

IV. Environmental Impact Analysis

M.3 Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure

1. Introduction

The following section analyzes the proposed Project's potential impacts on electricity, natural gas, and telecommunications infrastructure. This section focuses on the existing infrastructure serving the Project area and the potential environmental impacts from any physical improvements that may be necessary to accommodate the proposed Project. The data and analysis presented in this section is based on information provided by the City of Los Angeles Department of Water and Power (LADWP); the Energy Calculations for the Television City Project prepared by Eyestone Environmental, included as Appendix D of this Draft EIR; and the TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy (Utility Report) prepared by KPFF, provided in Appendix O of this Draft EIR.^{1,2}

Potential impacts associated with energy demand/supply and energy conservation policies are discussed in Section IV.C, Energy, of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding electric power, natural gas, and telecommunications infrastructure at the federal and state levels. Described below, these include:

- United States Department of Energy (Energy Policy Act of 2005)

¹ Eyestone Environmental, Energy Calculations for the Television City Project, January 2022.

² KPFF Consulting Engineers, TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy, March 2022.

- California Independent System Operator
- California Public Utilities Commission
- California Energy Commission
- Senate Bill 1389
- Senate Bill 649
- California Independent System Operator
- City of Los Angeles Information Technology Agency
- Los Angeles Municipal Code Section 10.5.4

(1) Federal

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

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

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

(2) State

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

(a) California Independent System Operator

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

(b) California Public Utilities Commission

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

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

(c) California Energy Commission

The CEC is a planning agency which provides guidance on setting the State's energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the State, developing renewable energy resources and permitting thermal power plants 50 megawatts (MW) and

larger. The CEC also has specific regulatory authority over publicly-owned utilities to certify, monitor, and verify eligible renewable energy resources procured.

(d) Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. In 2018, the CEC decided to write the Integrated Energy Policy Report in two volumes. Volume I, which was published on August 1, 2018, highlights the implementation of California’s innovative policies and the role they have played in moving toward a clean energy economy. Volume II, which was adopted in February 2019, identifies several key energy issues and actions to address these issues and ensure the reliability of energy resources.³

(e) Senate Bill 649

SB 649 requires small cellular installations be on vertical infrastructure and on property outside of public rights-of-way. The installation is required to comply with all applicable federal, state, and local health and safety regulations. Additionally, cellular equipment that is no longer in use is required to be removed at no cost to the City.

(3) Local

(a) City of Los Angeles Information Technology Agency

The City of Los Angeles Information Technology Agency (ITA) is responsible for a broad spectrum of services related to technology services to both internal and external customers. These range from classic IT services, such as computer support, enterprise applications, data networks, and a 24/7 data center, to progressive digital services, such as a TV station (LA CityView 35), 3-1-1 Call Center, public safety radio/microwave communications, helicopter avionics, enterprise social media, and more.

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

³ California Energy Commission, 2018 Integrated Energy Policy Report Updated, 2019, Volume II.

(b) Los Angeles Municipal Code Section 10.5.4

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

b. Existing Conditions

(1) Electricity

LADWP provides electrical service throughout the City of Los Angeles and many areas of the Owens Valley, serving approximately four million people within a service area of approximately 465 square miles, excluding the Owens Valley. Electrical service provided by LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within LADWP's Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2017 Power Strategic Long-Term Resource Plan (SLTRP), LADWP's latest power plan, LADWP has an installed net dependable generation capacity greater than 7,531 MW.⁴ In 2017, the LADWP power system experienced an instantaneous peak demand of 6,432 MW, representing an all-time high peak for the system.⁵ In addition, the system annual peak for 2018 was 6,195 MW.⁶ Approximately 34 percent of LADWP's 2019 electricity purchases were from renewable sources, which is greater than the statewide percentage of 32 percent of electricity purchases from renewable sources.⁷

LADWP generates its electricity via 14 small hydroelectric plants, one large hydroelectric plant, five thermal plants, one wind plant, and two solar photovoltaic plants. LADWP supplies electricity within its service area through a transmission network that includes 3,507 miles of overhead and 124 miles of underground transmission lines and a

⁴ LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017.

⁵ LADWP, 2018 Retail Electric Sales and Demand Forecast, November 5, 2018.

⁶ LADWP, 2018 Retail Electric Sales and Demand Forecast, November 5, 2018.

⁷ LADWP, 2019 Power Content Label, October 2020.

distribution network that includes 6,752 miles of overhead and 3,626 miles of underground distribution lines.⁸

Based on available substructure maps from the City of Los Angeles Bureau of Engineering's online Navigate LA database, the Project Site receives electrical power service from LADWP via existing underground conduits in Beverly Boulevard and Fairfax Avenue. As discussed in Section IV.C, Energy, of this Draft EIR, the existing uses on the Project Site are estimated to consume 11,626,479 kilowatt-hour (kWh) of electricity per year, approximately 1,617,000 kWh of which are offset annually by the existing photovoltaic panels on-site.⁹

(2) Natural Gas

Natural gas is provided to the Project area by SoCalGas. SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.¹⁰

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.¹¹ The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. Gas supply available to SoCalGas from California sources averaged 97 million cubic feet (cf) per day in 2019 (the most recent year for which data is available).¹²

According to the Utility Report prepared for the Project and attached as Appendix O, there are two local gas lines that have laterals terminating within the Project Site. There is an existing 10-inch SoCalGas line in Beverly Boulevard and a three-inch SoCalGas line in Ogden Drive (north of the Project Site) that continues east within the northern sidewalk along Beverly Boulevard. As discussed in Section IV.C, Energy, of this Draft EIR, the

⁸ LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017.

⁹ Eyestone Environmental, Energy Calculations for the Television City Project, January 2022; see Appendix D of this Draft EIR.

¹⁰ SoCalGas, Company Profile, www.socalgas.com/about-us/company-profile, accessed February 2, 2022.

¹¹ California Gas and Electric Utilities, 2020 California Gas Report.

¹² California Gas and Electric Utilities, 2020 California Gas Report.

existing uses on the Project Site are estimated to consume 5,733,265 cf of natural gas per year.¹³

(3) Telecommunications

Telecommunication facilities are installed throughout the City by a variety of private utility companies, including AT&T, Charter Communications, DirecTV, Dish Network, Frontier Communications, Charter Spectrum, and Verizon. The majority of the landline facilities are located in County- or City-owned rights-of-way and on private easements. Telecommunications lines are either copper wire or fiber optic cable and are routed overhead on utility poles, as well as underground. In addition, cell phone towers and associated cell phone service exist throughout the City, including along major transportation corridors, to meet general communications and emergency service needs.

Communication and television cable systems located in the Project area include underground fiber optic cable, telephone transmission lines (overhead and underground), and cellular towers owned or leased by telecommunications service providers. All such infrastructure exists on or otherwise serves the Project Site. According to the City of Los Angeles utility purveyor records, AT&T, DirecTV, Dish Network, Frontier Communications, Charter Spectrum, and Verizon all have telecommunications services throughout the City.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.¹⁴

¹³ Eyestone Environmental, Energy Calculations for the Television City Project, February 2022; see Appendix D of this Draft EIR.

¹⁴ Refer to Section IV.G, Hydrology and Water Quality, of this Draft EIR for a discussion of the stormwater infrastructure impacts of the Project; Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of the water supply and infrastructure impacts of the Project; and Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of the wastewater infrastructure impacts of the Project.

In assessing impacts related to energy and telecommunication infrastructure in this section, the City uses Threshold (a) from CEQA Guidelines Appendix G as the threshold of significance. The factors and considerations identified below from the L.A. CEQA Thresholds Guide are used, where applicable and relevant, to assist in analyzing the Appendix G significance threshold:

- Would the project result in the need for new (off-site) energy supply facilities, or major capacity enhancing alterations to existing facilities?
- Whether and when the needed infrastructure was anticipated by adopted plans?

b. Methodology

This analysis of energy infrastructure evaluates the potential impact of the Project on existing energy infrastructure by comparing the estimated Project energy demand with the existing available capacity of the local electricity and natural gas infrastructure to satisfy this demand. Will-serve letters from LADWP and SoCalGas, included as Exhibits 5 and 6 in the Utility Report, provided in Appendix O of this Draft EIR, demonstrate that there is sufficient existing available local energy infrastructure to serve the Project.

The Project's estimated operational electricity and natural gas demand was calculated using CalEEMod Version 2020.4.0. The detailed CalEEMod electricity demand calculations are included in Appendix D of this Draft EIR.

The analysis of telecommunications infrastructure identifies, on a qualitative basis, the need for telecommunications service generated by the Project and the anticipated infrastructure improvements required to provide this service.

c. Project Design Features

The Project includes several Project design features intended to improve energy efficiency, including Project Design Features GHG-PDF-1 and GHG-PDF-2 set forth in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. Per Project Design Feature GHG-PDF-1, the Project would incorporate energy efficiency and conservation features capable of achieving the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold rating or equivalent green building standards. These measures include, but are not limited to, the following: use of light-emitting diode (LED) and other efficient lighting technology; energy saving lighting control systems, such as light- and motion-detection controls (where applicable); energy efficient heating, ventilation, and air conditioning (HVAC) equipment; and use of Energy Star appliances (e.g., refrigerators, air conditioners, and water heaters) consistent with CCR Title 20 (Appliance

Efficiency Regulations). Project Design Feature GHG-PDF-2 would require photovoltaic panels on the Project Site capable of generating a minimum of 2,000,000 kWh annually.

Furthermore, mixed-use projects, such as the Project must be located on an infill site; achieve LEED Gold (or equivalent) certification; be consistent with the relevant regional sustainable communities strategy; and exceed the transportation efficiency for comparable projects by at least 15 percent. As such, certain sustainability measures that have been committed to by the Project Applicant, such as the provision of solar panels on-site (per Project Design Feature GHG-PDF-2), are accounted for in this analysis, where appropriate and quantifiable.

d. Analysis of Project Impacts

***Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*¹⁵**

(1) Impact Analysis

(a) Construction

(i) Electricity

Construction activities at the Project Site would require minimal electricity for lighting, equipment, and construction trailers. The demand would be supplied from existing electrical services within the Project Site and would not affect other nearby, existing services. Furthermore, short-term and intermittent energy usage during construction is generally far less than ongoing usage during a project's operational phase; thus, operational demands are the primary means for analyzing infrastructure capacity. Overall, demolition and construction activities would require minimal electricity consumption as compared to the existing energy usage on-site. Specifically, as discussed in Section IV.C, Energy, of this Draft EIR, Project construction activities are estimated to consume a total of 113,260 kWh of electricity as compared to the existing operational consumption of 11,626,479 kWh annually. Accordingly, Project construction would not have an adverse impact on existing electricity infrastructure.

¹⁵ Refer to Section IV.G, Hydrology, Water Quality and Groundwater, of this Draft EIR for a discussion of the Project's stormwater infrastructure impacts; Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of the Project's water supply and infrastructure impacts; and Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of the Project's wastewater infrastructure impacts.

With regard to electrical distribution lines, the Applicant would be required to coordinate any electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements as part of the connection permit process. This would ensure that potential service disruptions and impacts to existing electricity infrastructure associated with Project construction activities would be minimized. As such, Project construction activities would not adversely affect the existing electrical infrastructure serving the surrounding uses.

Lastly, construction impacts associated with the Project's electrical infrastructure upgrades would primarily be confined to trenching. Infrastructure improvements would comply with all applicable LADWP and City requirements. In addition, while off-site construction activities would be required to connect the existing off-site electricity lines to the proposed on-site electrical infrastructure, any such activities would be minimal, temporary, and would occur within developed areas. In general, the environmental effects associated with on-site construction activities, including the installation of electricity system improvements, are accounted for in the impact analyses throughout this Draft EIR, as appropriate. Furthermore, a Construction Traffic Management Plan would be implemented, as set forth under Project Design Feature TR-PDF-1 in Section IV.K, Transportation, of this Draft EIR, which would maintain traffic flow and safety and ensure that access to adjacent properties is maintained during construction, including during the installation of electricity infrastructure in any public rights-of-way. For the reasons discussed above, construction of the electrical infrastructure required to serve the Project would not cause significant environmental effects.

Based on the above, construction of the Project would not result in an increase in demand for electricity that exceeds the existing available supply or distribution infrastructure capabilities such that construction of new energy facilities or expansion of existing facilities would be required, the construction of which could cause significant environmental effects. Therefore, this impact would be less than significant.

(ii) Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, there would be no demand for natural gas during Project construction and no impact to the capacity of existing natural gas lines in the Project vicinity during construction. However, the Project would involve the installation of new on-site natural gas distribution lines to serve new buildings and connection of this system to the existing 10-inch line in Beverly Boulevard and the existing three-inch line in Odgen Drive/Beverly Boulevard. Nevertheless, for the same reasons discussed above with respect to electricity infrastructure, and because the Project would coordinate the construction of any required natural gas improvements with

SoCalGas, construction activities associated with the installation of the natural gas infrastructure required to serve the Project would not adversely impact existing natural gas lines and would not result in significant environmental effects. Furthermore, a Construction Traffic Management Plan would be implemented, as set forth under Project Design Feature TR-PDF-1 in Section IV.K, Transportation, of this Draft EIR, which would maintain traffic flow and safety and ensure that access to adjacent properties is maintained during construction, including during the installation of natural gas infrastructure in any public rights-of-way.

Based on the above, construction of the Project would not result in an increase in demand for natural gas that exceeds the existing available supply or distribution infrastructure capabilities and would not result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects. Therefore, this impact would be less than significant.

(iii) Telecommunications

Construction activities, including the construction of new buildings and facilities, typically do not involve demand for cable television or telephone and internet land lines, as limited computer and telephone services can be obtained via existing cellular and wireless signals. Accordingly, there would be little to no demand for telecommunications infrastructure during construction, and virtually no impact to the capacity of existing telecommunication lines in the Project vicinity during construction. However, the Project would involve the expansion of the on-site communications system and the connection of these lines to the existing communications lines in the Project Site vicinity. Nevertheless, for the same reasons discussed above with respect to electricity infrastructure, and because the Project would coordinate the construction of any required telecommunications improvements with applicable regulatory agencies, including the ITA, construction activities associated with the installation of any telecommunications infrastructure that may be required to serve the Project would not adversely impact existing telecommunications lines and would not result in significant environmental effects. Furthermore, a Construction Traffic Management Plan would be implemented, as set forth under Project Design Feature TR-PDF-1 in Section IV.K, Transportation, of this Draft EIR, which would maintain traffic flow and safety and ensure that access to adjacent properties is maintained during construction, including during the installation of electricity infrastructure in any public rights-of-way.

Therefore, construction of the Project would not result in an increase in demand for telecommunication infrastructure capabilities and would not result in the relocation or construction of new or expanded telecommunications facilities, the

construction or relocation of which could cause significant environmental effects. As such, this impact would be less than significant.

(b) Operation

As described in Section II, Project Description, of this Draft EIR, the Project would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the modernization and expansion of media production facilities within the approximately 25-acre Television City studio. The proposed Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated circulation improvements, parking, landscaping, and open space. The Specific Plan would provide development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, floor area from any permitted land use category may be exchanged for additional sound stage and production support uses as long as the limitations set forth in the Specific Plan are met. In particular, the total permitted floor area on-site must not exceed 1,874,000 square feet, and the sitewide floor area ratio must not exceed 1.75:1. For more information about the land use exchange component of the Specific Plan, see Section IV.H, Land Use and Planning, of this Draft EIR.

(i) Electricity

As detailed in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, the Project is anticipated to result in a net increase in on-site demand for electricity totaling 18,445,439 kWh per year.¹⁶ As discussed in the Utility Report, LADWP confirmed in its will-serve letter (included in Exhibit 5 of the Utility Report) that the Project's estimated electricity demand could be met by the existing electrical infrastructure in the Project area, including the existing underground conduits in Beverly Boulevard and Fairfax Avenue. Furthermore, the Project would include the installation of any necessary new lines, connections, and upgrades required by LADWP to ensure adequate service to the Project Site.

Based on the above, operation of the Project would not result in an increase in demand for electricity that exceeds the existing available supply or distribution infrastructure capabilities, such that there would be a need for new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, this impact would be less than significant.

¹⁶ As discussed in Section IV.C, Energy, of this Draft EIR, with implementation of the Project design features, the proposed development program would represent the maximum electricity demand scenario under the land use exchange program.

(ii) Natural Gas

As detailed in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, under the proposed development program, the Project is estimated to generate a net increase in on-site demand for natural gas totaling 13,654,855 cf per year. Based on a development mix under the proposed land use exchange program that would generate the maximum natural gas demand for the Project (i.e., a maximum demand scenario), which would involve a land use exchange of 100,000 square feet of production support uses to provide an additional 100,000 square feet of sound stages, the Project's maximum natural gas demand would represent a net increase of 14,522,855 cf. As discussed in the Utility Report, SoCalGas confirmed in its will-serve letter (included in Exhibit 6 of the Utility Report) that the Project's estimated natural gas demand could be met by the existing natural gas infrastructure in the Project area. Furthermore, the Project would include the installation of any necessary new lines, connections, and upgrades required by SoCalGas to ensure adequate service to the Project Site.

Based on the above, operation of the Project would not result in an increase in demand for natural gas that exceeds the existing available supply or distribution infrastructure capabilities, such that there would be a need for new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, this impact would be less than significant.

(iii) Telecommunications

The Project would include the installation of on-site telecommunications infrastructure (e.g., phone lines, cable/internet service, broadcast facilities, etc.) to serve the new buildings and connections to the existing telecommunications infrastructure in the surrounding streets. Such services are typically offered by a variety private providers, and service capacities are generally expanded as needed to meet local and regional demands. When the Applicant submits the Project's telecommunications infrastructure plans reflecting the estimated loads and recommended locations for the telecommunications infrastructure to the respective telephone, cable, and internet companies, each company would determine the most cost-effective systems to provide their services to the Project Site. Specifically, the telephone, cable, and internet companies would work with the Applicant's design and civil engineering team to design telecommunications conduits and lines to bring the necessary phone, cable, and internet service to the new buildings on the Project Site in a timely manner. Upgrades for the proposed Project would involve disconnecting existing connections and establishing new connections to proposed structures, as needed. Such improvements would be localized in nature and would utilize existing conduit and service lines, where feasible, to minimize disruption to City streets and sidewalks. Additionally, any work that may affect service from the existing nearby telecommunications lines would be coordinated with the respective service providers to minimize disruptions.

Therefore, operation of the Project would not result in an increase in demand for telecommunications infrastructure that exceeds the existing available supply or distribution infrastructure capabilities and would not result in the need for new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects. As such, this impact would be less than significant.

(2) Mitigation Measures

Project-level impacts with regard to energy and telecommunication infrastructure would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to energy and telecommunications infrastructure were determined to be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact levels remains less than significant.

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring and Reporting Program (MMRP) throughout the term of the Development Agreement. The Specific Plan and MMRP would continue to regulate development of the Project site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, with a later buildout date, the results of the Project's conservative analyses for electricity, natural gas, and telecommunications would remain unchanged, as a long-term buildout scenario would not affect the maximum demand conditions evaluated above. While future years could generate greater service area demands, the existing electricity, natural gas, and telecommunications infrastructure systems in the surrounding area would continue to be expanded and improved in response to any increased demand, and the service providers for these utilities would continue to evaluate the need for infrastructure upgrades and expansion based on long-term growth and demand projections. As such, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. There are 68 related projects in the Project Site vicinity, as listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR. Of these, 26 related projects are or would be served by LADWP. The projected growth associated with these 26 related projects is a conservative assumption regarding future development, as some of the related projects may not be built out by 2026, may never be built, or may be approved and built at reduced densities. To provide a conservative analysis, the future baseline forecast assumes that these 26 related projects would be fully built out by 2026, unless otherwise noted.

(1) Impact Analysis

(a) Electricity

The geographic context for the cumulative impact analysis on electricity infrastructure is the vicinity of the Project Site; specifically, the area served by the same electricity infrastructure as the Project. Buildout of the Project, the related projects listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, and additional forecasted growth in LADWP's service area together would cumulatively increase the demand for electricity supplies and infrastructure capacity. LADWP forecasts that its commercial sector energy sales in the 2026–2027 fiscal year (2026 being the Project's earliest buildout year) will be an estimated 13,718 GWh of electricity.¹⁷ Data used to develop the LADWP demand forecasts take into account population growth, energy efficiency improvements, and economic growth which includes future construction projects.¹⁸ LADWP indicated in its 2017 Power SLTRP that it has adequate electricity supplies to meet the projected demand within its service area during the 2026-2027 fiscal year and beyond.¹⁹

Electricity supply and infrastructure are typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. LADWP would continue to expand supply and delivery capacity as needed to meet demand increases within its service area. The 2017 Power SLTRP takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency,

¹⁷ LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

¹⁸ LADWP, 2018 Retail Electric Sales and Demand Forecast, November 5, 2018.

¹⁹ LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

conservation, and anticipated changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Furthermore, other development projects would be similarly 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.

LADWP would coordinate with the related projects to provide any necessary electrical infrastructure improvements specific to each development project. The related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet their respective needs. The related projects would be required to provide the necessary infrastructure and system improvements for their individual projects, thereby contributing to the electrical infrastructure in the service area. As discussed above, will-serve letters are provided for individual projects in which LADWP determines whether sufficient infrastructure is in place to provide electricity to a proposed project. As part of the will-serve process, LADWP takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is available. As discussed above, the LADWP will-serve letter for the Project demonstrates that adequate electricity infrastructure is available to serve the Project.²⁰

Based on the above, the Project's contribution to cumulative impacts related to new or expanded electricity infrastructure would not be cumulatively considerable and, therefore, would be less than significant. The cumulative impact of the Project's incremental effect and the effect of the related projects relative to new or expanded electricity infrastructure would be less than significant.

(b) Natural Gas

The geographic context for the cumulative impact analysis on natural gas infrastructure is the vicinity of the Project Site; specifically, the area served by the same gas infrastructure as the Project. Buildout of the Project, the related projects listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, and additional forecasted growth in the SoCalGas service area together would cumulatively increase the demand for natural gas supplies and infrastructure capacity. SoCalGas estimates the natural gas demand within its service area in 2026 (the Project's earliest buildout year) to be 2,317 million cf/day.²¹ Data used to develop the SoCalGas demand forecasts take into account population growth, energy efficiency improvements, and economic growth which

²⁰ KPFF Consulting Engineers, TVC 2050 Project Utility Infrastructure Technical Report: Water, Wastewater and Energy, March 2022. Refer to Exhibit 5 in Appendix O of this Draft EIR.

²¹ California Gas and Electric Utilities, 2020 California Gas Report.

includes future construction projects. SoCalGas indicated in the California Gas and Electric Utilities 2020 California Gas Report that it has adequate natural gas supplies to meet the projected demand within its service area in 2026 and beyond.²²

Natural gas supply and infrastructure are typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas are ongoing. SoCalGas would continue to expand supply and delivery capacity as needed to meet demand increases within its service area. The 2020 California Gas Report takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and anticipated changes in regulatory requirements. Development projects within the SoCalGas service area would also be anticipated to incorporate site-specific infrastructure improvements and 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.

SoCalGas would coordinate with the related projects to provide the necessary natural gas infrastructure improvements specific to each development project. The related projects would be reviewed by SoCalGas to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide the necessary infrastructure and system improvements for their individual projects, thereby contributing to the natural gas infrastructure in the service area. As discussed above, will-serve letters are provided for individual projects in which SoCalGas determines whether sufficient infrastructure is available to provide natural gas to a proposed project. As part of the will-serve process, SoCalGas takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is adequate. As discussed above, the SoCalGas will-serve letter for the Project demonstrates that adequate natural gas infrastructure is available to serve the Project.²³

Based on the above, the Project's contribution to cumulative impacts with respect to new or expanded natural gas infrastructure would not be cumulatively considerable and, therefore, would be less than significant. The cumulative impact of the Project's incremental effect and the effect of the related projects relative to new or expanded natural gas infrastructure would be less than significant.

²² California Gas and Electric Utilities, 2020 California Gas Report.

²³ KPFF Consulting Engineers, TVC 2050 Project Utility Infrastructure Technical Report: Water, Wastewater and Energy, March 2022. Refer to Exhibit 6 in Appendix O of this Draft EIR.

(c) Telecommunications

As the City's land area is largely built out, upgrades in electrical power, natural gas, and telecommunications capabilities are anticipated primarily due to redevelopment activities to improve outdated or underserved areas, upgrades and replacement of outdated infrastructure due to technological advances over time, and redevelopment projects that increase density or require more sophisticated technology. Similar to the Project, the potential environmental impacts from each of the related projects would be reviewed, including potential impacts related to telecommunications infrastructure. The concentration of business and population in the City and rapid technological advances offer the opportunity to provide an integrated network serving as the regional hub for public and private users. Each of the related projects would be required to coordinate with applicable regulatory agencies, including the ITA, and the telecommunications providers to implement the orderly construction, expansion, removal, and/or relocation of telecommunications facilities, as needed. As with the Project, the related projects would be expected to install the necessary telecommunications facilities concurrently with other utilities within roadway rights-of-way to lessen or eliminate potential environmental effects. Necessary telecommunications infrastructure required to serve the cumulative demand for such services would be evaluated, designed, and installed in coordination with the service providers, as needed, to meet the existing and projected service needs of the area in accordance with infrastructure and capital improvement plans. **Based on the above, the Project's contribution to cumulative impacts with respect to new or expanded telecommunications infrastructure would not be cumulatively considerable and, therefore, would be less than significant. The cumulative impact of the Project's incremental effect and the effect of related projects related to new or expanded telecommunications infrastructure would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with regard to energy and telecommunications infrastructure would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

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