

IV. Environmental Impact Analysis

K.2 Utilities and Service Systems—Energy 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 (LADWP), the *Energy Calculations for the Mt. Lebanon Project* prepared by Eyestone Environmental, and the *Our Lady of Mt. Lebanon Project Utility Infrastructure Technical Report: Energy* (Utility Report) prepared by KPFF Consulting Engineers (May 4, 2020), which are included as Appendix E and Appendix F to this Draft EIR, respectively. Potential impacts associated with energy demand and energy conservation policies are discussed in Section IV.D, 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; and
- Senate Bill 1389.

(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, 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.

(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.D, 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 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 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 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.¹

b. Existing Conditions

(1) Electricity

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

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

approximately 465 square miles, excluding the Owens Valley. 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.

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.² In 2017, the LADWP power system experienced an instantaneous peak demand of 6,432 MW.³ Approximately 34 percent of LADWP's 2019 electricity purchases were from renewable sources, which is better than the 32 percent statewide percentage of electricity purchases from renewable sources.⁴

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 South San Vicente Boulevard. Also, overhead wires connecting with a power pole are located in an alley just north of the Project site. Existing electricity usage was estimated based on the same methodology contained in the greenhouse gas (GHG) analysis included in Section IV.C, Greenhouse Gas Emissions, to 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 229,151 kWh of electricity per year.⁵

(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.⁶

² LADWP, *2017 Power Strategic Long-Term Resources Plan*.

³ LADWP, *2017 Retail Electric Sales and Demand Forecast*, p. 6.

⁴ LADWP, *2019 Power Content Label*, October 2020.

⁵ *Eyestone Environmental, Energy Calculations for the Mt. Lebanon Project*. See Appendix E to this Draft EIR.

⁶ SoCalGas, *Company Profile*, www.socalgas.com/about-us/company-profile, accessed February 24, 2021.

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.⁷ The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. Gas supply available to SoCalGas from California sources averaged 97 million cf per day in 2019 (the most recent year for which data are available).⁸

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 a two-inch gas line in Holt Avenue and a four-inch gas main in South San Vicente Boulevard.⁹ It is estimated that existing uses on the Project Site currently consume approximately 331,282 cf of natural gas per year.¹⁰

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 CalEEMod Version 2016.3.2.

a. Thresholds of Significance

In accordance with Appendix G to 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?¹¹

⁷ California Gas and Electric Utilities, 2020 California Gas Report, p. 111.

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

⁹ KPFF Consulting Engineers, Our Lady of Mt. Lebanon Project Utility Infrastructure Technical Report: Energy, May 4, 2020. Refer to Appendix F to this Draft EIR.

¹⁰ Eyestone Environmental, Energy Calculations for the Mt. Lebanon Project. See Appendix E to this Draft EIR.

¹¹ Refer to the Project's Initial Study (Appendix A to this Draft EIR) for a discussion of wastewater and stormwater impacts; Section IV.K.1, Water Supply and Infrastructure, to this Draft EIR for a discussion of water infrastructure Section VI, Other CEQA Considerations, of this Draft EIR discusses impacts to
(Footnote continued on next page)

In assessing impacts related to energy infrastructure in this section, the City will use Threshold (a) from Appendix G as the threshold 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 significance threshold.

The *L.A. CEQA Thresholds Guide* identifies the following criterion 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?
- Whether and when the needed infrastructure was anticipated by adopted plans?

b. Methodology

This analysis evaluates the potential impact 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 to 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 electronics/appliances. Additional details regarding Project energy usage are provided in Section IV.D, Energy, and Appendix F to this Draft EIR.

telecommunications facilities and concludes that impacts would be less than significant because the construction of new and expanded telecommunications facilities would be minor and limited to the Project Site. A Construction Traffic Management Plan would be prepared pursuant to Project Design Feature TR-PDF-1 to ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel. The operation of the Project would not require or result in the relocation or construction of telecommunication facilities.

The Project's estimated energy demands were also analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2024 (i.e., the Project buildout year) to determine if these two energy utility companies would be able to meet the Project's energy demands. Finally, the capacity of local infrastructure to accommodate the Project's estimated electricity and natural gas demand was assessed based on the Utility Report, included as Appendix F to this Draft EIR.

c. Project Design Features

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

d. Analysis of Project Impacts

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?¹²

(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. During Project construction activities, electricity usage represents two percent of the estimated net annual Project operational demand, which as described below, LADWP's existing electrical infrastructure currently has enough capacity to provide service for construction activities. Moreover,

¹² Refer to the Project's Initial Study (Appendix A to this Draft EIR) for a discussion of wastewater and stormwater impacts; Section IV.K.1, Water Supply and Infrastructure, to this Draft EIR for a discussion of water infrastructure. Section VI, Other CEQA Considerations, of this Draft EIR discusses impacts to telecommunications facilities and concludes that impacts would be less than significant because the construction of new and expanded telecommunications facilities would be minor and limited to the Project Site. A Construction Traffic Management Plan would be prepared pursuant to Project Design Feature TR-PDF-1 to ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel. The operation of the Project would not require or result in the relocation or construction of telecommunication facilities.

construction electricity usage would be substantially lower than the current demand for electricity with respect to the existing on-site uses, so that the existing electrical infrastructure is sufficient to accommodate construction activity. Temporary power poles 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. Project contractors would notify and coordinate with LADWP to identify the locations and depth of water mains and power lines and avoid disruption of electric and water service to other properties. As such, construction of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

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 energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and the Project's impact would therefore 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 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 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 to 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, and the Project's impact would therefore be less than significant.

(b) Operation

(i) Electricity

As shown in Table IV.D-2 in Section IV.D, Energy, to this Draft EIR, the Project's net operational electricity usage would be 1,378,556 kWh per year, which is less than 0.006 percent of LADWP's projected sales in the 2024-2025 fiscal year.¹³ In addition, during peak conditions, the Project would represent approximately 0.005 percent of the LADWP estimated peak load. As discussed in the Utility Report, the Project would include two LADWP transformers. One would serve the church, amenities and back-of-house, and the other would serve the residential portion. This would minimize the size and footprint of electricity infrastructure involved in providing power to all users. LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.¹⁴ 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 energy 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, and the Project's impact would therefore be less than significant.**

(ii) Natural Gas

As shown in Table IV.C-2 in Section IV.D, Energy, to this Draft EIR, the Project would consume 1,647,341 cf per year, which represents approximately 0.00002 percent of the 2024 forecasted consumption in the SoCalGas planning area. SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.¹⁵ Furthermore, the Project would implement any necessary connections and upgrades required by SoCalGas to ensure that 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

¹³ LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

¹⁴ KPFF Consulting Engineers, Our Lady of Mt. Lebanon Project Utility Infrastructure Technical Report: Energy, May 4, 2020. Refer to Appendix F to this Draft EIR.

¹⁵ KPFF Consulting Engineers, Our Lady of Mt. Lebanon Project Utility Infrastructure Technical Report: Energy, May 4, 2020. Refer to Appendix F to this Draft EIR.

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, and the Project's impact would therefore be less than significant.**

(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 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 capacity 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 are required or included, and the impact levels remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

(a) Electricity

Buildout of the Project, the 17 related projects located in the City of Los Angeles in the LADWP's service area and as listed in Table III-1 in Section III, Environmental Setting, to this Draft EIR, 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 2024-2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity.^{16,17} In addition, LADWP has confirmed that

¹⁶ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

the Project's electricity demand can be served by the facilities in the Project area.¹⁸ Data used to develop the LADWP demand forecasts take into account population growth, energy efficiency improvements, and economic growth which includes construction projects.¹⁹ The 10 related projects in the City of Beverly Hills and the 17 related projects in the City of West Hollywood are served by Southern California Edison and are not part of LADWP's service area.

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. Although detailed information regarding electrical infrastructure for development projects in LADWP's service area is not known, it is reasonably 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.²⁰ **For these reasons: (1) the Project's contribution to cumulative impacts related to electricity infrastructure would not be cumulatively considerable and, therefore, would be less than significant; and (2) the cumulative impact of the Project's incremental effect and the effect of related projects related to electricity infrastructure would be less than significant.**

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

¹⁸ KPFF Consulting Engineers, *Utility Infrastructure Technical Report: Energy, May 4, 2020. See Appendix F to this Draft EIR.*

¹⁹ LADWP, *2017 Retail Electric Sales and Demand Forecast, p. 6.*

²⁰ KPFF Consulting Engineers, *Utility Infrastructure Technical Report: Energy, May 4, 2020. See Appendix F to this Draft EIR.*

(b) Natural Gas

Buildout of the Project, the 44 related projects as listed in Table III-1 in Section III, Environmental Setting, to this Draft EIR, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. SoCalGas serves the City of Los Angeles, the City of Beverly Hills, and the City of West Hollywood. As stated above, the Project's estimated net increase in demand for natural gas is 1,647,341 cf per year, which translates to approximately 4,513 cf per day. SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area, and in general, each development project would be expected to comprise a similarly limited percentage of overall natural gas consumption.²¹ Moreover, SoCalGas' forecasts consider 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. 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.

For these reasons: (1) the Project's contribution to cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and, therefore, would be less than significant; and (2) the cumulative impact of the

²¹ *KPFF Consulting Engineers, Utility Infrastructure Technical Report: Energy, May 4, 2020. See Appendix F to this Draft EIR.*

Project's incremental effect and the effect of related projects related to natural gas infrastructure would be less than significant.

(c) Conclusion

Based on the analysis provided above: (1) the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas) would not result in a cumulatively considerable effect related to distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities and, therefore, would be less than significant; and (2) the cumulative impact of the Project's incremental effect and the effect of related projects related to electricity and natural gas infrastructure would 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 are required or included, and the impact levels remains less than significant.