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## Energy Resources

This section evaluates energy-related impacts from the proposed CalVTP. The analysis considers whether implementation of the CalVTP would result in inefficient, wasteful, or unnecessary consumption of energy or if it would obstruct the deployment or use of renewable energy resources. The CalVTP would not include the construction or operation of any land use types that would require grid-sourced energy. Treatments conducted under the CalVTP would require the use of petroleum fuels to power passenger vehicles, trucks, and heavy-duty equipment, but would not involve the consumption of electricity from the grid.

Comments on the Notice of Preparation related to energy resources included recommendations that CAL FIRE retrofit existing stations to be more energy efficient and supportive of solar photovoltaic systems (see Appendix A). The primary purpose of the proposed CalVTP is to reduce wildfire risk by treating vegetation and does not include physical alternations to existing fire stations. Therefore, this issue not addressed in this PEIR.

### Regulatory Setting

#### Federal

##### Energy Policy and Conservation Act, and CAFE Standards

The Energy Policy and Conservation Act of 1975 established nationwide fuel economy standards to conserve oil. Pursuant to this Act, the National Highway Traffic and Safety Administration (NHTSA), part of the U.S. Department of Transportation (DOT), is responsible for revising existing fuel economy standards and establishing new vehicle economy standards.

The Corporate Average Fuel Economy (CAFE) program was established to determine vehicle manufacturer compliance with the government’s fuel economy standards. Compliance with the CAFE standards is determined based on each manufacturer’s average fuel economy for the portion of their vehicles produced for sale in the country. The U. S. Environmental Protection Agency (EPA) calculates a CAFE value for each manufacturer based on the city and highway fuel economy test results and vehicle sales. The CAFE values are a weighted harmonic average of the EPA city and highway fuel economy test results. Based on information generated under the CAFE program, DOT is authorized to assess penalties for noncompliance. The Energy Independence and Security Act of 2007 (described below) identifies the current CAFE standards.

##### Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 (EPAct) was passed to reduce the country’s dependence on foreign petroleum and improve air quality. EPAct includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally-fueled fleets in metropolitan areas. EPAct requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in EPAct. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive programs to help promote AFVs. The Energy Policy Act of 2005 does the following: provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

##### Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 was designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. The Energy Independence and Security Act of 2007 increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels; and reduces U.S. demand for oil by originally setting a CAFE standard of 35 miles per gallon (mpg) by 2020—an increase in fuel economy standards of 40 percent. In 2012, the NHTSA amended the CAFE standard to achieve 54.5 mpg by 2025.

By addressing renewable fuels and the CAFE standards, the Energy Independence and Security Act of 2007 builds upon progress made by the Energy Policy Act of 2005 in setting out a comprehensive national energy strategy for the 21st century; however, in August of 2018, the NHTSA and EPA proposed the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks, which, if adopted, would decrease the stringency of CAFE standards. The Proposed Rule would maintain the existing standards until 2020 with a zero percent increase in fuel efficiency until 2026. The Proposed Rule is undergoing public and environmental review and has not been formally adopted (EPA 2018).

#### State

##### Warren-Alquist Act

The 1974 Warren-Alquist Act (Act) established the California Energy Resources Conservation and Development Commission, now known as the California Energy Commission (CEC). The Act was created in response to the state legislature’s review of studies that projected an increase in statewide energy demand, which could result in the development of power plants in environmentally sensitive areas. The Act introduced state policy for siting power plants to reduce potential environmental impacts, and additionally sought to reduce demand for new generation by directing CEC to develop statewide energy conservation “measures to reduce wasteful, uneconomic, inefficient, and unnecessary uses of energy” (Public Resources Code Section 25400). Conservation measures recommended establishing design standards for energy conservation in buildings. This ultimately resulted in the creation of the Title 24 Building Energy Efficiency Standards (California Energy Code), which have been updated regularly and remain in effect today. The Act additionally directed CEC to cooperate with the Office of Planning and Research, the California Natural Resources Agency (CNRA), and other interested parties in developing procedures to ensure that measures intended to minimize wasteful, inefficient, and unnecessary consumption of energy are included in all environmental impact reports required pursuant to CEQA.

##### Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), CEC and the California Air Resources Board (CARB) prepared and adopted a joint agency report in 2003, *Reducing California’s Petroleum Dependence.* Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CEC and CARB 2003). Further, in response to the CEC’s 2003 and 2005 *Integrated Energy Policy Reports*, Governor Davis directed CEC to take the lead in developing a long-term plan to increase alternative fuel use. A performance-based goal of AB 2076 was to reduce petroleum demand to 15 percent below 2003 demand by 2030.

##### Integrated Energy Policy Report

Senate Bill (SB) 1389 (Chapter 568, Statutes of 2002) required CEC to: “conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The Energy Commission shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state’s economy, and protect public health and safety” (Public Resources Code Section 25301(a)). This work culminated in the Integrated Energy Policy Report (IEPR).

CEC adopts an IEPR every 2 years and an update every other year. The 2017 IEPR is the most recent IEPR, which was adopted March 16, 2018. The 2017 IEPR provides a summary of priority energy issues currently facing the state, outlining strategies and recommendations to further the state’s goal of ensuring reliable, affordable, and environmentally-responsible energy sources. Energy topics covered in the report include progress toward statewide renewable energy targets and issues facing future renewable development; efforts to increase energy efficiency in existing and new buildings; progress by utilities in achieving energy efficiency targets and potential; improving coordination among the state’s energy agencies; streamlining power plant licensing processes; results of preliminary forecasts of electricity, natural gas, and transportation fuel supply and demand; future energy infrastructure needs; the need for research and development efforts to statewide energy policies; and issues facing California’s nuclear power plants.

##### Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statues of 2005) required CEC to prepare a state plan to increase the use of alternative fuels in California. CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other state, federal, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes the costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California’s goals to reduce petroleum consumption, increase alternative fuel use, reduce greenhouse gas (GHG) emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

##### Executive Order S-06-06

Executive Order S-06-06, signed on April 25, 2006, establishes targets for the use and production of biofuels and biopower, and directs state agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The Executive Order establishes numerical targets to increase the production and use of bioenergy within California, including ethanol and biodiesel fuels made from renewable resources. These targets entail the in-state production of a minimum of 20 percent of total biofuels consumed within California by 2010, 40 percent by 2020, and 75 percent by 2050. The Executive Order also calls for the state to meet a target for use of biomass electricity. The 2011 Bioenergy Action Plan identifies those barriers and recommends actions to address them so that the state can meet its clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 plan and provides a more detailed action plan to achieve the following goals:

* increase environmentally- and economically-sustainable energy production from organic waste;
* encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications;
* create jobs and stimulate economic development, especially in rural regions of the state; and
* reduce fire danger, improve air and water quality, and reduce waste.

As of 2017, 2.99 percent of the total electricity system power in California was derived from biomass (CEC 2018). There are about 30 biomass plants in California with a total capacity of almost 640 megawatts. These plants typically combust biomass from forest (43 percent), urban wood (29 percent), agricultural or food waste (21 percent), and municipal solid waste (7 percent) sources (CEC 2019a).

##### Assembly Bill 32, Senate Bill 32, and Climate Change Scoping Plan and Update

*California’s 2017 Climate Change Scoping Plan* (2017 Scoping Plan), prepared by CARB, outlines the main strategies California will implement to achieve the legislated GHG emission target for 2030 (i.e., 40 percent below 1990 levels) and “substantially advance toward our 2050 climate goals” (i.e., 80 percent below 1990 levels) (CARB 2017:1, 3, 5, 20, 25–26). The 2017 Scoping Plan identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste). Many of the regulations contained in the 2017 Scoping Plan such as the Advanced Clean Cars, Low Carbon Fuel Standard, and Renewable Portfolio Standard will reduce GHGs while simultaneously making the state as whole more energy efficient.

More details about the statewide GHG reduction goals and 2017 Scoping Plan measures are provided in the regulatory setting of Section 3.8, “Greenhouse Gas Emissions.”

##### 2030 Natural and Working Lands Climate Change Implementation Plan

In a joint, inter-agency effort, the California Environmental Protection Agency (CalEPA), California Department of Food and Agriculture (CDFA), CNRA, CARB, and California Strategic Growth Council (SGC) released the 2019 Draft California 2030 Natural and Working Lands Climate Change Implementation Plan (Plan) in January 2019. The Plan serves as a multi-disciplinary approach to conserve and maintain a resilient natural and working lands sector to provide the state with a natural carbon sink and improve air and water quality, wildlife habitat, recreation, and other benefits. The Plan sets goals for, at a minimum, increasing the rate of state-funded soil conservation practices by fivefold, doubling the rate of state-funded forest management and restoration efforts, tripling the rate of state-funded oak woodland and riparian reforestation, and doubling the rate of state-funded wetland and seagrass restoration above current practices (CalEPA, CNRA, CDFA, CARB, and SGC 2019).

##### Health and Safety Code Section 43870

Health and Safety Code (HSC) Section 43870 requires by January 1, 2024 that 10 percent of transportation fuels purchased by state agencies be very low carbon transportation fuels, which includes renewable diesel fuels. HSC Section 43870(b) defines “very low carbon transportation fuel” to mean a liquid or gaseous transportation fuel having no greater than 40 percent of the carbon intensity of the closest comparable petroleum fuel for that year as measured by the methodology in the Low Carbon Fuel Standard Regulation.

##### Senate Bill 100: California Renewables Portfolio Standard Program

SB 100 accelerated targets set by previously-enacted Renewable Portfolio Standard (RPS)-related legislation to require that all California utilities, including independently-owned utilities, energy service providers, and community choice aggregators, supply 44 percent of retail sales from renewable resources by December 31, 2024, 50 percent by December 31, 2026, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The law requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Biomass is indicated as an eligible renewable energy source under the state’s RPS guidelines.

##### 2016 Mobile Source Strategy

In 2016, CARB released the updated Mobile Source Strategy, which addresses exhaust emissions from on-road light-duty and heavy-duty vehicles, off-road federal and international sources (i.e., aircraft, locomotives, and ocean-going vessels), and off-road equipment. The strategy demonstrates how the state can simultaneously meet air quality standards, achieve greenhouse gas emission reduction targets, decrease health risk from transportation-related emissions, and reduce petroleum consumption over the next 15 years. The strategy identifies the mobile-source reductions necessary to reduce transportation-related petroleum use by up to 50 percent statewide by 2030.

##### Short-Lived Climate Pollutant Strategy

Short-lived climate pollutants (SLCPs) are powerful GHGs that remain in the atmosphere for a much shorter period of time than longer-lived pollutants such as carbon dioxide. They include methane, fluorinated gases, and black carbon (particulates). Their potency, as compared to carbon dioxide, can be tens, hundreds, and thousands of times greater. SB 605 directed CARB to develop a comprehensive SLCP strategy. In coordination with other state agencies and local air districts, CARB adopted the SLCP Strategy in March 2017. The strategy identified the use of anaerobic digesters to convert organic waste such as mulch or wood chips to renewable electricity, biogas, clean transportation fuels, and others.

### Environmental Setting

#### energy Consumption for transportation

Gasoline and diesel fuel constitute 83 and 17 percent of petroleum-based fuels sold in California, respectively. According to the state Board of Equalization, 15.58 billion gallons of gasoline and 3.12 billion gallons of diesel were sold in 2017 (CEC 2019b). Passenger cars and light-duty trucks operated by CAL FIRE in 2016 consumed 1.59 million gallons of gasoline and 1.63 million gallons of petroleum-based diesel fuel. This segment of the agency’s vehicle fleet additionally consumed 148,573 gallons of renewable diesel fuel in response to goals established in the state’s Green Fleet alternative fuels program (DGS 2019).

##### Fuel Types

###### Petroleum

Gasoline and diesel fuel sold in California for motor vehicles and equipment is refined in California to meet specific formulations required by CARB.

###### Alternative Fuels

A variety of alternative fuels are used to reduce demand for petroleum-based fuel. The use of these fuels is encouraged through various statewide regulations and plans, including the Low Carbon Fuel Standard and 2017 Scoping Plan. Conventional gasoline and diesel can be replaced (depending on the capability of the vehicle) with many transportation fuels, including:

* biodiesel,
* electricity,
* ethanol (E-10 and E-85),
* hydrogen,
* natural gas (methane in the form of compressed and liquefied natural gas),
* propane,
* renewable diesel (including biomass-to-liquid),
* synthetic fuels, and
* gas-to-liquid and coal-to-liquid fuels.

California has a growing number of alternative fuel vehicles due to the joint efforts of CEC, CARB, local air districts, federal government, transit agencies, utilities, and other public and private entities. As of March 2019, California contained over 20,000 alternative fueling stations (Alternative Fuels Data Center 2019).

##### Vehicle Miles Traveled and Gasoline Consumption

According to Caltrans, total gasoline purchased in 2015 totaled 6.5 million gallons (Caltrans 2018). Fuel consumption per capita in California decreased by nearly 11 percent from 2008 to 2011 (Bureau of Transportation Statistics 2015). Despite the progress in reducing per capita VMT and per capita fuel consumption, the continued projected increases in total fuel consumption and VMT can be attributed to the overall increase in population.

#### Energy Consumption for Current vegetation treatments and wildfire

Treatments currently occur within the treatable landscape and energy is consumed during ongoing vegetation treatments when gasoline and diesel fuel are combusted during operation of vehicles and equipment (e.g., chainsaws and masticators). As described in Chapter 1, “Introduction” and Section 2.3.1, “Past and Current Treatments,” vegetation treatment currently occurs around the state under several other wildfire risk reduction programs implemented by various federal, state, and local agencies. In 2017–2018, CAL FIRE treated approximately 33,000 acres in California using the same treatment activities as proposed under the CalVTP.

Wildfire can occur throughout the state and require emergency response in the form of personnel and equipment. In cases where a wildfire exceeds the capacity of a local CAL FIRE unit, emergency resources may be diverted to a wildfire from elsewhere in the state requiring the consumption of fuels to transport personnel and equipment. At the peak of the Carr Fire in 2018, for instance, as many as 4,766 personnel worked to contain the fire, including 50 firefighters dispatched from Australia and New Zealand. During the peak of the Camp Fire in 2018, nearly 6,000 firefighters, 622 engines, 75 water tenders, 103 bulldozers, and 24 helicopters from all over the Western United States were deployed (InciWeb 2018). Although these catastrophic fires are atypical, emergency response to more “typical” wildfires also results in deployment of substantial human and equipment resources from distant locations. During catastrophic wildfire events, the main goal is containment and reducing impacts to human life and property. Efficient use of energy and fuels is not prioritized, and energy resources are used as a means to reach that goal. Energy is also consumed to evacuate residents, fire suppression, and move personnel.

Additionally, wildfires can damage or destroy electrical transmission and distribution facilities and infrastructure. In some cases, when meteorological conditions are conducive to supporting wildfire, utilities may opt to cut electricity to consumers within their service areas as a preventative measure against ignition of wildfires.

### Impact Analysis and Mitigation Measures

#### Analysis Methodology

The analysis of environmental impacts associated with energy consumption focuses on the potential to result in the wasteful, inefficient, or unnecessary consumption of energy or conflict with or obstruct a state or local plan for energy efficiency. As discussed in Section 3.9.1, “Regulatory Setting,” the Warren-Alquist Act of 1974 directed CEC to develop statewide energy conservation measures to minimize environmental impacts caused by “…growth in demand which is caused by wasteful, uneconomic, inefficient, and unnecessary uses of power” (Priolo 1973). Reducing the growth in energy demand under this legislation was intended to limit the proliferation of power plants in environmentally sensitive areas of the state. The act also involved the establishment of parameters for the siting of power plants. This language from the act is represented in Appendix G of the State CEQA Guidelines and can be intuited to primarily apply to environmental impacts related to energy demand requiring increased generation capacity and appurtenant transmission infrastructure.

Significance determinations account for the influence of SPRs, which are incorporated into treatment design. The analysis herein discusses energy consumption under the CalVTP qualitatively in consideration of whether such consumption would be wasteful, uneconomic, inefficient, and unnecessary, consistent with the intentions of the Warren-Alquist Act.

#### Thresholds of Significance

Thresholds of significance are based on Appendix G of the 2019 State CEQA Guidelines. A treatment implemented under the proposed CalVTP would result in a significant impact on energy resources if it would:

* result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and/or
* conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

#### Issues Not Evaluated Further

Regarding whether the CalVTP would conflict with or obstruct a state or local plan for renewable energy or energy efficiency, CAL FIRE’s participation in the state’s Green Fleet Program would enable the ongoing incorporation of alternative fuels, including renewable diesel fuels into the agency’s statewide operations. Additionally, the treatment activities occurring under the CalVTP would result in the availability of organic materials that could potentially be used for renewable energy generation. Biomass is indicated as an eligible renewable energy source under the state’s RPS guidelines. The RPS was recently updated to require statewide zero-carbon electricity projection by 2045, which would require a diverse mix of renewable energy generation sources. The organic material produced by CalVTP could also be converted into renewable electricity, biogas, and biodiesel for use as a renewable transportation fuel in anaerobic digestion facilities throughout the state, as has been proposed and is currently being implemented under CARB’s SLCP strategy. For these reasons, implementation of the CalVTP would not conflict with state or local plans for renewable energy or energy efficiency. Therefore, this impact is not evaluated further.

#### Impact Analysis

Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy

Energy would be consumed under the proposed CalVTP in the form of fossil fuel (e.g., diesel and other petroleum fuels) combustion in the engines of vehicles and equipment, which would be used by workers accessing treatment areas and during implementation of treatment activities. Consistent with the CalVTP’s purpose of reducing wildfire risk and to the extent it would decrease intensity of wildfires, implementation of treatment activities would also reduce the intensity of fire response. With less intense wildfire response and its relatively inefficient consumption of energy, fuel and energy consumption for wildfire response would decrease, as well. Thus, impacts related to consumption of energy resources would be **less than significant**.

Energy would be consumed from the combustion of diesel and other petroleum-based fuels to operate heavy-duty equipment and trucks during implementation of treatment activities in the treatable landscape, as well as from gasoline and diesel consumption associated with the movement of workers to and from treatment areas. Gasoline and diesel would be consumed during transport of workers, equipment and livestock (for prescribed herbivory) to and from treatment areas.

Diesel fuel would also be used to power heavy-duty equipment (e.g., bulldozers), other mechanical treatment equipment (e.g., masticators, chainsaws), and water trucks. Manual vegetation treatment would require the use of hand-operated power tools which typically run on blended two-cycle engine fuel (i.e., gasoline and oil mixed together). In some cases, jet fuel would be required to operate helicopters, if used in prescribed burning.

Under existing conditions, vegetation treatments are implemented within the treatable landscape by CAL FIRE and other land management agencies and agencies with land ownership responsibilities. As described in Section 2.3.1 of Chapter 2, “Program Description,” CAL FIRE currently treats approximately 33,000 acres annually and other agencies currently treat additional acres in the treatable landscape. Under the proposed CalVTP these treatment activities would continue to occur and substantially increase in pace and scale to achieve the annual treatment target of approximately 250,000 acres. With this increase in treatment acreage, total fuel consumption related to vegetation treatments in comparison to existing conditions would greatly increase. Assuming that the same distribution of treatment activities would continue to occur under the CalVTP as existing conditions, petroleum fuel consumption could increase by approximately tenfold. However, the actual combination of treatment activities cannot be accurately predicted (refer to Section 2.5.2 in Chapter 2, “Program Description”).

A primary objective of the CalVTP is to reduce wildfire risk. Land management practices focusing on fire suppression combined with changing meteorological conditions due to climate change (e.g., higher temperatures, drought conditions) has contributed to increased and prolonged wildfires throughout the treatable landscape. Higher temperatures in particular have extended the fire season to nearly year-around.

Wildfires require an immediate response from emergency personnel and mobilization of equipment. During wildfires that exceed the containment capacity of local resources, personnel from throughout the state (and occasionally nationally and internationally) are dispatched to assist in firefighting. Refer to Energy Consumption for Current Vegetation Treatments and Wildfire in Section 3.9.2 for examples. Efficient energy consumption is not a primary consideration during wildfires. Rather, protecting human life and property is prioritized.

Additionally, containment and cleanup of wildfires require a joint effort by local, state, and federal agencies. CalEPA and its departments assist local, state, and federal agencies during and after major wildfires. CARB provides emergency air monitoring, the California Department of Toxic Substances Control identifies and removes hazardous materials following containment, and the California Department of Resources Recycling and Recovery removes ash. This movement of personnel results in a surge of consumption of fossil fuels associated with vehicle and aerial travel, as well as an increase in grid-sourced electricity and propane and natural gas consumption associated with lodging personnel. While implementation of treatment activities under the CalVTP cannot ensure that catastrophic fires would not occur due to unforeseen factors (e.g., future climate conditions, availability of resources), implementation of the proposed CalVTP would reduce wildfire risk and the comparatively inefficient fossil fuel consumption associated with such events would also be reduced.

As described under Analysis Methodology above, a project that could introduce substantial energy demand such that additional energy-related infrastructure and facilities (e.g., power plant) would need to be built and would result in physical environmental effects, would be considered a significant energy impact. Energy consumption under the CalVTP would be from the combustion of fuels to implement vegetation treatment activities. Therefore, the CalVTP would not generate energy demand from the electrical grid to warrant the construction or operation of additional energy infrastructure that could result in physical environmental effects.

The existing conditions within the treatable landscape currently support landscapes conducive to largescale, highly damaging wildfire which, while active, require immediate and inefficient energy consumption to respond. Efficient energy use is not a primary consideration during wildfires. Rather, protecting human life and property is prioritized. By reducing wildfire risk the inefficient allocation of energy resources during catastrophic wildfire events could also be reduced.

For the reasons described above, energy consumption under the CalVTP would not be “wasteful, inefficient, or unnecessary.” This impact would be **less than significant**.

##### Mitigation Measures

No mitigation is required for this impact.