IV. Environmental Impact Analysis

N.4. Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications Infrastructure

1. Introduction

The following section analyzes the 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 Project. Potential impacts associated with energy demand and energy conservation policies are discussed in Section IV.C, *Energy*, of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

(1) Federal

(a) United States Department of Energy (the 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 VI.C, *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. The 2019 Integrated Energy Policy Report, the latest report published by the CEC, provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles, energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.[1]

(e) 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.

(3) Local

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 (LA CityView), 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.

1 California Energy Commission (CEC), *2019 Integrated Energy Policy Report*, February 20, 2020.

(a) City of Los Angeles Municipal Code Section 10.5.4

Section 10.5.4 of the City's Municipal Code 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) Electricity Supplies

The LADWP provides electrical service throughout the City, including the Project Site, serving approximately 4 million people within a service area of approximately 465 square miles. Electrical service provided by LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within LADWP's Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP has a net dependable generation capacity greater than 7,531 megawatts (MW).[2] On August 31, 2017, LADWP's power system experienced a record instantaneous peak demand of 6,502 MW.[3] Approximately 34 percent of LADWP's 2019 electricity purchases were from renewable sources, which is similar to the 31.7 percent statewide percentage of electricity purchases from renewable sources.[4] The annual electricity sale to customers for the 2018–2019 fiscal year was approximately 22,663 million kilowatt-hours (kWh).[5]

(b) Electricity Distribution System

The power supplied to LADWP consumers is distributed through a network of approximately 6,752 miles of overhead distribution lines and approximately 3,626 miles of underground distribution lines.[6] The Project Site is currently developed with existing

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2 Los Angeles Department of Water and Power (LADWP), *2017 Power Strategic Long-Term Resource Plan*, December 2017, page 17.

3 LADWP, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=9598324856637&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9598324856637%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dfcfwtty0v_25. Accessed March 26, 2021.

4 LADWP, 2019 Power Content Label, Version: October 2020.

5 LADWP, *2017 Retail Electric Sales and Demand Forecast*, page 14.

6 LADWP, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=9598324856637&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9598324856637%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dfcfwtty0v_25. Accessed March 26, 2021.

one- to four-story freezer, cold storage, and dry storage warehouses with associated office space, loading docks, and surface parking totaling approximately 205,393 square feet and total electricity consumption is approximately 4,304,153 kWh (refer to Section IV.C, *Energy*, of this Draft EIR).

(2) Natural Gas

(a) Natural Gas Supplies

As discussed in Section IV.C, *Energy*, of this Draft EIR, SoCalGas provides natural gas resources to the City and most of Southern California and Central California from the from the City of Visalia to the U.S./Mexican border.[7] 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 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 one percent per year from 2020 to 2035 in the SoCalGas service area.[8] Gas supply available to SoCalGas from California sources averages 97 million cubic feet per day.[9]

(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' polices and extension rules with the CPUC at the time contractual agreements are made. Natural gas is delivered to the Project Site through natural gas facilities underneath the adjacent public streets.

The Project Site is currently developed with existing one- to four-story freezer, cold storage, and dry storage warehouses with associated office space, loading docks, and surface parking totaling approximately 205,393 square feet and annual natural gas demand is approximately 271,303 thousand British thermal unit (kBtu), based on facility provided information including utility billing data (refer to Section IV.C, *Energy*, of this Draft EIR).

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7 Southern California Gas Company (SoCalGas), Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed March 26, 2021.

8 California Gas and Electric Utilities, *2020 California Gas Report*, 2020, page 96.

9 California Gas and Electric Utilities, *2020 California Gas Report*, 2020, page 111.

(3) Telecommunication Facilities

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. Based on the most recent Topographic Survey Map prepared for the Project Site and observations of the Project Site, there are no cable or telephone lines that currently run under the Project Site, and there are no communication towers on the Project Site.[10]

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to solid waste if it would:

Threshold (a): Require of 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 or relocation of which could cause significant environmental effects.[11]

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide (Thresholds Guide), to assist in answering the Appendix G Threshold question. The Thresholds Guide identifies the following criteria to evaluate impacts to energy infrastructure:

- Would the project result in the new for new (off-site) energy supply facilities, or major capacity enhancing alterations to existing facilities?

[10] CRC Enterprises, Topographic Survey Map for 670 Mesquit Street, Sheets 5 through 7, May 21, 2021.

[11] Refer to Section IV.N.2, *Water Supply*, of this Draft EIR for a discussion of water infrastructure; Section IV.N.1, *Wastewater*, of this Draft EIR for a discussion of wastewater infrastructure; and Section IV.G, *Hydrology and Water Quality*, of this Draft EIR, for a discussion of storm water infrastructure.

b) Methodology

The analysis evaluates the potential impacts of the Project on existing energy infrastructure by comparing the estimated Project energy demand with available capacity. Project energy usage, including electricity and natural gas, was calculated using CalEEMod Version 2016.3.2. During construction, energy would be consumed in the form of electricity associated with conveyance of water, lighting, and other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Operational 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.C, *Energy*, and Appendix E of this Draft EIR.

For consistency with the emissions modeling provided in Section IV.A, *Air Quality*, Section IV.C, *Energy*, and Section IV.E, *Greenhouse Gas Emissions*, the Project's energy use was calculated assuming buildout would occur in 2025. However, the Project would be completed as early as 2026. The Project's electricity and natural gas energy demand would not change whether buildout occurs in 2025 or 2026 because this analysis assumes that the Project would comply with the same Title 24 Building Energy Efficiency Standards (currently the 2019 version) in either year. While the Title 24 standards are typically revised every three years with more stringent energy efficiency requirements, it is not known to what extent future revisions to the Title 24 standards would reduce the Project's energy demand. Therefore, it is not possible to accurately quantify the effects of future revisions to the Title 24 standards on the Project's energy demand.

The Project's estimated energy demands were analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2025 (i.e., the earliest Project buildout year) to determine if these two energy utilities companies would be able to meet the Project's energy demands.

c) Project Design Features

No specific Project Design Features are proposed with regard to electric power, natural gas, and telecommunications infrastructure. However, the Project would include Project Design Features designed to improve energy efficiency as discussed further below and as set forth in Sections IV.A, *Air Quality*; Section IV.E, *Greenhouse Gas Emissions*; and Section IV.N.2, *Water Supply*.

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) Construction

(i) Electricity

As discussed above, construction activities at the Project Site would require limited and minor quantities of electricity for watering, lighting, power tools and other support equipment. Heavy construction equipment would be powered with diesel fuel. Construction electricity usage would replace the existing electricity usage at the Project Site during construction since the existing on-site uses which currently generate a demand for electricity would be removed. As existing power lines are located in the vicinity of the Project Site, temporary power poles would be installed to provide electricity during Project construction. 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. As discussed above, electricity demand during project construction would be approximately 0.3 percent of the Project's net annual operational electricity consumption, of which would be within the supply and infrastructure capabilities of LADWP.[12] Therefore, construction of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

With regard to existing electrical distribution lines, the Project Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized.

The Project would remove and replace the existing mechanical, electrical and plumbing (MEP) system for the existing cold storage facility with a new system sufficiently sized to accommodate the Project uses. Replacement of the MEP system would occur as part of the Project's building construction activities. However, the replacement of the MEP system does not constitute a new or expanded electric power facility since it is an on-site system specific to serving the Project's MEP needs and not a facility serving regional needs. In general, all new developments require on-site MEP systems appropriately sized to accommodate on-site uses. Thus, the Project's MEP system would not be considered a new or expanded energy facility.

Therefore, construction of the Project is not anticipated to adversely affect the electric power facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of

[12] The percentage is derived by taking the annual average amount of electricity usage during the construction period (79,626 kWh) and dividing that number by the annual amount of net electricity usage during operation (26,472,098 kWh) to arrive at 0.3 percent.

existing facilities, the construction of which could cause significant environmental effects.

(ii) Natural Gas

As stated above, construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be expected to be supplied to support Project construction activities; thus, there would be no expected demand generated by construction.

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 grading/trenching activities in order to place the lines below surface. In addition, prior to ground disturbance, Project 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, or an interruption in the delivery of, natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities. Further, the construction of the Project would reduce the consumption of natural gas at the Project Site during construction activities due to the removal of existing on-site uses.

Therefore, the construction of the Project is not anticipated to adversely affect the natural gas facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

(iii) Telecommunications

Construction activities, including the construction of new buildings and hardscape, typically do not involve the construction of telecommunication facilities. As the Project Site is currently developed with existing one- to four-story freezer, cold storage, and dry storage warehouses with associated office space, loading docks, and surface parking, installation of new underground telecommunication lines (for internet, telephone, and other services) to serve the Project would be required on the Project Site. Construction impacts associated with the installation of new telecommunication infrastructure would primarily involve trenching in order to place the lines below ground surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications facilities

are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Project design features and mitigation measures identified throughout this Draft EIR, where appropriate to reduce impacts associated with Project construction activities, would be in place for these installation activities. **As such, construction of the Project is not anticipated to adversely affect telecommunications infrastructure and would not result in the relocation or construction of new telecommunication facilities or expansion of existing facilities, which could cause significant environmental effects.**

(iv) Project with the Deck Concept

(a) Electricity

Construction of the Project with the Deck Concept would require similar construction activities as the Project. As such, the Project with the Deck Concept would require the same use of the existing electricity facilities in the vicinity of the Project Site. As with the Project, electricity demand during construction of the Project with the Deck Concept would be approximately 0.3 percent of the Project's net annual operational electricity consumption, of which would be within the supply and infrastructure capabilities of LADWP.[13] In addition, the Project Applicant would be required to comply with LADWP's requirements.

As with the Project, the Project with the Deck Concept would remove and replace the existing MEP system for the existing cold storage facility with a new system sufficiently sized to accommodate the Project with the Deck Concept uses. However, the replacement of the MEP system does not constitute a new or expanded electric power facility since it is an on-site system specific to serving the Project's MEP needs and not a facility serving regional needs.

Therefore, construction of the Project with the Deck Concept is not anticipated to adversely affect the electric power facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

(b) Natural Gas

Construction of the Project with the Deck Concept would require similar construction activities as the Project. As such, the Project with the Deck Concept would not involve the consumption of natural gas. For installation of new natural gas connections to serve the Project Site, the Project with the Deck Concept would comply with all SoCalGas notification requirements. **Therefore, construction of the Project with the Deck Concept is not anticipated to adversely affect the natural gas facilities serving the**

[13] The percentage is derived by taking the annual average amount of electricity usage during the construction period (79,626 kWh) and dividing that number by the annual amount of net electricity usage during operation (26,518,298 kWh) to arrive at 0.3 percent.

surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

(c) Telecommunications

Construction of the Project with the Deck Concept would require similar construction activities as the Project and would installation of new underground telecommunication lines. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications facilities are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Project design features and mitigation measures identified throughout this Draft EIR, where appropriate to reduce impacts associated with construction activities, would be in place for these installation activities. **Therefore, construction of the Project with the Deck Concept is not anticipated to adversely affect the telecommunications facilities serving the surrounding uses or utility system capacity and would not require the construction of new telecommunications facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.**

(b) Operation

(i) Electricity

As reported in Table IV.C-2 and Table IV.C-3, in Section IV.C, *Energy*, of this Draft EIR, the Project's annual net increase in operational electricity usage would be approximately 26,472,098 kWh for the Project, which is approximately 0.099 percent of LADWP's projected sales in fiscal year 2025–2026 and would be consistent with LADWP's anticipated regional demand from population or economic growth.[14] In addition, during peak conditions, the Project would represent approximately 0.099 percent of the LADWP estimated peak load for 2025–2026.

LADWP generates its load forecast to account for regional economic and population growth based on multiple forms of data from various agencies, including historical sales from the General Accountings Consumption and Earnings report, historical Los Angeles County employment data provided from the State's Economic Development Division, plug-in electric vehicle (PEV) projections from the CEC account building permits when determining electricity Load Forecasts, solar rooftop installations from the Solar Energy Development Group, electricity price projections from the Financial Services organization, and LADWP program efficiency forecasts.[15] In addition, LADWP considers projected Los Angeles County building permit amounts calculated by the UCLA Anderson School of

[14] LADWP, *2017 Final Power Strategic Long-Term Resource Plan*, December 2017, Appendix A, Table A-1.

[15] LADWP, *2017 Final Power Strategic Long-Term Resource Plan*, December 2017, page 70.

Management when determining its load forecast and would therefore account for the Project's electricity demand.[16]

Based on LADWP's collected data in its 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its net energy for load in the 2025–2026 fiscal year (the Project's buildout year) will be 26,748 gigawatt-hours (GWh) of electricity.[17,18]

The LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate energy resources to support future generation capacity.[19] The Project would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction. Therefore, during Project operations, it is expected that LADWP's existing infrastructure, planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Based on the required load forecast projections by LADWP, this utility would be expected to meet the Project's demand, and the Project's operational electricity services and supply and infrastructure impacts would be less than significant and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

(ii) Natural Gas

As reported in Table IV.C-2 and Table IV.C-3, in Section IV.C, *Energy*, of this Draft EIR, the Project would consume a net increase of approximately 49,463,425 kBtu of natural gas per year, which represents approximately 0.005 percent of the 2025 forecasted consumption in the SoCalGas planning area. SoCalGas expects overall natural gas demand to decline through 2035, even accounting for population and economic growth, with efficiency improvements and the State's transition away from fossil fuel-generated electricity to increased renewable energy. The 2020 California Gas Report states, "SoCalGas projects total gas demand to decline at an annual rate of 1 percent from 2020 to 2035. The decline in throughput demand is due to modest economic growth, and CPUC-mandated energy efficiency (EE) standards and programs and SB 350 Goals. Other factors that contribute to the downward trend are tighter standards created by the revised Title 24 Codes and Standards, renewable electricity goals, a decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI)."[20] Based on the Project's small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide

16 LADWP, *2017 Final Power Strategic Long-Term Resource Plan*, December 2017, page 67.

17 LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

18 LADWP, *2017 Final Power Strategic Long-Term Resource Plan*, December 2017, page 14.

19 LADWP, *2017 Final Power Strategic Long-Term Resource Plan*, December 2017, page ES-25. "… the 2017 SLTRP outlines an aggressive strategy for LADWP accomplish its goals, comply with regulatory mandates, and provide sufficient resources over the next 20 years given the information presently available …"

20 California Gas and Electric Utilities, *2020 California Gas Report*, 2020, page 96.

natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project's demand for natural gas. Furthermore, SoCalGas has stated that it has "facilities in the area" of the Project Site and that "service would be in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (Commission) at the time contractual arrangements are made.[21] **Based on the required load forecast projections by SoCalGas, the utility would be expected to meet the Project's demand and natural gas services, and the Project's operation would not significantly affect the available natural gas supply or distribution infrastructure and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.**

(iii) Telecommunications

As previously discussed, underground telecommunication lines (for internet, telephone, and other services) to serve the Project would be installed on the Project Site during construction activities. As telecommunication providers already deliver their services to a large number of commercial and residential buildings in in the vicinity of the Project Site, it is anticipated that existing telecommunications facilities would be sufficient to support the Project's needs for telecommunication services. **As such, no upgrades to off-site telecommunications facilities are anticipated. Therefore, the Project would not create the need for additional off-site telecommunications infrastructure, which could cause significant environmental effects.**

(iv) Project with the Deck Concept

(a) Electricity

Similar to the Project, operation of the Project with the Deck Concept would consume energy for multiple purposes, as described above, however, electricity would slightly increase due to the increase in outdoor lighting usage associated with the Deck. Under the Project with the Deck Concept, the net increase in energy demand would be approximately 26,518,298 kWh of electricity, as discussed further in Section IV.C, *Energy*, of this Draft EIR. This accounts for 0.099 percent of LADWP's projected electricity sales in 2025. In addition, during peak conditions, the Project would represent approximately 0.100 percent of the LADWP estimated peak load for 2025–2026. As with the Project, during operation of the Project with the Deck Concept, it is expected that LADWP's existing infrastructure, planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. **Based on the required load forecast projections by LADWP, this utility would be expected to meet the Project with the Deck Concept's demand, and the Project with the Deck Concept's operational electricity services and supply and infrastructure impacts would be less than significant and would not require the construction of new energy facilities**

[21] SoCalGas, Will Serve – 670 Mesquit St, Los Angeles. Included in Appendix E of this Draft EIR.

or the expansion of existing facilities, the construction of which could cause significant environmental effects.

(b) Natural Gas

Similar to the Project, operation of the Project with the Deck Concept would consume energy for multiple purposes, as described above, however, natural gas would slightly increase due to the increase in vehicle miles travelled (VMT) associated with additional temporary programming on the Deck. Under the Project with the Deck Concept, the net increase in energy demand would be approximately 49,510,054 kBtu of natural gas, as discussed further in Section IV.C, *Energy*, of this Draft EIR. This accounts for 0.005 percent of the 2025 forecasted annual natural gas consumption in SoCalGas' planning area. As with the Project, based on the Project with the Deck Concept'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, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project with the Deck Concept's demand for natural gas. **Based on the required load forecast projections by SoCalGas, the utility would be expected to meet the Project with the Deck Concept's demand and natural gas services, and the Project with Deck Concept's operation would not significantly affect the available natural gas supply or distribution infrastructure and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.**

(c) Telecommunications

As previously discussed, underground telecommunication lines (for internet, telephone, and other services) to serve the Project with the Deck Concept would be installed on the Project Site during construction activities. As telecommunication providers already deliver their services to a large number of commercial and residential buildings in in the vicinity of the Project Site, it is anticipated that existing telecommunications facilities would be sufficient to support the Project with the Deck Concept's needs for telecommunication services. **As such, no upgrades to off-site telecommunications facilities are anticipated. Therefore, the Project with the Deck Concept would not create the need for additional off-site telecommunications infrastructure, which could cause significant environmental effects.**

(c) Conclusion

As demonstrated by the analyses above, construction and operation of the Project would not result in an increase in demand for electricity, natural gas, or telecommunications services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. **Therefore, the Project would not 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 and impacts would be less than significant.

(i) Project with the Deck Concept

As demonstrated by the analyses above, construction and operation of the Project with the Deck Concept would not result in an increase in demand for electricity, natural gas, or telecommunication services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. **Therefore, the Project with the Deck Concept would not 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 and impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding electric power, natural gas, or telecommunications facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding electric power, natural gas, or telecommunications 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.

e) Cumulative Impacts

(1) Impact Analysis

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. As presented in Chapter III, *Environmental Setting*, of this Draft EIR, Table III-1, the City has identified 141 related projects located within the vicinity of the Project Site. The geographic context for the analysis of cumulative impacts on electricity is LADWP's service area, and the geographic context for the analysis of cumulative impacts on natural gas in SoCalGas' service area, because the Project and related projects are located within the service boundaries of LADWP and SoCalGas.

(a) Electricity

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2017 Power Strategic Long-Term Resource Plan, 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.[22] The 2017 Power Strategic Long-Term Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[23] In addition, LADWP considers projected Los Angeles County building permit amounts when determining its load forecast and would therefore account for the Project's and the related project's electricity demand within its projections.[24] Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Thus, LADWP considers growth from related projects within its service area for the need for energy infrastructure, such as new or expanded energy facilities.

Each of the related projects would be reviewed by the local utility provider to identify necessary electricity service connections to meet the needs of their respective projects. In addition, the local utility provider would provide service letters for each related project confirming availability of adequate electricity supplies as part of the total load growth of the regional power system. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project Site area. Related projects would also be required to evaluate electricity demands and coordinate with the local utility provider for providing adequate service, in accordance with future projected supplies, to each of the related project sites. Related projects would be required to obtain evidence of service from LADWP, or the appropriate utility provider, to ensure that electric service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's contribution to cumulative impacts due to the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable, and, thus, cumulative impacts 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.[25] Development projects within SoCalGas' service area, including the Project and related projects also served by the existing SoCalGas infrastructure, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate.

22 LADWP, *2017 Final Power Strategic Long-Term Resource Plan*, December 2017, page ES-2.
23 LADWP, *2017 Final Power Strategic Long-Term Resource Plan*, December 2017, page ES-2.
24 LADWP, *2017 Final Power Strategic Long-Term Resource Plan*, December 2017, page 67.
25 SoCalGas, History of SoCalGas, https://www.socalgas.com/company-history. Accessed March 26, 2021.

Each of the related projects would be reviewed by SoCalGas to identify necessary natural gas service connections to meet the needs of their respective projects. In addition, SoCalGas would provide service letters for each related project confirming availability of adequate natural gas supplies as part of the total load growth of the regional natural gas system. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the natural gas infrastructure in the Project area. Related projects would also be required to evaluate natural gas demands and coordinate with the local utility provider for providing adequate service, in accordance with future projected supplies, to each of the related project sites. Related projects would also be required to obtain evidence of service from SoCalGas, or the appropriate utility provider, to ensure that natural gas service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's contribution to cumulative impacts due to the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(c) Telecommunications

Expansion of telecommunication infrastructure, including internet and telephone services, is typically at the discretion of the service providers and would occur as needed. It is expected that the telecommunication service providers would expand off-site telecommunications systems if necessary to meet demand increases within their service area. Related projects may require the installation of new underground telecommunication lines to serve the project. As with the Project, installation of new telecommunications infrastructure for the related projects are anticipated to be limited to on-site telecommunications distribution and minor off-site work associated with connections to the existing system. Installation would be short term in duration and would cease to occur when installation is complete. In addition, as with the Project, related projects would need to adhere to any applicable ground-disturbing project design features and mitigation measures, which would also serve to reduce potential impacts from any installation activities.

As such, the Project's contribution to cumulative impacts due to the relocation or construction of new or expanded telecommunication facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(i) Project with the Deck Concept

(a) Electricity

As described above, electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2017 Power Strategic Long-Term Resource Plan, 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.[26] Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Thus, LADWP considers growth from related projects within its service area for the need for energy infrastructure, such as new or expanded energy facilities. Any related projects would be subject to the same process and requirements as the Project with the Deck Concept.

As such, the Project with the Deck Concept's contribution to cumulative impacts due to the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(b) Natural Gas

As described under the cumulative Project analysis above, natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SoCalGas occur as needed.[27] Development projects within SoCalGas' service area, including the Project with the Deck Concept and related projects also served by the existing SoCalGas infrastructure, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. Any related projects would be subject to the same process and requirements as the Project with the Deck Concept.

As such, the Project with the Deck Concept's contribution to cumulative impacts due to the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(c) Telecommunications

As described under the cumulative Project analysis above, expansion of telecommunication infrastructure, including internet and telephone services, is typically at the discretion of the service providers and would occur as needed. Development projects within service providers service area, including the Project with the Deck Concept and

[26] LADWP, *2017 Final Power Strategic Long-Term Resource Plan*, December 2017, page ES-2.
[27] SoCalGas, History of SoCalGas.

related projects may require the installation of new underground telecommunication lines to serve the project. As with the Project with the Deck Concept, installation of new telecommunications infrastructure for the related projects are anticipated to be limited to on-site telecommunications distribution and minor off-site work associated with connections to the existing system. Installation would be short term in duration and would cease to occur when installation is complete. In addition, as with the Project with the Deck Concept, related projects would need to adhere to any applicable ground-disturbing project design features and mitigation measures, which would also serve to reduce potential impacts from any installation activities.

As such, the Project with the Deck Concept's contribution to cumulative impacts due to the relocation or construction of new or expanded telecommunication facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

(ii) Conclusion

Based on the analyses provided above, the Project's contribution to cumulative impacts due to the relocation or construction of new or expanded electric power, natural gas, and telecommunication facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable. As such, cumulative energy infrastructure impacts are concluded to be less than significant.

(a) Project with the Deck Concept

Based on the analyses provided above, the Project with the Deck Concept's contribution to cumulative impacts due to the relocation or construction of new or expanded electric power, natural gas, and telecommunication facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable. As such, cumulative energy infrastructure impacts are concluded to be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding electric power, natural gas, and telecommunications infrastructure were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding electric power, natural gas, and telecommunications infrastructure 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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