

IV. Environmental Impact Analysis

L.3 Utilities and Service Systems—Energy Infrastructure

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts on electricity, natural gas, and transportation-related energy (petroleum-based fuels). The information presented herein is based, in part, on the *Energy Calculations for 1360 N. Vine Project* prepared by Eyestone Environmental and the *Utility Infrastructure Technical Report: Energy, Water, and Wastewater* (Utility Report) prepared by KPFF Consulting Engineers (August 2021), which are included as Appendix E and Appendix F of this Draft EIR, respectively.

2. Environmental Setting

a. Regulatory Framework

(1) Federal

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

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on the certification of an Electric Reliability Organization (ERO) which sets, approves, and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America.

Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

(2) State

California energy infrastructure policy is governed by three institutions: the California Independent System Operator (California ISO), the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC). These three agencies share similar goals, but have different roles and responsibilities in managing the State's energy needs.

Many state regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to Section IV.C, Energy, of this Draft EIR. There are, however, regulations pertaining to infrastructure. These are discussed further below.

(a) California Independent System Operator

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

(b) California Public Utilities Commission

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Public-owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUC's jurisdiction.

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

(c) California Energy Commission

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

(d) Senate Bill 1389

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

(3) Regional

There are no regional regulations with respect to electricity and natural gas infrastructure. For a discussion of regional regulations pertaining to energy conservation, refer to Section IV.C, Energy, of this Draft EIR.

(4) Local

There are no local regulations with respect to electricity and natural gas infrastructure. For a discussion of local regulations pertaining to energy conservation, refer to Section IV.C, Energy, of this Draft EIR.

b. Existing Conditions

(1) Electricity

The LADWP provides electrical service throughout the City of Los Angeles and many areas of the Owens Valley, serving approximately 4 million people within a service

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

area of approximately 465 square miles, excluding the Owens Valley. Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan.²

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, the LADWP has a net dependable generation capacity greater than 7,531 MW.³ In 2017, the LADWP power system experienced an instantaneous peak demand of 6,432 MW.⁴ Approximately 36.7 percent of LADWP's 2020 electricity purchases were from renewable sources, which is greater than the 33.1 percent statewide percentage of electricity purchases from renewable sources.⁵

LADWP supplies electrical power to the Project Site from electrical service lines located in the Project vicinity. According to the Utility Report, the Project Site receives electric power service from LADWP via an existing underground conduit in Vine Street. Existing electricity usage was estimated based on the same methodology contained in the greenhouse gas (GHG) analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR (California Emissions Estimator Model [CalEEMod] Version 2016.3.2). It is estimated that existing uses on the Project Site currently consume approximately 547,474 kWh of electricity per year.⁶

(2) Natural Gas

Natural gas is provided to the Project Site by 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.⁷

SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada, as well

² LADWP, *Facts and Figures*, www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=35f3ppo9l_167&_afLoop=1437473791682267, August 31, 2021.

³ LADWP, *2017 Power Strategic Long-Term Resources Plan*.

⁴ LADWP, *2017 Retail Electric Sales and Demand Forecast*, p. 6.

⁵ LADWP, *2020 Power Content Label*.

⁶ *Eyestone Environmental, Energy Calculations for 1360 N. Vine Project*. See Appendix E of this Draft EIR.

⁷ SoCalGas, *Company Profile*, www.socalgas.com/about-us/company-info.shtml, accessed August 30, 2021.

as local California supplies.⁸ The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provides only a small share of SoCalGas supplies due to the high cost of transport.⁹ Gas supply available to SoCalGas from California sources averaged 97 million cubic feet (cf) per day in 2019 (the most recent year for which data are available).¹⁰

SoCalGas supplies natural gas to the Project Site from natural gas service lines located in the Project vicinity. According to the Utility Report, the Project Site receives natural gas service via two separate SoCalGas operated services (a 3-inch service in De Longpre Avenue and a 2-inch service in Afton Place).¹¹ There is also an 8-inch SoCalGas main along Vine Street.¹² It is estimated that existing uses on the Project Site currently consume approximately 269,775 cf of natural gas per year.¹³

3. Project Impacts

This analysis addresses the Project's potential impacts on electricity and natural gas infrastructure as well as transportation-related energy (petroleum-based fuels). The Project's estimated energy consumption was calculated using CalEEMod Version 2016.3.2 and the LADOT VMT calculator.

a. Thresholds of Significance

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

Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the

⁸ California Gas and Electric Utilities, 2020 California Gas Report, p. 111.

⁹ California Gas and Electric Utilities, 2020 California Gas Report, p. 111.

¹⁰ California Gas and Electric Utilities, 2020 California Gas Report, p. 111.

¹¹ KPFF Consulting Engineers, Utility Infrastructure Technical Report: Energy, Water, and Wastewater, August 2021. Refer to Appendix F of this Draft EIR.

¹² KPFF Consulting Engineers, Utility Infrastructure Technical Report: Energy, Water, and Wastewater, August 2021. Refer to Appendix F of this Draft EIR.

¹³ Eystone Environmental, Energy Calculations for 1360 N. Vine Project. See Appendix E of this Draft EIR.

***construction or relocation of which could cause significant environmental effects?*¹⁴**

In assessing impacts related to energy infrastructure in this section, the City will use Appendix G as the thresholds of significance. The factors and considerations identified below from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate impacts to energy infrastructure:

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

b. Methodology

This analysis evaluates the potential impacts of the Project on existing energy infrastructure by comparing the estimated Project energy demand with the available capacity. Will-serve letters from LADWP and SoCalGas included in Appendix F of this Draft EIR demonstrate the availability of sufficient energy resources to supply the Project's demand.

Project energy usage, including electricity and natural gas, was calculated using CalEEMod Version 2016.3.2. During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control (including supply and conveyance) and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. 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). Construction activities typically do not involve the consumption of natural gas. During Project operation, energy consumption would include electricity and natural gas from uses such as heating/ventilation/air conditioning (HVAC); water heating, cooking, lighting, and use of

¹⁴ Refer to Section IV.L.1, *Utilities and Service Systems—Water Supply and Infrastructure*, of this Draft EIR for a discussion of water infrastructure; Section IV.L.2, *Utilities and Service Systems—Wastewater*, of this Draft EIR for a discussion of wastewater infrastructure; Section IV.F, *Hydrology and Water Quality*, of this Draft EIR for a discussion of stormwater infrastructure; and Section VI, *Other CEQA Considerations*, for a discussion of telecommunications facility impacts.

electronics/appliances. Additional details regarding Project energy usage are provided in Section IV.C, Energy, and Appendix E of this Draft EIR.

Project construction is anticipated to be completed as late as 2027 for both Project Options. For purposes of conservatively analyzing construction and operational impacts, it was assumed that construction of the Project could be completed as early as 2025. Based on CalEEMod energy usage factors, the construction equipment and truck fleet mix will consume less energy in future years due to more stringent energy efficiency standards. In addition, Project operations would also consume less energy in future years due to increasing energy efficiency standards. As construction and operational activities for the Project are evaluated based on an earlier start date, the energy usage presented is more conservative.

The Project's estimated energy demands were also analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2025 to determine if these two energy utility companies would be able to meet the Project's energy demands. Although Project construction is expected to be completed by as late as 2027 for both Project Options, for purposes of conservatively analyzing construction impacts, it was assumed that construction of the Project could be completed as early as 2025. Based on SCAQMD factors, the construction equipment and truck fleet mix will consume less energy in future years due to more stringent emissions control and fuel efficiency regulations. As construction activities for the Project are evaluated based on an earlier start date, the energy usage values presented are more conservative. 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 F of this Draft EIR.

c. Project Design Features

No specific project design features are proposed with regard to energy infrastructure. However, the Project would include project design features designed to improve energy efficiency as set forth in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development options—the Residential Option and the Office Option.

The Residential Option would develop a new high-rise building with four levels of subterranean parking consisting of up to 429 new residential units, an approximately 55,000-square-foot grocery store, approximately 5,000 square feet of neighborhood-serving commercial retail uses, and 8,988 square feet of uses in the bungalows. The

bungalows would be rehabilitated and adapted for reuse as either restaurants or residential units, in which case the development would still propose a total of 429 residential units onsite. The new building would be 360 feet 4 inches in height when accounting for rooftop mechanical equipment. The estimated depth of excavation expected for the subterranean parking and building foundations would be up to approximately 45 feet below grade. It is estimated that approximately 142,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase. Overall, the Residential Option would provide approximately 484,421 square feet of floor area within the Project Site.

The Office Option would develop a new high-rise building with eight levels of subterranean parking with approximately 463,521 square feet of office uses and 11,914 square feet of restaurant uses in the proposed building, as well as 8,988 square feet in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or nine residential units. The new building would be 303 feet when accounting for rooftop mechanical equipment. The estimated depth of excavation expected for the 8 levels of subterranean parking and building foundations would be up to approximately 83 feet below grade. It is estimated that approximately 321,060 cubic yards of export material and soil would be hauled. Upon completion, the Office Option would provide approximately 484,423 square feet of floor area within the Project Site.

The following analysis accounts for both development options and the term “Project” is used to describe all development scenarios unless stated otherwise.

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?¹⁵

¹⁵ Refer to Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of water infrastructure; Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of wastewater infrastructure; Section IV.F, Hydrology and Water Quality, of this Draft EIR for a discussion of stormwater infrastructure; and Section VI, Other CEQA Considerations, for a discussion of telecommunications facility impacts.

(1) Impact Analysis

(a) Construction

(i) Electricity

As discussed above, construction activities at the Project Site would require minor quantities of electricity for lighting, power tools and other support equipment. Heavy construction equipment would be powered with diesel fuel. As shown in Table IV.C-1 of Section IV.C, Energy, of this Draft EIR, the Project's construction electricity usage would be 35,265 kWh under the Residential Option and 26,444 kWh under the Office Option. The estimated construction electricity usage under the Residential Option with Residential Bungalows and Residential Option with Restaurant Bungalows would represent approximately 0.73 and 0.69 percent of the estimated net annual operational demand, respectively, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.¹⁶ Construction electricity usage under the Office Option with Residential Bungalows and Office Option with Restaurant Bungalows represent approximately 0.28 and 0.27 percent of the net annual operational demand, respectively. As discussed below, LADWP's existing electrical infrastructure currently has enough capacity to provide service during Project operation. Since the electricity demand during Project construction would be substantially less than its operational demand under both Project options, LADWP's electrical infrastructure would also have sufficient capacity to provide service for construction activities. Moreover, construction electricity usage would be offset by the elimination of the existing electricity usage at the Project Site during construction since the existing on-site uses which currently generate a demand for electricity would be removed. Temporary power poles that connect to the existing power lines located in the vicinity of the Project Site may be installed to provide electricity during Project construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the project during construction or demolition.

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

¹⁶ *The percentage is derived by taking the total amount of electricity usage during construction and dividing that number by the total amount of net electricity usage during operation. Detailed calculations are provided in Appendix E of this Draft EIR.*

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

(ii) 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. However, the Project would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below the surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. **Therefore, construction of the Project would not result in an increase in demand for natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects.**

(b) Operation

(i) Electricity

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, the Project's net operational electricity usage would be 4,812,037 kWh per year under the Residential Option with Residential Bungalows and 5,141,611 kWh per year under the Residential Option with Restaurant Bungalows, which is less than 0.02 percent of LADWP's projected sales in 2025.^{17,18} Under the Office Option with Residential Bungalows, operational electricity usage would be 9,300,929 kWh per year and 9,656,111 kWh per year under the

¹⁷ LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

¹⁸ Project construction is anticipated to be completed as late as 2027. Project-related energy consumption for construction equipment and operational vehicle trips would be lower in future years due to increasing energy efficiency regulations and fuel economy standards. As construction and operational activities are based on an earlier start date and completion date (2025), the energy consumption values presented are more conservative.

Office Option with Restaurant Bungalows, which is less than 0.04 percent of LADWP's projected sales in 2025. In addition, during peak conditions, the Project under the Residential Option would represent approximately 0.02 percent of the LADWP estimated peak load and the Office Option would represent 0.03 percent of the peak load. Thus, it is anticipated that LADWP's existing and planned electricity supplies would be sufficient to support the Project's electricity demand. In addition, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.¹⁹ 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. As such, operation of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity and would not result in the construction of new electric power facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. **Therefore, during Project operations, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.**

(ii) *Natural Gas*

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, the Project's net consumption of natural gas during operation would be 4,616,646 cf per year under the Residential Option with Residential Bungalows and 6,367,572 cf per year under the Residential Option with Restaurant Bungalows. As shown in Table IV.C-3 in Section IV.C, Energy, of this Draft EIR, the Project's net consumption of natural gas during operation would be 6,741,308 cf per year under the Office Option with Residential Bungalows and 8,391,482 cf per year under the Office Option with Restaurant Bungalows. This represents approximately 0.0005 percent of the 2025 forecasted consumption in the SoCalGas planning area under the Residential Option with Residential Bungalows and 0.0007 percent of the 2025 forecasted consumption in the SoCalGas planning area under the Residential Option with Restaurant Bungalows. Under the Office Option with Residential Bungalows and Office Option with Restaurant Bungalows would account for 0.0008 and 0.009 percent of the SoCalGas planning area respectively. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's natural gas demand. SoCalGas has also confirmed that the Project's natural gas demand can be served by the facilities in the Project area.²⁰ Furthermore, the Project would implement any necessary connections and upgrades required by SoCalGas to ensure that

¹⁹ *KPFF Consulting Engineers, Utility Infrastructure Technical Report: Energy, Water, and Wastewater, August 2021. Refer to Appendix F of this Draft EIR.*

²⁰ *KPFF Consulting Engineers, Utility Infrastructure Technical Report: Energy, Water, and Wastewater, August 2021. Refer to Appendix F of this Draft EIR.*

SoCalGas would be able to adequately serve the Project. Thus, operation of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. **Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas.**

(c) Conclusion

As demonstrated in the analysis above, construction and operation of the Project would not result in an increase in demand for electricity or natural gas that exceeds available energy supplies or infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. **Therefore, Project impacts related to energy infrastructure would be less than significant during construction and operation.**

(2) Mitigation Measures

Project-level impacts with regard to energy infrastructure would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Project-level impacts related to energy infrastructure 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) Electricity

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. LADWP forecasts that its total energy sales in the 2025–2026 fiscal year (the Project's buildout year) will be 23,537 GWh of electricity.^{21,22} In addition, LADWP

²¹ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

²² LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

has confirmed that the Project's electricity demand can be served by the facilities in the Project area.²³ Similar to the Project, it is expected that the electricity demand for each related project would comprise a small percentage of the overall electricity consumption forecast for LADWP's service area. Furthermore, data used to develop the LADWP demand forecasts take into account population growth, energy efficiency improvements, and economic growth which includes construction projects.²⁴ Therefore, the electricity demand for the Project and related projects is likely accounted for in LADWP's demand forecasts.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk, consistent with LADWP's environmental priorities and reliability standards. The 2017 Power Strategic Long-Term Resources Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary, as well as energy conservation measures, which would reduce demand. Although detailed information regarding electrical infrastructure for development projects in LADWP's service area is not known, it is expected that LADWP would provide for necessary improvements specific to each development project. Each of the development projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the service area. As discussed above, will-serve letters are provided for individual projects in which LADWP determines whether sufficient infrastructure is in place to provide electricity to a proposed project. As part of the will-serve letter process, LADWP takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is adequate. As the will-serve letter for the Project identified adequate infrastructure, construction and operation of the Project would not adversely affect the LADWP electrical grid. **The Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and, thus, would result in a less-than-significant cumulative impact.**

²³ *KPFF Consulting Engineers, Utility Infrastructure Technical Report: Energy, Water, and Wastewater, August 2021. See Appendix F of this Draft EIR.*

²⁴ *LADWP, 2017 Retail Electric Sales and Demand Forecast, p. 6.*

(b) *Natural Gas*

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. Based on annual natural gas consumption rates stated above, the Project's estimated net increase in demand for natural gas is 12,648 cf per day under the Residential Option with Residential Bungalows; 17,445 cf per day under the Residential Option with Restaurant Bungalows; 18,469 cf per day under the Office Option with Residential Bungalows and; 22,990 cf per day under the Office Option with Restaurant Bungalows. SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.²⁵ In addition, similar to the Project, it is expected that the natural gas demand for each related development project would comprise a small percentage of overall natural gas consumption. Moreover, SoCalGas' forecasts take into account projected population growth and development based on local and regional plans. Therefore, natural gas usage resulting from future operations at many of the development projects is likely accounted for in the SoCalGas projections.

Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SoCalGas occur as needed. It is expected that SoCalGas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Although detailed information regarding natural gas infrastructure for each of the development projects is not known, it is expected that SoCalGas would provide for necessary improvements specific to each development project. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate, as well as energy conservation measures, which would reduce demand. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the natural gas infrastructure in the service area.

As discussed above, will-serve letters are provided for individual projects, in which SoCalGas determines whether sufficient infrastructure is in place to provide natural gas service to a proposed project. As part of the will-serve letter process, SoCalGas takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is adequate. As the will-serve letter for the Project identified adequate infrastructure, construction and operation of the Project would not significantly affect the SoCalGas regional infrastructure. **The Project's contribution to cumulative impacts with respect to natural gas infrastructure would not be**

²⁵ *KPFF Consulting Engineers, Utility Infrastructure Technical Report: Energy, Water, and Wastewater, August 2021. See Appendix F of this Draft EIR.*

cumulatively considerable and, thus, would result in a less-than-significant cumulative impact.

(c) Conclusion

Based on the analysis provided above, the Project's contribution to cumulative impacts related to electricity and natural gas consumption would not result in a cumulatively considerable effect to energy infrastructure that could result in the construction of new energy facilities or expansion of existing facilities. As such, the Project's impacts would not be cumulatively considerable; therefore, cumulative energy infrastructure impacts are concluded to be less than significant.

(2) Mitigation Measures

Cumulative impacts with regard to energy infrastructure would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts related to energy infrastructure were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact levels remain less than significant.