisdictions within the HSA over the long term and represent an investment in safe, livable, and sustainable communities.

## 4.5 Environmentally Superior Alternative

As discussed above, each of the Proposed Project Alternatives (Alternatives 1, 2, 3, and 4) would meet the long-term goals of protecting public health and safety, providing adequate wastewater treatment and conveyance capacity, and protecting the environment. Although each of the Proposed Project Alternatives would result in short-term or temporary construction-related impacts, implementing any one of them would be superior to the No Project Alternative, because they are designed to ensure that adequate wastewater treatment and conveyance capacity exists to prevent sewage overflows, comply with NPDES effluent quality, and meet the requirements of other laws and regulations.

Among the Proposed Project Alternatives, Alternative 1 has been identified as the Environmentally Superior Alternative based on its lower level of energy consumption and associated lower levels of air emissions.

Several components of the IRP, such as NEIS II and GBIS, are common to all the Proposed Project Alternatives and, therefore, impacts after mitigation would be comparable for each of the four Project Alternatives. There are, however, distinct differences among the impacts of the four Project Alternatives. The expansion of wastewater capacity at Tillman and LAG (Alternative 2) or Tillman only (Alternatives 3 and 4) would be subject to more stringent effluent discharge standards than at Hyperion (Alternative 1) because the upstream plants discharge effluent to the Los Angeles River, whereas Hyperion discharges effluent to the Santa Monica Bay. On the basis of this difference in effluent treatment, discharge under Alternatives 2, 3, or 4 (to either Tillman or LAG) would require a higher level of energy consumption for advanced treatment, and this would result in Alternative 1 being the most energy efficient of the four Proposed Project Alternatives. The lower energy consumption of Alternative 1 also would contribute to Alternative 1 producing the lowest operational air quality emissions of the four Proposed Project Alternatives. Alternative 1 is, therefore, deemed to be the Environmentally Superior Alternative.

Although Alternative 1 has been identified as the Environmentally Superior Alternative based on lesser impacts to energy consumption and air quality, other factors (such as cost, system reliability, and redundancy) must be considered in



selecting the Preferred Alternative for implementation. As such, the Preferred Alternative could use criteria other than those considered in selecting the Environmentally Superior Alternative.

## **4.6 Unavoidable Significant Adverse Impacts**

CEQA requires the disclosure of significant environmental effects that cannot be avoided if the Project is implemented. Section 3 of this EIR identifies the anticipated environmental effects for each resource area, identifies mitigation measures for potentially significant impacts, and determines if impacts after implementation of mitigation are significant. Significant impacts that remain after implementation of mitigation are considered significant unavoidable adverse impacts. Significant unavoidable adverse impacts are identified in Chapter 3 and are also summarized in Table ES-1 in the Executive Summary.