IV. Environmental Impact Analysis

C. Energy

1. Introduction

This section of the Draft EIR provides the content and analysis required by Public Resources Code (PRC), Section 21100(b)(3) and described in Appendix F to the Guidelines for the Implementation of the California Environmental Quality Act (CEQA; 14 California Code of Regulations [CCR] Section 15000 et seq.) In accordance with CEQA and Appendix F, Energy Conservation, of the CEQA Guidelines, in order to assure that energy implications are considered in project decisions, EIRs are required to include a discussion of the potential significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (PRC Section 21100(b)(3)).

Consistent with the goals of Appendix F to conserve energy by decreasing overall per capita energy consumption, decreasing reliance on fossil fuels, and increasing reliance on renewable energy sources, this section analyzes the Project's potential impacts on energy resources, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). This section evaluates the demand for energy resources attributable to the Project and makes a determination as to whether the Project would result in a potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction and operation and whether the Project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency regarding the Project's use and conservation of energy resources. Appendix G of the State CEQA Guidelines checklist, Section VI, Energy, also includes questions to assist lead agencies when assessing a project's potential energy impacts.

The information presented herein is based, in part, on the *Energy Calculations for the Sunset and Western Project,* as well as the *Utility Technical Report: Water, Wastewater, and Energy* (Utility Report) prepared for the Project by KPFF in July 2021, provided in Appendices D and E of this Draft EIR, respectively.

2. Environmental Setting

a. Regulatory Framework

(1) Federal

(a) Federal Corporate Average Fuel Economy (CAFE) Standards

First established by Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and United States Environmental Protection Agency (USEPA) jointly administer the CAFE standards. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.[1]

(b) Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA)[2] facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;

- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;

- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and

- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing

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[1] *For more information on the CAFE standards, refer to www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy.*

[2] *Energy Independence and Security Act of 2007, www.epa.gov/laws-regulations/summary-energy-independence-and-security-act, accessed March 9, 2021.*

the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[3]

(2) State

(a) California Building Standards Code (Title 24)

(i) California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. On May 9, 2018, the CEC adopted the 2019 Title 24 Standards, which went into effect on January 1, 2020. The 2019 standards continue to improve upon the previous (2016) Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings.[4] The 2019 Title 24 Standards represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy (ZNE) goal." Single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. Nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades.[5]

(ii) California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2017. The 2016 CALGreen Code includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality.[6] The CalGreen code is

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[3] *A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.*

[4] *CEC, 2019 Building Energy Efficiency Standards.*

[5] *CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.*

[6] *California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, January 2017.*

updated regularly with the latest version (2019) which went into effect January 1, 2020. Most mandatory measure changes in the 2019 CALGreen Code from the previous 2016 CALGreen Code were related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For example, several definitions related to outdoor water use were clarified to present a more generic reference to irrigation requirements for residential developments. In addition, the 2019 CALGreen Code resulted in minor changes to voluntary measures related to landscaping water usage and indoor air quality. Compliance with the CALGreen Code is enforced through the building permit process.

(b) California's Renewable Portfolio Standard

First established in 2002 under Senate Bill (SB) 1078 and amended by SB 350 and SB 100 (discussed further below), California's Renewable Portfolio Standard (RPS) Program requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 60 percent of total retail sales by 2030.[7] The California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.[8]

(c) Senate Bill 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15, issued in April 2015, which established a new statewide policy goal to reduce greenhouse gas (GHG) emissions 40 percent below their 1990 levels by 2030. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030.[9] SB 350 accelerated the RPS program, mandating a 50 percent RPS procurement by 2030. SB 350 includes interim annual RPS targets with three-year compliance periods and requires 65 percent of RPS procurement to be derived from long-term contracts of 10 or more years.

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[7] *CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/rps/, accessed March 9, 2021.*

[8] *CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/rps/, accessed March 9, 2021.*

[9] *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, ch. 547.*

(d) Senate Bill 100

SB 100, signed September 10, 2018, is the 100 Percent Clean Energy Act of 2018. SB 100 updates the goals of California's RPS and SB 350, as discussed above, to the following: achieve 50 percent renewable resources target by December 31, 2026, and achieve a 60-percent target by December 31, 2030. SB 100 also requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity of California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.[10]

(e) Assembly Bill 32

As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599; AB 32), also known as the California Global Warming Solutions Act of 2006, commits the State to achieving year 2000 greenhouse gas (GHG) emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the CPUC and the CEC with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors. As required by AB 32, the CARB approved a *Climate Change Scoping Plan which identifies measures in order to achieve GHG reduction goals.* Subsequently, CARB approved updates to the *Climate Change Scoping Plan in 2014 (First Update) and 2017 (2017 Update)*, with the *2017 Update* considering SB 32 (adopted in 2016) in addition to AB 32. The Scoping Plan includes energy efficiency measures such as higher standards for vehicle fuel economy, reducing travel distances, transit-oriented development and increases to energy efficiency standards. Although measures were developed to reduce GHG emissions, energy usage would also be reduced due to improvements in efficiency. The full implementation of AB 32 would help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste.[11]

(f) Assembly Bill 1493 (AB 1493)/Pavley Regulations

AB 1493 (commonly referred to as CARB's Pavley regulations) was the first state legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger

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[10] *SB 100 (2017–2018 Reg. Session) Stats 2018, ch, 312.*

[11] *CARB, AB 32 Global Warming Solutions Act of 2006, ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006, accessed March 9, 2021.*

vehicles (cars and light-duty trucks) for model years 2009–2016.[12] The Pavley regulations are expected to reduce GHG emissions from California's passenger vehicles by about 30 percent in 2016, while improving fuel efficiency and reducing motorists' costs.[13] While the main purpose is to reduce GHG emissions, the Pavley regulations would also result in better fuel efficiency. In comparison to the Federal CAFE standard of 35 miles per gallon (mpg), the California average fuel economy would be 43 mpg in 2020.[14]

(g) California Air Resources Board

(i) CARB's Advanced Clean Cars Regulation

Closely associated with the Pavley regulations, the Advanced Clean Cars emissions-control program was approved by CARB in 2012.[15] The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles for model years 2015–2025.[16] The components of the Advanced Clean Cars program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[17] In March 2017, CARB voted unanimously to continue with the vehicle greenhouse gas emission standards and the ZEV program for cars and light trucks sold in California through 2025.[18] An increase in ZEV and PHEV provides for a reduction in transportation fuel usage.

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[12] *CARB, California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley), ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley, accessed March 9, 2021.*

[13] *CARB, California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley), ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley, accessed March 9, 2021.*

[14] *CARB, Addendum to February 25 Technical Assessment, Comparison of Greenhouse Gas Reductions for the United States and Canada under ARB Regulations and Proposed 2011–2015 Model Year Fuel Economy Standards, May 8, 2008.*

[15] *CARB, Advanced Clean Cars Program, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed March 9, 2021.*

[16] *CARB, Advanced Clean Cars Program, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed March 9, 2021.*

[17] *CARB, Advanced Clean Cars Program, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed March 9, 2021.*

[18] *CARB, News Release: CARB finds vehicle standards are achievable and cost-effective, March 24, 2017.*

In September 2019, the USEPA formally revoked the waiver of preemption it had previously provided to California in 2013 for the State's GHG and ZEV programs under Section 209 of the Clean Air Act.[19] The withdrawal of the waiver became effective November 26, 2019. In response, several states, including California, filed a lawsuit challenging the withdrawal of the EPA waiver.[20] CARB is currently enforcing the affected portions of the waiver on a voluntary basis, including issuing certifications for the greenhouse gas emissions and zero-emission vehicle programs.[21] However, these actions continue to be challenged in court.

(ii) Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, CCR, Division 3, Chapter 10, Section 2435) was adopted to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. This section applies to diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. Reducing idling of diesel-fueled commercial motor vehicles reduces the amount of petroleum-based fuel used by the vehicle.

(iii) Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles.

The Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles (Title 13, CCR, Division 3, Chapter 1, Section 2025) was adopted to reduce emissions of diesel particulate matter, oxides of nitrogen (NO_X) and other criteria pollutants from in-use diesel-fueled vehicles. This regulation is phased, with full implementation by 2023. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. The newer emission-controlled models would use petroleum-based fuel in a more efficient manner.

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[19] *84 Federal Register 51310*

[20] *United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.*

[21] *CARB, ww2.arb.ca.gov/es/resources/documents/carb-waiver-timeline, accessed April 8, 2021.*

(h) Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction mandates established in AB 32. SB 375 specifically requires each Metropolitan Planning Organization (MPO) to prepare a "sustainable communities strategy" (SCS) as a part of its Regional Transportation Plan (RTP), that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by reducing vehicle-miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.[22] The primary focus of the SCS is to plan development in a manner that will reduce GHG emissions, but this strategy also includes an effort to address transit and VMT, which reduces the consumption of petroleum-based fuels.

The Project Site is located within the planning jurisdiction of the Southern California Association of Governments (SCAG). SCAG's first-ever SCS was included in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), which was adopted by SCAG in April 2012. The goals and policies of the SCS that reduce VMT (and result in corresponding decreases in transportation-related fuel consumption) focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities so there is access to high quality transit service. Specific goals include, actively encourage and create incentives for energy efficiency, where possible (Goal 7) and encourage land use and growth patterns that facilitate transit and active transportation (Goal 8). These goals would serve to reduce transportation fuel usage. SCAG has since adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS).[23] The goals and policies of the 2016–2040 RTP/SCS are substantially the same as those in the 2012–2035 RTP/SCS. In addition, SCAG approved the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) in September 2020. See further discussion below.

(i) Senate Bill 1389

SB 1389 (PRC Sections 25300–25323; SB 1389) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. 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 (IEPR) in two volumes. Volume I, which was published on August 1, 2018, highlights the

[22] *CARB, What are Sustainable Communities Strategies?, ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/what-are-sustainable-communities-strategies, March 9, 2021.*

[23] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, dated April 2016.*

implementation of California's innovative policies and the role they have played in establishing a clean energy economy. Volume II was adopted February 20, 2019, provides more detail on several key energy issues, and will encompass new analyses.[24] The IEPR contains measures such as decarbonizing buildings, doubling energy efficiency savings, increasing flexibility in the electrical system to integrate more renewable energy, and reduce petroleum use in cars and trucks by up to 50 percent.

(j) California Environmental Quality Act

Appendix F of the CEQA Guidelines provides a list of energy-related items that may be included throughout the various chapters of an EIR. In addition, while not described as significance thresholds for determining the significance of impacts related to energy, Appendix F provides topics that the lead agency may consider in the discussion of energy use in an EIR, where topics are applicable or relevant to the project, as detailed below in Subsection 3.a.

(3) Regional

As discussed in Section IV.E, Land Use, of this Draft EIR, SCAG's 2016–2040 RTP/SCS presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The 2016–2040 RTP/SCS included land use strategies that focus on urban infill growth and walkable, mixed-use communities in existing urbanized and opportunity areas as well as transportation investments and land use strategies that encourage carpooling, increased transit use, active transportation opportunities, and promoting more walkable and mixed use communities which would potentially help to offset passenger VMT.

The 2016–2040 RTP/SCS also established High-Quality Transit Areas (HQTA), which are generally described as walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with a 15-minute or less service frequency during peak commute hours.[25] Local governments are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The Project Site is located within an HQTA as identified by the 2016–2040 RTP/SCS.[26]

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[24] *2018 Integrated Energy Policy Report, Volume I, August 2018.*

[25] *SCAG, 2016–2040 RTP/SCS, p. 8.*

[26] *SCAG, 2016–2040 RTP/SCS, Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.*

The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy 2020–2045 RTP/SCS) was approved by SCAG in September 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing, and using an electric vehicle will be easier thanks to an expanded regional charging network.

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.[27] By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. Priority Growth Areas (e.g., HQTAs) will account for less than four percent of regional total land but are projected to accommodate 64 percent of future household growth and 74 percent of employment growth between 2020 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions and related VMT by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[28]

The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS, the Project would also be consistent with the 2020–2045

[27] *2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.*

[28] *SCAG, Final 2020–2045 RTP/SCS, Making Connections, p. 5, May 7, 2020.*

RTP/SCS.[29] As the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the Notice of Preparation (NOP) for the Project on June 28, 2017, this section and the balance of this Draft EIR provide detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

(4) Local

(a) City of Los Angeles Green Building Code

On December 11, 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX, Article 9 of the Los Angeles Municipal Code (LAMC), 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 CALGreen Code. Projects filing for building permits on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements 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. Mandatory measures include installation of electrical raceways to future electric vehicle supply equipment (EVSE), reduce water use by 20 percent compared to maximum allowable water use per plumbing fixture as required by the LAMC, and use of roofing material to reduce the heat island effect.

(b) City of Los Angeles Sustainable City pLAn/L.A.'s Green New Deal

The Sustainable City pLAn was adopted in 2015 and includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[30] The Sustainable City pLAn was updated in April 2019 and renamed as L.A.'s Green New Deal. The 2019 Sustainable City pLAn/L.A.'s Green New Deal established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling of 100 percent of wastewater by 2035.

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[29] *For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within an HQTA, would include transit-oriented development, and would implement TDM, all of which would reduce the City's per capita VMT and associated air emissions. Another example is that because the Project would be consistent with the City's existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.*

[30] *City of Los Angeles, Sustainable City pLAn, April 2015.*

On February 10, 2020, Mayor Garcetti issued Executive Directive No. 25 which builds upon the goals and targets of L.A.'s Green New Deal. The directive implements a number of measures to reduce GHG emissions at city-owned buildings. Such measures include construction of zero carbon microgrids for city-owned infrastructure and construction or renovation of city-owned buildings to achieve carbon neutrality by 2030. With regard to transportation GHG emissions, the directive calls to streamline EV charger installation, procure zero emission vehicles, and encourage alternative modes of transportation.

b. Existing Conditions

(1) Electricity

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours.

The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City and many areas of the Owens Valley, serving approximately four 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 Resources Plan,

LADWP has a net dependable generation capacity greater than 7,880 MW.[31] In 2017, the LADWP power system experienced an instantaneous peak demand of 6,432 MW.[32] Approximately 34 percent of LADWP's 2019 electricity purchases were from renewable sources, which is greater than the 32 percent statewide percentage of electricity purchases from renewable sources.[33]

According to the Utility Report, the Project Site would receive power from existing underground power lines within the North Western Avenue right-of-way as well as the Sunset Boulevard right-of-way. Existing electricity usage was estimated based on the same methodology contained in the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. It is estimated that existing uses on the Project Site currently consume 3,455,694 kWh of electricity per year.[34]

(2) Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network, and, therefore, resource availability is typically not an issue. Natural gas provides almost one-third of the state's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet (cf).

Natural gas is provided to the Project Site by the Southern California Gas Company (SoCalGas). SoCalGas 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.[35]

SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan

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[31] *LADWP, 2017 Power Strategic Long-Term Resources Plan.*

[32] *LADWP, 2018 Retail Electric Sales and Demand Forecast, p. 6.*

[33] *LADWP, 2019 Power Content Label, October 2020.*

[34] *Eyestone Environmental, Energy Calculations for Sunset and Western Project, See Appendix D of this Draft EIR.*

[35] *SoCalGas, Company Profile, www.socalgas.com/about-us/company-profile, accessed May 8, 2020.*

Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.[36] The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. 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).[37]

SoCalGas would supply natural gas to the Project Site from natural gas service lines located in the vicinity of the Project Site. According to the Utility Report, there is a 16-inch gas line in the Sunset Boulevard right-of-way which currently supplies natural gas to the Project Site.[38] Smaller gas lines within the Project vicinity have been abandoned, leaving the 16-inch main as the only viable option for natural gas service.[39] It is estimated that existing uses on the Project Site currently consume approximately 2,618,926 cf of natural gas per year.[40]

(3) Transportation Energy

According to the CEC, transportation accounts for nearly 41.1 percent of California's total energy consumption in 2017.[41] In 2018, California consumed 15.6 billion gallons of gasoline and 3.1 billion gallons of diesel fuel.[42,43] Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.[44] However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. Although gasoline consumption has increased from 2013–2017, the CEC predicts that the demand for gasoline will decline over the next ten years, and there will be an increase in the use of alternative fuels.[45,46]

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[36] *California Gas and Electric Utilities, 2020 California Gas Report, p. 111.*

[37] *California Gas and Electric Utilities, 2020 California Gas Report, p. 111.*

[38] *Sunset and Western Utility Technical Report: Water, Wastewater, and Energy. September 2020. KPFF Consulting Engineers. See Appendix E of this Draft EIR.*

[39] *Sunset and Western Utility Technical Report: Water, Wastewater, and Energy. February 14, 2018. KPFF Consulting Engineers. See Appendix E of this Draft EIR.*

[40] *Eyestone Environmental, Energy Calculations for Sunset and Western Project, See Appendix D of this Draft EIR.*

[41] *CEC, 2019 Integrated Energy Policy Report, docketed May 6, 2020.*

[42] *California Board of Equalization, Net Taxable Gasoline Gallons 10-Year Report.*

[43] *California Board of Equalization, Net Taxable Diesel Gallons 10-Year Report.*

[44] *CEC, 2016–2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, March 2016.*

[45] *CEC, Transportation Energy Demand Forecast, 2018–2030, docketed December 4, 2017*

According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources consumed 7.19 billion gallons of gasoline and 1.23 billion gallons of diesel fuel in 2019.[47]

The existing on-site land uses currently generate a demand for transportation-related fuel use as a result of vehicle trips to and from the Project Site. The estimate of annual VMT associated with the existing Project Site uses is 15,624,179 VMT per year.[48] This translates to 612,279 gallons of gasoline and 102,758 gallons of diesel per year based on baseline year (2017) average fuel economy standards for the Southern California region.[49] Persons traveling to and from the Project Site also have the option of using public transportation to reduce transportation-related fuel use, as the Project Site is located approximately 0.25 mile from the Los Angeles County Metropolitan Transportation Authority (Metro) Hollywood/Western Station and near several bus lines with stops along Sunset Boulevard. For further discussion of public transit lines that serve the Project area, refer to Section IV.I, Transportation, of this Draft EIR.

3. Project Impacts

This analysis addresses the Project's potential energy usage, including electricity, natural gas, and transportation fuel. Energy consumption during both construction and operation is assessed. The Project's estimated energy consumption was calculated using CalEEMod Version 2016.3.2. Specific analysis methodologies are discussed below.

a. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to energy if it would:

Threshold (a): Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Threshold (b): Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

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[46] *CEC, 2019 Integrated Energy Policy Report, docketed May 6, 2020.*

[47] *CARB, EMFAC2014 Web Database.*

[48] *Existing VMT calculated by LADOT VMT Calculator, reflects existing floor area.*

[49] *Eyestone Environmental, Energy Calculations for the Sunset and Western Project. See Appendix D of this Draft EIR.*

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by case basis, considering the following factors:

- 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.

In accordance with Appendix F and the *L.A. CEQA Thresholds Guide*, the following criteria may be considered as appropriate in determining whether this threshold of significance is met:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
3. The effects of the project on peak and base period demands for electricity and other forms of energy;
4. The degree to which the project complies with existing energy standards;
5. The effects of the project on energy resources;
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives;
7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements; and
8. Whether the project conflicts with adopted energy conservation plans.

With regard to Threshold (b), the Project will be evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CalGreen Code, and City building codes. Also, as discussed in Section IV.D, Greenhouse

Gas Emissions, of this Draft EIR, the Project would also be consistent with the SCAG's RTP/SCS, which includes goals to reduce VMT and corresponding decrease in fuel consumption.

b. Methodology

Appendix F provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where topics are applicable or relevant to the project:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources;
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

(1) Construction

Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated using the California Emissions Estimator Model (CalEEMod).[50] Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power was calculated based on data provided in South Coast Air Quality Management District (SCAQMD) construction surveys (i.e., construction activity, horsepower, load factor, and hours of use per day).[51] The SCAQMD construction surveys identified the use of diesel generators to supply construction sites with electrical power.

In terms of natural gas, construction activities typically do not involve the consumption of natural gas.

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[50] *California Air Pollution Control Officers Association, CalEEMod™ version 2016.3.2, www.caleemod.com.*

[51] *CalEEMod Users Guide. Appendix E1, Technical Source Documentation. October 2017.*

Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the project site, construction worker travel and from the Project Site, and delivery and haul truck trips (e.g., the hauling of demolition material to off-site reuse and disposal facilities). Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files included in Appendix D of this Draft EIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of SCAQMD's *CEQA Air Quality Handbook*. Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total VMT was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC 2017 model (EMFAC2017). EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker trips were assumed to include 50 percent light duty gasoline auto and 50 percent light duty gasoline trucks. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks. Refer to Appendix D, *Energy Calculations for the Sunset and Western Project,* of this Draft EIR for detailed calculations.

(2) Operation

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas was calculated using demand factors provided in CalEEMod as part of the GHG analysis included in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., the heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and California Residential Appliance Saturation Survey (RASS) studies.[52] The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the ZIP Code tool.

[52] *CEC, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.*

Energy impacts associated with transportation during operation were also assessed. Daily trip generation used in this analysis was based on the *CEQA Thresholds Analysis for the Sunset & Western Project, Hollywood, California* dated April 2020 (Transportation Analysis) prepared by Gibson Transportation Consulting, Inc., and provided in Appendix N of this Draft EIR. As discussed therein, Project-related VMT was calculated using the LADOT VMT Calculator Version 1.3. The VMT Calculator was developed by the City and LADOT to comply with SB 743 which requires lead agencies to adopt VMT criteria to determine transportation related impacts. The resulting annual VMT was used as part of the GHG analysis included in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. Based on this annual VMT, gasoline and diesel consumption rates were calculated using the county-specific miles per gallon calculated using EMFAC2017. The vehicle fleet mix for vehicles anticipated to visit the Project Site was calculated consistent with the CalEEMod default for Los Angeles County. Supporting calculations are provided in Appendix D of this Draft EIR.

The Project's estimated energy demands were also analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2026 (i.e., buildout of the Project) 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 based on the Utility Report, included as Appendix E of this Draft EIR.

c. Project Design Features

The Project would include project design features designed to improve energy efficiency as set forth in Section IV.D, Greenhouse Gas Emissions, and Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR.

d. Analysis of Project Impacts

Threshold (a): Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

(1) Impact Analysis

The following analysis considers the eight criteria identified in the Thresholds of Significance subsection above to determine whether this significance threshold would be exceeded.

(a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction,

operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;

As discussed above, the Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, maintenance, and removal activities).[53]

For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping, and application of architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Removal of Project activities would include the future demolition or abandonment of the Project as proposed. However, as it is not known when the Project would be removed, the analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

(i) Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Electricity from these construction activities would be limited in comparison to existing operational electricity on the Project Site given that construction activities would be intermittent and use of heating and cooling equipment would also be used intermittently. As discussed below, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities), which together are described as "On-road construction equipment" in Table IV.C-1 on page IV.C-21.

As shown in Table IV.C-1, a total of 40,835 kWh of electricity, 162,744 gallons of gasoline, and 447,607 gallons of diesel is estimated to be consumed during Project construction. Project construction is expected to be completed by 2026.

[53] *Removal activities relate to the life of a project.*

Table IV.C-1
Summary of Energy Use During Project Construction[a]

Fuel Type	Quantity
Electricity	
Water Consumption	14,526 kWh
Lighting, electronic equipment, and other construction activities necessitating electrical power	26,309 kWh
Total Electricity	**40,835 kWh**
Gasoline	
On-Road Construction Equipment and Vehicles[b]	162,744 gallons
Off-Road Construction Equipment and Vehicles[c]	0 gallons
Total Gasoline	**162,744 gallons**
Diesel	
On-Road Construction Equipment and Vehicles[b]	315,194 gallons
Off-Road Construction Equipment and Vehicles[c]	132,413 gallons
Total Diesel	**447,607 gallons**

MWh = megawatt hours

[a] *Detailed calculations are provided in Appendix D of this Draft EIR.*

[b] *On-road construction equipment encompasses construction worker trips, vendor trips, and haul trips.*

[c] *Off-road construction equipment encompasses construction equipment usage on the Project Site (e.g., excavators, cranes, forklifts, etc.) Heavy equipment is assumed to be powered with diesel fuel.*

Source: Eyestone Environmental, 2021.

Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by existing electrical services within the Project Site and would not affect other services. This would be consistent with Project Design Feature AQ-PDF-1 which would require the use of electricity from power poles rather than temporary gasoline or diesel powered generators where available. As shown in Table IV.C-1, a total of approximately 40,835 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the site and

staging areas would also comply with applicable Title 24 requirements which includes limits on the wattage allowed per specific area, which result in the conservation of energy.[54] As such, the demand for electricity during construction would not cause wasteful, inefficient, and unnecessary use of energy.

The estimated construction electricity usage represents approximately 1.03 percent of the estimated annual operational demand for the Project[55] which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Moreover, construction electricity usage would replace the existing electricity usage at the Project Site during construction.

Natural Gas

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.

Transportation Energy

The petroleum-based fuel use summary provided in Table IV.C-1 on page IV.C-21 represents the amount of transportation energy that was calculated to be consumed during Project construction based on a conservative set of assumptions provided in Appendix D of this Draft EIR. As shown, on- and off-road vehicles would consume an estimated 162,744 gallons of gasoline and approximately 447,607 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.003 percent of the 2022 annual on-road gasoline-related energy consumption and 0.04 percent of the 2022 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix D of this Draft EIR.

Trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. In addition, on-road vehicles (i.e., haul trucks, worker

[54] *California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.*

[55] *The percentage is derived by taking the total amount of electricity usage during construction (40,835 kWh) and dividing that number by the total amount of net electricity usage during operation (3,976,774 kWh) to arrive at 1.03 percent.*

vehicles) would be subject to Federal and State fuel efficiency requirements. Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, and unnecessary use of energy.

Construction Materials

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation is expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

(ii) Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table IV.C-2 on page IV.C-24, development of the Project would result in an increase of 3,976,774 kWh electricity per year, an increase of 4,915,403 cf of natural gas per year, and an increased consumption of 214,834 gallons of gasoline per year and 43,510 gallons of diesel fuel per year over baseline conditions.

Electricity

The Project's projected on-site demand for electricity is 3,976,774 kWh per year.

In addition to complying with CALGreen requirements, the Project Applicant would also implement Project Design Feature GHG-PDF-1 in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of the new buildings shall use Energy Star–labeled products and applicants, and use light-emitting diode (LED) lighting where appropriate, to reduce electricity use. Additionally, the Project would provide 10 percent of the parking spaces with EV charging stations consistent with City code

Table IV.C-2
Summary of Net Annual Energy Use During Project Operation[a]

Source	Project (Net Increase)	Existing
Electricity[b]		
Building[c]	3,242,548 kWh	3,331,476 kWh
Water[d]	640,335 kWh	124,218 kWh
EV Chargers	93,891 kWh	0 kWh
Total Electricity	**3,976,774 kWh**	**3,455,694 kWh**
Natural Gas[b]		
Building	4,915,403 cf	2,618,926 cf
Total Natural Gas	**4,915,403 cf**	**2,618,926 cf**
Transportation[e]		
Gasoline	214,834 gallons	496,228 gallons
Diesel	43,510 gallons	100,501 gallons
Total Transportation	**258,345 gallons**	**596,729 gallons**

cf = cubic feet

MWh = megawatt hours

[a] *Detailed calculations are provided in Appendix D of this Draft EIR.*

[b] *Electricity and natural gas estimates assume compliance with applicable 2016 CALGreen requirements and implementation of Project Design Feature GHG-PDF-1 (which includes requirements of exceeding Title 24), in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR.*

[c] *As discussed further in Section IV.D, Greenhouse Gas Emissions, states that that the Project would provide at least 30 percent EV-ready charging stations and that the Project would provide ten percent of the parking spaces with EV charging stations consistent with City codes. Providing infrastructure for EV in itself does not result in additional electricity usage. These project design features were not included in the electricity calculation for the Project electricity usage.*

[d] *Calculations assume compliance with Project Design Feature WAT-PDF-1.*

[e] *Transportation fuel estimates include project characteristics consistent with LADOT VMT Calculator Guidelines. Existing and Project transportation fuel usage are calculated based on fuel economy standards for buildout year (2026). These fuel economy standards would result in less fuel consumed compared to the baseline year (2017).*

Source: Eyestone Environmental, 2021.

requirements.[56] It is anticipated that these measures would marginally increase usage of electricity, but that any additional electricity usage would be offset by energy savings of gasoline and diesel from the electric vehicles using the equipment. As discussed in Section II, Project Description, of this Draft EIR, the Project would also incorporate efficient design methods and technologies, such as high performance window glazing; undergrounding parking to reduce heat island effects; passive energy efficiency strategies, such as façade shading, roof overhangs, porches, and inner courtyards; high efficiency

[56] *City of Los Angeles Ordinance No. 186485. December 11, 2019.*

domestic heaters; and enhanced insulation to minimize solar heat gain. The Project would also implement Project Design Feature WAT-PDF-1, presented in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, which states that the Project would implement water conservation features, such as high-efficiency toilets and low-flow faucets and showerheads. In addition, the Project would be subject to the 2019 Title 24 standards which represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the ZNE goal." This analysis conservatively includes a 10-percent reduction in the CalEEMod calculated energy use to account for compliance with 2019 Title 24 standards.

LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 34 percent of LADWP's overall energy mix in 2019, the most recent year for which data are available.[57] This represents the available off-site renewable sources of energy that would meet the Project's energy demand. The use of renewable energy would indirectly reduce use of fossil fuels required for electricity generation (natural gas, coal, oil). While the electricity usage rate for a given land use would not be directly affected by the availability of renewable energy, the consumption of fossil fuels required for electricity generation would be reduced.

In addition, the Project would comply with Section 110.10 of Title 24, which includes mandatory requirements for solar-ready buildings, and, as such, would not preclude the potential use of alternate sources of electrical energy.

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2026–2027 fiscal year (the Project's buildout year) will be 23,807 GWh of electricity.[58,59] As such, the Project-related net annual electricity consumption of 3,976,774 kWh per year would represent approximately 0.01 percent of LADWP's projected sales in 2026 (the Project's buildout year).

Natural Gas

As provided in Table IV.C-2 on page IV.C-24, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 4,915,403 cf/year. In addition, the Project Applicant would implement Project Design Feature GHG-PDF-1 in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would incorporate sustainability features (e.g.,

[57] *LADWP, 2019 Power Content Label, October 2020.*

[58] *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.*

[59] *LADWP, 2017 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1.*

Energy Star–labeled products). As discussed above, the Project would be subject to the 2019 Title 24 standards. This analysis conservatively includes a 10-percent reduction in the CalEEMod calculated energy use to account for compliance with 2019 Title 24 standards. In order to meet the Title 24 energy performance requirement, the Project would include use of efficient water heaters, cooking equipment and other major support appliances.

The Project's estimated net annual demand for natural gas is 4,915,403 cf/year, or approximately 13,467 cf/day. Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.46 billion cf/day in 2026 (the Project's buildout year).[60] The Project would account for approximately 0.0005 percent of the 2026 (the Project's buildout year) forecasted consumption in SoCalGas' service area.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As noted above, the Project Site is located in an HQTA designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth," regional planning perspective. [61],[62] As discussed in Section IV.I, Transportation, of this Draft EIR, the Project Site is located in an area well-served by public transit. Specifically, the Project Site will be located approximately 0.25 mile from the Metro B (Red) Line Hollywood/Western Station and is served by ten Metro local lines and one DASH line and one LADOT Commuter Express line that would encourage and support use of public transportation. Furthermore, the Project would provide 76 short-term and 472 long-term bicycle parking spaces in addition to bicycle-serving amenities, which would

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[60] *California Gas and Electric Utilities, 2020 California Gas Report p. 147.*

[61] *SCAG, 2020–2045 RTP/SCS, Exhibit 3.8: High Quality Transit Areas in the SCAG Region for 2045 Plan, p. 90.*

[62] *Smart growth is an approach to development that encourages a mix of building types and uses, diverse housing and transportation options, development within existing neighborhoods, and community engagement. Smart growth includes the following ten principles: mix land uses; take advantage of compact building design; create a range of housing opportunities and choices; create walkable neighborhoods; foster distinctive, attractive communities with a strong sense of place; preserve open space, farmland, natural beauty, and critical environmental areas; strengthen and direct development towards existing communities; provide a variety of transportation choices; make development decisions predictable, fair, and cost effective; and encourage community and stakeholder collaboration in development decisions. Source: U.S. Environmental Protection Agency and the International City/County Management Association, This is Smart Growth, 2014; Smart Growth America, What is smart growth?, https://smartgrowthamerica.org/our-vision/what-is-smart-growth/, accessed March 9, 2021; SCAG, 2020–2045 RTP/SCS, Glossary, September 2020.*

further encourage biking. Additionally, the Project Site was designed to encourage walkability.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.[63] The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in Appendix D, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a 29 percent reduction in overall VMT and resulting in a 29-percent reduction in transportation fuel consumption

As summarized in Table IV.C-2 on page IV.C-24, when accounting for the measures that would be implemented to reduce VMT, the Project's estimated net petroleum-based fuel usage would be approximately 214,834 gallons of gasoline and 43,510 gallons of diesel per year, or a total of 258,345 gallons of petroleum-based fuels annually. This would be a 29-percent reduction in petroleum-based fuel usage in comparison to a standard project as estimated by CalEEMod. Calculations documenting the reduction in fuel usage are provided in Appendix D.

(iii) Summary of Energy Requirements and Energy Use Efficiencies

As previously discussed, CEQA Guidelines Appendix F recommends quantification of a project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of a project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed. The Project's energy requirements were calculated based on the methodology contained in CalEEMod for electricity and natural gas usage. Project VMT data was calculated based on LADOT VMT Calculator methodology. The calculations also took into account energy efficiency measures such as Title 24, CalGreen and vehicle fuel economy standards.

[63] *USEPA, Mixed-Use Trip Generation Model, www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed March 9, 2021.*

Table IV.C-2 on page IV.C-24 provides a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 40,835 kWh of electricity would be consumed along with 610,351 gallons of transportation fuel (gasoline and diesel). During Project operations, a net total of 3,976,774 kWh of electricity, 4,915,403 cf of natural gas, and 258,345 gallons of transportation fuel would be consumed on an annual basis.

(b) The effects of the project on local and regional energy supplies and on requirements for additional capacity

(i) Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 1.03 percent of the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.[64] Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses, which currently generate a demand for electricity. 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, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.003 percent of the 2017 annual on-road gasoline-related energy consumption and 0.04 percent of the 2017 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix D, of this Draft EIR. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

(ii) Operation

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2026–2027 fiscal year (the Project's buildout

[64] *The percentage is derived by taking the total amount of electricity usage during construction (40,835 kWh) and dividing that number by the total amount of net electricity usage during operation (3,976,774 kWh) to arrive at 1.03 percent.*

year) will be 23,807 GWh of electricity.[65,66] As such, the Project-related net annual electricity consumption of 3,976,774 kWh per year would represent less than 0.02 percent of LADWP's projected sales in 2026 (the Project's buildout year). In addition, LADWP has confirmed that the Project's electricity demand can be served by the existing facilities in the Project area.[67] Furthermore, the Project would implement any necessary connections and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project.

(c) The effects of the project on peak and base period demands for electricity and other forms of energy

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system experienced an all time high peak of 6,432 MW on August 31, 2017.[68] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2018, the base case peak demand for the power grid is 5,820 MW.[69] Peak electricity demand for the Project was calculated in the Utility Report included in Appendix E of this Draft EIR. It was determined that the Project's peak electricity usage would be 11,000 kW. In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.2 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical demand by the Project. Peak natural gas demand for the Project was calculated in the Utility Report. The Project would result in a net increase in peak natural gas demand of 18,500 cubic feet per hour (cfh). The will serve letter provided Utility Report has identified that SoCalGas has facilities that will be available to serve the Project Site. Therefore, Project electricity and natural gas consumption during operational activities would have a negligible effect on peak load conditions of the power grid or natural gas system. Project operational impacts with regard to baseline and peak load electricity and natural gas usage would be less than significant.

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[65] *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.*

[66] *LADWP, 2017 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1.*

[67] *LADWP, Will serve letter from Vincent Zabukovec, dated February 27, 2017.*

[68] *LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.*

[69] *LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.*

(d) The degree to which the project complies with existing energy standards

Construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.[70] Electricity and natural gas usage during Project operations presented in Table IV.C-2 on page IV.C-24 would comply with 2019 Title 24 standards and applicable 2019 CalGreen requirements. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation for trucks and equipment used during construction. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles traveling to and from the Project Site would comply with CAFE fuel economy standards, as required for those vehicle manufacturers.

Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption.

(e) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP's most recently adopted 2017 Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.[71] According to the United States Energy Information Administration (EIA), the United States currently has approximately 84 years of natural gas reserves based on 2019 production.[72] Compliance with energy standards is expected to result in more efficient use

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[70] *Energy Independence and Security Act of 2007. Pub.L. 110-140.*

[71] *California Gas and Electric Utilities, 2020 California Gas Report.*

[72] *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed March 9, 2021.*

of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[73] Passenger vehicles and trucks operated by Project residents, visitors and vendors would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above in the Regulatory Framework, one of the objectives of SB 350 is to increase procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. Accordingly, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 34 percent of LADWP's overall energy mix in 2019, the most recent year for which data are available.[74] This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, as discussed in Section II, Project Description, of this Draft EIR, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. The Project would also comply with Title 24 requirements for "Solar Ready Buildings" which requires a certain area of rooftop to be set aside for installation of solar panels. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, while methane is a renewable derived biogas and was found beneath the Project Site, it is not available on the Project Site in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in this part of Los Angeles. Specifically, based on a map of

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[73] *BP Global, Oil Reserves, www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed March 9, 2021.*

[74] *LADWP, 2019 Power Content Label, October 2020.*

California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[75]

(f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives

As discussed above, the Project would include project features to reduce VMT during operational activities. The Project's high density design and location to job centers and retail uses would allow for more residents to live closer to work and shopping areas, reducing VMT. The design, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also encourages non-automotive forms of transportation such as walking or biking to destinations. The Project would be located approximately 0.25 mile from the Metro B (Red) Line Hollywood/Western Station as well as 12 bus lines that would encourage and support use of public transportation. The Project would also provide 76 short-term and 472 long-term bicycle parking spaces for the proposed uses to encourage utilization of alternative modes of transportation. As further discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, these measures would reduce VMT by approximately 29 percent, with a corresponding reduction in the Project's petroleum-based fuel usage. Therefore, the Project would encourage the use of efficient transportation alternatives.

(g) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements

The City's Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). The Project would implement measures to further reduce energy consumption during operations such as use of energy efficient appliances and water saving measures (e.g., high-efficiency toilets with flush volume of 1.0 gallon of water per flush, showerheads with a flow rate of 1.5 gallons per minute or less, and drip/subsurface irrigation, among others). Therefore, the Project would incorporate measures that are consistent with or better than current conservation requirements.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of

[75] *CEC, Wind Projects and Wind Resource Areas, 2018.*

petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

With implementation of these features along with complying with state and local energy efficiency standards, the Project would meet and/or exceed all applicable energy conservation policies and regulations.

(h) Whether the Project conflicts with adopted energy conservation plans

As discussed in Section IV.D, Greenhouse Gas Emissions, the City has published its LA's Green New Deal, which outline goals and actions by the City to reduce GHG emissions. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.E, Land Use, of this Draft EIR, SCAG's 2016–2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region.

The 2016–2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT. The Project would be consistent with the energy efficiency policies emphasized in the 2016–2040 RTP/SCS. Most notably, the Project represents an infill development within the City of Los Angeles that would concentrate new residential and commercial uses within an HQTA, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.E, Land Use, of this Draft EIR for further details). The Project would be located approximately 0.25 mile from the Metro B (Red) Line Hollywood/Western Station as well as 12 bus lines that would encourage and support use of public transportation. Development of the Project within an HQTA would encourage the use of transit and reduce the transportation fuel associated with VMT.

The introduction of new housing and job opportunities within an HQTA, as proposed by the Project, is consistent with numerous policies in the 2016–2040 RTP/SCS and in the

2020–2045 RTP/SCS. As discussed above, with incorporation of MXD VMT reduction features, the Project would result in a 29-percent reduction in VMT and transportation fuel consumption. In addition, as previously discussed, the Project would exceed state energy efficiency requirements and would use electricity from LADWP, which has a current (2019) renewable energy mix of 34 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the Project would be consistent with adopted energy conservation plans.

(i) Conclusion

As demonstrated in the analysis above, the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local or regional supplies or capacity. The Project's energy usage during base and peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During operations, the Project would comply with applicable energy efficiency requirements such as the State Building Energy Efficiency Standards and applicable provisions of CalGreen, as well as include energy conservation measures beyond such requirements. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with relevant energy efficiency standards. **Therefore, Project impacts related to energy use would be less than significant during construction and operation.**

(2) Mitigation Measures

Project-level impacts related to Threshold (a) would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to Threshold (a) were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

Threshold (b): Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

(1) Impact Analysis

As discussed in Subsection 3.c(2)(h) above, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen building code, and the City's Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

With regard to transportation related energy usage, the Project would comply with goals of the SCAG's 2016–2040 RTP/SCS which incorporates VMT targets established by SB 375. The Project's mixed-use development and proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the Project results in a VMT reduction of approximately 29 percent in comparison to a free-standing site. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, the Project would not conflict with adopted energy conservation plans, or violate state or federal energy standards. **Therefore, Project impacts associated with regulatory consistency under Threshold (b) would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to Threshold (b) would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to Threshold (b) were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

(a) Wasteful, Inefficient and Unnecessary Use of Energy

Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or

reasonably foreseeable projects in a similar geographic area. Based on the information presented in Section III, Environmental Setting, of this Draft EIR, there are 100 related projects located within the vicinity of the Project Site. The geographic context for the cumulative analysis of electricity is LADWP's service area and the geographic context for the cumulative analysis of natural gas is SoCalGas' service area. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Project in the context of County-wide consumption. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

(i) Electricity

Although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with growth expectations for LADWP's service area. The Project would also incorporate additional energy efficiency measures as required by Project Design Feature GHG-PDF-1. Furthermore, 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. Additionally, as discussed above, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 34 percent of LADWP's overall energy mix in 2019, the most recent year for which data are available.[76] This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. **As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.**

(ii) Natural Gas

Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SoCalGas' service area. The Project would also incorporate additional energy efficiency measures as required by Project Design Feature GHG-PDF-1. Furthermore, future development

[76] *LADWP, 2019 Power Content Label, October 2020.*

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**. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable and, thus, would be less than significant.**

(iii) Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. At buildout, the Project's estimated net petroleum-based fuel usage would be approximately 214,834 gallons of gasoline and 43,510 gallons of diesel per year, or a total of 258,345 gallons of petroleum-based fuels annually. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.004 percent of the 2026 annual on-road gasoline-related energy consumption and 0.004 percent of the diesel-related energy consumption in Los Angeles County, as shown in Appendix D, of this Draft EIR.

Related projects in the Project vicinity would also be infill projects locating uses near other residential and commercial uses which would reduce distance travelled as well as consumption of transportation fuel. As analyzed above, Project transportation fuel usage would represent a small percentage of total fuel consumption within Los Angeles County. While it is speculative to assess transportation fuel usage from related projects, it is expected that cumulative transportation fuel usage resulting from the Project and related projects would be consistent with projections discussed above.

As described above, petroleum currently accounts for 90 percent of California's transportation energy sources; however, over the last decade the State has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled, all of which serve to reduce reliance on petroleum fuels. According to the CEC, gasoline consumption has declined by 6 percent since 2008, and the CEC predicts that the demand for gasoline will continue to decline over the next 10 years, with a corresponding increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions.

Furthermore, as described above, the Project would be consistent with the policies emphasized by the 2016–2040 RTP/SCS. Most notably, the Project represents an infill

development within the City of Los Angeles that would concentrate new residential and commercial uses within an HQTA, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.E, Land Use, of this Draft EIR for further details). The Project would be located approximately 0.25 mile from the Metro B (Red) Line Hollywood/Western Station as well as 12 bus lines that would encourage and support use of public transportation. Although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.[77] Implementation of the 2016–2040 RTP/SCS would result in an estimated 8-percent decrease in per capita GHG emissions by 2020, 18-percent decrease in per capita GHG emissions by 2035, and 21-percent decrease in per capita GHG emissions by 2040. As discussed above, CARB updated the SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035. Implementation of the 2016–2040 RTP/SCS or the next plan is expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's GHG emission reduction goals. As discussed in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, the Project results in a VMT reduction of approximately 29 percent in comparison to a standard project as estimated by CalEEMod, which would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS and with CARB's updated 2035 target.

Although the 2016–2040 RTP/SCS is intended to reduce GHG emissions, the reduction in VMT would also result in reduced transportation fuel consumption. By its very nature, the 2016–2040 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. In addition, it is assumed that related projects in the Project Site vicinity would reduce VMT, consistent with the goals of the 2016 RTP/SCS. **Since the Project is consistent with the 2016–2040 RTP/SCS and CARB's updated 2035 target, its contribution to cumulative transportation energy use would not be cumulatively considerable, and therefore, would be less than significant.**

(iv) Conclusion

Based on the analysis provided above, the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas, and fuel) would not result in a cumulatively considerable effect related to potentially significant environmental impacts due to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation. As such, the Project's

[77] *SCAG, Final 2016–2040, RTP/SCS, April 2016, p. 153.*

impacts would not be cumulatively considerable; therefore, cumulative energy impacts under Threshold (a) are concluded to be less than significant.

(b) Consistency with State or Local Plans

Related and future projects within the Project area would be required to comply with energy conservation and renewable energy plans and polices described above, including Title 24, CALGreen, and the City's Green Building Code. As related projects would be required to meet the same energy consumption standards, there would be no significant cumulative impacts with regard to consistency with energy conservation plans.

Furthermore, as described above, the Project would be consistent with the policies emphasized by the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS. The Project would be mixed-use and located near major job centers and public transit which would result in a VMT reduction. As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project results in a VMT reduction of approximately 29 percent in comparison to a standard project as estimated by CalEEMod, which would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS and with CARB's updated 2035 target. Therefore, the Project is consistent with the 2016–2040 RTP/SCS and would not be cumulatively considerable with regard to consistency with energy conservation plans.

(2) Mitigation Measures

Cumulative impacts related to energy use and conflicts with plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts related to energy use and conflicts with plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact levels remains less than significant.