

## **IV. Environmental Impact Analysis**

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### **M.4 Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications Infrastructure**

#### **1. Introduction**

The following section analyzes the proposed Project's potential impacts upon electric power, natural gas and telecommunications infrastructure. This section focuses on the existing infrastructure serving the project area and the potential for environmental impact to occur as a result of any physical improvements that may be necessary to accommodate the proposed Project. The information presented in this section is based in part on the information provided by the City of Los Angeles Department of Water and Power and *Morrison Hotel Project Utility Infrastructure Technical Report: Energy* (Infrastructure Technical Report: Energy)<sup>1</sup>, prepared by KPFF Consulting Engineers, September 23, 2020. The *Infrastructure Technical Report: Energy* is included as **Appendix D.1** of this Draft EIR. Potential impacts associated with energy demand and energy conservation policies are discussed in **Section IV.C, Energy**.

#### **2. Environmental Setting**

##### **a) Regulatory Framework**

There are several plans, policies, and programs regarding Electric Power, Natural Gas, and Telecommunications Infrastructure at the federal and state levels. Described below, these include:

- United States Department of Energy (the Energy Policy Act of 2005)
- California Independent System Operator
- California Public Utilities Commission,
- California Energy Commission
- Senate Bill 1389
- Senate Bill 649
- California Independent System Operator

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<sup>1</sup> *KPFF Consulting Engineers, Morrison Hotel Project, Utility Infrastructure Technical Report: Energy for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020.*

- City of Los Angeles Information Technology Agency
- City of Los Angeles Municipal Code Section 10.5.4

## (1) Federal

### (a) *United States Department of Energy (Energy Policy Act of 2005)*

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

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves, and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority.

## (2) State

California energy infrastructure policy is governed by three institutions: the California Independent System Operator (California ISO), the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC). These three agencies share similar goals, but have different roles and responsibilities in managing the State's energy needs. The majority of state regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to **Section IV.B, Energy**, of this Draft EIR. There are, however, regulations pertaining to infrastructure. These are discussed further below.

### (a) *California Independent System Operator*

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member

board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

*(b) California Public Utilities Commission*

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

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

*(c) California Energy Commission*

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

*(d) Senate Bill 1389*

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. In 2018, the CEC decided to write the Integrated Energy Policy Report in two volumes. The 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>2</sup>

*(e) Senate Bill 649*

Senate Bill SB 649 requires small cellular installations be on vertical infrastructure and on property outside of public rights-of-way. The installation is required to comply with all applicable federal,

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<sup>2</sup> 2018 Integrated Energy Policy Report Updated, Volume II, February 2019.

state, and local health and safety regulations. Additionally, cellular equipment that is no longer in use is required to be removed at no cost to the City.

### (3) Local

#### (a) *City of Los Angeles Information Technology Agency*

The City of Los Angeles Information Technology Agency (ITA) is responsible for a broad spectrum of services related to technology services to both internal and external customers. These range from classic IT services, such as computer support, enterprise applications, data networks, and a 24/7 data center to progressive digital services, such as a TV station (LACityview), 3-1-1 Call Center, public safety radio/microwave communications, helicopter avionics, enterprise social media, and more.

ITA's Video Services Regulatory Division advises the Mayor and City Council on certain issues relating to video/cable TV services and private telecommunications franchises. The Division regulates and monitors the compliance of video/cable TV services and franchises issued by the CPUC. More specifically, it ensures that video/cable TV service providers comply with local, state, and federal laws and oversees the video/cable TV service interests of City residents.

#### (b) *City of Los Angeles Municipal Code Section 10.5.4*

Section 10.5.4 of the City's Municipal Code states that telecommunications providers are required to comply with all city, state, and federal regulations during installation and operation of equipment. Additionally, each lease, sublease, or license facilitated by telecommunications providers are required to seek approval from the City.

## **b) Existing Conditions**

The Project Site is located within the South Park subarea of the Central City Community Plan, which is bounded by Figueroa Street and the Harbor Freeway to the west, Main Street to the east, 8th Street to the north, and the Santa Monica Freeway to the south, and is primarily made up of residential, medical, commercial, and retail uses. Warehouse space in one-story unreinforced masonry buildings is scattered throughout the district. The Central City Community Plan anticipates the South Park area will attract large commercial projects that will combine commercial and residential development to take advantage of the downtown area.

The Project Site is approximately 56,325 square feet (1.29 acres) and is currently occupied by multiple commercial buildings and a four-story residential hotel building. The Project fronts both West Pico Boulevard and South Hope Street.

### (1) Electricity

#### (a) *Electricity Supplies*

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 of Los Angeles' 1.5 million residential and business customers as well as over 5,000 customers in the Owens Valley. LADWP has over 7,880 megawatts (MW) of generation capacity from a diverse mix of energy sources including renewable energy, natural gas, nuclear, large hydro, coal, and other sources.

(b) *Electricity Distribution System*

The power supplied to LADWP customers is distributed through a network of approximately 7,148 miles of overhead distribution lines and approximately 3,709 miles of underground distribution cables.<sup>3</sup> The Project Site is approximately 56,325 square feet and is currently occupied by multiple commercial buildings and a vacant four-story residential hotel building. As discussed in **Section IV.C, Energy**, of this Draft EIR, total existing electricity consumption is approximately 422,824 kilowatt hours (kWh) of electricity per year (refer to **Table IV.C-1, Estimated Existing Electricity Consumption**, in **Section IV.C, Energy**, of this Draft EIR).

(2) Natural Gas

(a) *Natural Gas Supplies*

As discussed in **Section IV.C. Energy**, of this Draft EIR, the Southern California Gas Company (SoCalGas) provides natural gas resources to the City and most of Southern and Central California from the United States/Mexico border to the City of Visalia, California. 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>4</sup> The availability of natural gas is based upon present conditions of gas supply and regulatory policies as the SoCalGas is under the jurisdiction of the California Public Utilities Commission (CPUC) and other Federal regulatory agencies. In addition, SoCalGas makes available to its customers energy efficiency programs with rebates and incentives for the purpose of reducing natural gas consumption.

(b) *Natural Gas Distribution Systems*

(i) *Interstate Distribution System*

Natural gas is supplied to the Southern California region through a system of interstate pipelines. The *2020 California Gas Report* projects that California natural gas demand is expected to decline at an annual rate of 1.0 percent per year from 2020 to 2035 in the SoCalGas service area.<sup>5</sup> Current capacities in the interstate pipeline system can provide approximately 3,775 million cubic feet (cf) of gas per day for Southern California customers.<sup>6</sup> Gas supply available to SoCalGas

<sup>3</sup> *City of Los Angeles, Department of Water and Power, Power, Facts & Figures Website, accessed May 5, 2021.*

<sup>4</sup> *California Gas and Electric Utilities, 2020 California Gas Report, page 111.*

<sup>5</sup> *The California Gas and Electric Utilities, 2020 California Gas Report, page 4.*

<sup>6</sup> *The California Gas and Electric Utilities, 2020 California Gas Report, Figure 20 – Receipt Point and Transmissions Zone Firm Capacities, page 114.*

from California sources averaged 97 million cf per day in 2019 (the most recent year for which data are available).<sup>7</sup>

### (ii) *Local Distribution System*

SoCalGas provides natural gas resources to the City through existing gas mains located under the streets and public rights-of-way. Natural gas services are provided in accordance with SoCalGas's policies and extension rules on file with the CPUC at the time contractual agreements are made. Natural gas is delivered to the Project Site through natural gas facilities underneath the adjacent public streets.

The Project Site is approximately 56,325 square feet and is currently occupied by multiple commercial buildings and a vacant four-story residential hotel building. Total gas consumption is approximately 338,846 cf of natural gas per year (refer to **Table IV.C-2, Estimated Existing Natural Gas Consumption** in **Section IV.C. Energy**, of this Draft EIR).

### (3) Telecommunication Facilities

Prior to 2006, the City of Los Angeles had 14 cable television franchise areas that were served by three incumbent cable operators: Time Warner, Cox, and Charter. The City had provided cable television franchising regulatory authority of its cable television operators for over 30 years. Through City-issued franchises and enforcement of relevant ordinances, the City oversaw these cable television operators in the areas of consumer services and financial payments to the City, technical compliance with all local, state, and federal laws, and Public, Educational, and Governmental (P.E.G.) Access support. In 2006, the California Public Utilities Code was amended under state law and ceded the City's cable television franchising rights to the California Public Utilities Commission. In 2007 and 2008, Verizon and AT&T began operating in the City. Currently, the City's incumbent cable and video TV providers are AT&T, Charter/Spectrum, Cox Communications, Frontier, and Race Communications.<sup>8</sup>

Communication systems located throughout the Project area include underground fiber optic cable, telephone transmission lines (overhead and underground), and cellular towers owned or leased by telecommunications service providers.

Landline telephone service in the Project area is provided by various commercial communications companies. The majority of the landline facilities are located in county- or city-owned rights-of-way and on private easements. Telecommunications lines are either copper wire or fiber optic cable and are routed overhead on utility poles and underground.

In addition to landline service, a large number of communications towers have been constructed throughout the downtown area for cellular telephone service. Cellular towers have been erected along major travel corridors to meet emergency service objectives. Cellular service is available, to varying degrees, throughout the downtown area.

<sup>7</sup> *California Gas and Electric Utilities, 2020 California Gas Report, page 111,*

<sup>8</sup> *City of Los Angeles, Information Technology Agency, News, Video Services/Cable TV, April 10, 2018.*

### 3. Project Impacts

#### a) Thresholds of Significance

In accordance with the State *CEQA Guidelines* Appendix G (Appendix G), the Project would have a significant impact related to utilities and service systems if it would:

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes the following factors and considerations identified in the Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions:

- *The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities; and*
- *Whether and when the needed infrastructure was anticipated by adopted plans.*

#### b) Methodology

The environmental impacts of the Project with respect to electric power, natural gas, and telecommunications facilities are determined based on the proposed increase in dry utility generation and the capacity of existing and proposed infrastructure. The existing facilities' capacities and generation is compared to the Project's dry utility generation and future facility capacities.

#### c) Project Design Features

The Project would implement the following project design feature (PDF) to avoid or minimize adverse construction-related impacts. The PDF would be incorporated into the Project and is considered to be part of the Project for purposes of the impact analysis.

**PDF EPNGTI-1.** Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators will be used during construction.

#### d) Analysis of Project Impacts

***Threshold a) Would the project require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?***

## (1) Impact Analysis

### (a) Construction

#### (i) Electricity

As discussed in **Section IV.C. Energy, Table IV.C-3, Summary of Energy Use During Project Construction**, of this Draft EIR, construction would require a total of approximately 218,803 kWh of electricity. The estimated construction electricity usage over the anticipated construction period represents approximately 2.9 percent<sup>9</sup> of the Project's estimated net annual operational electricity demand, which, would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be offset with the removal of the existing on-site uses which currently generate a demand for 422,824 kWh of electricity per year. Accordingly, over the 36 months of construction, there would be a reduction of 349,890 kWh in the annual consumption of electricity at the Site.<sup>10</sup> Therefore, energy consumption during the construction of the Project would be finite and limited (i.e., all equipment would be turned off when not in use).

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 adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

**Therefore, construction of the Project would not require or result in the need for 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, natural gas would not be supplied to support Project construction, and there would be no demand generated by construction activities. 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 on-site trenching in order to place the lines below surface and minor off-site work to connect to existing supply lines. Therefore, as part of the

<sup>9</sup> The percentage is derived by taking the total amount of electricity usage during construction (218,803 kWh) and dividing that number by the annual amount of net electricity usage during operation (7,428,839 kWh) to arrive at 2.9 percent.

<sup>10</sup> The reduction in annual consumption is derived by subtracting the annual amount of electricity consumed during construction (218,803 kWh total / 3 years = 72,934 kWh annually) from the annual amount of electricity consumed by the existing Site uses (422,824 kWh).



Project, pursuant to project design feature PDF TR-1, a construction staging and traffic management plan (detailed in **Section IV.K, Transportation**), would be implemented to reduce any temporary pedestrian and traffic impacts during construction, ensuring safe vehicle travel and safe pedestrian and emergency vehicle access. 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 to avoid disruption of gas service to other properties. **Therefore, construction of the Project would not require or result in the need for relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, and no impacts would occur.**

(iii) *Telecommunication Facilities*

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant shall coordinate with applicable regulatory agencies and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. As part of the Project, pursuant to project design feature PDF TR-1, a construction staging and traffic management plan (detailed in **Section IV.K, Transportation**), would be implemented to reduce any temporary pedestrian and traffic impacts during construction, ensuring safe vehicle travel and safe pedestrian and emergency vehicle access. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease when installation is complete. Installation of new telecommunications infrastructure would primarily take place onsite, with minor offsite work associated with connections to the public system. No upgrades to offsite telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers. **Therefore, construction of the Project would not require or result in the need for relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which would cause significant environmental effects, and impacts would be less than significant.**

(b) *Operation*

(i) *Electricity*

As discussed previously in **Section IV.C. Energy**, of this Draft EIR, the Project would consume approximately 7,502,588 kWh per year, a net increase of approximately 7,428,839 kWh per year compared to the existing land uses (refer to **Table IV.C-4, Summary of Annual Net New Energy Use During Project Operation**, in **Section IV.C. Energy**, of this Draft EIR). Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2024–2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity.<sup>11</sup> As such, the Project-related net increase in annual electricity consumption of 7,428,839 kWh per year would represent approximately 0.03 percent of LADWP's projected sales in 2024. LADWP has confirmed the Project's electricity demand can be served by the existing facilities in the Project

<sup>11</sup> LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, Appendix A, December 2017.

area by specifically indicating “[t]he estimated power requirement for this proposed project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the power system.”<sup>12</sup> Therefore, it is anticipated that LADWP’s existing and planned electricity capacity and electricity supplies would be sufficient to support the Project’s electricity demand. 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, which, as detailed above for the analysis of construction impacts, would not cause significant environmental effects as these connections and upgrades would require minor construction work and would not involve large facility upgrades. **Therefore, operation of the Project would not require or result in the need for relocation or construction of new or expanded electrical facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

(ii) *Natural Gas*

As discussed in **Section IV.C. Energy**, of this Draft EIR, buildout of the Project would result in a projected net increase in the on-site demand for natural gas totaling approximately 21,758,597 cf per year, or approximately 59,613 cf per day (refer to **Table IV.C-4, Summary of Annual Net New Energy Use During Project Operation**, in **Section IV.C. Energy**, of this Draft EIR). Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas’ planning area will be approximately 2,349 million cf per day in 2024 (the Project’s buildout year).<sup>13</sup> Accordingly, the Project would account for approximately 0.003 percent of the daily 2024 forecasted consumption in SoCalGas’ planning area. According to the United States Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2018 consumption.<sup>14</sup> Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, it is anticipated that SoCalGas’ existing and planned natural gas supplies would be sufficient to support the Project’s natural gas demand. In addition, SoCalGas has confirmed that the Project’s natural gas demand can be served by the facilities in the Project area.<sup>15</sup> Furthermore, the Project would implement any necessary connections and upgrades required by SoCalGas for service to the Project Site. Therefore, the Project would not result in the need to build new natural gas infrastructure and the Project Site would be served by existing distribution lines. **Therefore, operation of the Project would not require or result in the need for relocation or construction of new or expanded natural gas facilities, the construction or**

<sup>12</sup> KPFF Consulting Engineers, *Morrison Hotel Project, Utility Infrastructure Technical Report: Energy for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, Exhibit 1. See Appendix D.1 of this Draft EIR.*

<sup>13</sup> *California Gas and Electric Utilities, 2020 California Gas Report, September 2020, page 145.*

<sup>14</sup> *U.S. Energy Information Administration, Frequently Asked Questions, How much natural gas does the United States have, and how long will it last?*

<sup>15</sup> KPFF Consulting Engineers, *Morrison Hotel Project, Utility Infrastructure Technical Report: Energy for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, Exhibit 2. See Appendix D.1 of this Draft EIR.*

**relocation of which could cause significant environmental effects, and impacts would be less than significant.**

*(iii) Telecommunications Facilities*

It is not currently known specifically what telecommunications companies have facilities within the Project area, nor which company(ies) serve the existing Project Site uses. However, it is assumed that there are existing Telecommunications/Data/Cable TV conduit in the vicinity of the Project Site. The determination of which facilities would provide service for the Project would be determined by the Applicant at the time service contracts are prepared. Electrical plans reflecting the estimated loads and recommended location for the Telecommunications/Data facilities would be submitted by the Applicant to the respective telephone and cable TV companies and each company would determine the most cost-effective communications/data cable system to provide their service to the Site. The telephone company and the cable TV company would work with the Owner's Project team to design conduit and cable systems to bring the necessary Communications/Data facilities to the Project in a timely manner. **Therefore, operation of the Project would not require or result in the need for relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

**(2) Mitigation Measures**

Impacts regarding electric power, natural gas, or telecommunication facilities 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.

**(3) Level of Significance After Mitigation**

Impacts regarding electric power, natural gas, or telecommunication facilities 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.

## **4. Cumulative Impacts**

### **a) Impact Analysis**

Buildout of the Project, the 172 Related Projects, and additional growth forecasted to occur in the City would increase electricity consumption during Project construction and operation and, thus, cumulatively increase the need for infrastructure capacity, such as new or expanded electric power, natural gas, and telecommunications facilities.

## (1) Electricity

As discussed previously in **Section IV.C. Energy**, of this Draft EIR, electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2017 SLTRP, 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. LADWP has indicated that the 2017 SLTRP incorporates the estimated electricity requirement for the Project. The 2017 SLTRP accounts for 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. 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 Project area. **As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and cumulative impacts would be less than significant.**

## (2) Natural Gas

As discussed previously in **Section IV.C. Energy**, of this Draft EIR, 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. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. Project impacts would be less than significant. **As such, cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and cumulative impacts would be less than significant.**

## (3) Telecommunication Facilities

Each of the Related Projects would be reviewed for environmental impacts. The concentration of business and population in the City of Los Angeles and rapid technological advances offer the opportunity to provide an integrated network serving as the regional hub for public and private users. Each of the Related Projects would have the telecommunication facilities updated and constructed concurrently with other utilities within roadway rights-of-way to lessen or eliminate potential environmental effects. And similar to the Project, before construction begins, the Related Projects would coordinate with applicable regulatory agencies and telecommunication providers to implement orderly relocation of telecommunication facilities that need to be removed or relocated. **As such, cumulative impacts with respect to telecommunication facilities would not be cumulatively considerable and cumulative impacts would be less than significant.**

## **b) Mitigation Measures**

Cumulative impacts to electric power, natural gas, or telecommunication facilities infrastructure would be less than significant. Therefore, no mitigation measures are required.

## **c) Level of Significance After Mitigation**

Cumulative impacts related to electric power, natural gas, or telecommunication facilities infrastructure would be less than significant.