

## **IV. Environmental Impact Analysis**

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### **L.3 Utilities and Service Systems—Energy Infrastructure**

#### **1. Introduction**

This section of the Draft EIR analyzes the Project’s potential impacts on electricity and natural gas infrastructure. The information presented herein is based, in part, on the *Energy Calculations for Angels Landing* prepared by Eystone Environmental and included as Appendix D of this Draft EIR, as well as the *Angels Landing Mixed-Use Project Utility Infrastructure Technical Report: Water, Wastewater, and Energy* (Utility Report), dated December 2020, which was prepared by prepared by KPFF Consulting Engineers and included as Appendix L of this Draft EIR.

#### **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; ensuring 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 the additional responsibility 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.

The majority of state regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to Section IV.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 electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

### *(b) California Public Utilities Commission*

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE), Southern California Gas Company (SoCalGas), and San Diego Gas and Electric (SDG&E). 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 Senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities.

(c) *California Energy Commission*

The CEC is a planning agency which provides guidance on setting the 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.<sup>1</sup>

(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 Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City of Los Angeles and many areas of the Owens Valley.

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<sup>1</sup> CEC, *Toward a Clean Energy Future, 2018 Integrated Energy Policy Report Update, Volume II, February 2019*,

According to the Utility Report, LADWP's Power system is the nation's largest municipal electric utility and serves a 465-square-mile area in Los Angeles and much of the Owens Valley. The system supplies more than 26 million megawatt-hours (MWh) of electricity a year for the City's 1.4 million residential and business customers as well as over 5,000 customers in the Owens Valley. The LADWP distribution network includes 6,800 miles of overhead distribution lines and 3,597 miles of underground distribution cables.<sup>2,3</sup>

According to LADWP's 2017 Power Strategic Long-Term Resources Plan, the LADWP has a net dependable generation capacity greater than 7,531 MW.<sup>4</sup> On August 31, 2017, the LADWP power system experienced an instantaneous peak demand of 6,502 MW.<sup>5</sup> Approximately 32 percent of LADWP's 2018 electricity purchases were from renewable sources, which is slightly greater than the 31 percent statewide percentage of electricity purchases from renewable sources.<sup>6</sup>

Electrical service provided by the 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.

There are existing LADWP underground electrical lines in the Hill, Olive and 4th Street rights-of-way adjacent to the Project Site. Feeder lines from the underground power line in Hill Street provide electricity to the Los Angeles County Metropolitan Transportation Authority (Metro) B and D Lines (formerly Red and Purple Lines) Pershing Square Station portal located in the southeast corner of the Project Site.<sup>7</sup> There are also two abandoned LADWP electrical vaults located on the Project Site which provided electricity during construction of the Metro station portal.

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<sup>2</sup> Los Angeles Department of Water and Power, *Facts and Figures*, [www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?\\_adf.ctrl-state=j29dmmm8\\_4&\\_afLoop=987630465818417](http://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=j29dmmm8_4&_afLoop=987630465818417), accessed December 6, 2020.

<sup>3</sup> Los Angeles Department of Water and Power, *Past and Present*, [www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?\\_adf.ctrl-state=j29dmmm8\\_4&\\_afLoop=987740179561027](http://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=j29dmmm8_4&_afLoop=987740179561027), accessed December 6, 2020.

<sup>4</sup> LADWP, *2017 Power Strategic Long-Term Resources Plan*, December 2017.

<sup>5</sup> LADWP, *Facts and Figures*, [www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?\\_adf.ctrl-state=o7lbsrw0g\\_17&\\_afLoop=43174387627557](http://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=o7lbsrw0g_17&_afLoop=43174387627557), accessed December 7, 2020.

<sup>6</sup> California Energy Commission, *Utility Annual Power Content Labels for 2018*.

<sup>7</sup> Alta/NSPS Land Title Survey for Project Site, May 24, 2018.

The 2.24-acre Project Site is a mostly vacant parcel that currently contains the aforementioned Metro station portal, limited paved areas, and unmaintained landscaping. Existing electricity usage at the Project Site is restricted to the Metro station and is minimal. To provide a conservative analysis in this section as well as in Section IV.C, Energy, of this Draft EIR, no existing electricity usage is assumed at the Project Site).

## (2) Natural Gas

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 Visalia to the Mexican border.<sup>8</sup>

SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada, as well as local California supplies.<sup>9</sup> The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas's natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.<sup>10</sup> Gas supply available to SoCalGas from California sources averaged 97 million cubic feet (cf) per day in 2019 (the latest year for which data are available).<sup>11</sup>

According to the Utility Report, existing SoCalGas infrastructure around the Project Site includes 4-inch gas mains in the Hill Street and Olive Street rights-of-way, and a 3-inch gas main in the 4th Street right-of-way. There is currently no functioning natural gas infrastructure on the Project Site. Based on the lack of natural gas infrastructure at the Project Site, and the fact that the only active on-site use is the Metro station portal, the analysis in this Draft EIR conservatively assumes that no natural gas is currently consumed at the Project Site.

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<sup>8</sup> SoCalGas, *Company Profile*, [www.socalgas.com/about-us/company-info.shtml](http://www.socalgas.com/about-us/company-info.shtml), accessed April 21, 2020.

<sup>9</sup> *California Gas and Electric Utilities, 2020 California Gas Report*, p. 111.

<sup>10</sup> *California Gas and Electric Utilities, 2020 California Gas Report*, p. 111.

<sup>11</sup> *California Gas and Electric Utilities, 2020 California Gas Report*, p. 111.

### 3. Project Impacts

This analysis addresses the Project's potential impacts on electricity and natural gas infrastructure. The Project's estimated energy consumption was calculated using the California Emissions Estimator Model (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 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 construction or relocation of which could cause significant environmental effects?<sup>12</sup>***

For the analysis of Project impacts to energy (e.g., electric power and natural gas) infrastructure in this section, the Appendix G Threshold above is relied upon. The analysis also considers the following City 2006 L.A. CEQA Thresholds Guide factor as it pertains 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. The will-serve letters from LADWP and SoCalGas included in the Utility Report as Appendix L of this Draft EIR, demonstrate that sufficient electricity and natural gas infrastructure exists around the Project Site to serve the Project.

Project energy usage, including electricity and natural gas, was calculated using CalEEMod Version 2016.3.2. During Project construction, energy would be consumed in

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<sup>12</sup> 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; and the Initial Study for the project, included as Appendix A of this Draft EIR, for a discussion of stormwater and telecommunications infrastructure.

the form of electricity associated with the conveyance of water used for dust control (including supply and conveyance) and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. During Project operation, energy consumption would include electricity and natural gas from uses such as heating/ventilation/air conditioning (HVAC); water heating, cooking, lighting, and use of electronics/appliances. Additional details regarding Project energy usage are provided in Section IV.C, Energy, and 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 (e.g., the Project buildout year) to determine whether LADWP and SoCalGas 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, and its supporting evidence, included as Appendix L 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 Sections IV.C, Energy, and IV.E, Greenhouse Gas Emissions, of this Draft EIR. The Project would also comply with the energy efficiency requirements of the California Building Standards Code (Title 24), Los Angeles Green Building Code and CALGreen, and would be constructed and operated in accordance with the energy efficiency and other sustainability measures required to achieve Leadership in Energy and Environmental Design (LEED®) Silver certification. Compliance with these energy-related project design features and requirements would reduce both the Project's energy demand and the impact that such demand would have on the electricity and natural gas infrastructure capacity.

### **d. Analysis of Project Impacts**

As set forth in Section II, Project Description, of this Draft EIR, the Project would involve the development of two towers (referred to as Tower A and Tower B) atop a podium structure and subterranean parking. Tower A would include 63 floors with a building height of up to 854 feet, while Tower B would include 42 floors with a building height of up to 494 feet. The proposed uses within these buildings would include: 180 residential for-sale condominium units; 252 residential apartments; two hotels with a combined total of 515 guest rooms (as well as ballrooms, meeting rooms, amenity space, and 12,170 square feet of restaurant space); and 72,091 square feet of general commercial space (including 30,466 square feet of retail and 41,625 square feet of restaurant). The Project would also provide private and public open spaces totaling 56,881 square feet, and would retain the

existing Metro B/D Lines Pershing Square Station portal. In all, the Project would result in approximately 1,269,150 square feet of new floor area on the approximately 2.24-acre Project Site, with a maximum floor-area ratio (FAR) of 13:1.

***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?*<sup>13</sup>**

## (1) Impact Analysis

### (a) Construction

#### (i) Electricity

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. During Project construction, Project electricity usage (49 MWh) would represent only 0.6 percent of the Project's estimated net annual operational Project electricity demand (8,213 MWh). As indicated in the operational impact analysis in the next subsection, LADWP's existing underground electrical lines in Hill, Olive, and 4th Streets have adequate capacity to serve Project operation. Therefore, it is reasonable to conclude that adequate capacity would also be available for Project construction activities.

With regard to construction of the required electrical line connection(s) between the Project Site and the existing LADWP underground electrical lines in Hill, Olive and 4th Streets, the Applicant would be required to coordinate such connections with LADWP, and to 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. Furthermore, the Project would be required to implement a Construction Management Plan to ensure that any trenching or other construction activities associated with the construction of the required connections would not result in substantial construction traffic, impedance of vehicle, bicycle and pedestrian traffic, serious safety issues, and blockages to emergency access. Lastly, all regulatory requirements, City standard conditions of approval (COAs), and mitigation set

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<sup>13</sup> 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; and the *Initial Study for the project*, included as Appendix A of this Draft EIR, for a discussion of stormwater and telecommunications infrastructure.

forth in this Draft EIR applicable to construction activities (such as the archaeological resources mitigation identified in Section IV.B, Cultural Resources, of this Draft EIR) would also be applicable to the activities associated with construction of the connections.

**Based on the above, Project construction activities would not require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

*(ii) Natural Gas*

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, there would be no demand for natural gas from SoCalGas natural gas infrastructure associated with Project construction activities.

With regard to construction of the required natural gas line connection(s) between the Project Site and the existing SoCalGas underground natural gas lines in Hill, Olive and 4th Streets, the construction contractors would be required to 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. Furthermore, implementation of the required Construction Management Plan, regulatory requirements, COAs, and mitigation measures identified in this Draft EIR that are applicable to construction activities would ensure that the construction impacts associated with the required natural gas connections would be less than significant.

**Therefore, Project construction activities would not require or result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

*(b) Operation*

*(i) Electricity*

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, the Project's net operational electricity demand would be approximately 8,213 MWh per year. This would represent approximately 0.03 percent of LADWP's projected electricity sales of 23,807 gigawatt hours (GWh) in 2026.<sup>14</sup> Thus, LADWP's existing and planned electricity supplies

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<sup>14</sup> LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1, p. A-6.

would be sufficient to support the Project's electricity demand. Furthermore, LADWP has confirmed that the existing electricity infrastructure in the Project area has adequate capacity to serve the Project which would generate an estimated peak electrical load of 18.3 MW on the local electricity infrastructure.<sup>15</sup> As such, operation of the Project is not anticipated to exceed the capacity of the existing electrical facilities, and the construction of new electrical transmission lines or other major electric power facilities would not be required to serve the Project. **Therefore, Project operation would not require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

(ii) *Natural Gas*

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, Project operation would result in a net increase in natural gas usage at the Project Site of approximately 22,478,182 cf per year (61,584 cf per day). This would represent approximately 0.002 percent of the 2026 forecasted natural gas consumption in the SoCalGas service area of approximately 2.782 billion cf per day.<sup>16</sup> Therefore, SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas. Furthermore, SoCalGas has confirmed that the existing natural gas infrastructure in the Project area has adequate capacity to serve the Project's natural gas demand. which would generate an estimated peak natural gas load of 75,000 cubic feet per hour (CFH) at 5 pounds per square inch (psi) on the local natural gas infrastructure.<sup>17</sup> As such, the construction of new natural gas transmission lines or other major natural facilities would not be required to serve the Project. Operation of the Project would not result exceed the capacity of the distribution infrastructure such that the expansion or construction of new natural gas facilities would be required.

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

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<sup>15</sup> *KPFF Consulting Engineers, Angels Landing Mixed-Use Project Utility Infrastructure Technical Report: Water, Wastewater, and Energy, December 2020. Included as Appendix L of this Draft EIR.*

<sup>16</sup> *California Gas and Electric Utilities, 2020 California Gas Report, Table 29, p. 139.*

<sup>17</sup> *KPFF Consulting Engineers, Angels Landing Mixed-Use Project Utility Infrastructure Technical Report: Water, Wastewater, and Energy, December 2020. Included as Appendix L of this Draft EIR.*

(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 supply or distribution infrastructure capabilities such that the construction of new energy facilities or expansion of existing facilities would be required, the construction of which could cause significant environmental effects. **Therefore, Project impacts related to energy infrastructure capacity would be less than significant during construction and operation.**

(2) Mitigation Measures

Project-level impacts related 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 or included, and the impact level remains less than significant.

## e. Cumulative Impacts

(1) Impact Analysis

(a) *Electricity*

Buildout of the Project, the 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 2026 (the Project's buildout year) will be 23,807 GWh of electricity.<sup>18</sup> The Project's annual electricity consumption of 8,213 MWh per year would be approximately 0.03 percent of LADWP's total projected sales in 2026. In addition, LADWP has confirmed that its existing electrical facilities in the Project area have sufficient capacity to serve the Project's electricity demand. Also, as stated in LADWP's will serve letter, the availability to provide electricity to the Project, and the related projects, is part of the total load growth forecast for the City and has been taken into account in the planned growth of the City's power system. Moreover, data used to develop the LADWP demand forecasts take into account population growth, energy efficiency improvements, and economic growth which includes

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<sup>18</sup> LADWP, *2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1, page A-6*.

construction projects.<sup>19</sup> Therefore, the electricity demand for the Project and related projects is accounted for in LADWP's demand forecasts and would not be cumulatively considerable.

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. The related projects would also incorporate energy conservation measures, which would reduce demand. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the 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, and as the related projects would require will-serve letters with similar findings, construction and operation of the Project and the related projects would not adversely affect the LADWP electrical grid.

**Therefore, the Project and the related projects would not result in significant cumulative impacts related to electricity infrastructure. As such, the Project's contribution would not be cumulatively considerable, and impacts would be less than significant.**

*(b) Natural Gas*

Buildout of the Project, the related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. The Project's natural gas demand of 22,478,182 cf per year (61,584 cf per day) would account for approximately 0.002 percent of the 2026 forecasted natural gas consumption within SoCalGas' service area of approximately 2.782 billion cf

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<sup>19</sup> *Facts and Figures*, [www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?\\_adf.ctrl-state=o7lbsrw0g\\_17&\\_afLoop=43174387627557](http://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=o7lbsrw0g_17&_afLoop=43174387627557), accessed December 7, 2020.

per day.<sup>20</sup> SoCalGas has confirmed that the Project's natural gas demand can be served by its existing natural gas facilities in the Project area.<sup>21</sup> In addition, similar to the Project, it is expected that the natural gas demand for each related development project would comprise a minimal percentage of the overall natural gas consumption forecasts for SoCalGas' service. 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 of the Project and the related projects is 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. SoCalGas would continue to expand delivery capacity if necessary to meet demand increases within its service area. The related projects would also incorporate energy conservation measures, which would reduce demand. In addition, 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, and as will-serve letters for the related projects would be required to have similar findings, construction and operation of the Project and the related projects would not significantly affect the SoCalGas regional infrastructure.

**Therefore, the Project and related projects would not result in significant cumulative impacts related to natural gas infrastructure. As such, the Project's contribution would not be cumulatively considerable, and impacts would be less than significant.**

## (2) Mitigation Measures

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

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<sup>20</sup> *California Gas and Electric Utilities, 2020 California Gas Report, Table 29, p. 139.*

<sup>21</sup> *KPFF Consulting Engineers, Angels Landing Mixed-Use Project Utility Infrastructure Technical Report: Water, Wastewater, and Energy, December 2020. Included as Appendix L of this Draft EIR.*

### (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 are required or included, and the impact level would remain less than significant.