

IV. Environmental Impact Analysis

0.4 Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications

1. Introduction

This section describes the existing electric power, natural gas, and telecommunications services for the Project Site and vicinity, identifies relevant regulatory requirements, and evaluates the potential impacts related to implementation of the proposed Project. Specifically, the analysis in this section assesses the Project’s potential to result in the need for new or expanded electric power facilities, natural gas facilities, and telecommunication facilities, the construction of which could cause significant environmental effects.

The information in this section is based in part on the following documents:

Appendix G-7 Southern California Gas Company, Will Serve Letter – 1317, 1321, 1329, 1345, 1517 N. Vermont Ave., 1328 N. New Hampshire Ave., 4760 Sunset Blvd., 1505, 1526 N. Edgemont St., 1430, 1424 N. Alexandria Ave., Los Angeles, CA 90027, June 26, 2020

Appendix G-8 Los Angeles Department of Water and Power, Metropolitan East Service Planning, Will Serve Letter – 1345 N. Vermont Ave., 1329/1331 N. Vermont Ave. and 1337/1339 N. Vermont Ave., 1317, 1321, and 1325 N. Vermont Ave., 1326/1328 N. New Hampshire Ave., 4760 Sunset Blvd., 1505 N. Edgemont St., 1526 N. Edgemont St., 1517 N. Vermont Ave., 1425 N. Alexandria Ave., January 14, 2021

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:

- U.S. 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
- L.A.'s Green New Deal
- City of Los Angeles Green Building Code
- City of Los Angeles Information Technology Agency
- Los Angeles Municipal Code Section 10.5.4

(1) Federal

The U.S. Department of Energy 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 U.S. Department of Energy, which is responsible for regulating interstate transmission of natural gas, oil, and electricity; monitoring reliability of the electric grid; and approving 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, which establishes, approves, and enforces mandatory electricity reliability standards. FERC has certified the North American Electric Reliability Corporation as the nation's Electric Reliability Organization 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 requires all new cellular tower construction to be approved by a state or local authority for a proposed site and compliance with Federal Communications Commission 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 VI.P, Energy, of this Draft EIR. There are additional regulations pertaining to infrastructure that are discussed further below.

(a) *California ISO*

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 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) *CPUC*

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

CPUC is overseen by five commissioners appointed by the governor and confirmed by the State Senate. 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) *CEC*

CEC is a planning agency that 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. CEC also has

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 State Legislature an Integrated Energy Policy Report every 2 years. In 2018, CEC decided to write the Integrated Energy Policy Report in two volumes. 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) *SB 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 of Los Angeles (City).

(3) **Local**

(a) *L.A.’s Green New Deal*

On April 8, 2015, Mayor Eric Garcetti released the City’s first-ever Sustainable City pLAN (the pLAN). In 2019, the Mayor’s office adopted the Green New Deal Sustainable City pLAN 2019 (L.A.’s Green New Deal), as an update to the pLAN, which establishes accelerated goals for a cleaner environment and a stronger economy, with a commitment to equity as its foundation. L.A.’s Green New Deal reported that in 2017 approximately 30 percent of the LADWP’s total energy production was from renewable energy sources.²

(b) *City of Los Angeles Green Building Code*

The Los Angeles City Council approved Ordinance No. 184692, which amended Chapter IX of the Los Angeles Municipal Code, referred to as the “Los Angeles Green Building Code,” by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2019 California Green Building Standards (CALGreen) Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements

¹ California Energy Commission, 2018 Integrated Energy Policy Report Updated, Volume II, February 2019.

² City of Los Angeles, L.A.’s Green New Deal, Sustainable City pLAN 2019.

and elective measures are provided for three categories: (1) low-rise residential buildings, (2) nonresidential and high-rise residential buildings, and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

(c) *City of Los Angeles Information Technology Agency*

The City of Los Angeles Information Technology Agency 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.

The Information Technology Agency'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.

(d) *Los Angeles Municipal Code Section 10.5.4*

Los Angeles Municipal Code 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) Electric Power

(a) *Electric Power and Infrastructure Facilities*

LADWP provides electricity to the Project Site, as well as to all of the City and parts of the Owens Valley. In general, LADWP provides electrical service to approximately 1.5 million people within a service area of approximately 465 square miles. LADWP can supply over 7,800 megawatts of electricity from 23 generation plants. The highest recorded instantaneous peak demand within LADWP's service area was 6,500 megawatts on August 31, 2017. Electrical service is provided through 6,752 miles of overhead distribution lines, 3,626 miles of underground distribution cables, and various other

infrastructure located throughout California.³ Electrical power to the Project Site is provided by underground and overhead electrical facilities.

(b) Existing Electrical Consumption

As shown in **Table IV.P-1**, Existing Electrical Consumption on the Project Site (see Section IV.P, Energy of this Draft EIR), the existing land uses on the Project Site consume approximately 4,556,465 kilowatt-hour (kWh) of electricity per year.

(2) Natural Gas

(a) Natural Gas Facilities and Infrastructure

Natural gas is provided to the Project Site by SoCalGas, which is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities, encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.⁴

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.⁵ The traditional, southwestern United States sources of natural gas continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.⁶ According to a Will-Serve letter (Appendix G-7), SoCalGas has facilities in the Project area.

(b) Existing On-site Natural Gas Consumption

As shown in **Table IV.P-2**, Existing Natural Gas Consumption on the Project Site (see Section IV.P, Energy, of this Draft EIR), the existing land uses on the Project Site consume approximately 118,824 therms⁷ per year or 11,882,400 thousand British thermal units (kBtu) of natural gas per year.

³ LADWP, Facts and Figures, 2013.

⁴ SoCalGas, Company Profile, 2020.

⁵ California Gas and Electric Utilities, 2018 California Gas Report, 2019.

⁶ California Gas and Electric Utilities, 2018 California Gas Report, 2019.

⁷ A therm is a unit of heat equivalent to 100,000 BTUs or 1.055×10^8 joules.

(3) Telecommunications

(a) Telecommunication Facilities and Infrastructure

Telecommunication facilities are installed throughout the City by a variety of private utility companies, including AT&T, Charter Communications, DirecTV, Dish Network, Frontier Communications, Charter Spectrum, and Verizon.⁸ Telecommunications are provided to the Project Site by underground and overhead facilities located in the adjacent streets.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State California Environmental Quality Act (CEQA) Guidelines Appendix G (Appendix G), the Project would have a significant impact related to electric power, natural gas, and telecommunications if it would:

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

The 2006 L.A. CEQA Thresholds Guide does not include environmental factors related to electric power, natural gas, or telecommunication facilities.

b) Methodology

Environmental impacts were evaluated assuming that new and expanded electric power, natural gas, and telecommunication service connections would be required as part of the proposed Project. The Project's existing electric and natural gas usage needs were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. Anticipated electric and natural gas usage during operation was calculated by Ted Jacob Engineering Group (see Appendix N-2). Impacts associated with the operation and installation of new electrical, natural gas, and telecommunication infrastructure, including solar panels, lighting, heating, cooling, and appliances, have been addressed herein and in other sections of this Draft Environmental Impact Report (EIR) (Sections IV.B, Air Quality; IV.D, Cultural Resources; IV.E, Geology and Soils; IV.F, Greenhouse Gas Emissions; IV.H, Hydrology and Water Quality; IV.J, Noise, and IV.P, Energy, of this Draft EIR).

⁸ City of Los Angeles, Utilities, 2020.

c) Project Design Features

No project design features are proposed for natural gas, electricity, and telecommunication infrastructure.

d) Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

(1) Impact Analysis

(a) Electric Power Facilities

Upgrades would be required with respect to electric power, based on the change in land use. Electric power would be part of a dry utility package that would be installed on site and in the adjacent public roadways to provide service to the Project. Construction activities at the Project Site would require limited quantities of electricity for watering, lighting, power tools, and other support equipment. Heavy construction equipment would be powered with diesel fuel. As existing power lines are located in the vicinity of the Project Site, temporary power poles would be installed to provide electricity during construction. Existing off-site infrastructure would not have to be expanded or constructed to provide electrical service to the Project Site during construction or demolition.

As shown in **Table IV.P-8**, Phases 1 through 3 (Option B) Estimated Project Operation Electricity Demand (see Section IV.P, Energy, of this Draft EIR), the proposed Project, under the more conservative Option B (i.e., the higher impact scenario), would result in a net increase in electric demand of 1,533,820 kWh/yr.⁹ However, based on a Will Serve letter from the LADWP (Appendix G-8), there is sufficient electrical source available to operate the proposed Project. Nevertheless, depending on the final layout of the proposed Project, there may be a need to reconfigure the existing underground electrical facilities to match the proposed development layout. The relocation work may also require some updates to the existing electrical systems to bring the system up to the current standards and to account for the potential increase in load demand.

In a worst-case scenario, the LADWP would require Kaiser Permanente to balance the overall electrical load of the development on different LADWP circuits. This task may mandate additional off-site infrastructure improvements, including new or extended off-site backbone system upgrades on the surrounding streets in order to bring additional

⁹ Appendix N-2, Energy Calculations – Operations.

electrical circuits to the Project Site. However, LADWP would be able to accommodate any load that is required, independent of the costs required for possible upgrades.

Impacts associated with the installation and operation of new electrical infrastructure, including solar panels (or the necessary connections for solar), lighting, heating, cooling, appliances, etc., have been addressed in this section and other sections of this Draft EIR (Sections IV.B, Air Quality; IV.D, Cultural Resources; IV.E, Geology and Soils; IV.F, Greenhouse Gas Emissions; IV.H, Hydrology and Water Quality; IV.J, Noise; and IV.P, Energy). Impacts analyzed in these sections take into consideration all Project components, including installation and operation of electrical facilities during Phases 1 through 3. These sections determined that some impacts would be reduced to less than significant with mitigation, while other impacts would be less than significant without mitigation. See impact discussions in each of these other resource sections for specific impacts and associated mitigation measures related to construction/installation of new electrical facilities.

As such, the Project would not require or result in the relocation or construction of new or expanded electric power facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

(b) Natural Gas Facilities

Upgrades would be required with respect to natural gas, based on the change in land use. Natural gas would be part of a dry utility package that would be installed on site and in the adjacent public roadways to provide service to the Project. Construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, natural gas would not generally be expected to be used for Project construction activities; thus, there would be no expected demand generated by construction. If natural gas is used during construction, it would be in limited amounts and on a temporary basis and would specifically be used to replace or offset diesel-fueled equipment and as such, would not result in substantial ongoing demand.

As shown in **Table IV.P-9**, Phases 1 through 3 (Option B) Estimated Project Operational Natural Gas Demand (see Section IV.P, Energy, of this Draft EIR), the proposed Project would result in a net increase of 58,640 therms/yr or 5,864,000 kBtu under the more conservative Option B (i.e., the higher impact scenario).¹⁰ However, according to a Will Serve letter (Appendix G-7), SoCalGas has facilities in the Project area, and service would be provided for the Project. Gas mainlines are located in adjacent City streets. The existing on-site natural gas infrastructure would be reconfigured, if necessary, to account for the proposed development layout, but this is typical of any proposed development.

¹⁰ Appendix N-2, Energy Calculations – Operations.

Impacts associated with the operation and installation of new gas infrastructure have been addressed in this section and other sections of this Draft EIR (Sections IV.B, Air Quality; IV.D, Cultural Resources; IV.E, Geology and Soils; IV.F, Greenhouse Gas Emissions; IV.H, Hydrology and Water Quality; IV.J, Noise, and IV.P, Energy). Impacts analyzed in these sections take into consideration all Project components, including installation and operation of gas facilities during Phases 1 through 3. These sections determined that some impacts would be reduced to less than significant with mitigation, while other impacts would be less than significant without mitigation. See impact discussions in each of these other resource chapters for specific impacts and associated mitigation measures related to construction/installation of new natural gas facilities.

As such, the Project would not require or result in the relocation or construction of new or expanded natural gas facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

(c) Telecommunication Facilities

Upgrades may be required with respect to telecommunication infrastructure, based on the change in land use. In the event that upgrades are required to meet the demands of proposed Project operations, telecommunication would be part of a dry utility package that would be installed on site and in the adjacent public roadways to provide upgraded service to the Project. Installation would be completed either by trenching or trenchless technology. Upgrades for the proposed Project would involve disconnecting existing connections and establishing new connections to proposed structures. Such improvements would be localized in nature and would utilize existing conduit and service lines, to the maximum extent possible, to minimize disruption to City streets and sidewalks.

Impacts associated with installation of new telecommunication facilities have been addressed in this section and other sections of this Draft EIR (Sections IV.B, Air Quality; IV.D, Cultural Resources; IV.E, Geology and Soils; IV.F, Greenhouse Gas Emissions; IV.H, Hydrology and Water Quality; IV.J, Noise; and IV.P, Energy). Impacts analyzed within these sections take into consideration all Project components, including installation of telecommunication facilities during Phases 1 through 3. These sections determined that some impacts would be reduced to less than significant with mitigation, while other impacts would be less than significant without mitigation. See impact discussions in each of these other resource chapters for specific impacts and associated mitigation measures related to construction/installation of new telecommunication facilities.

As such, the Project would not require or result in the relocation or construction of new or expanded telecommunication facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

(2) Mitigation Measures

Impacts related to the relocation or construction of new or expanded electric, natural gas, or telecommunication facilities were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

(3) Level of Significance after Mitigation

Impacts related to the relocation or construction of new or expanded electric, natural gas, or telecommunication facilities were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

As previously discussed, the City's land area is built out, and upgrades in electrical power, natural gas, and telecommunication capabilities are anticipated primarily due to development in the form of revitalization of outdated or underserved areas, and redevelopment of specific properties that would increase density and require more sophisticated technology, such as the proposed Project. Similar to the proposed Project, the related projects, as defined in Section II.4, Related Projects, and listed in **Table II-2**, Related Projects, are located on infill development lots that are currently served by existing infrastructure or are located adjacent to properties or right-of-way facilities that would accommodate utility connections without resulting in significant environmental impacts. The proposed Project's contribution to cumulative impacts related to electric power, natural gas, or telecommunications systems would not result in a cumulatively considerable effect related to available distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electric power and natural gas facilities, the construction of which could cause significant environmental effects. As a result, cumulative impacts associated with upgrades of electric, natural gas, and telecommunication facilities would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to electric power, natural gas, and telecommunication facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts related to electric power, natural gas, and telecommunication facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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