IV. Environmental Impact Analysis

C. 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. Section VI, Energy, of the Appendix G Checklist of the State CEQA Guidelines, 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 D 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; Section IV.D, Greenhouse Gas Emissions; and Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure.

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 that apply to the Project. 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
- Phase 1 and 2 Heavy-Duty Vehicle GHG Standards
- Public Utility Regulatory Policies Act of 1978
- 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

(1) Federal

(a) Energy Independence and Security Act of 2007

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

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that require 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
- Establishing miles per gallon (mpg) targets for cars and light trucks and directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks, as superseded by the United States Environmental Protection Agency (USEPA) and National Highway Traffic Safety Administration (NHTSA) actions described below.

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 NHTSA and the 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 raised, automakers respond by

[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.*

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 mpg. Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by the USEPA and the 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]

(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 CAFE regulations.

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

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by the USEPA and the 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 USEPA and the 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.

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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.*

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

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 (EPACT92)

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

Clean Air Act (CAA) Section 211(o), as amended by the Energy Policy Act of 2005, requires the Administrator of the USEPA 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 Energy Policy 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 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 mpg 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 Standards

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.[4] 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 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.[5]

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

[4] *California Public Utilities Commission, California Renewables Portfolio Standard (RPS), 2018.*

[5] *California Public Utilities RPS Program Overview, 2018.*

policy.[6] 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.[7] 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, which became effective on January 1, 2023. The 2022 Title 24 standards continue to improve upon the preceding versions of the Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings, which encourage use of electric heat pumps, requiring newly constructed residences to be electric-ready and introduces solar and battery storage standards as an optional measure to achieve compliance and increases minimum ventilation requirements to improve air quality.

(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 2022 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.[8] The 2022 CALGreen Code improves upon the preceding versions of the CALGreen Code by simplifying the code and its application by offering new voluntary prerequisites for builders to choose from. Such measures include battery storage systems, electric heat pump space and water heating which encourage

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[6] *California Energy Commission, California Public Utilities Commission, 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.*

[7] *California Energy Commission, California Public Utilities Commission, 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 Building Standards Commission, Guide to the 2022 California Green Building Standards Code Nonresidential, 2022.*

building electrification. The 2022 CALGreen Code went into effect on January 1, 2023. Refer to Section IV.D, 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_2) emissions, Assembly Bill (AB) 1493 (commonly referred to as 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.[9,10] In March 2020, the NHTSA and the USEPA issued the SAFE Vehicles Rule, which amends existing CAFE standards and tailpipe CO_2 emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026. Refer to Section IV.D, Greenhouse Gas Emissions, of this Draft EIR for additional details regarding this regulation.

(e) California Air Resources Board

(i) Scoping Plan

AB 32 required CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (Health and Safety Code [HSC] Section 38561 (h)). The 2008 Climate Change Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[11] The 2008 Climate Change Scoping Plan had a range of GHG reduction actions, which included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a Cap-and-Trade Program, and an AB 32 implementation fee to fund the program.

The 2008 Climate Change Scoping Plan called for a "coordinated set of solutions" to address all major categories of GHG emissions. Transportation emissions were addressed

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

10 *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.*

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

through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to use energy more efficiently. Utility energy providers were required to include more renewable energy sources through implementation of the RPS.[12] Additionally, the 2008 Climate Change Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicates that substantial savings of electricity and natural gas will be accomplished through "improving energy efficiency by 25 percent."

The 2008 Climate Change Scoping Plan identified several specific issues relevant to development projects, including:

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting that:

  > A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.

- The importance of supporting the Department of Water Resources' work to implement the Governor's objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The Climate Change Scoping Plan notes that water use requires significant amounts of energy, including approximately one-fifth of Statewide electricity.

- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

The latest update is the 2022 Scoping Plan, which is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-

[12] *For a discussion of Renewables Portfolio Standard, refer to subsection California Renewables Portfolio Standard.*

effective, and equity-focused path to achieve new targets for 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.[13] Measures to reduce GHG emissions include building decarbonization, energy efficiency improvements and transportation electrification.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

(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.[14] The program requires a greater number of zero-emissions vehicle (ZEV) 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 ZEV regulations 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.

(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

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

[14] *California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493, www.arb.ca.gov/msprog/acc/acc.htm, accessed October 4, 2023.*

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 beginning on 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 the 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 VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, the 2020–2045 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, 2012, and 2016 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.[15] Specific targets included the construction of new housing units within 1,500 feet of transit by 2017, reducing VMT per capita by five 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.

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

In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAn renamed as LA's Green New Deal, which consist of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.[16] The Green New Deal 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 foot for all building types 22 percent by 2025, 34 percent by 2035, and 44 percent by 2050 (from a baseline of 68 thousand British thermal units (mBTU) per square foot 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.
- 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 vehicles (EVs) and ZEVs 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.

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

- 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 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 0.5 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 EV charging spaces and water efficiency, which result in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency. In December 2022, the City approved Ordinance No. 187,714, which requires newly constructed buildings to be all electric. Cooking equipment contained within kitchens in a public use area, such as restaurants, commissaries, cafeterias, and community kitchens is exempt as long as electrical infrastructure is installed. Gas-powered process equipment Occupancy Groups I-2 (institutions such as hospitals), F (industrial) and L (laboratories), provided the electrical infrastructure is installed in accordance with Section 99.05.106.14.1 are also exempt.

(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.[17] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their

[17] *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.*

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 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 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 Resources Plan, the LADWP has a net dependable generation capacity greater than 8,101 MW.[18] In 2017, the LADWP power system experienced an instantaneous peak demand of 6,502 MW.[19] Approximately 35.6 percent of LADWP's 2021 electricity purchases were from renewable sources, which is similar to the 35.8 percent statewide percentage of electricity purchases from renewable sources.[20]

LADWP supplies electrical power to the Project Site from electrical service lines located in the Project vicinity. As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by a mixed-use development known as The Bloc. The northern portion of the Project Site (outside of the Development Area) contains an office tower, a high-rise hotel, commercial/retail uses and an expansive plaza that includes a portal to the Metro 7th Street/Metro Center Station. The southern portion of the Project Site constitutes the Development Area and is currently developed with a nine-story parking/retail podium building, which includes five stories of enclosed parking, four stories of existing commercial/retail floor area, and rooftop parking. The Project Site also has two existing basement levels below the podium building, which consist of one level of vehicle parking and one level of loading areas and a gym/fitness use. Existing uses within The Bloc comprise approximately 1,424,314 square feet of floor area comprised of 656,423 square feet of office space, 28,599 square feet of medical office space, 269,622 square feet of retail uses, 23,180 square feet of restaurant/dining areas, 30,363 square feet of fitness uses, a 28,770-square-foot theater that includes 569 fixed seats, and a 387,357-square-foot hotel that includes 496 rooms and 25,282 square feet of meeting/banquet spaces. The Project Site also includes approximately 1,971 parking spaces. Approximately 24,243 square feet of existing commercial uses would be removed for the Project, which currently consume approximately 262,494 kWh of electricity per year.[21]

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

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

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

[21] *Eyestone Environmental, Energy Calculations for The Bloc Project. See Appendix D of this Draft EIR.*

(2) Natural Gas

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

Natural gas is provided to the Project Site by the Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.[22]

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.[23] The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.[24] 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).[25] SoCalGas supplies natural gas to the Project Site from natural gas service lines located in the Project vicinity. It is estimated that existing uses to be removed on the Project Site currently consume approximately 114,203 cubic feet of natural gas per year.[26]

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

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

[24] *California Gas and Electric Utilities, 2022 California Gas Report, p. 136.*

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

[26] *Eyestone Environmental, Energy Calculations for The Bloc Project. See Appendix D of this Draft EIR.*

(3) Transportation Energy

According to the U.S. Energy Information Administration, transportation accounts for nearly 38 percent of California's total energy consumption in 2021.[27] In 2022, California consumed 13.6 billion gallons of gasoline and 3.1 billion gallons of diesel fuel.[28,29] Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.[30] 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. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity.[31] According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources consumed 3.998 billion gallons of gasoline and 600 million gallons of diesel fuel in 2022.[32]

The estimate of annual VMT associated with the existing Project Site uses to be removed is 1,604,905 VMT per year.[33] This translates to 65,039 gallons of gasoline and 9,688 gallons of diesel per year based on current (2022) fuel economy averages.[34]

3. Project Impacts

a. Thresholds of Significance

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

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[27] *U.S. Energy Information Administration. California State Profile and Energy Estimates. Consumption by Sector: www.eia.gov/state/?sid=CA#tabs, accessed October 4, 2023.*

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

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

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

[31] *CEC, 2015 Integrated Energy Policy Report, docketed June 29, 2016, p. 113.*

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

[33] *Eyestone Environmental, Energy Calculations for The Bloc Project, see Appendix D of this Draft EIR.*

[34] *Eyestone Environmental, Energy Calculations for The Bloc Project, see Appendix D of this Draft EIR.*

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

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- 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 were considered in determining whether this threshold of significance is met:

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.

8. Whether the project conflicts with adopted energy conservation plans.

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

b. Methodology

CEQA Guidelines Appendix F provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where topics are applicable or relevant to the Project:

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

- The effects of the project on local and regional energy supplies and on requirements for additional capacity;

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

- The degree to which the project complies with existing energy standards;

- The effects of the project on energy resources; and

- The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

(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.[35] Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated using CalEEMod.[36] 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).[37] Although the Project Site would use electricity from poles where possible, electricity demand calculations were based on the SCAQMD construction surveys which identifies 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 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 B of this Draft EIR and calculations are provided in Appendix D of this DEIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of the SCAQMD *CEQA Air Quality Handbook*. Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total VMT was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC 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 D of this Draft EIR for detailed calculations.

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[35] *Construction activities include demolition of the existing site, site preparation, grading, building construction, building finishes, landscaping and paving.*

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

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

(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 and accounting for Ordinance 187714 as part of the GHG analysis included in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR.

Energy impacts associated with transportation during operation were also assessed. Daily trip generation used in this analysis was based on *Transportation Assessment for The Bloc Residential Tower and Signage SUD Project* dated January 2023, and revised September 2023 (Transportation Assessment), included as Appendix I.1 of this Draft EIR.[38] As discussed therein, the Project daily VMT was calculated using the Los Angeles Department of Transportation (LADOT) VMT Calculator. The resulting annual VMT was used as part of the GHG analysis included in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. Based on this annual VMT, gasoline and diesel consumption rates were calculated using the County-specific mpg 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 D of this Draft EIR. These calculations were used to determine if the Project would cause the wasteful, inefficient and/or unnecessary consumption of energy as required by Appendix F of the CEQA Guidelines.

The Project's estimated energy demands were also analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2031 (i.e., the Project buildout year) to determine if these two energy utility companies would be able to meet the Project's energy demands.

c. Project Design Features

The Project would include project design features designed to improve energy efficiency as set forth in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, including Project Design Feature GHG-PDF-1. These features include, but are not limited to, use of Energy Star–labeled products and appliances, light-emitting diode lighting, fenestration for solar orientation, and short- and long-term bicycle parking. The Project would also include water conservation and waste reduction measures as set forth by Project Design Feature WAT-PDF-2 in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR.

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[38] *Gibson Transportation Consulting, Inc., Transportation Assessment for The Bloc Residential Tower and Signage SUD Project, Los Angeles, California, January 2023, revised February 2024.*

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 described in Subsection IV.C.3.a, Thresholds of Significance, in order 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 addresses 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).[39]

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. After completion of full or partial construction of the Project, removal activities would include demolition or abandonment of the Project Site. However, it is not known if or when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

(i) Construction

As discussed in more detail below, 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

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

be limited in comparison to existing operational electricity usage at the Project Site given that construction activities would be intermittent and temporary. As discussed below, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As shown in Table IV.C-1 on page IV.C-26, a total of 50,643 kWh of electricity, 77,658 gallons of gasoline, and 667,498 gallons of diesel is estimated to be consumed during Project construction. Project construction is expected to start in 2027 and be completed by 2031.

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. This would be 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.[40]

As shown in Table IV.C-1, a total of approximately 50,643 kWh of electricity is 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 and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, long-term construction lighting (longer than 120 days) providing illumination for the construction site and staging areas would also comply with applicable Title 24 requirements, which include limits on the wattage allowed per specific area, resulting in the conservation of energy.[41] As such, the demand for electricity during construction would not cause wasteful, inefficient, or unnecessary use of energy.

[40] *Analysis conservatively assumes that electrical power during construction will be provided by diesel generators.*

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

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

Fuel Type	Quantity
Electricity	
Water Consumption	4,224 kWh
Lighting and other construction activities necessitating electrical power[b]	27,317 kWh
Electric Equipment	19,102 kWh
Total Electricity	**50,643 kWh**
Gasoline	
On-Road Construction Equipment[c]	77,658 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	**77,658 gallons**
Diesel	
On-Road Construction Equipment[c]	563,063 gallons
Off-Road Construction Equipment[d]	104,435 gallons
Total Diesel	**745,156 gallons**

kWh = kilowatt hours

[a] *Detailed calculations are provided in Appendix D 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. This is a conservative assumption as electrical power will be provided via power poles where available.*

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

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

Source: Eyestone Environmental, 2023.

The estimated construction electricity usage represents approximately 19.3 percent of the annual operational demand of 262,494 kWh currently consumed by the existing uses to be removed, which, as discussed below, would be within the supply capabilities of LADWP.[42] Moreover, construction electricity usage would be somewhat offset by the removal of existing on-site uses, which currently generate a demand for electricity.

[42] *The percentage is derived by taking the total amount of electricity usage during construction (50,643 kWh) and dividing that number by the total amount of net electricity usage during operation (262,494 kWh) to arrive at 19.3 percent.*

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas, and the use of natural gas-powered equipment is not anticipated as part of Project construction. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated for natural gas during construction.

Transportation Energy

The petroleum-based fuel use summary provided above in Table IV.C-1 on page IV.C-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 D of this Draft EIR. Construction assumptions assume that the maximum activity (equipment usage and truck trips) would be occurring every day even though such activity would not occur throughout the entire construction phase. As shown, on- and off-road vehicles would consume an estimated 77,658 gallons of gasoline and approximately 667,498 gallons of diesel fuel throughout the Project's construction period (2027–2031). For comparison purposes, the fuel usage during Project construction would represent approximately 0.002 percent of the 2027 (start year of Project construction) annual on-road gasoline-related energy consumption and 0.107 percent of the 2027 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix D of this Draft EIR.[43]

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, or unnecessary use of energy, and impacts would be less than significant.

[43] *The gasoline percentage is derived by taking the total amount of gasoline usage during construction (77,658 gallons) and dividing that number by the total amount of net gasoline usage during operation (3.678 billion gallons) to arrive at 0.002 percent. The diesel percentage is derived by taking the total amount of diesel usage during construction (667,498 gallons) and dividing that number by the total amount of net gasoline usage during operation (623 million gallons) to arrive at 0.107 percent.*

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. 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. The production methods and source of construction materials are not known. Also, it is not known how Project building materials (steel, concrete, lumber) would be recycled or disposed at end of life. As energy usage would vary widely depending on the production methods, source location, recycling or disposal methods used for building materials, it would be speculative to assess energy usage for production and disposal of Project building materials. 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

As discussed in more detail below, during operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, 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.C-2 on page IV.C-29, the Project's net new energy demand would be approximately 4,571,455 kWh of electricity per year, 40,719 gallons of gasoline per year, and 7,243 gallons of diesel fuel per year. The net reduction of 114,203 cf per year in natural gas is due to the Project not including any natural gas-powered equipment during operations in compliance with Ordinance No. 187,714, which requires all new buildings to be all-electric.

Electricity

As shown in Table IV.C-2, with compliance with Title 24 standards and applicable CALGreen Code requirements, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 4,571,455 kWh per year. In addition to complying with CALGreen Code, the Applicant would also implement Project Design Feature GHG-PDF-1 in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would incorporate sustainability features (e.g., Energy Star-labeled products, and use of LED lighting), and Project Design Feature WAT-PDF-2, presented in Section IV.J.1, Utilities and Service Systems—Water

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

Source	Estimated Energy Demand During Project Operations
Electricity	
Building	3,330,291 kWh
Digital Signs	1,064,726 kWh
Water[b]	136,177 kWh
EV Chargers[c]	40,261 kWh
Total Electricity[d]	**4,571,455 kWh**
Natural Gas	
Building	-114,203 cf
Total Natural Gas[d]	**-114,203 cf**
Transportation (On-Road Vehicles and Off-Road Equipment)	
Gasoline	40,719 gal
Diesel	7,243 gal
Total Transportation[e]	**47,962 gal**

cf = cubic feet

gal = gallons

[a] *Detailed calculations are provided in Appendix D of this Draft EIR. Totals may not add up due to rounding. Project energy demand is all net new. Existing energy usage includes 262,494 kWh per year of electricity, 114,203 cu ft per year of natural gas, 56,533 gallons per year of gasoline, and 10,056 gallons per year of diesel.*

[b] *Calculations assume compliance Los Angeles Green Building Code Chapter 4.303.4, which requires a 20-percent reduction in water usage compared to baseline. As quantifiable measures to reduce water usage are consistent with City code, no water reduction credit was assumed in the analysis.*

[c] *Consistent with City Code, 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. The parking spaces capable of supporting future EVSE and the parking spaces equipped with EV charging stations would apply to the new parking spaces on the new parking levels.*

[d] *Electricity and natural gas estimates assume compliance with applicable CALGreen Code requirements, City Ordinance No. 187,714, and implementation of Project Design Feature GHG-PDF-1, in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR.*

[e] *Transportation fuel estimates include Project characteristics consistent with the LADOT VMT Calculator. Fuel estimates conservatively do not include reductions in fuel usage associated with implementation of EV charging stations.*

Source: Eyestone Environmental, 2023.

Supply and Infrastructure, of this Draft EIR, which states that the Project would incorporate water conservation features, such as high-efficiency Energy Star–rated residential clothes washers and dishwashers, drought-tolerant plans, and drip/subsurface irrigation, among

others. Project Design Features GHG-PDF-1 and WAT-PDF-2 would reduce the Project's energy demand but conservatively have not been incorporated into the calculation of the Project's energy usage. In addition, the Project would be subject to the 2022 Title 24 standards. As CalEEMod is based on 2019 Title 24 standards, this analysis conservatively does not take into account additional energy usage reductions under 2022 Title 24 standards. Future iterations of Title 24 standards are expected to increase energy efficiency requirements, and the Project would be required to comply with the latest Title 24 standards. In addition, the Project would be required to comply with the City's All-Electric ordinance, which does not allow installation of natural gas-powered equipment (stoves, water heaters, space heating) within residential uses. While this would result in a decrease in natural gas usage, electricity usage would increase as a result.

LADWP is required to procure at least 60 percent of their energy portfolio from renewable sources by 2030. The current sources procured by LADWP include wind, solar, geothermal sources, hydroelectric, and biomass/biowaste. These sources account for 35.6 percent of LADWP's overall energy mix in 2022, the most recent year for which data are available.[44] This represents the available off-site 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 as renewable energy generation increases.

The Project would also comply with lighting requirements in the SUD, which restrict internally illuminated Project signs to a maximum allowed lighting power of 12 watts per square foot.

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2031–2032 fiscal year (the Project's buildout year) would be 25,135 GWh of electricity.[45,46] As such, the Project-related net increase in electricity consumption of 4,571,455 kWh per year would represent approximately 0.02 percent of LADWP's projected sales in 2031.[47] In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

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[44] *LADWP 2022 Power Content Label.*

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

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

[47] *1 GWh = 1,000,000 kWh; 4.579843÷25,135=0.00018 (approximately 0.02 percent).*

Natural Gas

The Project would be subject to the City's all-electric ordinance, which does not allow for natural gas equipment to be installed as part of the Project. Accordingly, removal of existing uses, which consume natural gas, would result in a net decrease in natural gas consumption. Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area would be approximately 2.090 billion cf per day in 2031 (the Project's buildout year).[48] The Project, with a net decrease in natural gas consumption, would not affect SoCalGas' 2031 forecasted consumption in SoCalGas' planning area.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The Project Site is located in an HQTA designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth," regional planning perspective.[49,50,51] As discussed in Section IV.H, Transportation, of this Draft EIR, the Project Site contains a portal to the Metro 7th Street/Metro Center Station, which provides access to the Metro B (Red) Line, Metro D (Purple) Line, Metro A (Blue)

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

[49] *The City's ZIMAS identifies the Project Site as also located in a Transit Priority Area as defined by Public Resources Code Section 20199. Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5-mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." The Project Site contains a portal to the Metro 7th Street/Metro Center Station.*

[50] *Smart growth is an approach to development that encourages a mix of building types and uses, diverse housing and transportation options, development within existing neighborhoods, and community engagement. Smart growth includes the following ten principles: mix land uses; take advantage of compact building design; create a range of housing opportunities and choices; create walkable neighborhoods; foster distinctive, attractive communities with a strong sense of place; preserve open space, farmland, natural beauty, and critical environmental areas; strengthen and direct development towards existing communities; provide a variety of transportation choices; make development decisions predictable, fair, and cost effective; and encourage community and stakeholder collaboration in development decisions. Source: U.S. Environmental Protection Agency and the International City/County Management Association, This is Smart Growth, 2014; Smart Growth America, What is smart growth?, https://smartgrowthamerica.org/our-vision/what-is-smart-growth/, accessed February 27, 2023; SCAG 2020–2045 RTP/SCS, "Smart Growth Principles," page 174.*

[51] *SCAG, 2020–2045 RTP/SCS; Exhibit 3.8: High Quality Transit Areas in the SCAG Region for 2045 Plan, p. 90.*

Line, and Metro E (Exposition) Line to provide residents and guests with various public transportation opportunities. In accordance with the LAMC, the Project would provide short- and long-term bicycle parking spaces consistent with applicable regulations. Additionally, the Project would be located in Downtown Los Angeles on a site conducive to promoting walkability due to the proximity of existing commercial, retail, employment, and entertainment uses within the area.

The Project would implement VMT reduction strategies to reduce vehicle trips and associated energy usage.[52] Such strategies include increasing the density of housing in comparison to existing on-site uses and being located close to major job or residential centers (Downtown Los Angeles and Hollywood). As such, the Project's siting would lessen transportation fuel consumption through the reduction of VMT, as described above and discussed further in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. With implementation of these strategies to reduce the Project's vehicle trips, net transportation-fuel usage would be reduced for both gasoline and diesel fuels.

Prior to July 1, 2020, and SB 743, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.[53] 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.

As summarized in Table IV.C-2 on page IV.C-29, when accounting for the strategies that would be implemented to reduce VMT, the Project's estimated petroleum-based fuel usage would result in a net increase of 40,719 gallons of gasoline and 7,243 gallons of diesel per year or a total of 47,962 gallons of petroleum-based fuels annually.

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[52] *See section IV.H, Transportation, of this Draft EIR, for applicable VMT reduction measures.*

[53] *Environmental Protection Agency, Mixed-Use Trip Generation Model. www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed February 27, 2023.*

(iii) Summary of Energy Requirements and Energy Use Efficiencies

As discussed previously, the energy calculations also took into account energy efficiency measures such as Title 24, CALGreen Code, and vehicle fuel economy standards. Table IV.C-1 and Table IV.C-2 on pages IV.C-26 and IV.C-29, respectively, provide a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 50,643 kWh of electricity would be consumed along with 745,156 gallons of transportation fuel (gasoline and diesel). During Project operation, a total of 4,571,455 kWh of electricity and 47,962 gallons of transportation fuel would be consumed on an annual basis. Moreover, the Project would result in a 114,203 cf per year net reduction of natural gas usage due to compliance with Ordinance 187714. Details are provided in Appendix D of this Draft EIR. Based on the Project's energy requirements and its energy use efficiencies, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. Therefore, the Project would result in less-than-significant impacts on energy resources.

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

(i) Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 19.3 percent of the annual operational demand of 262,494 kWh currently consumed by the existing uses to be removed, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.[54] Furthermore, the electricity demand during construction would be somewhat offset by the removal of the existing on-site uses, which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction. Transportation fuel usage during Project construction activities would represent approximately 0.002 percent of

[54] *The percentage is derived by taking the total amount of electricity usage during construction (50,643 kWh) and dividing that number by the total amount of electricity usage during operation of existing uses to be removed (262,494 kWh) to arrive at 19.3 percent.*

gasoline usage and 0.107 percent of diesel usage within Los Angeles County, respectively. As energy consumption during Project construction activities would be relatively negligible, the Project would not affect local and regional energy supplies or the requirements for additional capacity in years during the construction period. As such, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction. Therefore, the Project would result in less-than-significant impacts on energy resources.

(ii) Operation

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2031–2032 fiscal year (the Project's buildout year) will be 25,135 GWh of electricity.[55,56] As such, the Project-related net increase in electricity consumption of 4,571,455 kWh per year would represent approximately 0.02 percent of LADWP's projected sales in 2031.[57] Furthermore, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.[58] Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

As stated above, the Project's estimated net decrease in demand for natural gas is 144,203 cf per year. Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimated natural gas consumption within SoCalGas' planning area would be approximately 2.090 billion cf per day in 2031 (the Project's buildout year).[59] The Project would not affect the 2031 forecasted consumption in SoCalGas' planning area.

At buildout, the Project would result in an increase of 40,719 gallons of gasoline and 7,243 gallons of diesel per year or a total of 47,962 gallons of petroleum-based fuels consumed per year, as shown in Appendix D of this Draft EIR. Transportation fuel usage during Project operational activities would represent approximately 0.001 percent of gasoline and diesel usage within Los Angeles County.

In sum, as energy consumption during Project operations would be relatively negligible, the Project would not affect local and regional energy supplies or the

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

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

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

[58] *KPFF Consulting Engineers, The Bloc Residential Tower*—Utility Infrastructure Technical Report: Water and Energy*, May 2023.*

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

requirements for additional capacity within LADWP's and SoCalGas' service area. As such, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project operation. Therefore, the Project would result in less-than-significant impacts on energy resources.

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

As discussed above, electricity demand during construction and operation 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.[60] In 2018, the LADWP power system experienced a peak of 6,195 MW on July 6, 2018. The 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 2031, the base case peak demand for the power grid will be 6,069 MW.[61] Under peak conditions, the Project would consume 990 kW.[62] In comparison to the LADWP power grid base peak load of 6,069 MW in 2031, the Project would represent approximately 0.02 percent of the LADWP base peak load conditions. 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.[63] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid. As discussed above, natural gas demand during operations would result in a net reduction of natural gas usage onsite. Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimated natural gas consumption within SoCalGas' planning area would be approximately 2.090 billion cf per day in 2031 (the Project's buildout year).[64] The Project would not affect the 2031 forecasted consumption in SoCalGas' planning area. As such, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

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

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

[62] *Eyestone Environmental, Energy Calculations for The Bloc Project, See Appendix D of this Draft EIR.*

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

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

(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 (including 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.[65] Electricity and natural gas usage during Project operations presented in Table IV.C-2 on page IV.C-29 would comply with 2022 Title 24 standards and applicable CALGreen Code 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 required CAFE fuel economy. Project-related vehicle trips would also comply with Pavley and LCFS, which are designed to not only reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards, as required.

Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption. As such, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

(e) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP's most recently adopted 2017 Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity.

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

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.[66] According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.[67] As the Project will comply with Ordinance 187,714 and not consume natural gas, Project construction and operation activities would not affect SoCalGas' 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, 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 over 50 years of consumption.[68] As discussed previously, the Project transportation fuel consumption during operations would represent 0.001 percent of the gasoline and diesel usage within Los Angeles County. The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also result in lower emissions by complying with Pavley and LCFS, which are designed to not only reduce GHG emissions but would also result in fuel savings in addition to compliance with CAFE standards. In addition, the Project would include provisions to 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. Moreover, the Project will provide EV parking spaces and EV Supply Equipment in accordance with the LAMC. In addition, the Project is located within an HQTA as the Project site contains a portal to the Metro 7th Street/Metro Center Station, which would encourage use of mass transit, further reducing transportation fuel usage during Project operations. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

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

[67] *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed February 27, 2023.*

[68] *BP Global, Oil Reserves, www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html, accessed February 27, 2023.*

As discussed above in Subsection IV.C.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 would require retail sellers of electric services to increase procurement from eligible renewable energy resources to 50 percent renewable resources target by December 31, 2026, and 60 percent by December 31, 2030. Accordingly, LADWP is required to procure at least 60 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 35.6 percent of LADWP's overall energy mix in 2022, the most recent year for which data are available.[69] 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, and 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 procured by LADWP would indirectly reduce consumption of fossil fuels.

With regard to on-site renewable energy sources, Title 24 requires Photovoltaic (PV) and Battery Storage systems for new construction, with exceptions for buildings that do not have sufficient roof area to install PV systems. Based on the amount of rooftop available, the Project would be exempt from Title 24 PV and battery storage system requirements.[70] In addition, 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.[71]

In sum, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, and Project construction and operation activities would result in less-than-significant impacts on energy resources.

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

[70] *California Energy Commission. 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings. Section 140.10.*

[71] *NREL, California—Annual Average Wind Speed at 80 m.*

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

The Project's high-density design and proximity to retail and employment uses would allow for more residents to live closer to shopping and employment areas, reducing the VMT. The design, which includes dedicated bicycle parking facilities within the Project Site also encourages non-automotive forms of transportation, such as walking or biking to nearby destinations. In addition, the Project Site contains a portal to the Metro 7th Street/ Metro Center Station, which provides access to the Metro B (Red) Line, Metro D (Purple) Line, Metro A (Blue) Line, and Metro E (Exposition) Line. Additional transit options near the Project Site include the Metro local line 51 and 66; LADOT Commuter Express (CE) routes 409, 422, 423, 431, 437, 448, and 534; LADOT Downtown Area Short Hop (DASH) A, E, and F; Antelope Valley Transportation Authority (AVTA) 785; Metro Express 460 and J (Silver) line; Torrance Transit Route 4X; and Orange County Transportation Authority (OCTA) 701. This portal would contribute to a reduction in trips due to the accessibility of mass transit. With the reduction in trips, the Project would result in a 52-percent reduction in VMT compared to a Project without reduction features, with a corresponding reduction in the Project's petroleum-based fuel usage.[72,73] Therefore, the Project would encourage the use of efficient transportation alternatives. As such, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

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

The Project would be required to comply with the applicable provisions of the 2022 Title 24 standards, which include the CALGreen Code, and the Los Angeles Green Building Code.

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

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[72] *The Project without reduction features scenario does not account for energy efficiency measures that would exceed the Title 24 Building Standards Code or trip reductions.*

[73] *VMT reduction calculations provided in Appendix B, Air Quality and Greenhouse Gas Emissions, of this Draft EIR, CalEEMod Vehicle Trip Input Calculations, p. 298.*

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 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. The City also approved the Waste Hauler Permit Program (Ordinance No. 181,519, LAMC Chapter VI, Article 6, Section 66.32-66.32.5), which requires private waste haulers to obtain AB 939 Compliance Permits to transport construction and demolition waste to City-certified construction and demolition waste processors. Thus, through compliance with the City's solid waste recycling programs, the Project 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 applicable energy conservation policies and regulations.

In addition, Project Design Feature GHG-PDF-1 would incorporate sustainability features beyond 2022 Title 24 requirements such as use of Energy Star appliances, LED lighting and fenestration designed for solar orientation. Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements.

Project Design Feature WAT-PDF-2 in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, states that the Project would implement water conservation features, including high-efficiency Energy Star–rated residential clothes washers and dishwashers, drought-tolerant plans, and drip/subsurface irrigation, among others. While some measures contained in WAT-PDF-2 are consistent with the City of LA Green Building Code, other measures such as drip irrigation, hydro-zoning and use of drought-tolerant plants would reduce water usage beyond what is required by City code. A reduction in water usage would in turn reduce the amount of electricity used for water conveyance. Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements. As such, the Project would not result in potentially significant environmental impacts due to

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

wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

(h) Whether the Project conflicts with adopted energy conservation plans

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the Los Angeles Green Building Code, and City ordinance No. 187,714.

With regard to transportation uses, the Project design would reduce VMT within the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.E, 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 the three principles most critical to the future of the region. As part of the approach, the 2020–2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2020–2045 RTP/SCS. Most notably, the Project would be a residential development with 466 dwelling units located in an area characterized by a high degree of pedestrian activity, transit, jobs, and services. The 2020–2045 RTP/SCS also identifies HQTAs, 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.[75] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The Project Site is located within an HQTA as designated by the 2020–2045 RTP/SCS.[76] The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including the Metro 7th Street/Metro Center Station, as evidenced by the Project Site's location within a designated HQTA.[77]

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[75] *SCAG, 2020–2045 RTP/SCS, p. 23.*

[76] *SCAG, 2020–2045 RTP/SCS, Exhibit 3.8: High Quality Transit Areas in the SCAG Region for 2045 Plan, p. 90.*

[77] *SCAG, 2020–2045 RTP/SCS, Exhibit 3.8: High Quality Transit Areas in the SCAG Region for 2045 Plan, p. 90; The City's ZIMAS identifies the Project Site as also located in Transit Priority Area as defined by Public Resources Code Section 20199. Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5-mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."*

(Footnote continued on next page)

The introduction of new housing within an HQTA, as proposed by the Project, is consistent with the policies in the 2020–2045 RTP/SCS related to locating new housing and jobs near transit. The 2020–2045 RTP/SCS is expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

As discussed above, the Project would result in a 52-percent reduction in VMT compared to a project without reduction features when taking into account features, such as high-density design, walkability, and access to mass transit.[78] With this reduction in VMT, the Project would be consistent with goals of the 2020–2045 RTP/SCS and SB 375 requirements.

In addition, the Project would comply with State energy efficiency 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 and transportation fuel. Based on the above, the Project would not conflict with adopted energy conservation plans.

(i) 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, or unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity future projections for the region. As discussed previously, gasoline fuel usage for the region is expected to decline over the next 10 years. Transportation fuel supply is not expected to decrease significantly over this same period and 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 operations, the Project would comply with existing energy efficiency requirements, such as CALGreen Code, as well as include energy conservation measures beyond requirements. **In summary, the Project's energy demands would comply with existing energy efficiency standards and would not cause wasteful, inefficient, or unnecessary use of energy. Therefore, Project**

Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."

[78] *VMT reduction calculations provided in Appendix B, CalEEMod Vehicle Trip Input Calculations.*

impacts related to energy use under Threshold (a) would be less than significant during construction and operation.

(2) Mitigation Measures

Project-level impacts with related to the wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As discussed in Subsection IV.C.3.d.(1)(a)(h) above, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2022 CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

With regard to transportation related energy usage, the Project would comply with goals of the SCAG's 2020–2045 RTP/SCS, which incorporates VMT targets established by SB 375. The Project's residential development and proximity to public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would have reduced emissions in compliance with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, the Project would not conflict with adopted energy conservation plans or violate state or federal energy standards. **Therefore, Project impacts associated with 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 were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

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

Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. Based on the information presented in Section III, Environmental Setting, of this Draft EIR, there are 44 related projects located within the vicinity of the Project Site. The geographic context for the cumulative analysis of electricity is LADWP's service area, and the geographic context for the cumulative analysis of natural gas is SoCalGas' service area. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Project in the context of County-wide consumption. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy.

(i) Electricity

Although Project 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 more energy-efficient, and would be consistent with growth expectations for LADWP's service area. The Project also would incorporate energy efficiency measures to 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.

Additionally, as discussed above, 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 accounted for 35.6 percent of LADWP's overall energy mix in 2022, the most recent year for which data are available.[79] 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, the Project's contribution to cumulative impacts related to wasteful, inefficient, or unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.**

(ii) Natural Gas

Project operations would not result in the use of natural gas due to compliance with the City's All-Electric Ordinance. Furthermore, future development projects within SoCalGas' service area would be expected to incorporate energy conservation features; comply with applicable regulations, including the CALGreen Code and State energy standards under Title 24; and incorporate mitigation measures, as necessary. **As such, the Project would not have any contribution to cumulative impacts related to wasteful, inefficient, or unnecessary use of natural gas.**

(iii) Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the State and in the County. As described above, at buildout, the Project would result in an increase of 40,719 gallons of gasoline and 7,243 gallons of diesel per year, or a total of 47,962 gallons of petroleum-based fuels consumed per year, as shown in Appendix D of this Draft EIR.

Related projects in the Project vicinity would also be infill projects locating uses near other residential and commercial uses, which would reduce distance traveled, 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. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions, which, in turn, would reduce fuel consumption.

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

Furthermore, as described above, the Project would be consistent with the energy efficiency policies emphasized by the 2020–2045 RTP/SCS. Specifically, the Project would be a residential development located in an area that is characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, and would be well-served by existing public transportation, including Metro's 7th Street/ Metro Center Station, which contains the Metro B (Red) Line, Metro D (Purple) Line, Metro A (Blue) Line, and Metro E (Exposition) Line. Additional transit options in the Project vicinity include the Metro local line 51 and 66; LADOT CE routes 409, 422, 423, 431, 437, 448, and 534; LADOT DASH A, E, and F; AVTA 785; Metro Express 460 and J (Silver) line; Torrance Transit Route 4X; and OCTA 701. The Project also would introduce new housing opportunities (generated from the proposed 466 dwelling units) within a HQTA, which is consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new housing near transit.[80] Although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2045, the 2020–2045 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2045.[81] It is anticipated that in future years, SB 375 would have more stringent reduction targets. Implementation of the 2020–2045 RTP/SCS would result in an estimated 19-percent decrease in per capita GHG emissions by 2035. Implementation of the 2020–2045 RTP/SCS is expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's GHG emission reduction goals.[82] In addition, the Project would further reduce VMT through such measures as transit accessibility as estimated by the VMT Calculator, which would be consistent with the goals and land use growth pattern in the 2020–2045 RTP/SCS.

The 2020–2045 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects and is applicable to the Project and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by the 2020–2045 RTP/SCS, such as promotion of alternative forms of transportation, proximity to public transportation options, provisions for encouraging multi-modal and energy efficient transit, such as by accommodating bicycle parking and EV chargers at or above regulatory requirements. Furthermore, as with the Project, the related projects within the Project vicinity and HQTA would similarly be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions that would not be in conflict with applicable provisions of the SCAG 2020–2045 RTP/SCS for the land use type.

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[80] *SCAG, 2020–2045 RTP/SCS, Exhibit 3.8: High Quality Transit Areas in the SCAG Region for 2045 Plan, p. 90.*

[81] *SCAG, 2020–2045 RTP/SCS, September 2020, p. 126.*

[82] *SCAG, 2020–2045 RTP/SCS, September 2020, p. 140.*

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. In addition, it is assumed that related projects in the Project Site vicinity would reduce VMT, consistent with the goals of the 2020–2045 RTP/SCS. **Therefore, based on the above, and as the Project is consistent with the 2020–2045 RTP/SCS, its contribution to cumulative impacts related to wasteful, inefficient or unnecessary use of transportation fuel would not be cumulatively considerable and, thus, would be less than significant.**

(iv) Conclusion

Based on the analysis provided above, the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity and transportation fuel) would not result in a cumulatively considerable effect related to potentially significant environmental impacts due to the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. As such, the Project's impacts would not be cumulatively considerable; therefore, cumulative energy impacts under Threshold (a) are concluded to be less than significant.

(b) Consistency with State or Local Plans

Related projects and other future development projects within the Project area would be required to comply with energy conservation and renewable energy plans and policies described above, including Title 24 and the Los Angeles Green Building Code. As related projects would be required to meet the same energy consumption standards, there would be no significant cumulative impacts with regard to consistency with energy conservation plans.

As discussed above, the Project would be consistent with the policies emphasized by the 2020–2045 RTP/SCS. The Project is an infill development near transit within an existing urbanized area that would concentrate new residential uses within an HQTA, thus reducing VMT. This reduction in VMT is substantially better that the goals of the 2020–2045 RTP/SCS. Also as discussed above, related projects in the Project vicinity would also be infill projects locating uses near other residential and commercial uses, which benefit from similar reductions in VMT and transportation fuel consumption. Therefore, the Project is consistent with the 2020–2045 RTP/SCS, and its contribution to cumulative impacts with regard to consistency with energy conservation plans would not be cumulatively considerable, and thus, would be less than significant.

(2) Mitigation Measures

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