IV. Environmental Impact Analysis

C. Energy

1. Introduction

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

Consistent with the goals of Appendix F to conserve energy by decreasing overall per capita energy consumption, decreasing reliance on fossil fuels, and increasing reliance on renewable energy sources, this section analyzes the Project's potential impact on energy resources, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). This section evaluates the demand for energy resources attributable to the Project and makes a determination as to whether the Project would result in a potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction and operation and whether the Project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The information presented herein is based, in part, on the *Energy Calculations for the District NoHo Project* prepared by Eyestone Environmental, which is included as Appendix F of this Draft EIR and the District NoHo Utility Infrastructure Technical Report: Water, Wastewater, and Energy prepared by KPFF Consulting Engineers in January 2022, which is included in Appendix G of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Federal

(a) Corporate Average Fuel Economy Standards

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

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by USEPA and NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 percent to 23 percent over the 2010 baseline, depending on the vehicle type. USEPA and NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5- to 25-percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.

(2) State

(a) California Building Standards Code (Title 24)

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

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. On May 9, 2018, the CEC adopted the 2019 Title 24 Standards, which will go into effect on January 1, 2020.[2] The 2019 standards continue to improve upon the previous (2016) Title 24 standards for new construction of,

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[1] *For more information on the CAFE standards, refer to www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy, accessed March 9, 2022.*

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

and additions and alterations to, residential and non-residential buildings.[3] The 2019 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As described in the 2019 Title 24 Standards, the standards represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy (ZNE) goal." Single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards.[4] Nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades.[5]

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

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2017. The 2019 CALGreen Code, which went into effect January 1, 2020, includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality.[6] Most mandatory measure changes in the 2019 CALGreen Code from the previous 2016 CALGreen Code are related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional electric vehicle charging space requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification.[7] For nonresidential mandatory measures, the table (Table 5.106.5.3.3) identifying the number of required EV charging spaces has been revised in its entirety.[8] Compliance with the 2019 CALGreen Code is enforced through the building permit process.

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

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

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

[6] *California Building Standards Commission, 2019 Green Building Standards Code.*

[7] *California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, Chapter 4—Residential Mandatory Measures, effective January 1, 2020.*

[8] *California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, Chapter 5—Nonresidential Mandatory Measures, effective January 1, 2020.*

(b) California's Renewable Portfolio Standard

First established in 2002 under Senate Bill (SB) 1078 and amended by SB 350 and SB 100 (discussed further below), California's Renewable Portfolio Standard (RPS) program requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 60 percent of total retail sales by 2030.[9] The California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.[10] The CEC's responsibilities include: (1) certifying renewable facilities as eligible for the RPS; and (2) designing and implementing a tracking and verification system to ensure that renewable energy output is counted only once for the purpose of the RPS and verifying retail product claims in California or other states.

(c) Senate Bill 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15, issued in April 2015, which established a new statewide policy goal to reduce greenhouse gas (GHG) emissions 40 percent below their 1990 levels by 2030. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030.[11] SB 350 also accelerated the RPS program, mandating a 50 percent RPS by 2030. SB 350 includes interim annual RPS targets with three-year compliance periods and requires 65 percent of RPS procurement to be derived from long-term contracts of 10 or more years.

(d) Senate Bill 100

SB 100, signed September 10, 2018, is the 100 Percent Clean Energy Act of 2018. SB 100 updates the goals of California's RPS and SB 350, as discussed above, to the following: achieve 50 percent renewable resources target by December 31, 2026, and achieve a 60-percent target by December 31, 2030. SB 100 also requires that eligible

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[9] *CPUC, California Renewables Portfolio Standard (RPS) Program, https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps, accessed March 9, 2022.*

[10] *CPUC, California Renewables Portfolio Standard (RPS) Program, https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps, accessed March 9, 2022.*

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

renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.[12]

(e) Assembly Bill 1493/Pavley Regulations

Assembly Bill (AB) 1493 (commonly referred to as the California Air Resources Board's [CARB] Pavley regulations) was the first legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks) for model years 2009–2016.[13] It is expected that the Pavley regulations would reduce GHG emissions from California's passenger vehicles by about 30 percent in 2016, while improving fuel efficiency and reducing motorists' costs.[14] While the main purpose is to reduce GHG emissions, the Pavley regulations would also result in better fuel efficiency. In comparison to the Federal CAFE standard of 35 miles per gallon (mpg), the California average fuel economy would be 43 mpg in 2020.[15]

(f) California Air Resources Board Advanced Clean Cars Program

Closely associated with the Pavley regulations, the Advanced Clean Cars emissions-control program was approved by CARB in 2012.[16] The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles for model years 2015–2025.[17] The components of the Advanced Clean Cars program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (i.e., battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[18] In March

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[12] *Senate Bill 100 (2017–2018 Reg. Session) Stats 2018, ch. 312.*

[13] *CARB, California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley), ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley, accessed February 17, 2022.*

[14] *CARB, California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley), ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley, accessed February 17, 2022.*

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

[16] *CARB, Clean Cars, ww2.arb.ca.gov/our-work/topics/clean-cars, accessed February 17, 2022.*

[17] *CARB, Clean Cars, ww2.arb.ca.gov/our-work/topics/clean-cars, accessed February 17, 2022.*

[18] *CARB, Clean Cars, ww2.arb.ca.gov/our-work/topics/clean-cars, accessed February 17, 2022.*

2017, CARB voted unanimously to continue with the vehicle GHG emission standards and the ZEV program for cars and light trucks sold in California through 2025.[19]

On September 19, 2019, the USEPA formally revoked the waiver of preemption it had previously provided to California in 2013 for the State's GHG and ZEV programs under Section 209 of the Clean Air Act.[20] The withdrawal of the waiver became effective November 26, 2019. In response, several states including California filed a lawsuit challenging the withdrawal of the EPA waiver.[21] In April 2021, the USEPA announced it will move to reconsider its previous withdrawal and grant California permission to set more stringent climate requirements for cars and SUVs.[22] The waiver was reinstated on March 9, 2022.[23]

(g) Sustainable Communities Strategy (SB 375)

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction mandates established in AB 32. SB 375 specifically requires each Metropolitan Planning Organization (MPO) to prepare a "sustainable communities strategy" (SCS) as part of its Regional Transportation Plan (RTP), which is required by the state and federal government, that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by reducing vehicle miles travelled (VMT) from light duty vehicles through the development of more compact, complete and efficient communities.[24]

The Project Site is located within the planning jurisdiction of the Southern California Association of Governments (SCAG). SCAG's first-ever SCS was included in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/ SCS), which was adopted by SCAG in April 2012. The goals and policies of the SCS that

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[19] *CARB, Release Number 17-19: CARB finds vehicle standards are achievable and cost-effective, March 24, 2017*

[20] *84 CFR 51310*

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

[22] *United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.*

[23] *USEPA, EPA Restores California's Authority to Enforce Greenhouse Gas Emission Standards for Cars and Light Trucks, https://www.epa.gov/newsreleases/epa-restores-californias-authority-enforce-greenhouse-gas-emission-standards-cars-and, accessed March 11, 2022.*

[24] *CARB, Sustainable Communities, ww2.arb.ca.gov/our-work/topics/sustainable-communities, accessed April 28, 2021.*

reduce VMT (and result in corresponding decreases in transportation-related fuel consumption) focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities so there is access to high quality transit service. Specific goals that would reduce transportation fuel usage include, actively encourage and create incentives for energy efficiency, where possible (Goal 7) and encourage land use and growth patterns that facilitate transit and active transportation (Goal 8). SCAG has since adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).[25] The goals and policies of the 2016 RTP/SCS are substantially the same as those in the 2012–2035 RTP/SCS. In addition, SCAG approved the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) in September 2020. See further discussion below.

(h) Senate Bill 1389

SB 1389 (PRC Sections 25300–25323) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report (IEPR) 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 establishing a clean energy economy. Volume II was adopted February 20, 2019, provides more detail on several key energy issues and will encompass new analyses.[26] The IEPR contains measures such as decarbonizing buildings, doubling energy efficiency savings, increasing flexibility in the electrical system to integrate more renewable energy, and reduce petroleum use in cars and trucks by up to 50 percent. As of January 2022, the 2021 IERP, which consists of four volumes, has been released for public review, but has not yet been adopted.

(i) California Environmental Quality Act

In accordance with CEQA and Appendix F, Energy Conservation, to the CEQA Guidelines, in order to assure that energy implications are considered in project decisions, EIR's are required to include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F to the CEQA Guidelines provides a list of energy-related items that may be included throughout the various chapters of an EIR. In addition, while not described or required as significance thresholds for determining the

[25] *SCAG, 2016-2040 RTP/SCS, dated April 2016.*

[26] *2018 Integrated Energy Policy Report, Volume I, August 2018.*

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

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

(3) Regional

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

The 2016–2040 RTP/SCS also established High-Quality Transit Areas (HQTA), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[27] Local jurisdictions were encouraged to focus

[27] *SCAG, 2016–2040 RTP/SCS, p. 8.*

housing and employment growth within HQTAs to reduce VMT. The Project Site is located within an HQTA as designated by the 2016 RTP/SCS.[28]

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

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.[29] By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. Transit Priority Areas[30] (TPAs) will account for less than 1 percent of regional total land but are projected to accommodate 30 percent of future household growth between 2016 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. TPAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions and related VMT by 19 percent by

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

[29] *2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.*

[30] *Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours*

2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[31]

(4) Local

(a) City of Los Angeles Green Building Code

On December 11, 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX, Article 9 of the Los Angeles Municipal Code (LAMC), referred to as the "Los Angeles Green Building Code," by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2019 CALGreen Code. Projects filed for building permits on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings. Mandatory measures include installation of electrical raceways to future electric vehicle supply equipment (EVSE), reduce water use by 20 percent compared to maximum allowable water use per plumbing fixture as required by the LAMC, and use of roofing material to reduce the heat island effect.

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

The Sustainable City pLAn was adopted in 2015 and includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[32] Specific targets include the construction of new housing units within 1,500 feet of transit by 2025, reducing VMT per capita by 13 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. In addition, building energy use per square foot for all building types will be reduced by 22 percent by 2025, 34 percent by 2035, and 44 percent by 2050. On April 29, 2019, the first four-year update to the Sustainable City pLAn was released and renamed as L.A.'s Green New Deal. The 2019 Sustainable City pLAn/L.A.'s Green New Deal has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling of 100 percent of wastewater by 2035.

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

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

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

b. Existing Conditions

The 15.9-acre Project Site includes four sub sites located generally north/east and south/west of Lankershim Boulevard. The existing uses on the Project Site are located within one- and two-story buildings that comprise approximately 25,145 square feet.[33] In total, 1,098 surface parking spaces are located on the Project Site. The Off-Site Metro Parking Areas are currently developed with surface parking associated with the Los Angeles County Metropolitan Transportation Authority's (Metro) North Hollywood Station and industrial/warehouse buildings totaling 25,691 square feet.

(1) Electricity

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

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

[33] *On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.*

The Los Angeles Department of Water and Power (LADWP) provides electricity throughout the City of Los Angeles and many areas of the Owens Valley, serving approximately 4 million people within a service area of approximately 465 square miles, excluding the Owens Valley. Electricity 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 Valley 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.[34] In 2018, the LADWP power system experienced an instantaneous peak demand of 6,432 MW.[35] Approximately 37 percent of LADWP's 2020 electricity purchases were from renewable sources, which is better than the 33 percent statewide percentage of electricity purchases from renewable sources.[36] LADWP's annual electricity sale to customers for the 2017–2018 fiscal year, the most current year for which data is available, was approximately 22,383 million kWh.[37]

LADWP supplies electrical power to the Project Site and Off-Site Metro Parking Areas from electrical service lines located in the Project vicinity. Existing electricity usage was estimated based on the same methodology contained in the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. Specifically, the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate the existing electricity usage by inputting into the program the size of the land uses, the electrical demand factors for the land uses, electrical intensity factors related to water usage, and the estimated existing vehicle miles traveled (VMT) at the Project Site. It is estimated that existing uses on the Project Site and Off-Site Metro Parking Areas currently consume approximately 844,506 kWh of electricity per year.[38]

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

[35] *LADWP, 2017 Retail Electric Sales and Demand Forecast, p. 6.*

[36] *LADWP, 2020 Power Content Label.*

[37] *LADWP, 2018 Retail Electric Sales and Demand Forecast, 2018, p. 15.*

[38] *Eyestone Environmental, Energy Calculations for the District NoHo Project. See Appendix F of this Draft EIR.*

(2) Natural Gas

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

Natural gas is provided to the Project Site by the Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 20,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.[39]

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.[40] 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).[41] SoCalGas supplies natural gas to the Project Site from natural gas service lines located in the Project vicinity.

Existing natural gas usage was estimated based on the same methodology contained in the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. Specifically, the existing natural gas usage is based on the size of the land uses and the natural gas combustion factors for the land uses in units of million British thermal units (MMBtu). It is estimated that existing uses on the Project Site and Off-site Metro Parking Areas currently consume approximately 433,636 cf of natural gas per year.[42]

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[39] *SoCalGas, Company Profile, www.socalgas.com/about-us/company-profile, accessed February 17, 2022.*

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

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

[42] *Eyestone Environmental, Energy Calculations for the District NoHo Project. See Appendix F of this Draft EIR.*

(3) Transportation Energy

According to the U.S. Energy Information Administration, transportation accounts for nearly 40 percent of California's total energy consumption in 2018.[43] In 2018, California consumed 15.6 billion gallons of gasoline and 3.1 billion gallons of diesel fuel.[44,45] Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.[46] However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. According to the California Department of Tax and Fee Administration, total statewide gasoline consumption has increased by six percent from 2011 to 2019.[47] However, this increase is mainly due to population increases as the per capita gasoline consumption is showing a downward trend.[48] The CEC, also predicts that there will be an increase in use of alternative fuels, such as natural gas, biofuels, and electricity. According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources consumed 3.76 billion gallons of gasoline and 1.18 billion gallons of diesel fuel in 2019.[49]

The existing on-site land uses currently generate limited demand for transportation-related fuel use as a result of vehicle trips to and from the Project Site and Off-site Metro Parking Areas. Because industrial/warehouse uses are not significant trip generators, the estimate of annual VMT associated with the existing Project Site and Off-Site Metro Parking Areas uses was conservatively assumed to be zero VMT per year.

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[43] *CEC, 2016 Integrated Energy Policy Report, docketed January 18, 2017, p. 4.*

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

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

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

[47] *California Department of Tax and Fee Administration, Fuel Taxes Statistics & Reports, www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm, accessed March 8, 2021.*

[48] *Eno Center for Transportation. How Have Different State Populations Changed Their Gasoline Consumption? www.enotrans.org/article/how-have-different-state-populations-changed-their-gasoline-consumption/, accessed March 8, 2021*

[49] *California Air Resources Board, EMFAC2017 Web Database.*

3. Project Impacts

a. Thresholds of Significance

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

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

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

With regard to Threshold (a), this analysis relates to Appendix F to the CEQA Guidelines, prepared in response to the requirement in PRC Section 21100(b)(3) that an EIR shall include a detailed statement setting forth "[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."

In addition, with regard to potential energy impacts, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall consider the following factor[50]:

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

In accordance with Appendix F and the *L.A. CEQA Thresholds Guide*, the following factors will be considered in determining whether the Project would have a significant impact with regard to Threshold (a):

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.

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[50] *L.A. CEQA Thresholds Guide factors related to infrastructure are evaluated in Section IV.M.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR.*

3. The effects of the project on peak and base period demands for electricity and other forms of energy.

4. The degree to which the project complies with existing energy standards.

5. The effects of the project on energy resources.

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

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

With regard to Threshold (b), the Project will be evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CalGreen Code, and City building codes. Also, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project will also be evaluated for consistency with the 2020–2045 RTP/SCS, which includes goals to reduce VMT and corresponding decrease in fuel consumption.

In accordance with Appendix F and the *L.A. CEQA Thresholds Guide*, the following factor will be considered in determining whether the Project would have a significant impact with regard to Threshold (b):

1. Whether the Project conflicts with adopted energy conservation plans.

b. Methodology

(1) Construction

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. Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated using CalEEMod.[51] Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power was calculated based on data provided

[51] *California Air Pollution Control Officers Association, CalEEMod™ version 2016.3.2 User's Guide, November 2017.*

in South Coast Air Quality Management District (SCAQMD) construction surveys (i.e., construction activity, horsepower, load factor, and hours of use per day).[52] SCAQMD construction surveys identified the use of diesel generators to supply construction sites with electrical power.

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

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

(2) Operation

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas was calculated using demand factors provided in CalEEMod as part of the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. As mentioned above, electricity usage and natural gas consumption is calculated based on default energy demand factors contained within CalEEMod for the Project land uses. Electricity from water usage is also based on CalEEMod electricity intensity factors related to water treatment and conveyance.

Energy impacts associated with transportation during operation were also assessed. Vehicle usage in this analysis was based on the *Transportation Assessment for the District*

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

NoHo Mixed-Use, prepared by Gibson Transportation Consulting, Inc. (See Appendix R of this Draft EIR). As discussed therein, Project-related VMT was calculated using the LADOT VMT Calculator. The VMT Calculator was developed by the City and LADOT to comply with SB 743, which requires lead agencies to adopt VMT criteria to determine transportation related impacts.[53] Weekend project trips were based on the Institute of Transportation Engineers trip generation factors for the applicable land uses. The daily Project-related VMT were then input into CalEEMod, which calculated the annual VMT. The resulting annual VMT was used as part of the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. Based on this annual VMT, gasoline and diesel consumption rates were calculated using the county-specific miles per gallon calculated using EMFAC2017. The vehicle fleet mix for vehicles anticipated to visit the Project Site was calculated consistent with the CalEEMod default for Los Angeles County. Supporting calculations are provided in Appendix F of this Draft EIR. These calculations were used to determine, as required by Appendix F guidelines, if the Project would cause the wasteful, inefficient and/or unnecessary consumption of energy.

c. Project Design Features

The Project includes project design features designed to improve energy efficiency as set forth in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, including Project Design Features GHG-PDF-1 and GHG-PDF-2, and Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, including Project Design Feature WAT-PDF-1. These measures include, but are not limited to, the following: Energy Star appliances; plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code; weather-based irrigation system; water-efficient landscaping; a limitation on the number of natural gas fireplaces/firepits; tankless and on-demand water heaters; individual metering and billing for commercial water use; point of use domestic water heating systems; and pool/spa filtering and leak detection equipment. The Project would also comply with the City's EV charging requirements which specifies

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

that 10 percent of new parking spaces would require EV charging equipment. In addition, 30 percent of all new parking spaces would be required to be EV "ready" which will be capable of supporting future EV charging equipment.[54] .

d. Analysis of Project Impacts

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

(1) Impact Analysis

The following analysis considers the seven factors in the Thresholds of Significance subsection above to determine whether Threshold (a) would be exceeded.

> *(a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.*

As discussed above, the Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption (during operation only), and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, maintenance and removal activities).[55]

For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping and architectural coatings, which could potentially use electricity and petroleum-based fuels. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Project removal activities would include demolition of the proposed buildings following their construction and/or abandonment of the Project Site. However, it is not known when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities are too speculative for evaluation. For this reason, impacts related to the energy usage of the removal or abandonment of the Project were not analyzed.

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

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

(i) Construction

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

As shown in Table IV.C-1 on page IV.C-21, a total of 177,558 kWh of electricity, 482,116 gallons of gasoline, and 1,361,915 gallons of diesel are estimated to be consumed during Project construction. Project construction is expected to start in 2022 and be completed in 2037.

Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electric equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site as provided in Project Design Feature AIR-PDF-1. This is consistent with suggested measures in the *L.A. CEQA Thresholds Guide* to use electricity from power poles rather than temporary gasoline or diesel powered generators.

As shown in Table IV.C-1, a total of approximately 177,558 kWh of electricity are anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, with the demolition and grading phases having the greatest demand, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements which includes limits on the wattage allowed per specific area, which result in the conservation of

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

Fuel Type	Quantity
Electricity	
Water Consumption	41,478 kWh
Lighting, Electric Equipment, and Other Construction Activities Necessitating Electrical Power[b]	136,080 kWh
Total Electricity[c]	**177,558 kWh**
Gasoline	
On-Road Construction Equipment	482,116 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	**482,116 gallons**
Diesel	
On-Road Construction Equipment	430,192 gallons
Off-Road Construction Equipment	931,723 gallons
Total Diesel	**1,361,915 gallons**

kWh = kilowatt hours

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

[b] *Electricity usage is based on SCAQMD construction site survey data and typical requirements for power generators. Such electricity demand would be temporary, limited, and would cease upon the completion of construction.*

[c] *Total construction electricity usage of 177,558 kWh represents approximately 19 percent of the 944,635 kWh existing annual operational electricity usage.*

Source: Eyestone Environmental, 2020.

energy.[56] As such, the demand for electricity during construction would not cause wasteful, inefficient, and unnecessary use of energy.

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. Furthermore, the existing natural gas usage at the Project Site of approximately 433,636 cf per year would no longer be required because the existing 49,111 square feet of industrial/warehouses uses would be demolished or no longer

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

functional.[57] As such, the energy requirements and energy use of the Project related to natural gas during construction would not cause wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.

Transportation Energy

The petroleum-based fuel use summary provided in Table IV.C-1 on page IV.C-21 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix F of this Draft EIR. The construction energy analysis assumes that all equipment would be operating continuously (8 hours per day) throughout the entire duration of construction. However, under real world typical conditions, most equipment would be operating less than 8 hours per day. As shown, on- and off-road vehicles would consume an estimated 482,116 gallons of gasoline and approximately 1,361,915 gallons of diesel fuel for the Project's construction.

Moreover, trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. In addition, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, and unnecessary use of energy.

(ii) Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, the following: heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. The Project includes demolition of the existing industrial/warehouse buildings on the Project Site, which currently consume electricity and natural gas. As discussed above, because the existing industrial/warehouse uses are not significant trip generators, the estimate of annual VMT associated with the existing Project Site and Off-Site Metro Parking Areas uses was conservatively assumed to be zero VMT per year. As

[57] *On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.*

shown in Table IV.C-2 on page IV.C-24, the Project's net new energy demand would be approximately 18,933,185 kWh of electricity per year and 36,429,174 cf of natural gas per year.[58] The Project would also result in an increase of 955,733 gallons of gasoline per year and 211,206 gallons of diesel fuel per year consumed.

Electricity

As shown in Table IV.C-2, with compliance with Title 24 standards and applicable CALGreen Code requirements, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 18,933,185 kWh per year. In addition to complying with CALGreen Code, the Project would also implement GHG-PDF-1 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would incorporate sustainability features (e.g., Energy Star–labeled products), and Project Design Feature WAT-PDF-1, presented in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, which states that the Project would incorporate water conservation features, such as high-efficiency toilets with flush volume of 1.0 gallon of water per flush, showerheads with a flow rate of 1.5 gallons per minute or less, and drip/subsurface irrigation, among others. These measures along with the Project being designed to meet the standards of LEED Silver® or equivalent would further reduce the Project's energy demand. In addition, the Project would be subject to the 2019 Title 24 standards, which represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the ZNE goal." Residential and nonresidential buildings built in compliance with the 2019 standards use about 30 to 53 percent less energy than those under the 2016 standards.[59] This analysis conservatively includes only a 10-percent reduction in the CalEEMod calculated energy use to account for compliance with 2019 Title 24 standards.

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

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2037–2038 fiscal year (the Project's buildout

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[58] *As discussed in Section II, Project Description, of this Draft EIR, the Project may exchange up to 75,000 square feet of retail and restaurant uses for 75,000 square feet of office uses. Under this scenario, the Project would result in an estimated energy demand of 16,770,800 kWh of electricity, 21,118,914 cf of natural gas, and 754,675 gallons of transportation fuels.*

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

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

Source	Estimated Energy Demand	
	Operation (Project)	**Existing**
Electricity		
Building	17,842,282 kWh	694,235 kWh
Water[b]	614,283 kWh	150,271 kWh
EV Chargers[c]	476,621 kWh	0 kWh
Total Electricity[d]	**18,933,185 kWh**[f]	**844,506 kWh**
Natural Gas		
Building	36,268,460 cf	433,636 kWh
Natural Gas Fireplaces[d]	160,714 cf	0 cf
Total Natural Gas[d]	**36,429,174 cf**[f]	**433,636 kWh**
Transportation (On-Road Vehicles and Off-Road Equipment)		
Gasoline	955,733 gallons	0 gallons[g]
Diesel	211,206 gallons	0 gallons[g]
Total Transportation[e]	**1,166,939 gallons**[f,g]	**0 gallons**[g]

cf = cubic feet

kWh = thousand kilowatt hours

[a] *Detailed calculations are provided in Appendix F of this Draft EIR. Totals may not precisely add up due to rounding.*

[b] *Calculations assume compliance with Project Design Feature GHG-PDF-1 provided in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR and Project Design Feature WAT-PDF-1 provided in Section IV.M.1, Utilities and Service System—Water Supply and Infrastructure.*

[c] *As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would provide at least 30 percent of Code-required parking spaces with the capability of supporting electric vehicle supply equipment (EVSE) and that a minimum of 10 percent of Code-required parking spaces would be further equipped with EV charging stations consistent with City building codes.*

[d] *Electricity and natural gas estimates assume compliance with applicable CALGreen requirements and implementation of GHG-PDF-1 and GHG-PDF-2, in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. GHG-PDF-1 assumes use of light emitting diodes (LED) lighting which will reduce lighting energy usage by 25 percent. Natural gas fireplaces would be limited to the equivalent of 5 percent of the dwelling units under GHG-PDF-2.*

[e] *Transportation fuel estimates include project characteristics consistent with CAPCOA guidance measures. Fuel estimates conservatively do not include reductions in fuel usage associated with installation of EV chargers as required by City building codes*

[f] *As discussed in Section II, Project Description, of this Draft EIR, the Project may exchange up to 75,000 square feet of retail and restaurant uses for 75,000 square feet of office uses. Under this scenario, the Project would result in an estimated energy demand of 16,770,800 kWh of electricity, 21,118,914 cf of natural gas, and 754,675 gallons of transportation fuels.*

[g] *The industrial/warehouse uses are not significant trip generators, the estimate of annual VMT associated with the existing Project Site and Off-Site Metro Parking Areas uses was conservatively assumed to be zero VMT per year.*

Source: Eyestone Environmental, 2020.

year) will be 26,993 GWh of electricity.[60,61] As such, the Project-related net increase in annual electricity consumption of 18,933,185 kWh per year would represent less than 0.07 percent of LADWP's projected sales in 2037. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage and additional efficiency requirements under various Codes may further reduce Project-related consumption.

Natural Gas

As provided in Table IV.C-2 on page IV.C-24, the buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 36,429,174 cf per year, assuming compliance with Title 24 standards and applicable CALGreen Code requirements. As discussed above, in addition to complying with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen Code), the Project would implement project design features to further reduce energy use. Specifically, the Project would implement GHG-PDF-1 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would incorporate sustainability features (e.g., Energy Star–labeled products). As discussed above, the Project would be subject to the 2019 Title 24 standards which represent "challenging but achievable design and construction practices". However, CalEEMod default energy usage factors are based on 2016 Title 24 standards. This analysis therefore conservatively includes only a 10-percent reduction in the CalEEMod default (2016 Title 24) calculated energy use to account for compliance with 2019 Title 24 standards. In order to meet the Title 24 energy performance requirement, the Project may include use of efficient water heaters, cooking equipment and other major support appliances. The Applicant would also implement GHG-PDF-2 which, limits natural gas fireplaces/firepits to approximately 5 percent of the total dwelling units.

As stated above, the Project's estimated net increase in demand for natural gas is 36,429,174 cf per year, or approximately 99,806 cf per day. Based on the 2020 California Gas Report, the estimated natural gas consumption within SoCalGas' planning area will be approximately 2.103 billion cf/day in 2035 (2035 is the latest projected year in the 2018 Gas Report).[62] The Project would account for approximately 0.005 percent of the 2035 forecasted consumption in SoCalGas' planning area. In addition, as also previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

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

[61] *LADWP, 2017 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1, page A-6.*

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

Transportation Energy

During operation, Project-related vehicle trips would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As noted above, the Project Site is located in an HQTA designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth," regional planning perspective. Furthermore, the Project is a Transit Oriented Development located adjacent to a major public transit hub, including a stop for the Metro's B (Red) Line and G (Orange) Line stations, and would develop uses, including housing, office, retail, restaurant, and open space, in one location. In addition, the Project Site's proximity to a variety of commercial uses and services would allow residents of the Project Site to walk to nearby destinations to meet their shopping needs, thereby reducing VMT.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.[63] The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. Furthermore, as discussed in Section IV.K, Transportation, of this Draft EIR, the Project would also implement VMT reduction measures to further reduce vehicle trips and associated energy usage, including reduced parking supply, promotions and marketing, traffic calming improvements, on-street bicycle facility improvements, bicycle parking supply consistent with LAMC requirements, first mile/last mile transportation alternatives, and pedestrian network improvements. As such, the Project's siting would minimize transportation fuel consumption through the reduction of VMT, as described above and discussed further in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. With incorporation of these trip reduction measures, net

[63] *USEPA, Mixed-Use Trip Generation Model, www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed February 17, 2022.*

transportation-fuel usage would be reduced by 42 percent for both gasoline and diesel fuels.[64]

As summarized in Table IV.C-2 on page IV.C-24, when accounting for the measures that would be implemented to reduce VMT, the Project's estimated petroleum-based fuel usage would result in an increase of 955,733 gallons of gasoline and 211,206 gallons of diesel per year, or a total of 1,166,939 gallons of petroleum-based fuels annually.

(iii) Summary of Energy Requirements and Energy Use Efficiencies

As previously discussed, CEQA Guidelines Appendix F recommends quantification of a project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed. The Project's energy requirements were calculated based on the methodology contained in CalEEMod for electricity and natural gas usage. Project VMT data were calculated based on the LADOT VMT Calculator. The calculations also took into account energy efficiency measures such as Title 24, CalGreen Code, and vehicle fuel economy standards. Table IV.C-1 on page IV.C-21 and Table IV.C-2 provide a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 177,558 kWh of electricity would be consumed along with 1,844,031 gallons of transportation fuel (gasoline and diesel). During Project operations, a net total of 18,933,185 kWh of electricity, 36,429,174 cf of natural gas would be consumed on an annual basis. The Project would also result in a net increase of 1,166,939 gallons of transportation fuel consumption. When accounting for project design features and increased energy efficiency measures, operational electricity usage would be reduced by 9 percent, which accounts for GHG-PDF-1 (LEED Silver®). Use of light emitting diodes (LED) lighting would reduce lighting energy usage by 25 percent and a 20-percent reduction in water usage would result in a corresponding 20-percent reduction in electricity associated with delivery, treatment, and distribution of water. Natural gas fireplaces would be limited to the equivalent of 5 percent of the dwelling units under GHG-PDF-2 which results in natural gas usage reduced by 7 percent when compared to a project without energy efficiency measures. Transportation fuel usage would be reduced by 42 percent compared to the Project without trip reduction features. Details are provided in Appendix F of this Draft EIR.

[64] *See Page 3 of Appendix F, Energy Calculations, of this Draft EIR.*

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

(i) Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The Project's estimated construction electricity usage represents approximately 0.9 percent of the estimated Project's net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.[65] Furthermore, the electricity demand during construction would be offset with the temporary removal of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be required for Project construction activities, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.01 percent of gasoline usage and 0.2 percent of diesel usage within Los Angeles County, respectively.[66] As energy consumption during Project construction activities would be relatively negligible, the Project would not materially affect local and regional energy supplies during the construction period or require additional capacity.

(ii) Operation

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2037–2038 fiscal year (the Project's buildout year) will be 26,993 GWh of electricity.[67,68] As such, the Project-related net operational increase in annual electricity consumption of 18,933,185 kWh per year would represent

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[65] *The percentage is derived by taking the total amount of electricity usage during construction (177,558 kWh) and dividing that number by the total amount of net electricity usage during operation (18,933,185 kWh) to arrive at 0.9 percent.*

[66] *Calculated based on EMFAC2017 for Buildout Year using Los Angeles County data. Please refer to Appendix F for detailed calculations.*

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

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

less than 0.07 percent of LADWP's projected sales in 2037.[69] Furthermore, LADWP has confirmed that the Project's operational electricity demand can be served by the facilities in the Project area.[70] Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's operational electricity demand.

As stated above, the Project's estimated net increase in operational demand for natural gas is 36,429,174 cf per year, or approximately 99,806 cf per day. Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimated natural gas consumption within SoCalGas' planning area will be approximately 2.103 billion cf/day in 2035 (2035 is the latest projected year in the 2020 Gas Report).[71] The Project would account for approximately 0.005 percent of the 2035 forecasted consumption in SoCalGas' planning area.

At buildout in 2037, the operation of the Project would result in a net increase of 955,733 gallons of gasoline and 211,206 gallons of diesel per year, or a total of 1,166,939 gallons of petroleum-based fuels consumed per year, as shown in Appendix F of this Draft EIR. Transportation fuel usage during Project operations would represent approximately 0.03 percent of gasoline and diesel usage within Los Angeles County in 2037, respectively.[72]

In sum, energy consumption during Project operations would not materially affect LADWP's and SoCalGas' energy supplies or requirements for additional capacity.

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

As discussed above, the electricity demand, natural gas consumption, and transportation energy consumption would be well within the available regional supplies and overall capacity of LADWP, SoCalGas, and California refineries, respectively. The Proposed Project's energy demand and consumption are negligible compared to available supplies during both construction and operation.

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[69] *LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A.*

[70] *KPFF Consulting Engineers, District NoHo Utility Infrastructure Technical Report: Water, Wastewater, and Energy, January 2022. Refer to Appendix G of this Draft EIR.*

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

[72] *Vehicles within Los Angeles County are expected to consume 2,870,962,826 gallons of gasoline and 634,448,702 gallons of diesel in 2037 from vehicles as calculated with EMFAC2017.*

Electricity demand during construction (177,558 kWh) and operation (18,933,185 kWh) of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system experienced an all time high peak of 6,432 MW on August 31, 2017.[73] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2017, the most current year for which data is available, the base case peak demand for the power grid is 5,854 MW.[74] The Project would consume 4,157 kW during peak load conditions. In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project's electricity demand would represent approximately 0.07 percent of the LADWP base peak load conditions.[75] In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical demand by the Project.[76] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

With regard to peak day natural gas demand, the 2020 California Gas Report estimates for 2035 (2035 is the latest projected year in the 2020 Gas Report), the extreme peak demand for the SoCalGas service area is 2,218 million cf/day. Under peak conditions, the Project would consume approximately 105,264 cf per day. In comparison to the CEC extreme peak day demand of 2,218 million cf for 2035, based on the assumption above, the Project would represent 0.005 percent of SoCalGas' forecasted extreme peak day demand. Therefore, Proposed Project natural gas demand during operational activities would have a negligible effect on peak demands of the natural gas supplies.

The electricity and natural gas energy supplies would be sufficient to serve the Project's peak energy demand. Thus, Project's electricity and natural gas demand during operational activities would have a negligible effect on demand during peak and base load periods of the power grid and on the natural gas supplies, and impacts would be less than significant.

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

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project

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[73] *LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.*

[74] *LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.*

[75] *The percentage is derived by taking the peak electricity usage during Project operations (4,157 kW) and dividing that number by the LADWP base case peak demand of 5,854,000 kWh (5,854 MWh) to arrive at 0.07 percent.*

[76] *LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.*

Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.[77] Electricity and Natural Gas usage during Project operations presented in Table IV.C-2 on page IV.C-24 would comply with Title 24 standards and applicable CalGreen and Los Angeles Green Building Code requirements. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks, and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with CAFE fuel economy Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards, as required.

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

(e) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP's most recently adopted 2017 Power Strategic Long-Term Resources Plan (SLTRP) identifies adequate resources (natural gas, coal) to support future generation capacity. The LADWP 2017 Power SLTRP contains an analysis of actions to maintain regulatory requirements for providing electricity while accommodating for population growth within the region. As the Project would be receiving electricity from the LADWP, the Project's construction and operational activities would have a negligible effect on the region's electricity supply.

Natural gas supplied to Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California

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

region are obtained from locations throughout the western United States as well as Canada.[78] According to the U.S. Energy Information Administration (EIA), the United States currently has approximately 84 years of natural gas reserves based on 2019 production.[79] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

With regard to on-site energy resources, the Project Site does not contain any significant sources of renewable (i.e., water, solar, wind, geothermal) or non-renewable energy, such as coal, natural gas, petroleum. In addition, the Project would not generate power using non-renewable sources or associated energy transmission lines. Therefore, the Project construction and operation activities would not conflict with existing or planned energy resources.

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. According to the United States Energy Information Administration, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2050.[80] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). The Project would also enough include adequate alternative modes of transportation by providing for bicycle parking spaces and preferred parking for fuel efficient vehicles, resulting in a reduction of transportation fuel usage. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above in Subsection 2.a, Regulatory Framework, one of the objectives of SB 350 is to increase procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. However, as of September 2018, SB 100 was signed, which would require retail sellers of electric services to increase procurement from eligible renewable energy resources to 50 percent renewable resources target by December 31, 2026, and 60 percent by December 31, 2030. Accordingly, LADWP is required to procure at least 60 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for approximately 37 percent of

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

[79] *U.S. Energy Information Administration, Frequently Asked Questions, How much natural gas does the United States have, and how long will it last?, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed March 8, 2021.*

[80] *U.S. Energy Information Administration, Frequently Asked Questions, Does the world have enough oil to meet our future needs?, www.eia.gov/tools/faqs/faq.php?id=38&t=6, accessed February 17, 2022.*

LADWP's overall energy mix in 2020, the most recent year for which data are available.[81] This represents the available off-site renewable sources of energy that would meet the Project's energy demand. The Project's use of renewable energy would indirectly reduce use of fuels required for electricity generation (natural gas, coal, oil). While the Project's electricity usage rate would not be directly affected by the availability of renewable energy, the Project's usage of renewable energy would indirectly avoid consumption of fossil fuels.

With regard to on-site renewable energy sources, as discussed in Section II, Project Description, of this Draft EIR, the Project would comply with Title 24 requirements for "Solar Ready Buildings," which requires a certain area of rooftop to be set aside for installation of solar panels. Based on the current design, 20,932 square feet of rooftop area would be set aside to meet this requirement. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[82]

Based on the above, the Project's electricity and natural gas consumption would not affect energy resources of the LADWP or SoCalGas. The Project would also comply with CAFÉ fuel economy standards and encourage alternative modes of transportation resulting in a negligible effect on transportation fuel resources. The Project would also comply with Title 24 requirements for solar energy and would not affect the renewable energy resources within the region. Therefore, the Project would not affect energy resources.

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

As discussed above, the Project is an infill development within an existing urbanized area that would introduce new residential, retail, restaurant, and office buildings, within an HQTA. The Project Site is well served by public transportation, with the Metro B (Red) Line North Hollywood Station and G (Orange) Line Station located within the Project Site serving approximately 25,000 riders per day. Several transit providers also serve the Project Site and surrounding community, including Metro, LADOT, and the Burbank Bus. The Project Site is located in a TPA, as defined by SB 743 and City ZI File No. 2452. In

[81] *LADWP, 2020 Power Content Label.*

[82] *CEC, Wind Project and Wind Resource Areas, 2018.*

accordance with the LAMC, the Project includes bicycle parking spaces consistent with code. Taking into consideration the accessibility to mass transit, bicycle parking and proximity to job centers and retail uses, the Project results in a VMT reduction of approximately 42 percent (see Appendix F of this Draft EIR) compared to a Project without reduction features, with a corresponding reduction in the Project's petroleum-based fuel usage.[83] Therefore, the Project would encourage the use of efficient transportation alternatives.

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

The current City of Los Angeles Green Building Code requires compliance with the CalGreen Code and California's Building Energy Efficiency Standards (Title 24). In addition to compliance with the City's Green Building Code, the Project would comply with 2019 Title 24 standards. Residential and nonresidential buildings built in compliance with the 2019 standards will use about 30 percent to 53 percent less energy than those under the 2016 standards.[84] In addition, Project Design Feature GHG-PDF-1 would incorporate sustainability features to be capable of meeting LEED Silver® or equivalent green building standards. These measures include use of Energy Star appliances, LED lighting and fenestration designed for solar orientation. Incorporation of these sustainability measures would allow the Project to exceed Title 24 energy efficiency requirements. Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements.

GHG-PDF-2 would also limit the number of natural gas-fueled fireplaces to the equivalent of 5 percent of residential units, resulting in less natural gas consumed during operations. In addition, Project Design Feature WAT-PDF-1 in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, states that the Project would implement water conservation features, including high-efficiency toilets with flush volume of 1.0 gallon of water per flush, showerheads with a flow rate of 1.5 gallons per minute or less, and drip/subsurface irrigation, among others. A reduction in water usage would in turn reduce the amount of electricity used for water conveyance. Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements.

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[83] *The Project without Reduction Features scenario does not account for energy efficiency measures or trip reductions.*

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

Based on the above, with compliance with state and local energy efficiency standards, the Project would meet all applicable energy conservation policies and regulations.

(h) Conclusion Regarding Significance Threshold (a)

As demonstrated in the analysis above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or require additional capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. As also discussed, gasoline fuel usage for the region is expected to be on the decline over the next 10 years. The Project's transportation fuel consumption is also expected to decline based on more stringent CAFE fuel economy standards. As transportation fuel supply is not expected to decrease significantly over this same period, supplies would be sufficient to meet project demand. Therefore, electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of project-related construction and operations. With respect to operation, the Project would comply with existing energy efficiency requirements such as CalGreen Code as well as include energy conservation measures beyond requirements to meet LEED Silver® or equivalent green building standards, consistent with GHG-PDF-1. **In summary, the Project's energy demands would not cause wasteful, inefficient, or unnecessary use of energy. Therefore, Project impacts related to energy use under Threshold (a) would be less than significant with respect to both construction and operation.**

(2) Mitigation Measures

The Project's impact related to energy use would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

The Project's impact related to energy use was determined to be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact remains less than significant.

Threshold (b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

(1) Impact Analysis

The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. Such requirements of the Title 24, CALGreen and Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would implement these measures as required by code. The 2019 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices. In addition, the Project would implement measures to comply with Title 24 energy efficiency requirements, including the GHG-PDFs 1 through 4 and WAT-PDF-1, as discussed above.

With regard to transportation uses, the Project design would reduce VMT in comparison to developments located in non-infill, non-urban areas and encourage use of alternative modes of transportation. The Project would not conflict with regional planning strategies that address energy conservation. As discussed above and in Section IV.G, Land Use, of this Draft EIR, SCAG's 2020–2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2020–2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Draft Program EIR for the 2020-2045 RTP/SCS identifies program and project-level mitigation measures which includes improved energy efficiency. In this case, the Project would integrate green building measures consistent with CALGreen and local building codes. The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. The Project would provide at least 30 percent of the total LAMC-required parking spaces provided to be capable of supporting future EVSE and at least 10 percent of the total LAMC-required parking spaces with EV charging stations as dictated by City requirements. The consolidated transit center would also incorporate electric bus charging infrastructure and charging masts for the Metro G (Orange) Line and allow for future electric bus infrastructure improvements in furtherance of Metro's commitment to convert to an all-electric fleet by 2040, with 100 percent of annual new bus purchases at zero emissions by 2029.[85]

[85] *CARB, "California transitioning to all-electric public bus fleet by 2040," December 14, 2018.*

The Project would not conflict with the energy efficiency policies emphasized in the 2020–2045 RTP/SCS. Most notably, the Project is a mixed use development located in an area characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation. This is evidenced by the Project Site's location within a designated HQTA.[86]

The Project's introduction of new housing and job opportunities within an HQTA is consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new housing and jobs near transit. The 2020–2045 RTP/SCS would comply with SB 375 targets which requires an estimated 19-percent decrease in VMT by 2035. Although SB 375 does not establish targets beyond Year 2035, the 2020–2045 RTP/SCS contains additional measures to decrease VMT to the 2045 Plan year. Taking into consideration the accessibility to mass transit, bicycle parking and proximity to job centers and retail uses, the Project results in a VMT reduction of approximately 42 percent compared to a Project without reduction features and would support the target reductions in the 2020–2045 RTP/SCS. Therefore, the Project would be consistent with the goals of the 2020–2045 RTP/SCS with regards to reducing VMT and transportation energy consumption. In addition, the Project would comply with state energy efficiency requirements, would comply with Title 24 requirements and would use electricity from LADWP, which has a current renewable energy mix of 32 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the Project would be consistent with adopted energy conservation plans.

In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, the Project would not conflict with or obstruct adopted energy conservation plans, or violate state or local energy standards for renewable energy or energy efficiency. **Therefore, Project's impact related to regulatory consistency under Threshold (b) would be less than significant.**

(2) Mitigation Measures

The Project's impact related to conflicts with plans would be less than significant. Therefore, no mitigation measures are required.

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[86] *The Project Site is also located in a TPA, as defined by SB 743 and City ZI File No. 2452.*

(3) Level of Significance After Mitigation

The Project's impact related to conflicts with plans were determined to be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

(a) Threshold (a) (Wasteful, Inefficient, and Unnecessary Use of Energy)

Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. Based on the information presented in Section III, Environmental Setting, of this Draft EIR, there are 34 related projects located within the vicinity of the Project Site. The geographic context for the cumulative analysis of electricity is LADWP's service area and the geographic context for the cumulative analysis of natural gas is SoCalGas' service area. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Project in the context of County-wide consumption. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

(i) Electricity

Buildout of the Project, the 34 related projects in the LADWP service area, and additional growth forecasted to occur in the City would increase electricity consumption during project construction and operation and, therefore, cumulatively increase the need for energy supplies and infrastructure capacity, such as new or expanded energy facilities. LADWP forecasts that its total energy sales in 2037–2038 fiscal year (the project buildout year) will be 26,993 GWh of electricity. Based on the Project's estimated net new electrical consumption of 18,933,185 kWh per year, the Project would account for approximately 0.07 percent of LADWP's project sales for the Project's buildout year. As discussed above, the construction of the Project would consume less electricity than operation, so operation electricity consumption is used to determine the largest scope Project electricity consumption would have. Although future development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale relative to LADWP's supplies, would be reduced by measures making the Project and related projects more energy-efficient, and would be consistent with growth expectations for LADWP's service area. As such, development of the related projects would not result in

a cumulative impact. The Project also would incorporate energy efficiency measures to make the Project comply with the 2019 Title 24 standards. Residential and nonresidential buildings built in compliance with the 2019 standards will use about 30 percent to 53 percent less energy than those under the 2016 standards.[87] Furthermore, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including the CALGreen Code and state energy standards under Title 24, and incorporate mitigation measures, as necessary.

Additionally, as discussed above, LADWP was required to procure at least 33 percent of its energy portfolio from renewable sources by 2020. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for approximately 37 percent of LADWP's overall energy mix in 2020, the most recent year for which data are available.[88] This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. Therefore, the Project and related projects within LADWP's service area would comply with energy conservation plans and efficiency standards required to ensure that energy is used efficiently.

Based on the above, the Project together with the related projects would not cause wasteful, inefficient, or unnecessary use of electricity, nor would the Project contribute considerably to significant cumulative electricity impacts. As such, cumulative electricity impacts would be less than significant.

(ii) Natural Gas

Buildout of the Project, the 34 related projects in the SoCalGas service area, and additional growth forecasted to occur in the City would increase natural gas consumption during project construction and operation and, therefore, cumulatively increase the need for energy supplies and infrastructure capacity, such as new or expanded energy facilities. SoCalGas forecasts that its total natural gas consumption in 2035 (2035 is the latest projected year in the 2020 Gas Report) will be 2.103 billion cf/day. Based on the Project's estimated net new natural gas consumption of 36,429,174 cf per year, the Project would account for approximately 0.005 percent of SoCalGas' projected consumption for the Project's buildout year. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale relative to SoCalGas' supplies, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local

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

[88] *LADWP, 2020 Power Content Label.*

growth expectations for SoCalGas' service area. The Project also would incorporate energy efficiency measures to make the Project capable of meeting Title 24 requirements, as required by GHG-PDF-1 and reduce natural gas usage by limiting the number of natural gas-fueled fireplaces, as required by GHG-PDF-2. Furthermore, future development projects within SoCalGas' service area would be expected to incorporate energy conservation features, comply with applicable regulations including the CALGreen Code and State energy standards under Title 24, and incorporate mitigation measures, as necessary.

Based on the above, the Project together with the related projects would not cause wasteful, inefficient, or unnecessary use of natural gas, nor would the Project contribute considerably to significant cumulative natural gas impacts. As such, cumulative natural gas impacts would be less than significant.

(iii) Transportation Energy

Buildout of the Project, the related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would result in an increase of 955,733 gallons of gasoline and 211,206 gallons of diesel per year, or a total of 1,166,939 gallons of petroleum-based fuels consumed per year, as shown in Appendix F of this Draft EIR. As discussed above, with incorporation of trip reduction measures, net transportation-fuel usage for the Project would be reduced by 42 percent for both gasoline and diesel fuels.

Related projects in the Project vicinity, as listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, would also be infill projects locating uses near other residential and commercial uses which would reduce distance travelled, as well as consumption of transportation fuel. As analyzed above, Project transportation fuel usage would represent a small percentage of total fuel consumption within Los Angeles County. While it is speculative to assess transportation fuel usage from related projects, it is expected that cumulative transportation fuel usage resulting from the Project and related projects would be consistent with projections discussed above.

Additionally, as described above, petroleum currently accounts for 90 percent of California's transportation energy sources; however, over the last decade the State has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled, which would reduce reliance on petroleum fuels. According to the California Department of Tax and Fee Administration,

gasoline consumption has increased by 6 percent from 2011 to 2019;[89] however, the CEC predicts that there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions.

Furthermore, as previously discussed, the Project would be consistent with the energy efficiency policies emphasized by the 2020–2045 RTP/SCS. Specifically, the Project includes residential development in an area that is characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, and would be well-served by existing public transportation. The Project also would introduce new housing within an HQTA, which is consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new jobs near transit.[90] In addition, the Project would further reduce VMT through such measures as transit accessibility as estimated by CalEEMod, which would support the transportation VMT target reductions provided in the 2020–2045 RTP/SCS. As the 2020–2045 RTP/SCS is a regional plan which includes the City of Los Angeles, this analysis applies with equal force to the related projects. Related projects would be urban infill projects located near other commercial, retail and entertainment uses which would encourage alternative modes of transport reducing vehicle trips.

Although the 2020–2045 RTP/SCS is intended to reduce GHG emissions, the reduction in VMT would also result in reduced transportation fuel consumption, thereby reducing GHG emissions. By its very nature, the 2020–2045 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects.

Based on the above, the Project together with the related projects would not result in significant cumulative impacts related to transportation energy, nor would the Project contribute considerably to significant cumulative transportation energy

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[89] *California Department of Tax and Fee Administration, Fuel Taxes Statistics & Reports (December 2020—Motor Vehicle Fuel 10 Year Report), www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm, accessed March 26, 2021.*

[90] *The City's ZIMAS identifies the Project Site as also located in TPA as defined by PRC Section 20199. PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."*

impacts. As such, cumulative transportation energy impacts would be less than significant.

(iv) Conclusion

Based on the above, the Project together with the related projects would not result in significant cumulative impacts related to energy, nor would the Project contribute considerably to significant cumulative energy impacts. As such, the cumulative energy impacts associated with the Project and the related projects under Threshold (a) are concluded to be less than significant.

(b) Consistency with State or Local Plans

Related projects within the Project area, as listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, as well as future development projects, would be required to comply with energy conservation and renewable energy plans and polices described above, including Title 24, CALGreen Code, and the City of Los Angeles Green Building Code. As related projects would be required to meet the same energy consumption standards, there would be no significant cumulative impacts with regard to consistency with energy conservation plans.

Furthermore, as described above, the Project would be consistent with the policies emphasized by the 2020–2045 RTP/SCS. The Project is a mixed-use Transit Oriented Development, including residential, office, retail, and restaurant uses, located near public transit, which would result in a 42-percent reduction in overall VMT compared to a Project without reduction features. This reduction in VMT would support the goals of the 2020–2045 RTP/SCS. Related projects would also be urban infill projects which are located near mass transit and other commercial, retail and entertainment uses which would reduce vehicle trips. As a result, related projects would likely achieve a similar reduction in vehicle trips and VMT in comparison to the Project.

Based on the above, the Project together with the related projects would not result in significant cumulative impacts related to conflicts with plans, nor would the Project contribute considerably to significant cumulative conflict with plans impacts. As such, cumulative conflict with plans impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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