IV. Environmental Impact Analysis

D. Energy

1. Introduction

This section analyzes impacts on energy resources due to construction and operation of the Project. Section 15126.2 (b) of the California Environmental Quality Act (CEQA) Guidelines states that a project's energy use shall be analyzed to determine the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy, as well as being compliant with building codes and renewable energy features. The Appendix G Checklist of the State CEQA Guidelines, Section VI, Energy, includes questions to assist lead agencies when assessing a project's potential energy impacts. Additionally, State CEQA Guidelines Appendix F provides guidance on information to use when evaluating a project's energy use.

In accordance with the applicable Appendix G sections and utilizing guidance from Appendix F of the State CEQA Guidelines, this Draft EIR includes relevant information and analyses that address the energy implications of the Project, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). Detailed energy calculations can be found in Appendix E of this Draft EIR. Information found herein, as well as other aspects of the Project's energy implications, are discussed in greater detail elsewhere in this Draft EIR, including in Section II, Project Description and Section IV.F, Greenhouse Gas Emissions.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding energy at the federal, state, regional, and City of Los Angeles levels. As described below, these plans, guidelines, and laws include the following:

- Energy Independence and Security Act of 2007
- Corporate Average Fuel Economy Standards

- Federal Energy Policy and Conservation Act
- National Energy Policy Act of 1992;
- Energy Policy Act of 2005;
- Clean Air Act;
- Energy Independence and Security Act of 2007;
- Clean Cities Program;
- Senate Bill 1389
- Renewables Portfolio Standards
- California Building Standards
  - California Building Energy Efficiency Standards
  - California Green Building Standards
- California Assembly Bill 1493
- California Air Resources Board
  - Scoping Plan
  - Advanced Clean Car Program
  - Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
  - In-Use Off-Road Diesel Fueled Fleets Regulation
- Senate Bill 375
- Regional Transportation Plan/Sustainable Communities Strategy
- Green New Deal
- Green Building Code
- City of Los Angeles Mobility Plan 2035
- City of Los Angeles All-Electric Buildings

(1) Federal

(a) Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[1]

(b) Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and the United States Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. 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. When these standards are

[1] *A "green job," as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.*

raised, automakers respond by creating a more fuel-efficient fleet. In 2012, the NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). 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 to 23 percent over the 2010 baseline, depending on the vehicle type.[2] 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.[3]

In March 2020, the USEPA and NHTSA issued the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule that would maintain the CAFE standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFE standards for model year 2020 are 43.7 mpg for passenger cars and 31.3 mpg for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. However, consistent with President Biden's executive order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, USEPA and NHTSA are now evaluating whether and how to replace the SAFE Rule.[4]

(c) Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve, the Energy Conservation Program for Consumer Products, and Corporate Average Fuel Economy regulations.

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[2] *United States Environmental Protection Agency, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011.*

[3] *United States Environmental Protection Agency, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 2018.*

[4] *United States District Court for the District Court of Columbia, Union of Concerned Scientists, et al., v. National Highway Traffic Safety Administration, USCA Case No, 19-1230 and consolidated cases (D.C. Cir. 2020) (February 21, 2021, order holding cases in abeyance held in abeyance pending further order of the court and directing the government to file status reports on the agencies' review of the One National Program at 90-day intervals beginning 90 days from the date of the order).*

(d) Phase 1 and 2 Heavy-Duty Vehicle GHG Standards

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by U.S. EPA and the National Highway Traffic Safety Administration (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 to 23 percent over the 2010 baseline, depending on the vehicle type. The U.S. EPA 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.

(e) Public Utility Regulatory Policies Act of 1978, Public Law 95-617

The Public Utility Regulatory Policies Act of 1978 (PURPA) sought to promote conservation of electric energy. Additionally, PURPA created a new class of nonutility generators (small power producers) from which, along with qualified co-generators, utilities are required to buy power.

PURPA was in part intended to augment electric utility generation with more efficiently produced electricity and to provide equitable rates to electric consumers. Utility companies are required to buy all electricity from qualifying facilities (Qfs) at avoided cost (i.e., the incremental savings associated with not having to produce additional units of electricity). PURPA expanded participation of nonutility generators in the electricity market and demonstrated that electricity from nonutility generators could successfully be integrated with a utility's own supply. In addition, PURPA requires utilities to buy whatever power is produced by Qfs (usually cogeneration or renewable energy). The Fuel Use Act (FUA) of 1978 (repealed in 1987) also helped Qfs become established. Under FUA, utilities were not allowed to use natural gas to fuel new generating technologies, but Qfs, by definition not utilities, were able to take advantage of abundant natural gas and abundant new technologies (such as combined-cycle). The technologies lowered the financial threshold for entrance into the electricity generation business as well as shortened the lead time for constructing new plants.

(f) National Energy Policy Act of 1992

The National Energy Policy Act of 1992 (EPACT92) calls for programs that promote efficiency and the use of alternative fuels. EPACT92 requires certain federal, state, and local government and private fleets to purchase a percentage of light duty alternative fuel vehicles (AFV) capable of running on alternative fuels each year. In addition, EPACT92 has financial incentives. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. The Act also requires states to consider a variety of incentive programs to help promote AFVs.

(g) Energy Policy Act of 2005

The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

(h) Clean Air Act

The Clean Air Act (CAA) Section 211(o), as amended by the Energy Policy Act of 2005, requires the Administrator of the U.S. EPA to annually determine a renewable fuel standard (RFS) which is applicable to refineries, importers, and certain blenders of gasoline, and to publish the standard in the Federal Register by November 30 each year. On the basis of this standard, each obligated party determines the volume of renewable fuel that it must ensure is consumed as motor vehicle fuel. This standard is calculated as a percentage, by dividing the amount of renewable fuel that the Act requires to be blended into gasoline for a given year by the amount of gasoline expected to be used during that year, including certain adjustments specified by the CAA.

(i) Energy Independence and Security Act of 2007

EISA is designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. It expands the production of renewable fuels, reducing dependence on oil, and confronting global climate change. Specifically, it:

- Increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels; and

- Reduces U.S. demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020. (an increase in fuel economy standards of 40 percent).

(j) Clean Cities Program

The U.S. Department of Energy's (DOE) Clean Cities Program promotes voluntary, locally based government/industry partnerships for the purpose of expanding the use of alternatives to gasoline and diesel fuel by accelerating the deployment of AFVs and building local AFV refueling infrastructure. The mission of the Clean Cities Program is to advance the nation's economic, environmental and energy security by supporting local decisions to adopt practices that contribute to the reduction of petroleum consumption. The Clean Cities Program carries out this mission through a network of more than

80 volunteer coalitions, which develop public/private partnerships to promote alternative fuels and vehicles, fuel blends, fuel economy, hybrid vehicles, and idle reduction.

(2) State

(a) Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code (PRC) Sections 25300–25323; SB 1389) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (PRC Section 25301[a]). The 2020 Integrated Energy Policy Report, the latest published report from CEC, provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles (ZEV), energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

(b) Renewable Portfolio Standard

First established in 2002 under SB 1078, California's Renewables Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030.[5] SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. 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 savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. On September 10, 2018, former Governor Jerry Brown signed SB 100, which further increased California's RPS and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; and 60 percent by December 31, 2030, and that the California Air Resources Board (CARB) should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual

[5] *California Public Utilities Commission, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/rps/, accessed October 3, 2023.*

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.[6]

In March 2021, the CEC, CPUC, and CARB issued an SB 100 Joint Agency Report that assesses barriers and opportunities to implementing the 100-percent clean electricity policy.[7] The report's initial findings suggest that the goals of SB 100 are achievable, though opportunities remain to reduce overall system costs; however, the report also notes that the findings are intended to inform state planning and are not intended as a comprehensive or prescriptive roadmap to 2045, and future work is needed on critical topics, such as system reliability and land use, and further addresses energy equity and workforce needs.[8] Refer to Section IV.F, Greenhouse Gas Emissions, of this Draft EIR for additional details regarding this regulation.

(c) California Building Standards

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

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, 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. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, effective on January 1, 2023. The 2022 Title 24 standards continue to improve upon previous versions of Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings which include efficiency improvements to the residential standards for attics, walls, water heating, and lighting, and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2017 national standards.[9]

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[6] *California Public Utilities RPS Program Overview, www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps/rps-program-overview, accessed October 3, 2023.*

[7] *California Energy Commission, California Public Utilities Commission, and California Air Resources Board, 2021 SB 100 Joint Agency Report Achieving 100 Percent Clean Electricity in California: An Initial Assessment, CEC-200-2021-001, March 2021.*

[8] *California Energy Commission, California Public Utilities Commission, and California Air Resources Board, 2021 SB 100 Joint Agency Report Achieving 100 Percent Clean Electricity in California: An Initial Assessment, CEC-200-2021-001, March 2021.*

[9] *California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2018.*

As set forth in Section 140.0 of Title 24, Part 6, nonresidential buildings shall comply with all of the mandatory measures set forth in Sections 100.0 through 110.12 for all buildings and Sections 120.0 through 130.5 for nonresidential buildings. Nonresidential buildings shall also comply with either the performance compliance approach (energy budgets) specified in Section 140.1 or the prescriptive compliance approach specified in Section 140.2 for the climate zone in which the building will be located. As set forth in Title 24, Part 6, Section 140.1, a building complies with the performance approach if the energy budget calculated for the proposed design building is no greater than the energy budget calculated for the standard design building. As set forth in Title 24, Part 6, Section 140.2, to comply using the prescriptive approach, a building shall be designed with and shall have constructed and installed systems and components meeting the applicable requirements of Sections 140.3 through 140.10, which specify building design requirements for building envelopes, space conditioning systems, water heating systems, indoor lighting, outdoor lighting, signs, covered processes, and photovoltaic and battery storage systems.

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

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are commonly referred to as the CALGreen Code. The 2019 CALGreen Code 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.[10] The 2019 CALGreen Code improves upon the 2016 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation. On August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which were approved by the California Building Standards Commission for inclusion into the California Building Standards Code in December 2021. The 2022 standards encourage efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards as described above, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 standards.[11] Refer to Section IV.F, Greenhouse Gas Emissions, of this Draft EIR for additional details regarding these standards.

(d) California Assembly Bill 1493 (AB 1493, Pavley)

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO–) emissions, Assembly Bill (AB) 1493 (commonly referred to as

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[10] *California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2018.*

[11] *California Energy Commission, 2022 Building Energy Efficiency Standards.*

CARB's Pavley regulations), enacted on July 22, 2002, requires CARB to set greenhouse gas (GHG) emission standards for new passenger vehicles, light duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards for model years 2017–2025.[12,13] As discussed In subsection IV.D.2.a.(1), Federal, on page IV.D-3, in March 2020, the U.S. DOT and the U.S. EPA issued the SAFE Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026. Refer to Section IV.F, Greenhouse Gas Emissions, of this Draft EIR for additional details regarding this regulation.

(e) California Air Resources Board

(i) Scoping Plan

The Scoping Plan is a strategy the California Air Resources Board (CARB) develops and updates at least one every five years, as required by AB 32. It lays out the transformations needed to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022 and it is the third update to the original plan that was adopted in 2008. The initial Scoping Plan laid out a path to achieve the AB 32 2020 limit of returning to 1990 levels of GHG emissions, a reduction of approximately 15 percent below business as usual.[14] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update assessed progress toward achieving the 2020 limit and made the case for addressing short-lived climate pollutants (SLCPs).[15] The most recent update, the 2017 Scoping Plan,[16] also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the Senate Bill 32 (SB 32, Pavley, Chapter 249, Statutes of 2016) target of reducing GHGs by at least 40 percent below 1990 levels by 2030.

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12 *California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493.*

13 *United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017–2025 Cars and Light Trucks, 2012.*

14 *CARB, Climate Change Scoping Plan, 2008.*

15 *CARB, First Update to the Climate Change Scoping Plan, 2014.*

16 *CARB, California's 2017 Climate Change Scoping Plan, 2017.*

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible and cost-effective path to achieve carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[17] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the Natural and Working Lands (NWL) sectors as both sources of emissions and carbon sinks.

Under the Scoping Plan Scenario, California's 2030 emissions are anticipated to be 48 percent below 1990 levels, representing an acceleration of the current SB 32 target. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the accelerated 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet our GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology.

(ii) Advanced Clean Cars Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations[18]. The program requires a greater number of zero-emission vehicle models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and the Zero-Emissions Vehicle regulations (ZEV) to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered.

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[17] *CARB, California's 2017 Climate Change Scoping Plan, 2017.*

[18] *California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493, www.arb.ca.gov/msprog/acc/acc.htm, last reviewed January 11, 2017, accessed October 3, 2023.*

(iii) Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 California Code of Regulations [CCR] Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

(iv) In-Use Off-Road Diesel Fueled Fleets Regulation

Because off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the "In-Use Off-Road Diesel Fueled Fleets Regulation" to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of 5 minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2016, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines and started enforcing beginning July 1, 2014. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year or has completed the Best Available Control Technology requirements (BACT). Large fleets have compliance deadlines each year from 2014 through 2023, medium fleets each year from 2017 through 2023, and small fleets each year from 2019 through 2028. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines.

(f) SB 375 (Sustainable Communities Strategy)

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associate with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish

GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) reflects CARB's updated SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035.

(3) Regional

(a) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SB 375 requires each MPO to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles and light duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted on September 3, 2020, is the current RTP/SCS and is an update to the 2016–2040 RTP/SCS.

The 2020–2045 RTP/SCS focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land use strategies in development of the SCAG region through horizon year 2045. The 2020–2045 RTP/SCS projects that the SCAG region will meet the GHG per capita reduction targets established for the SCAG region of 8 percent by 2020 and 19 percent by 2035. Additionally, its implementation is projected to reduce VMT per capita for the year 2045 by 4.1 percent compared to baseline conditions for the year. Rooted in the 2008 and 2012 RTP/SCS plans, the 2020–2045 RTP/SCS includes "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by location housing, jobs, and transit closer together, and increasing investments in transit and complete streets.

(4) Local

(a) Green New Deal

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAn, which 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.[19] Specific targets included the construction of new housing units within 1,500 feet of transit by 2017, reducing VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. The Sustainable City pLAn was intended to be updated every four years.

In April 2019, Mayor Eric Garcetti released the Green New Deal, a program of actions designed to create sustainability-based performance targets through 2050 designed to advance economic, environmental, and equity objectives.[20] L.A.s Green New Deal is the first four-year update to the City's first Sustainable City pLAn that was released in 2015 and therefore replaces and supersedes the Sustainable City pLAn.[21] It augments, expands, and elaborates in more detail L.A.'s vision for a sustainable future and it tackles the climate emergency with accelerated targets and new aggressive goals.

Within the Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 British Thermal Units (BTU)/sf in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/ matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.

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

[20] *City of Los Angeles. LA's Green New Deal, 2019.*

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

- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds (lbs.) of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

(b) Green Building Code

Chapter IX of the Los Angeles Municipal Code (LAMC) is referred to as the "Los Angeles Green Building Code," which incorporates by reference portions of the CALGreen 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. The Los Angeles Green Building Code includes mandatory measures for newly constructed nonresidential and high-rise residential buildings. The Los Angeles Green Building Code includes some requirements that are more stringent than State requirements such as increased requirements for electric vehicle charging spaces and water efficiency, which results in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency.

Chapter IX of the LAMC also requires that all new buildings be all-electric buildings, with some exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratory, and research and development uses. These LAMC requirements ensure that new buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035, rather than relying on fossil fuels.

(c) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[22] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities:

(1) Safety First;

(2) World Class Infrastructure;

(3) Access for All Angelenos;

(4) Collaboration, Communication, and Informed Choices; and

(5) Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals.

b. Existing Conditions

(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

[22] *Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.*

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.

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 Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2022 Power Strategic Long-Term Resource Plan, the LADWP has a net dependable generation capacity of 8,101 MW.[23] In 2017, the LADWP power system experienced a record instantaneous peak demand of 6,502 MW.[24] Approximately 35 percent of LADWP's 2021 electricity purchases were from renewable sources, which is better than the 34-percent statewide percentage of electricity purchases from renewable sources.[25]

LADWP supplies electrical power to the Project 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.F, Greenhouse Gas Emissions, of this Draft EIR. Specifically, the California Emissions Estimator Model (CalEEMod) Version 2022.1 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. The Project site is currently developed with a one-story (20-foot-tall), 23,072-square-foot office building and two single-story accessory buildings comprised of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street used for storage, and a two-story (26-foot-tall), 87,881-square-foot office building at

[23] *LADWP, 2022 Power Strategic Long-Term Resources Plan, p. ES-5.*

[24] *LADWP, 2022 Power Strategic Long-Term Resources Plan, p. ES-5.*

[25] *LADWP, Utility Annual Power Content Labels for 2021, 2022.*

12541 W. Beatrice Street as well as surface parking. It is estimated that existing uses on the Project Site currently consume approximately 2,027,266 kWh of electricity per year.[26]

(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 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.[27]

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.[28] 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 69 million cf per day in 2021 (the most recent year for which data are available).[29] 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.F, 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

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[26] *Eyestone Environmental, Energy Calculations for the New Beatrice West Project. See Appendix E of this Draft EIR.*

[27] *SoCalGas, Company Profile, www.socalgas.com/about-us/company-profile, accessed October 3, 2023.*

[28] *California Gas and Electric Utilities, 2022 California Gas Report, p. 135.*

[29] *California Gas and Electric Utilities, 2022 California Gas Report, p. 135.*

thermal units (MMBtu). The Project site is currently developed with a one-story (20-foot-tall), 23,072-square-foot office building and two single-story accessory buildings comprised of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street, and a two-story (26-foot-tall), 87,881-square-foot office building at 12541 W. Beatrice Street as well as surface parking. It is estimated that existing uses on the Project Site currently consume approximately 2,123,097 cf of natural gas per year.[30]

(3) Transportation Energy

According to the US Energy Information Administration, transportation accounts for approximately 34 percent of California's total energy consumption in 2020.[31] In 2022, California consumed 13.6 billion gallons of gasoline and 3.1 billion gallons of diesel fuel.[32,33] Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.[34] 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 6 percent from 2011 to 2019.[35] However, this increase is mainly due to population increases as the per capita gasoline consumption is showing a downward trend.[36] 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 EMission FACtor (EMFAC) Web Database, Los Angeles County on-road transportation sources consumed 6.21 billion gallons of gasoline and 1.08 billion gallons of diesel fuel in 2020.[37]

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[30] *Eyestone Environmental, Energy Calculations for the New Beatrice West Project. See Appendix E of this Draft EIR.*

[31] *U.S. Energy Information Administration. California State Profile and Energy Estimates. Consumption by Sector: www.eia.gov/state/?sid=CA#tab, accessed October 3, 2023.*

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

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

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

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

[36] *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 October 3, 2023*

[37] *California Air Resources Board, EMFAC2021 Web Database, www.arb.ca.gov/emfac/. Details provided in Appendix E of this Draft EIR.*

The AQMD has also acknowledged a reduction in emissions within the South Coast Air Basin as a result of the COVID-19 Pandemic Response. Changes in vehicle traffic patterns has resulted in a 25-percent reduction in light duty auto traffic and a 12-percent reduction in truck traffic from April 2019 through April 2020.[38] The Project's energy analysis presented later in the document conservatively does not take into account the reduction in transportation fuel usage due to the COVID-19 Pandemic Response.

The existing on-site land uses currently generate a demand for transportation-related fuel use as a result of vehicle trips to and from the Project Site. The estimate of annual VMT associated with the existing Project Site uses is 3,577,365 VMT per year.[39] This translates to 149,555 gallons of gasoline and 23,831 gallons of diesel per year based on current (2021) fuel economy averages.[40]

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."

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[38] *SCAQMD, Emissions Reductions and Air Quality Impacts from the COVID-19 Pandemic Response. Governing Board Meeting Presentation. June 5, 2020.*

[39] *Eyestone Environmental, Energy Calculations for New Beatrice West Project, see Appendix E of this Draft EIR.*

[40] *Eyestone Environmental, Energy Calculations for New Beatrice West Project, see Appendix E of this Draft EIR.*

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:[41]

- 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.
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 was 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.F, Greenhouse Gas Emissions, of this Draft EIR, the Project was evaluated for consistency with the 2020–2045 RTP/SCS, which includes goals to reduce VMT and corresponding decrease in fuel consumption.

[41] *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.*

b. Methodology

The existing 87,881-square foot building located at 12541 Beatrice Street would remain as part of the Project operation unchanged with no additional area or increased employee population. Thus, there is no construction energy use associated with this building, nor would there be any new energy use associated with this building during Project operation.

(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.[42] Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power was calculated based on data provided in South Coast Air Quality Management District (SCAQMD) construction surveys (i.e., construction activity, horsepower, load factor, and hours of use per day).[43] Although the Project site would use electricity from poles where possible pursuant to Project Design Feature AIR-PDF-1, electricity demand calculations were based on SCAQMD construction surveys, which identify 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 and current plans do not involve the use of natural gas powered construction equipment.

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 E 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

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[42] *California Air Pollution Control Officers Association, CalEEMod™ version 2022.1 User's Guide, April 2022.*

[43] *California Air Pollution Control Officers Association, CalEEMod Users Guide. Appendix D, Technical Source Documentation. April 2022.*

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 2021 model (EMFAC2021). 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 E 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.F, 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 New Beatrice West*, prepared by Linscott Law & Greenspan, Inc. (See Appendix K 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.[44] 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.F, Greenhouse Gas Emissions, of this Draft EIR. Based on this annual VMT, gasoline and diesel consumption rates were calculated using the

[44] *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 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.*

county-specific miles per gallon calculated using EMFAC2021. 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 E 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.F, Greenhouse Gas Emissions, of this Draft EIR, including Project Design Feature GHG-PDF-1, which requires that the Project design incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver® or equivalent green building standards.

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 (demolition, construction, operations, maintenance and removal activities).[45]

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

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.

(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 59,000 cubic yards of demolition material to off-site reuse and disposal facilities).

As shown in Table IV.D-1 on page IV.D-26, a total of 27,782 kWh of electricity, 29,626 gallons of gasoline, and 134,852 gallons of diesel are estimated to be consumed during Project construction. Project construction is expected to occur over an approximate 18-month period and be completed in 2025.

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.D-1, a total of approximately 27,782 kWh of electricity are anticipated to be consumed during all phases of Project construction, including demolition. 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. In addition, although Title 24 requirements typically apply to energy usage for buildings,

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

Fuel Type	Quantity
Electricity	
Water Consumption	1,483 kWh
Lighting, and Other Construction Activities Necessitating Electrical Power[b]	11,995 kWh
Electric Equipment (e.g., dewatering)	14,303 kWh
Total Electricity[c]	**27,782 kWh**
Gasoline	
On-Road Construction Equipment	29,626 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	**29,626 gallons**
Diesel	
On-Road Construction Equipment[d]	103,320 gallons
Off-Road Construction Equipment[e]	31,533 gallons
Total Diesel	**134,852 gallons**

kWh = kilowatt hours

[a] *Detailed calculations are provided in Appendix E 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 27,782 kWh represents approximately one percent of the 2,027,266 kWh existing annual operational electricity usage.*

[d] *On-Road equipment includes worker trips, vendor deliveries, and haul trucks. Haul trucks are assumed to be powered by diesel.*

[e] *Off-Road equipment includes on-site heavy equipment which are assumed to be powered by diesel*

Source: Eyestone Environmental, 2023.

long-term construction lighting (longer than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 mandatory requirements which includes limits on the wattage allowed per specific area, which result in the conservation of energy.[46] As such, the demand for electricity during construction would not cause wasteful, inefficient, and unnecessary use of energy.

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

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. The Project also does not anticipate use of natural gas powered construction equipment. Furthermore, the existing natural gas usage for the portion of the Project Site to be removed would no longer be required because the existing 23,072-square-foot office building and two accessory buildings would be demolished. 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.D-1 on page IV.D-26 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix E of this Draft EIR. The construction energy analysis assumes that all off-road 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 in Table IV.D-1, on- and off-road vehicles would consume an estimated 29,626 gallons of gasoline and approximately 134,852 gallons of diesel fuel for the Project's construction. This represents approximately 0.001 percent of gasoline and 0.02 percent diesel consumption in Los Angeles county during construction.[47]

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 and State 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.

[47] *CARB, EMFAC 2021.*

Construction Materials

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes that would occur as an indirect result of the Project. Because it cannot be predicted where materials would be sourced from and/or disposed of, estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation is expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

(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. As shown in Table IV.D-2 on page IV.D-29, the Project's net new energy demand would be approximately 5,863,013 kWh of electricity per year and a reduction of 214,171 cf of natural gas per year. The Project would also result in a net increase of 242,933 gallons of gasoline per year and 39,278 gallons of diesel fuel per year consumed.

Electricity

As shown in Table IV.D-2, with compliance with Title 24 standards and applicable CALGreen and City of Los Angeles Code requirements (e.g., requires all new buildings be all-electric buildings with some exceptions), buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 5,863,013 kWh per year. In addition to complying with CALGreen Code, the Applicant would implement Project Design Feature GHG-PDF-1 included in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, which requires that the Project design incorporate features of the LEED® program to be capable of meeting the standards of LEED Silver® or equivalent green building standards, including the use of Energy Star labeled products. In order to achieve LEED Silver certification, multiple options are available with regard to energy usage (electricity and natural gas), such as submetering, high efficiency boilers, and high efficiency furnaces. At this time, it is uncertain which energy reduction measures will be used to achieve LEED Silver certification. Therefore, as a conservative assumption, no reduction in the Project's energy consumption was assumed with implementation of Project Design Feature GHG-PDF-1.

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

Source	Estimated Energy Demand During Project Operation
Electricity	
Building	5,324,408 kWh
Water[b]	264,110 kWh
EV Chargers[c]	265,373 kWh
Total Electricity[d]	**5,863,013 kWh**
Natural Gas	
Building	-214,171 cf
Total Natural Gas[d]	**-214,171 cf**
Transportation (On-Road Vehicles and Off-Road Equipment)	
Gasoline	242,933 gallons
Diesel	39,278 gallons
Total Transportation[e]	**282,211 gallons**

cf = cubic feet

kWh = thousand kilowatt hours

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

[b] *Calculations assume a 20 percent reduction in water usage for new buildings as required by the Los Angeles Green Building Code.*

[c] *As discussed in Section IV.F, 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.*

[e] *Transportation fuel estimates include project characteristics (e.g., mix of land uses and proximity to transit) consistent with LADOT VMT calculator and the EPA MXD methodology. See page IV.D-32 for additional discussion of the EPA MXD methodology. Fuel estimates conservatively do not include reductions in fuel usage associated with installation of EV chargers as required by City building codes.*

Source: Eyestone Environmental, 2023.

The Project would be subject to the 2022 Title 24 standards, which represent an improvement over previous standards. In addition, future iterations of Title 24 are expected to increase energy efficiency requirements and the Project would be required to comply with the latest Title 24 standards. At the time of plan check submission, the Project would demonstrate compliance with the applicable California Energy Code, Title 24, Part 6 requirements, including the updates that would be in effect in January 2024. Based on the unique features of the building, including large glass façades, numerous patios, and shading elements, it is anticipated that the performance compliance approach would be

used to demonstrate compliance with the nonresidential building requirements of the California Energy Code instead of the prescriptive compliance approach.

The current renewable sources procured by LADWP include wind, solar, biomass/biowaste, eligible hydroelectric, and geothermal sources. These sources account for 35 percent of LADWP's overall energy mix in 2021, the most recent year for which data are available.[48] This represents the available offsite renewable sources of energy that would meet the Project's energy demand. The use of renewable energy would indirectly reduce use of fossil fuels required for electricity generation (natural gas, coal, oil). While the electricity usage rate for a given land use would not be directly affected by the availability of renewable energy, the consumption of fossil fuels required for electricity generation would be reduced.

Based on LADWP's 2022 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2025-2026 fiscal year (the Project's buildout year) will be 20,874 GWh of electricity.[49,50] As such, the Project-related net increase in annual electricity consumption of 5,863,013kWh per year would represent less than 0.028 percent of LADWP's projected sales in 2025. 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 regulations, such as Title 24 energy efficient requirements, CalGreen Code, and City building codes may further reduce Project-related consumption. As such, the demand for electricity during operation would not cause wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.

Natural Gas

As provided in Table IV.D-2 on page IV.D-29, the buildout of the Project is projected to generate a net decrease in the on-site demand for natural gas totaling approximately 214,171 cf per year, assuming compliance with Title 24 standards and applicable CALGreen and City of Los Angeles Code requirements (e.g., requires all new buildings be all-electric buildings with some exceptions). 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 Project Design Feature GHG-PDF-1 included in Section IV.F, Greenhouse Gas

[48] *LADWP 2021 Power Content Label, 2022.*

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

[50] *LADWP, 2022 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1, page A-7.*

Emissions, of this Draft EIR, which requires that the Project design incorporate features of the LEED® program to be capable of meeting the standards of LEED Silver® or equivalent green building standards, including the use of Energy Star labeled products. As discussed above, the Project's new buildings would be subject to the 2022 Title 24 standards. Title 24 provides a method to achieve compliance which is known as the Performance Method or performance compliance approach. Under the Performance Method, the Project would be allowed to choose from a variety of energy reduction measures which provides flexibility when seeking Title 24 compliance. In order to meet the Title 24 energy Performance Method requirement, the Project may include use of efficient water heaters, cooking equipment and other major support appliances such as HVAC.

As stated above, the Project's estimated net decrease in demand for natural gas is 214,171 cf per year. Based on the 2022 California Gas Report, the estimated natural gas consumption within SoCalGas' planning area will be approximately 2.30 billion cf/day in 2025.[51] As the Project's natural gas consumption results in a decrease in the onsite demand for natural gas, the Project would be consistent with the forecasted 2025 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, such as energy efficient heating, ventilation, and air conditioning (HVAC) equipment, consistent with Title 24 and CalGreen requirements. As such, the demand for natural gas during operation would not cause wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.

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 detailed in Section IV.K, Transportation, of this Draft EIR, the Project site is well served by public transportation. Specifically, the Project site is served by Metro bus lines 108 and 110 along with Commuter Express 437B, Culver City Bus Line 4, and City of Santa Monica Big Blue Bus 14 and is within an High-Quality Transit Areas (HQTA). In addition, the Project site's proximity to a variety of commercial and employment uses, including on the Project site, would allow employees of the Project site to walk to nearby restaurants and retail use such as the Runway Playa Vista, 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

[51] *California Gas and Electric Utilities, 2022 California Gas Report, p. 185.*

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.[52] The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project characteristics such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. A 10 percent reduction in VMT and associated fuel usage is included in Table IV.D-2 on page IV.D-29 using the USEPA MXD model. 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 implementing workplace parking pricing for employees, a Voluntary Travel Behavior Change Program, bicycle parking supply consistent with LAMC requirements as well as bike facilities such as showers and a repair station, pedestrian network improvements, and transit subsidies. 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.F, Greenhouse Gas Emissions, of this Draft EIR. Implementation of the TDM program as required by Mitigation Measure TR-MM-1 would further reduce net transportation-fuel usage by an additional 13 percent for both gasoline and diesel fuels.

As summarized in Table IV.D-2, which does not account for Mitigation Measure TR-MM-1 (TDM trip and VMT reduction measures), the Project's estimated petroleum-based fuel usage would result in a net increase of 242,933 gallons of gasoline and 39,278 gallons of diesel per year, or a total of 282,211 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. In addition, per CEQA Guidelines Appendix F, 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

[52] *Environmental Protection Agency, Mixed-Use Trip Generation Model, www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed October 3, 2023.*

Code, and vehicle fuel economy standards. Table IV.D-1 and Table IV.D-2 on pages IV.D-26 and IV.D-29, respectively, provide a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 27,782 kWh of electricity would be consumed along with 164,478 gallons of transportation fuel (gasoline and diesel). During Project operations, a net total of 5,863,013 kWh of electricity and a reduction of 214,171 cf of natural gas would be consumed on an annual basis. The Project would also result in a net increase of 282,211 gallons of transportation fuel consumption. As discussed above, the Project would implement Project Design Feature GHG-PDF-1 included in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, which would require the Project to achieve LEED Silver certification. Implementation of Project Design Feature GHG-PDF-1 would result in a reduction in energy usage in comparison to a Project without LEED Silver certification. The Project would also reduce water usage in new buildings by 20 percent compared to baseline conditions contained in the LAMC Green Building Code. A 20-percent reduction in water usage required by the Los Angeles Green Building Code would result in a corresponding 20-percent reduction in electricity associated with delivery, treatment, and distribution of water.[53] Transportation fuel usage would be reduced by 11 percent compared to the Project without trip reduction features discussed above. Details are provided in Appendix E 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. The Project's estimated construction electricity usage represents approximately 0.5 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.[54] Furthermore, the electricity demand during construction would be offset by the removal of a portion 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

[53] *Baseline water usage is calculated according to LAMC Table 99.04.303.4.1 contained in the Los Angeles Green Building Code.*

[54] *The percentage is derived by taking the total amount of electricity usage during construction (27,782 kWh) and dividing that number by the total amount of net electricity usage during operation (5,863,013 kWh) to arrive at 0.5 percent.*

construction activities, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.007 percent of gasoline usage and 0.006 percent of diesel usage within Los Angeles County, respectively.[55] 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 2025-2026 fiscal year (the Project's buildout year) will be 20,874 GWh of electricity.[56,57] As such, the Project-related net operational increase in annual electricity consumption of 5,863,013 kWh per year would represent 0.028 percent of LADWP's projected sales in 2025.[58] Furthermore, LADWP has confirmed that the Project's operational electricity demand can be served by the facilities in the Project area.[59] 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 decrease in operational demand for natural gas is 214,171cf per year. Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimated natural gas consumption within SoCalGas' planning area will be approximately 2.28 billion cf/day in 2025.[60] As the Project's natural gas consumption results in a decrease in the onsite demand for natural gas, the Project would be consistent with the forecasted 2025 consumption in SoCalGas' planning area.

At buildout in 2025, the operation of the Project would result in a net increase of 242,933 gallons of gasoline and 39,278 gallons of diesel per year, or a total of 282,211 gallons of petroleum-based fuels consumed per year, as shown in Appendix E of this Draft EIR. Transportation fuel usage during Project operations would represent

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[55] *Calculated based on EMFAC2021 for Buildout Year using Los Angeles County data. Please refer to Appendix E for detailed calculations.*

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

[57] *LADWP, 2022 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1, page A-7.*

[58] *LADWP, 2022 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1, page A-7*

[59] *Barbara L. Hall, P.E., Inc., Utility Technical Report for New Beatrice West, September 22, 2022. Refer to Appendix E of this Draft EIR.*

[60] *California Gas and Electric Utilities, 2022 California Gas Report p. 185.*

approximately 0.007 percent of gasoline and 0.006 percent of diesel usage within Los Angeles County in 2025.[61]

In sum, energy consumption during Project operations would not materially affect LADWP's, SoCalGas', and California refineries' 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 transportation energy, respectively. The Project's energy demand and consumption would be negligible compared to available supplies during both construction and operation.

Electricity demand during construction (27,782 kWh) and operation (5,863,013kWh) 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 6,502 MW on August 31, 2017.[62] In 2018, the LADWP power system experienced a peak of 6,195 MW on July 6, 2018. 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 2018, the base case peak demand for the power grid is 5,820 MW.[63] The Project would consume 1,709 kW during peak load conditions. In comparison to the LADWP power grid base peak load of 5,820 MW in 2018, the Project's electricity demand would represent approximately 0.02 percent of the LADWP base peak load conditions.[64] 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.[65] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

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[61] *Los Angeles County is expected to result in the consumption of 3,707,562,992 gallons of gasoline and 621,640,500 gallons of diesel in 2025 from vehicles as calculated with EMFAC2021.*

[62] *LADWP, 2022 Power Strategic Long-Term Resources Plan, p. ES-7.*

[63] *LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.*

[64] *The percentage is derived by taking the peak electricity usage during Project operations (11,709 kW) and dividing that number by the LADWP base case peak demand of 5,820,000 kWh (5,820 MWh) to arrive at 0.02 percent.*

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

With regard to peak day natural gas demand, the 2022 California Gas Report estimates for 2025, the extreme peak demand for the SoCalGas service area is 2,378 million cf/day.[66] As the Project's natural gas consumption results in a decrease in the onsite demand for natural gas, the Project would be consistent with the forecasted 2025 consumption in SoCalGas' planning area. Therefore, 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, the 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 usage.

(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 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.[67] Electricity and natural gas usage during Project operations presented in Table IV.D-2 on page IV.D-29 would comply with 2022 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 traveling to and from the Project Site are assumed to comply with CAFE fuel economy standards. 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.

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[66] *California Gas and Electric Utilities, 2022 California Gas Report p. 185.*

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

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 2022 Power Strategic Long-Term Resources Plan (SLTRP) identifies adequate resources (natural gas, coal) to support future generation capacity. The LADWP 2022 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 region are obtained from locations throughout the western United States as well as Canada.[68] 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.[69] 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. Based on current proven reserves, crude oil production would be sufficient to meet consumption until 2050.[70] The Project would also

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[68] *California Gas and Electric Utilities, 2022 California Gas Report.*

[69] *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed October 3, 2023.*

[70] *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 October 3, 2023.*

comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). The Project would also support 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, in September 2018, SB 100 was signed, which requires 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 35 percent of LADWP's overall energy mix in 2021, the most recent year for which data are available.[71] 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 detailed above in the Regulatory Framework subsection, new nonresidential buildings shall comply with all of the mandatory measures set forth in Title 24, Part 6, Sections 100.0 through 110.12 for all buildings and Sections 120.0 through 130.5 for nonresidential buildings. Nonresidential buildings shall also comply with either the performance compliance approach (energy budgets) specified in Title 24, Part 6, Section 140.1 or the prescriptive compliance approach specified in Section 140.2 for the climate zone in which the building will be located. As set forth in Title 24, Part 6, Section 140.1, a building complies with the performance approach if the energy budget calculated for the proposed design building is no greater than the energy budget calculated for the standard design building. As set forth in Title 24, Part 6, Section 140.2, to comply using the prescriptive approach, a building shall be designed with and shall have constructed and installed systems and components meeting the applicable requirements of Sections 140.3 through 140.10, which specify building design requirements for building envelopes, space conditioning systems, water heating systems, indoor lighting, outdoor lighting, signs, covered processes, and photovoltaic and battery storage systems.

[71] *LADWP, 2021 Power Content Label, 2022.*

As previously discussed, based on the unique features of the building, including large glass façades, numerous patios, and shading elements, the specific building design requirements under the prescriptive approach may not be achieved for the Project. Accordingly, it is anticipated that the performance compliance approach would be used to demonstrate compliance with the nonresidential building requirements of the California Energy Code instead of the prescriptive compliance approach. The Project would also implement Project Design Feature GHG-PDF-1 which requires the Project to achieve LEED Silver certification. In order to achieve this certification, the Project may choose from a variety of energy efficiency or renewable energy measures such as installation of solar panels.

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.[72]

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 CAFE 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 expanded office and retail uses. The Project site is well served by public transportation with multiple local and regional bus lines provided by Metro, Culver City, and City of Santa Monica. Specifically, the Project site is served by Metro bus lines 108 and 110 along with Commuter Express 437B, Culver City Bus Line 4, and City of Santa Monica Big Blue Bus 14 with the closet bus stop located approximately 750 feet south of the Project site. The Project would also implement VMT reduction measures as part of Mitigation Measure TR-MM-1 included in Section IV.K, Transportation, of this Draft EIR, to further reduce vehicle trips and associated transportation-related energy usage,

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

including implementing workplace parking pricing for employees, a Voluntary Travel Behavior Change Program, pedestrian network improvements, and transit subsidies. Taking into consideration the accessibility to mass transit, bicycle parking and proximity to job centers and retail such as Runway Playa Vista, located approximately 1,050 feet south of the Project site, uses and Mitigation Measure TR-MM-1, the Project results in a VMT reduction of approximately 23 percent (see Appendix E of this Draft EIR) compared to a Project without reduction features. While the TDM measure under Mitigation Measure TR-MM-1 would reduce the Project's VMT and associated petroleum-based fuel usage, the analysis of the Project's transportation fuel usage did not account for Mitigation Measure TR-MM-1.[73] 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 2022 Title 24 standards. Additionally, 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, weather based irrigation, and water efficient landscaping. 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.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would

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

provide adequate storage areas in accordance with Ordinance No. 171,687, which requires that development projects include an on-site recycling area or room of specified size.[74] The Project would also comply with State and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Thus, through compliance with the City's solid waste recycling programs, the Project during operation would contribute to reduced fuel-related energy consumption.

Based on the above, with compliance with state and local energy efficiency standards, the Project would meet and/or exceed 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 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. 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. During 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 Project Design Feature 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

Project-level impacts related to energy use would be less than significant. Therefore, no mitigation measures are required.

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[74] *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

(3) Level of Significance After Mitigation

Project-level impacts related to energy use were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level 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 2022 CALGreen Code, the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2020–2045 RTP/SCS. As Title 24, CalGreen and the City of LA Green Building code are mandatory under the City‘s Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. 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 2022 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 exceed Title 24 energy efficiency requirements, including Project Design Feature GHG-PDF 1, as discussed above.

With regard to transportation uses, the Project location and design features 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.H, Land Use and Planning, 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 principles 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. In this case, the Project would integrate green building measures consistent with CALGreen and local building codes. The 2020–2045 RTP/SCS also focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. The Project would support these policy goals by providing 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 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, consisting of office and retail uses, located in an area characterized by a high degree of pedestrian activity with several retail, residential, and entertainment uses within walking distance. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be served by existing public transportation.

The Project's introduction of new job opportunities is consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new jobs near transit and reducing VMT. The 2020–2045 RTP/SCS identifies 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. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The Project Site is located within a HQTA as designated by the 2020–2045 RTP/SCS. The Project would also implement VMT reduction measures as part of Mitigation Measure TR-MM-1 to further reduce vehicle trips and associated energy usage, including implementing workplace parking pricing for employees, a Voluntary Travel Behavior Change Program, bicycle parking supply consistent with LAMC requirements as well as bike facilities such as showers and a repair station, pedestrian network improvements, and transit subsidies. Taking into consideration the accessibility to mass transit, bicycle parking and proximity to job centers and retail uses as well as Mitigation Measure TR-MM-1, the Project results in a VMT reduction of approximately 23 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 35 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 which would result in reductions in the use of transportation fuels. 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 impacts related to regulatory consistency under Threshold (b) would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to conflicts with plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to conflicts with plans were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, 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 is one related project located in 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.

(i) Electricity

Buildout of the Project, the related project 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. LADWP forecasts that its total energy sales in 2025-2026 fiscal year (the project buildout year) will be 23,537 GWh of electricity. Based on the Project's estimated net new electrical consumption of 5,863,013 kWh per year, the Project would account for approximately 0.028 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 of the Project's electricity consumption. 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, 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. The Project would also incorporate energy efficiency measures to make the Project comply with the 2022 Title 24 standards." 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.

The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 35 percent of LADWP's overall energy mix in 2021, the most recent year for which data are available.[75] 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.

As such: (1) the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, therefore, would be less than significant; and (2) the cumulative impact of the Project's incremental effect and the effects of related projects related to wasteful, inefficient and unnecessary use of electricity would be less than significant.

(ii) Natural Gas

Buildout of the Project, the related project 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. SoCalGas forecasts that its total natural gas consumption in 2025 will be 2.30 billion cf/day.[76] Based on the Project's estimated net reduction of natural gas consumption of 214,171 cf per year, the Project would be consistent with the forecasted 2025 consumption in SoCalGas' planning area. 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, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SoCalGas' service area. The Project also would incorporate energy efficiency measures to make the Project capable of meeting Title 24 requirements. Furthermore, future development projects within SoCalGas' service area would be

[75] *LADWP, 2021 Power Content Label, 2022.*

[76] *California Gas and Electric Utilities, 2022 California Gas Report p. 185.*

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.

As such: (1) the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable and, therefore, would be less than significant; and (2) the cumulative impact of the Project's incremental effect and the effects of related projects related to wasteful, inefficient and unnecessary use of natural gas 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 242,933 gallons of gasoline and 39,278 gallons of diesel per year, or a total of 282,211 gallons of petroleum-based fuels consumed per year, as shown in Appendix E of this Draft EIR. As discussed above, a 10 percent reduction in VMT and associated fuel usage is included in Table IV.D-2 on page IV.D-29 using the USEPA MXD model (accounts for project characteristics such as increased density and proximity to transit). Implementation of the TDM program as required by Mitigation Measure TR-MM-1 would further reduce net transportation-fuel usage by an additional 13 percent.

The one related project identified in the vicinity of the Project Site would also be an infill project locating commercial 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 decreased by 5 percent from 2013 to 2021;[77] 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 development 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 commercial development in an area with other similar and supporting uses and in proximity to various public transit options as well as interconnected sidewalks for pedestrian movement and future bicycle lanes. In addition, the Project would 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 also applies to the related project. The related project is 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. By its very nature, the 2020–2045 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. The related project and additional forecasted growth would be required to comply with the energy efficiency policies of the 2020–2045 RTP/SCS, or incorporate mitigation measures.

For these reasons: (1) the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of transportation fuel would not be cumulatively considerable and, therefore, would be less than significant; and (2) the cumulative impact of the Project's incremental effect and the effects of related projects related to wasteful, inefficient and unnecessary use of transportation fuel would be less than significant.

*(*iv*) Conclusion*

Based on the analysis provided above: (1) the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas, and fuel) would not be cumulatively considerable and, therefore, would be less than

[77] *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 October 3, 2023.*

significant; and (2) the cumulative impact of the Project's incremental effect and the effects of related projects related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation would be less than significant. 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

The related project within the Project area 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, the City of Los Angeles Green Building Code. As the related project 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 includes office uses and retail located near public transit, which would result in a 23-percent reduction in overall VMT compared to a Project without reduction features and Mitigation Measure TR-MM-1.

This reduction in VMT would support the goals of the 2020–2045 RTP/SCS. It is uncertain whether the related project and additional projected growth would be consistent with the RTP/SCS targets. However, the related project and additional projected growth would 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, such projects would likely achieve a similar reduction in vehicle trips and VMT as with the Project.

For these reasons: (1) the Project's contribution to cumulative impacts related to consistency with adopted energy conservation plans, or state or local energy standards for renewable energy or energy efficiency would not be cumulatively considerable and, therefore, would be less than significant; and (2) the cumulative impact of the Project's incremental effect and effects of related projects related to consistency with adopted energy conservation plans, or state or local energy standards for renewable energy or energy efficiency 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 or included, and the impact level remains less than significant.