IV. Environmental Impact Analysis

M. Utility and Service Systems

4. Electric Power, Natural Gas, and Telecommunications Infrastructure

1. Introduction

The following section analyzes the proposed Project's potential impacts upon electric power, natural gas, and telecommunications infrastructure. This section focuses on the existing infrastructure serving the project area and the potential for environmental impact to occur as a result of any physical improvements that may be necessary to accommodate the proposed Project. The information presented in this section is based in part on the information provided by the City of Los Angeles Department of Water and Power. Potential impacts associated with energy demand and energy conservation policies are discussed in **Section IV.N. Energy**, of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

There are several plans, policies, and programs regarding Electric Power, Natural Gas, and Telecommunications Infrastructure at the federal and state levels. Described below, these include:

- United States Department of Energy (the Energy Policy Act of 2005)
- California Independent System Operator
- California Public Utilities Commission
- California Energy Commission
- Senate Bill 1389
- Senate Bill 649
- California Independent System Operator
- City of Los Angeles Information Technology Agency
- City of Los Angeles Municipal Code Section 10.5.4

(1) Federal

(a) United States Department of Energy (Energy Policy Act of 2005)

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves, and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority.

(2) State

California energy infrastructure policy is governed by three institutions: the California Independent System Operator (California ISO), the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC). These three agencies share similar goals, but have different roles and responsibilities in managing the state's energy needs. The majority of state regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to **Section IV.N. Energy**, of this Draft EIR. There are, however, regulations pertaining to infrastructure. These are discussed further below.

(a) California Independent System Operator

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The

California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

(b) California Public Utilities Commission

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUCs jurisdiction. The Digital Infrastructure and Video Competition Act of 2006 (DIVCA) established the CPUC as the sole cable/video TV franchising authority in the State of California. DIVCA took effect January 1, 2007.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the state Senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities.

(c) California Energy Commission

The CEC is a planning agency which provides guidance on setting the state's energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the state, developing renewable energy resources, and permitting thermal power plants 50 megawatts and larger. The CEC also has regulatory specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured.

(d) Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. In 2018, the CEC decided to write the Integrated Energy Policy Report in two volumes. The Volume I, which was published on August 1, 2018, highlights the implementation of California's innovative policies and the role they have played in moving toward a clean energy economy. Volume II, which was adopted in February 2019, identifies several key energy issues and actions to address these issues and ensure the reliability of energy resources.[1]

(e) Senate Bill 649

Senate Bill 649 (SB 649) requires small cellular installations be on vertical infrastructure and on property outside of public rights-of-way. The installation is required to comply with all applicable federal, state, and local health and safety regulations. Additionally, cellular equipment that is no longer in use is required to be removed at no cost to the City.

[1] 2018 Integrated Energy Policy Report Updated, Volume II, February 2019.

(3) Local

(a) City of Los Angeles Information Technology Agency

The City of Los Angeles Information Technology Agency (ITA) is responsible for a broad spectrum of services related to technology services to both internal and external customers. These range from classic IT services, such as computer support, enterprise applications, data networks, and a 24/7 data center to progressive digital services, such as a TV station (LACityview), 3-1-1 Call Center, public safety radio/microwave communications, helicopter avionics, enterprise social media, and more.

ITA's Video Services Regulatory Division advises the Mayor and City Council on certain issues relating to video/cable TV services and private telecommunications franchises. The Division regulates and monitors the compliance of video/cable TV services and franchises issued by the CPUC. More specifically, it ensures that video/cable TV service providers comply with local, state, and federal laws and oversees the video/cable TV service interests of City residents.

(b) City of Los Angeles Municipal Code Section 10.5.4

Los Angeles Municipal Code (LAMC) Section 10.5.4 states that telecommunications providers are required to comply with all City, state, and federal regulations during installation and operation of equipment. Additionally, each lease, sublease, or license facilitated by telecommunications providers are required to seek approval from the City.

b) Existing Conditions

(1) Electricity

(a) Electricity Supplies

LADWP's power system is the nation's largest municipal electric utility, and serves a 465-square-mile area in Los Angeles and much of the Owens Valley. The system supplies more than 26 million megawatt-hours (MWh) of electricity a year for the City's 1.5 million residential and business customers as well as over 5,000 customers in the Owens Valley. LADWP has over 7,880 megawatts (MW) of generation capacity from a diverse mix of energy sources including renewable energy, natural gas, nuclear, large hydro, coal, and other sources.[2]

(b) Electricity Distribution System

The power supplied to LADWP customers is distributed through a network of approximately 7,148 miles of overhead distribution lines and approximately 3,709 miles of underground distribution

[2] City of Los Angeles, Department of Water and Power, Power, Facts & Figures Website, available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures. Accessed August 22, 2022.

cables.[3] The Project Site is currently developed with two single-story vacant warehouses that occupy 31,600 square feet of floor area, two covered shelters, and an at grade concrete parking lot totaling 22,409 square feet. As discussed in **Section IV.N. Energy**, of this Draft EIR, the existing uses are currently vacant there is no on-site consumption of electricity.

(2) Natural Gas

(a) Natural Gas Supplies

The Southern California Gas Company (SoCalGas) provides natural gas resources to the City and most of Southern and Central California from the United States/Mexico border to the City of Visalia, California. SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.[4] The availability of natural gas is based upon present conditions of gas supply and regulatory policies as the SoCalGas is under the jurisdiction of the California Public Utilities Commission (CPUC) and other federal regulatory agencies. In addition, SoCalGas makes available to its customers energy efficiency programs with rebates and incentives for the purpose of reducing natural gas consumption.

(b) Natural Gas Distribution Systems

(i) Interstate Distribution System

Natural gas is supplied to the Southern California region through a system of interstate pipelines. The *2020 California Gas Report* projects that California natural gas demand is expected to decline at an annual rate of 1.0 percent per year from 2020 to 2035 in the SoCalGas service area.[5] Current capacities in the interstate pipeline system can provide approximately 3,775 million cubic feet (cf) of gas per day for Southern California customers.[6] Gas supply available to SoCalGas from California sources averaged 97 million cf per day in 2019 (the most recent year for which data are available).[7]

(ii) Local Distribution System

SoCalGas provides natural gas resources to the City through existing gas mains located under the streets and public rights-of-way. Natural gas services are provided in accordance with SoCalGas's policies and extension rules on file with the CPUC at the time contractual agreements are made. Natural gas is delivered to the Project Site through natural gas facilities underneath

[3] City of Los Angeles Department of Water and Power, Power, Facts & Figures Website, available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures. Accessed August 22, 2022.
[4] California Gas and Electric Utilities, 2020 California Gas Report, page 111.
[5] The California Gas and Electric Utilities, 2020 California Gas Report, page 4.
[6] The California Gas and Electric Utilities, 2020 California Gas Report, Figure 20 – Receipt Point and Transmissions Zone Firm Capacities, page 114.
[7] California Gas and Electric Utilities, 2020 California Gas Report, page 111,

the adjacent public streets. There are two separate two-inch gas mains in Seaton Street. There is also a two-inch gas main in 5th Street.[8]

The Project Site is currently developed with two single-story vacant warehouses that occupy 31,600 square feet of floor area, two covered shelters, and an at grade concrete parking lot totaling 22,409 square feet. As discussed in **Section IV.N. Energy**, of this Draft EIR, as the existing uses are currently vacant, there is no on-site consumption of natural gas.

(3) Telecommunication Facilities

Prior to 2006, the City of Los Angeles had 14 cable television franchise areas that were served by three incumbent cable operators; Time Warner, Cox, and Charter. The City had provided cable television franchising regulatory authority of its cable television operators for over 30 years. Through City-issued franchises and enforcement of relevant ordinances, the City oversaw these cable television operators in the areas of consumer services and financial payments to the City, technical compliance with all local, state, and federal laws, and Public, Educational, and Governmental (P.E.G.) Access support. In 2006, the California Public Utilities Code was amended under state law and ceded the City's cable television franchising rights to the California Public Utilities Commission. In 2007 and 2008, Verizon and AT&T began operating in the City. Currently, the City's incumbent cable and video TV providers are AT&T, Charter/Spectrum, Cox Communications, Frontier, and Race Communications.[9]

Communication systems located throughout the Project area include underground fiber optic cable, telephone transmission lines (overhead and underground), and cellular towers owned or leased by telecommunications service providers.

Landline telephone service in the Project area is provided by various commercial communications companies. The majority of the landline facilities are located in county- or city-owned rights-of-way and on private easements. Telecommunications lines are either copper wire or fiber optic cable and are routed overhead on utility poles and underground.

In addition to landline service, a large number of communications towers have been constructed throughout the downtown area for cellular telephone service. Cellular towers have been erected along major travel corridors to meet emergency service objectives. Cellular service is available, to varying degrees, throughout the downtown area.

[8] Synergy Advantage Engineers, approved by City of Los Angeles Engineering, stamped November 2020, included in **Appendix O** of this Draft EIR.

[9] City of Los Angeles, Information Technology Agency, News, Video Services/Cable TV Website, available at: https://ita.lacity.org/news/video-servicescable-tv. Accessed August 22, 2022.

3. Project Impacts

a) Thresholds of Significance

In accordance with guidance provided in Appendix G of the *State CEQA Guidelines*, the Project would have a significant impact related to electric power, natural gas, or telecommunication facilities if it would:

Threshold (a): ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.***

The analysis analyzes factors and considerations identified in the *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Threshold Questions. Per the *L.A. CEQA Thresholds Guide*, project-related factors to be used in a case-by-case evaluation of significance include the following:

- *The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;*
- *Whether and when the needed infrastructure was anticipated by adopted plans; and*
- *The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.*

b) Methodology

This analysis evaluates the potential impacts of the Project on existing energy infrastructure by comparing the estimated Project energy demand with the available capacity. Project energy demand, including electricity and natural gas, was calculated using CalEEMod Version 2016.3.2. During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control (including supply and conveyance) and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. During Project operation, energy consumption would include electricity and natural gas from uses such as heating/ventilation/air conditioning (HVAC); water heating, cooking, lighting, and use of electronics/appliances. Additional details regarding Project energy usage are provided in **Section IV.N, Energy**, and **Appendix O** of this Draft EIR.

The Project's estimated energy demands were analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2025 (i.e., the Project buildout year) to determine if these two energy utility companies would be able to meet the Project's energy demands. Finally, the capacity of local infrastructure to accommodate the Project's estimated electricity and natural gas demand was assessed. A will-serve letter from LADWP included in **Appendix K** of this Draft EIR

demonstrates the availability of sufficient electrical infrastructure and supplies to serve the Project's demand.

c) Project Design Features

Construction and operation of the Project would be implemented in accordance with applicable regulatory and code requirements related to electric power, natural gas, or telecommunications facilities. No specific Project Design Features have been identified with regard to electric power, natural gas, or telecommunications facilities.

d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 17,765 square feet to 64,313 square feet and, in turn, there would be a reduction in the number of live/work units from 220 to 200 units and a decrease in the number of bicycle spaces from 180 to 179. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.

Threshold (a): ***Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?***

Numerical differences exist for this threshold because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

(1) Impact Analysis

(a) Project

(i) Electricity

a. Construction

Construction activities at the Project Site would require limited and minor quantities of electricity for watering, lighting, power tools, and other support equipment. As discussed in **Section IV.N**, electricity demand during Project construction would be approximately 7.5 percent of the Project's

annual electricity consumption during operation,[10] which, as detailed below under operation, would be within the supply and infrastructure capabilities of the LADWP. Accordingly, existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition.

With regard to existing electrical distribution lines, the Project Applicant would be required to coordinate electrical infrastructure connections with the LADWP and comply with site-specific requirements set forth by the LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. As such, construction of the Project is not anticipated to adversely affect the existing electrical infrastructure serving the surrounding uses or utility system capacity.

Therefore, based on the above, construction of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could require the construction of new or expansion of existing electrical facilities, the construction of which could cause significant environmental effects and impacts would be less than significant.

b. Operation

As presented in **Table IV.N-2** in **Section IV.N. Energy**, of this Draft EIR, the Project's operational electricity usage would be approximately 3,150,019 kWh per year. The Project-related annual electricity consumption would represent approximately 0.01 percent of LADWP's projected sales of 23,537 GWh of electricity in the 2025–2026 fiscal year (the Project's buildout year).[11] In addition, during peak conditions, the Project would represent approximately 0.01 percent of LADWP's estimated base case peak demand of 6,076 MW for 2025-2026.[12] The LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate resources (natural gas, coal) to support future generation capacity.[13] Furthermore, LADWP has stated that "electric service is available," that LADWP "has planned sufficient resources to supply the electricity needs [of the Project]," and that "the estimated power requirement for the Project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the City's power system."[14] Based on these factors, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's electricity demand. In addition, the Project would implement any necessary connections and upgrades required by

[10] The percentage is derived by taking the total amount of electricity usage during construction (236,357 kWh) and dividing that number by the annual amount of electricity usage during operation (3,150,019 kWh) to arrive at 7.5 percent.

[11] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

[12] LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

[13] "The 2017 [Power Strategic Long-Term Resource Plan] outlines an aggressive strategy for LADWP to accomplish its goals, comply with regulatory mandates, and provide sufficient resources over the next 20 years given the information presently available." Source: LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2016, page ES-25.

[14] Written correspondence from Chuck Holloway, Manager of Environmental Planning and Assessment, Department of Water and Power, July 21, 2017, page 9. See **Appendix K** of this Draft EIR.

LADWP to ensure that LADWP would be able to adequately serve the Project, which, as detailed above for the analysis of construction impacts, would not cause significant environmental effects as these connections and upgrades would require coordination with LADWP to ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized.

Therefore, based on the above, operation of the Project would not require or result in the need for relocation or construction of new or expanded electrical facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.

(ii) Natural Gas

a. Construction

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction. However, the Project would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. **Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

b. Operation

As presented in **Table IV.N-2** in **Section IV.N. Energy**, of this Draft EIR, operation of the Project would consume approximately 7,327,423 cf of natural gas per year (approximately 20,075 cf per day), which represents approximately 0.0008 percent of the 2,342 million cf per day forecasted total consumption in SoCalGas's planning area in 2025 (the Project's buildout year) and approximately 0.002 percent of the 1,093 million cf per day additional supplies available for 2025.[15] Consistent with standard building practice, a detailed natural gas survey of the local infrastructure equipment would completed prior to construction to ensure that the current infrastructure can adequately sustain the demand for the Project. Because the Project Site is located in an area already served by existing natural gas infrastructure, any improvements required pursuant to the survey determinations would not be extensive and it is not anticipated that new natural gas distribution pipelines or infrastructure facilities would be constructed or

[15] California Gas and Electric Utilities, 2018 California Gas Report, page 145.

expanded as a result of the Project. The Project would, however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. Impacts associated with utility upgrades or additional connections would be temporary in nature and less than significant, as detailed above for construction. Based on the Project's small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project's demand for natural gas. **Therefore, operation of the Project would not require or result in the need for relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

(iii) Telecommunication Facilities

a. Construction

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant shall coordinate with applicable regulatory agencies, including the ITA, and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. This would involve disconnecting existing connections and establishing new connections to the proposed structure. Such improvements would be localized in nature and would utilize existing conduit and service lines. **Therefore, construction of the Project would not require or result in the need for relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which would cause significant environmental effects, and impacts would be less than significant.**

b. Operation

It is not currently known specifically what telecommunications companies have facilities within the Project area, nor which company(ies) serve the existing Project Site uses. However, it is assumed that there are existing Telecommunications/Data/Cable TV conduit in the vicinity of the Project Site. The determination of which facilities would provide service for the Project would be determined by the Applicant at the time service contracts are prepared. Electrical plans reflecting the estimated loads and recommended location for the Telecommunications/Data facilities would be submitted by the Applicant to the respective telephone and cable TV companies, each company would determine the most cost-effective communications/data cable system to provide their service to the Site. The telephone company and the cable TV company would work with the Owner's Project team to design conduit and cable systems to bring the necessary Communications/Data facilities to the Project in a timely manner. **Therefore, operation of the Project would not require or result in the need for relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

(b) Flexibility Option

Under the Flexibility Option, the commercial square footage provided would be increased to 64,313 square feet within the same building parameters and, in turn, there would be a reduction in the overall number of live/work units for a total of 200 units. Overall, the design, configuration, and operation of the Flexibility Option would be comparable to the Project.

(i) Electricity

a. Construction

As with the Project, construction of the Flexibility Option would require limited and minor quantities of electricity for watering, lighting, power tools, and other support equipment. As also discussed in **Section IV.N**, electricity demand during Flexibility Option construction would be approximately 7.2 percent of the Flexibility Option's annual electricity consumption during operation, [16] which, as detailed below under operation, would be within the supply and infrastructure capabilities of the LADWP. Accordingly, existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition associated with the Flexibility Option.

As with the Project, with regard to existing electrical distribution lines, the Flexibility Option Applicant would be required to coordinate electrical infrastructure connections with the LADWP and comply with site-specific requirements set forth by the LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. As such, construction of the Flexibility Option is not anticipated to adversely affect the existing electrical infrastructure serving the surrounding uses or utility system capacity.

Therefore, based on the above, as with the Project, construction of the Flexibility Option would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could require the construction of new or expansion of existing electrical facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

b. Operation

As presented in **Table IV.N-4** in **Section IV.N. Energy**, of this Draft EIR, the Flexibility Option would consume approximately 3,303,606 kWh of electricity per year, which would represent approximately 0.01 percent of LADWP's projected sales of 23,537 GWh of electricity in the 2025-2026 fiscal year (the Flexibility Option's buildout year).[17] In addition, during peak conditions, the Flexibility Option would represent approximately 0.01 percent of the total LADWP's estimated

[16] The percentage is derived by taking the total amount of electricity usage during construction (236,357 kWh) and dividing that number by the annual amount of electricity usage during operation (3,303,606 kWh) to arrive at 7.2 percent.

[17] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

base case peak demand of 6,076 MW for 2025-2026.[18] LADWP stated that adequate resources have been planned for the supply the needs of the Project and that such needs have been accounted for in planned growth of the power system.[19] Because the Flexibility Option would represent the same negligible percent of LADWP's projected sales as the Project, it is assumed that LADWP would similarly be capable of supply the Flexibility Option's electrical needs with planned for supplies and capacities. In addition, the Flexibility Option would implement any necessary connections and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Flexibility Option, which, as detailed above for the analysis of construction impacts, would not cause significant environmental effects as these connections and upgrades would require coordination with LADWP to ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized.

Therefore, based on the above, operation of the Flexibility Option would not require or result in the need for relocation or construction of new or expanded electrical facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.

(ii) Natural Gas

a. Construction

As with the Project, construction of the Flexibility Option would not be anticipated to consume natural gas as standard construction equipment is primarily powered by electricity or diesel fuel. Accordingly, natural gas would not be supplied to support Flexibility Option construction activities; thus, there would be no demand generated by construction. However, the Flexibility Option would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Flexibility Option would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. **Therefore, construction of the Flexibility Option would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

[18] LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

[19] Written correspondence from Chuck Holloway, Manager of Environmental Planning and Assessment, Department of Water and Power, July 21, 2017, page 9. See **Appendix K** of this Draft EIR.

b. Operation

As presented in **Table IV.N-4** in **Section IV.N. Energy**, of this Draft EIR, the Flexibility Option would consume approximately 7,292,806 cf of natural gas per year (approximately 19,980 cf per day), which would represent approximately 0.0008 percent of the 2,342 million cf per day forecasted total consumption in SoCalGas's planning area in 2025 (the Flexibility Option's buildout year) and approximately 0.002 percent of the 1,093 million cf per day additional supplies available for 2025.[20] As with the Project, consistent with standard building practice, a detailed natural gas survey of the local infrastructure equipment would completed prior to construction to ensure that the current infrastructure can adequately sustain the demand for the Flexibility Option. Because the Project Site is located in an area already served by existing natural gas infrastructure, any improvements required pursuant to the survey determinations would not be extensive and it is not anticipated that new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Flexibility Option. The Flexibility Option would, however, require local infrastructure improvements to connect to the existing infrastructure serving the Flexibility Option area. Impacts associated with utility upgrades or additional connections would be temporary in nature and less than significant, as detailed above for construction. **Therefore, operation of the Flexibility Option would not require or result in the need for relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

(iii) Telecommunication Facilities

a. Construction

Similar to the Project, construction-related activities for the Flexibility Option, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Applicant shall coordinate with applicable regulatory agencies, including the ITA, and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. This would involve disconnecting existing connections and establishing new connections to the proposed structure. Such improvements would be localized in nature and would utilize existing conduit and service lines. **Therefore, construction of the Flexibility Option would not require or result in the need for relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which would cause significant environmental effects, and impacts would be less than significant.**

b. Operation

As with the Project, the determination of which facilities would provide service for the Flexibility Option would be determined by the Applicant at the time service contracts are prepared. The telephone company and the cable TV company would determine the most cost-effective communications/data cable system to provide their service to the Site based on the Flexibility

[20] California Gas and Electric Utilities, 2018 California Gas Report, page 145.

Option's electrical plans and would work with the Owner's Project team to design conduit and cable systems to bring the necessary Communications/Data facilities to the Project in a timely manner. **Therefore, operation of the Flexibility Option would not require or result in the need for relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to dry utilities, would be less than significant; no mitigation measures would be required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to dry utilities, would be less than significant without mitigation.

4. Cumulative Impacts

Numerical differences exist regarding the impact analysis and impact significance determination presented below because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

a) Impact Analysis

(1) Project

Buildout of the Project, the 17 Related Projects, and additional growth forecasted to occur in the City would increase electricity consumption during Project construction and operation and, thus, cumulatively increase the need for infrastructure capacity, such as new or expanded electric power, natural gas, and telecommunications facilities.

(a) Electricity

As discussed in **Section IV.N. Energy**, of this Draft EIR, electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. The Project would account for approximately 0.01 percent of LADWP's 23,537 GWh of projected sales for the Project's build-out year and approximately 0.01 percent of the LADWP's estimated base case peak demand of 6,076 MW.[21] LADWP has stated that "electric service is available," that LADWP "has planned sufficient resources to supply the electricity needs [of the Project]." and that "the estimated power requirement for the Project is part of the total load

[21] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

growth forecast for the City and has been taken into account in the planned growth of the City's power system."[22]

As described in LADWP's 2017 SLTRP, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The 2017 SLTRP accounts for future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the Related Projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. **As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and the cumulative impact would be less than significant.**

(b) Natural Gas

As discussed in **Section IV.N. Energy**, of this Draft EIR, natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed. The Project would account for approximately 0.0008 percent of the 2,342 million cf per day forecasted total consumption in SoCalGas's planning area in the Project's buildout year and approximately 0.002 percent of the 1,093 million cf per day additional supplies available.[23] It is expected that SoCalGas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Furthermore, like the Project, during construction and operation, Related Projects and other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. **As such, the Project's contribution to cumulative impacts with respect to natural gas facilities would not be cumulatively considerable and cumulative impacts would be less than significant.**

(c) Telecommunication Facilities

Similar to the Project, each of the Related Projects would be reviewed for environmental impacts. The concentration of business and population in the City and rapid technological advances offer the opportunity to provide an integrated network serving as the regional hub for public and private users. However, before construction begins, Related Project shall coordinate with applicable regulatory agencies, including the ITA, and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. Each of the Related Projects would have the telecommunication facilities updated and constructed

[22] Written correspondence from Chuck Holloway, Manager of Environmental Planning and Assessment, Department of Water and Power, July 21, 2017, page 9. See **Appendix K** of this Draft EIR.

[23] California Gas and Electric Utilities, 2020 California Gas Report, page 145.

concurrently with other utilities within roadway rights-of-way to lessen or eliminate potential environmental effects. And similar to the Project, before construction begins, the Related Projects would coordinate with applicable regulatory agencies and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated.

As with the Project, the determination of which facilities would provide service for the Related Projects would be determined by those Related Project's Applicants at the time service contracts are prepared. Necessary Communications/Data facilities that would be required to serve the cumulative demand for such services by the Related Projects would be evaluated, designed, and installed as needed to serve the existing and projected service needs of the area on an on-going basis. **As such, the Project's contribution to cumulative impacts with respect to telecommunication facilities would not be cumulatively considerable and cumulative impacts would be less than significant.**

(2) Flexibility Option

Buildout of the Flexibility Option, the 17 Related Projects, and additional growth forecasted to occur in the City would increase electricity consumption during Flexibility Option construction and operation and, thus, cumulatively increase the need for infrastructure capacity, such as new or expanded electric power, natural gas, and telecommunications facilities.

(a) Electricity

As previously discussed, electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. The Flexibility Option would account for approximately 0.01 percent of LADWP's 23,537 GWh of projected sales for the Flexibility Option's build-out year and approximately 0.01 percent of the LADWP's estimated base case peak demand of 6,076 MW.[24] LADWP has stated that adequate resources have been planned for the supply the needs of the Project and that such needs have been accounted for in planned growth of the power system.[25] Because the Flexibility Option would represent the same negligible percent of LADWP's projected sales as the Project, it is assumed that LADWP would similarly be capable of supply the Flexibility Option's electrical needs with planned for supplies and capacities.

LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. Each of the Related Projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the area. **As such, the Flexibility Option's**

[24] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

[25] Written correspondence from Chuck Holloway, Manager of Environmental Planning and Assessment, Department of Water and Power, July 21, 2017, page 9. See **Appendix K** of this Draft EIR.

contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and the cumulative impact would be less than significant.

(b) Natural Gas

Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed. The Flexibility Option would account for approximately 0.0008 percent of the 2,342 million cf per day forecasted total consumption in SoCalGas' planning area in the Flexibility Option's buildout year and approximately 0.002 percent of the of the 1,093 million cf per day additional supplies available.[26] It is expected that SoCalGas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Furthermore, like the Flexibility Option, during construction and operation, Related Projects and other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. The Flexibility Option impacts would be less than significant**. As such, the Flexibility Option's contribution to cumulative impacts with respect to natural gas facilities would not be cumulatively considerable and, thus, would be less than significant.**

(c) Telecommunication Facilities

Similar to the Flexibility Option, each of the Related Projects would be reviewed for environmental impacts. The concentration of business and population in the City of Los Angeles and rapid technological advances offer the opportunity to provide an integrated network serving as the regional hub for public and private users. However, before construction begins, Related Project shall coordinate with applicable regulatory agencies, including the ITA, and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. Each of the Related Projects would have the telecommunication facilities updated and constructed concurrently with other utilities within roadway rights-of-way to lessen or eliminate potential environmental effects. And similar to the Flexibility Option, before construction begins, the Related Projects would coordinate with applicable regulatory agencies and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated.

As with the Flexibility Option, the determination of which facilities would provide service for the Related Projects would be determined by those Related Project's Applicants at the time service contracts are prepared. Necessary Communications/Data facilities that would be required to serve the cumulative demand for such services by the Related Projects would be evaluated, designed, and installed as needed to serve the existing and projected service needs of the area on an on-going basis. **As such, the Flexibility Option's contribution to cumulative impacts**

[26] California Gas and Electric Utilities, 2020 California Gas Report, page 145.

with respect to telecommunication facilities would not be cumulatively considerable and cumulative impacts would be less than significant.

b) Mitigation Measures

Cumulative impacts related to electricity, natural gas, and telecommunication facilities for both the Project and Flexibility Option would be less than significant; no mitigation measures would be required.

c) Level of Significance After Mitigation

Cumulative impacts related to electricity, natural gas, and telecommunication facilities for both the Project and Flexibility Option were determined to be less than significant without mitigation.