

## **IV. Environmental Impact Analysis**

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### **K.3 Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure**

#### **1. Introduction**

The following section analyzes the Project’s potential impacts upon electric power and natural gas infrastructure. This section focuses on the existing infrastructure serving the Project area and the potential for environmental impacts to occur as a result of any physical improvements that may be necessary to accommodate the Project. The information presented in this section is based, in part, on the information provided by the City of Los Angeles Department of Water and Power (LADWP), the *Energy Calculations for East End Studios ADLA Project* prepared by Eyestone Environmental, and the *Dry Utility Technical Report for East End Studios Arts District Campus*, prepared for the Project by Langan, dated July 2024 (Dry Utility Report), which are included as Appendix D and Appendix L of this Draft EIR, respectively. Potential impacts associated with energy demand and energy conservation policies are discussed in Section IV.C, Energy, of this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

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

- United States Department of Energy (Energy Policy Act of 2005)
- California Independent System Operator
- California Public Utilities Commission
- Senate Bill 1389
- Senate Bill 649

- California Independent System Operator
- City of Los Angeles Information Technology Agency
- Los Angeles Municipal Code Section 10.5.4
- City of Los Angeles All-Electric Building

### (1) Federal

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

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

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

### (2) State

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

Draft EIR. There are, however, regulations pertaining to infrastructure. These are discussed further below.

*(a) California Independent System Operator*

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

*(b) California Public Utilities Commission*

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

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

*(c) Senate Bill 1389*

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. In 2021, the CEC decided to write the Integrated Energy Policy Report in four volumes that were subsequently published in February 2022. Volume I highlights the actions necessary to decarbonize buildings within California. Additionally, the volume explores ways to reduce greenhouse gases from the agricultural and industrial sectors. Volume II explores actions to ensure California's energy system remains reliable and resilient. Volume III examines the role of gas in the energy system. Finally, Volume IV forecasts future demand in the electricity, gas, and transportation sectors.<sup>1</sup>

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<sup>1</sup> *California Energy Commission, 2021 Integrated Energy Policy Report, February 2022.*

*(d) Senate Bill 649*

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

**(3) Local**

*(a) City of Los Angeles Information Technology Agency*

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

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

*(b) City of Los Angeles Municipal Code Section 10.5.4*

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

*(c) City of Los Angeles All-Electric Building*

In December 2022, the City approved Ordinance No. 187,714, which amends Divisions 2, 4, and 5 of Article 9 of Chapter IX of the LAMC to require all new buildings to be all-electric buildings with exceptions. The ordinance is applicable to new buildings in which an application for a building permit was submitted after June 1, 2023. Consistent with this new ordinance, Chapter IX of the LAMC, Section 99.02.202 defines an all-electric building as:

*“A building that contains no combustion equipment, plumbing for combustion equipment, gas piping, or fuel gas serving any use including, but not limited to,*

*space heating (including fireplaces), water heating (including pools and spas), cooking appliances (including barbecues), and clothes drying, within the building or building property lines, and instead uses electricity as the sole source of energy for all lighting, appliances and/or equipment, including, but not limited to, space heating, water heating, cooking appliances, and drying appliances.”*

Chapter IX of the LAMC, Section 99.04.106.8 provides exemptions from the requirements for cooking equipment contained within kitchens in a public use area, such as restaurants, commissaries, cafeterias, and community kitchens as long as electrical infrastructure is installed. Gas-powered process equipment in institutions, such as hospitals, industrial, and laboratories, is also exempt. The LAMC is consistent with 2022 Title 24 goals of encouraging all-electric development, which requires new residential uses to be electric-ready (wiring installed for all-electric appliances). Buildings in Los Angeles account for 43 percent of greenhouse gas emissions—more than any other sector in the City. These LAMC requirements ensure that new buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035, rather than relying on fossil fuels.

## **b. Existing Conditions**

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with two single-story warehouse structures, consisting of approximately 311,000 square feet of floor area. The existing buildings are currently used for storage and distribution purposes. The Project Site also includes surface parking areas for automobiles and tractor trailer trucks.

### **(1) Electricity**

LADWP provides electrical service throughout the City, serving approximately 4 million people within a service area of approximately 465 square miles. Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within LADWP’s Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP’s 2022 Power Strategic Long-Term Resource Plan, LADWP has a net dependable generation capacity greater than 8,101 MW.<sup>2</sup> In 2017, the LADWP

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<sup>2</sup> LADWP, 2022 Power Strategic Long-Term Resource Plan, p. ES-5, December 2022.

power system experienced an instantaneous peak demand of 6,502 MW.<sup>3</sup> Approximately 36 percent of LADWP's 2022 electricity purchases were from renewable sources, which is similar to the 36-percent statewide percentage of electricity purchases from renewable sources.<sup>4</sup>

LADWP supplies electrical power to the Project Site from electrical service lines located in the Project Site vicinity. According to the Utility Report, the Project Site receives electric power service from LADWP via existing underground conduits from Alameda Street, 6<sup>th</sup> Street, and Mill Street. Existing electricity usage was estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.

It is estimated that existing uses on the Project Site currently consume approximately 2,216,480 kilowatt hours (kWh) of electricity per year.<sup>5</sup>

## (2) Natural Gas

Natural gas is provided to the Project Site by SoCalGas. SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.<sup>6</sup>

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.<sup>7</sup> The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. Gas supply available to SoCalGas from California sources averaged 69 million cubic feet (cf) per day in 2021 (the most recent year for which data are available).<sup>8</sup>

SoCalGas supplies natural gas to the Project Site from natural gas service lines located in the Project Site vicinity. According to the Utility Report, existing SoCalGas

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<sup>3</sup> LADWP, *2022 Power Strategic Long-Term Resource Plan*, p. ES-5, December 2022.

<sup>4</sup> California Energy Commission, *Utility Annual Power Content Labels for 2022, 2023*.

<sup>5</sup> Eyestone Environmental, *Energy Calculations for East End Studios ADLA Project*. See Appendix D of this Draft EIR.

<sup>6</sup> SoCalGas, *Company Profile*, [www.socalgas.com/about-us/company-profile](http://www.socalgas.com/about-us/company-profile), accessed May 10, 2023.

<sup>7</sup> California Gas and Electric Utilities, *2022 California Gas Report*, p. 135.

<sup>8</sup> California Gas and Electric Utilities, *2022 California Gas Report*, p. 135.

infrastructure around the Project Site includes a 3-inch and 4-inch gas main on Industrial Street, an 8-inch gas main on Alameda Street, a 6-inch gas main on 6th Street, and a 2-inch gas main on Mill Street.<sup>9</sup> It is estimated that the existing uses on the Project Site currently consume approximately 4,690,491 cf of natural gas per year.<sup>10</sup>

### (3) Telecommunications Facilities

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

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

## 3. Project Impacts

### a. Thresholds of Significance

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

***Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power,***

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<sup>9</sup> Langan, *Dry Utility Technical Report for East End Studios ADLA*. See Appendix L of this Draft EIR.

<sup>10</sup> Eyestone Environmental, *Energy Calculations for East End Studios ADLA Project*. See Appendix D of this Draft EIR.

***natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*<sup>11</sup>**

For this analysis, the Appendix G Threshold provided above is relied upon. This analysis utilizes factors and considerations identified in the City’s 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold question.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate impacts to energy infrastructure:

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

## **b. Methodology**

This analysis evaluates the potential impact of the Project on existing energy infrastructure by comparing the estimated Project energy demand with the available capacity.

Project energy usage was calculated using CalEEMod Version 2022.1. 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. 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. During Project operation, energy consumption would include electricity from uses, such as heating, ventilation, and air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. In terms of natural gas, the Project would generally not include the use of natural gas equipment in accordance with City Ordinance No. 187,714 (All-Electric Buildings Ordinance), except as permitted for restaurant uses. Additional details regarding Project energy usage are provided in Section IV.C, Energy, of this Draft EIR.

The Project’s estimated energy demands were also analyzed relative to LADWP’s existing and planned energy supplies in 2026 (i.e., the Project buildout year) to determine if LADWP would be able to meet the Project’s energy demands. Finally, the capacity of local

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<sup>11</sup> Refer to the Project’s Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater and telecommunications facility impacts and Section IV.K, Utilities and Service Systems, of this Draft EIR for a discussion of water infrastructure and wastewater infrastructure impacts.



infrastructure to accommodate the Project's estimated electricity demand was assessed based on the Dry Utility Report, included as Appendix L of this Draft EIR.

### **c. Project Design Features**

No specific project design features are proposed with regard to energy infrastructure. While not specific to energy infrastructure, Project Design Feature GHG-PDF-1 included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR would also serve to reduce energy consumption by prohibiting the use of natural gas during Project operations, with exceptions provided for: (1) water heaters; (2) food operations (e.g., restaurant/commissary uses); and (3) building heat for studio uses. The proposed office buildings would use electricity for building heating. Subsequent to the design of the Project, Ordinance No. 187,714 was passed by the City requiring new buildings be all-electric with some exceptions. In addition, the Project would comply with the energy efficiency requirements of the California Building Standards Code (Title 24), which includes the California Green Building Standards (CALGreen) Code, and the Los Angeles Green Building Code. Compliance with these requirements would reduce the Project's energy demand and the impact such demand would have on the electricity and natural gas infrastructure capacity.

### **d. Analysis of Project Impacts**

***Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?<sup>12</sup>***

#### **(1) Impact Analysis**

##### ***(a) Construction***

##### ***(i) Electricity***

As discussed above, construction activities at the Project Site would require minor quantities of electricity for lighting, power tools and other support equipment. Heavy construction equipment would be powered with diesel fuel. As discussed in Section IV.C, Energy, of this Draft EIR, the Project's estimated construction-related electricity usage represents approximately 0.95 percent of the existing annual operational demand of 2,216,480 kWh, which, as discussed below, would be within the supply and infrastructure

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<sup>12</sup> Refer to the Project's Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater and telecommunications facility impacts and Section IV.K, Utilities and Service Systems, of this Draft EIR for a discussion of water infrastructure and wastewater infrastructure impacts.

service capabilities of LADWP. Accordingly, the estimated construction-related electricity usage would be offset by the removal of the existing on-site uses. Thus, LADWP's existing electrical infrastructure has enough capacity to serve the Project's construction activities. Electricity during Project construction would be obtained from existing electrical lines that connect to the Project Site. Therefore, existing off-site infrastructure would not have to be expanded or newly developed to provide electricity to the Project Site during any phase of construction.

With regard to existing electrical distribution lines, the Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with all phases of construction within LADWP easements are minimized. Project contractors would notify and coordinate with LADWP to identify the locations and depth of water mains and power lines and avoid disruption of electric and water service to other properties. As such, construction of the Project would not adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

*(ii) Natural Gas*

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties.

*(iii) Telecommunications Facilities*

Construction activities, including the construction of new buildings and facilities, typically do not involve demand for cable television or telephone and internet land lines, as limited computer and telephone services can be obtained via existing cellular and wireless signals. Accordingly, there would be little to no demand for telecommunications infrastructure during construction, and virtually no impact to the capacity of existing telecommunication lines in the Project vicinity during construction. However, the Project would involve the expansion of the on-site communications system and the connection of these lines to the existing communications lines in the Project Site vicinity. Nevertheless, for the same reasons discussed above with respect to electricity infrastructure, and because the Project would coordinate the construction of any required telecommunications improvements

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

*(b) Operation*

*(i) Electricity*

As shown in Table IV.C-4 in Section IV.C, Energy, of this Draft EIR, the Project-related net annual electricity consumption is estimated to be 14,825,087 kWh per year with implementation of Project Design Feature GHG-PDF-1. Subsequent to the design of the Project, Ordinance No. 187,714 was passed by the City requiring new buildings to be all-electric. With compliance with the City's ordinance, the Project would result in a net annual electricity consumption of 14,980,013 kWh per year and would represent approximately 0.07 percent of LADWP's projected sales in 2026<sup>13</sup> (anticipated Project build out). Under peak conditions, the Project would represent approximately 0.05 percent of the LADWP estimated base peak load conditions (5,680 MW in 2026).<sup>14</sup> Additionally, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.<sup>15</sup> Furthermore, the Project would implement any necessary connections and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project. As such, operation of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity and would not require the construction of new electrical facilities or expansion of existing facilities.

*(ii) Natural Gas*

. Accordingly, the Project would have no impact on SoCalGas's projected sales in 2026. In compliance with City Ordinance No. 187,714, the majority of the proposed studio campus would be all-electric, except potential restaurant cooking uses that may be implemented as part of the Project. As shown in Table IV.C-4 in Section IV.C, Energy of this Draft EIR, the Project's net new natural gas demand with implementation of Project Design

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<sup>13</sup> Based on LADWP's 2022 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2026-2027 fiscal year (the Project's buildout year) will be 21,017 GWh of electricity.

<sup>14</sup>  $2,850 \text{ kW} / 5,680,000 \text{ kW} * 100 = 0.050\%$

<sup>15</sup> Langan, Dry Utility Technical Report for East End Studios Arts District Campus. See Appendix L of this Draft EIR.

Feature GHG-PDF-1 would be approximately 153,813 cf per year or a 60 percent reduction in natural gas usage from proposed uses in comparison to default natural gas usage calculated with CalEEMod. In addition, the Project would provide electric-ready (wiring installed for all electric appliances) for natural gas appliances, which is consistent with 2022 Title 24 goals. As discussed above, subsequent to the design of the Project, Ordinance No. 187,714 was passed by the City requiring new buildings be all-electric. As the Project would be required to comply with City Ordinance No. 187,714 (i.e., the City's All-Electric Buildings Ordinance), the Project would result in a reduction in annual natural gas usage of 4,423,062 cf when compared to the existing demand or a 98 percent reduction in natural gas usage in comparison to default natural gas usage calculated with CalEEMod. Compliance with the ordinance would also increase the electricity usage from 14,825,087 kWh per year to 14,980,013 kWh per year

*(iii) Telecommunications Facilities*

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

*(c) Conclusion*

As demonstrated in the analysis above, construction and operation of the Project would not result in an increase in demand for electricity, natural gas, or telecommunications facilities that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. **Therefore, Project impacts related to energy infrastructure capacity and**

**telecommunications facilities would be less than significant during construction and operation.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

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

# e. Cumulative Impacts

## (1) Impact Analysis

### (a) *Electricity*

Buildout of the Project, the related projects listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. LADWP forecasts that its total energy sales in the 2026-2027 fiscal year (the Project's buildout year) will be 21,017 gigawatt hours (GWh) of electricity. Data used to develop the LADWP demand forecasts take into account population growth, energy efficiency improvements, and economic growth, which includes construction projects.<sup>16</sup> Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk, consistent with LADWP's environmental priorities and reliability standards.

The 2022 Power Strategic Long-Term Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Although detailed information regarding electrical infrastructure for development projects in LADWP's service area is not known, it is reasonably expected that LADWP would provide for necessary improvements specific to

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<sup>16</sup> LADWP, 2022 Power Strategic Long-Term Resource Plan, Appendix A, Table A-1, p. A-7, December 2022.

each development project. Each of the development projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the service area. As discussed above, will-serve letters are provided for individual projects in which LADWP determines whether sufficient infrastructure is in place to provide electricity to a proposed project. As part of the will-serve letter process, LADWP takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is adequate. As the will-serve letter for the Project identified adequate infrastructure (see Appendix L of this Draft EIR), the estimated power requirement for the Project is a part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.<sup>17</sup>

*(b) Natural Gas*

As discussed above, Project operations with implementation of Project Design Feature GHG-PDF-1 would result in approximately 153,813 cf per year or a 60 percent reduction in natural gas usage from proposed uses in comparison to default natural gas usage calculated with CalEEMod. As discussed above, subsequent to the design of the Project, Ordinance No. 187,714 was passed by the City requiring new buildings to be all-electric with some exceptions. As the Project would be required to comply with City Ordinance No. 187,714 (i.e., the City's All-Electric Buildings Ordinance), the Project would result in a reduction in annual natural gas usage of 4,423,062 cf when compared to the existing demand or a 98 percent reduction in natural gas usage in comparison to default natural gas usage calculated with CalEEMod. In addition, the related projects listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, would also result in a reduction in the use of natural gas resources due to the compliance with the City's Ordinance No. 187,714 (All-Electric Buildings Ordinance). In addition, as with the Project, related projects would be required to provide electric-ready (wiring installed for all electric appliances) for natural gas appliances, which is consistent with 2022 Title 24 goals. SoCalGas serves the City, the City of Beverly Hills, and the City of West Hollywood. SoCalGas forecasts that its total natural gas consumption in 2026 will be approximately 2.267 billion cf per day.<sup>18</sup> Based on the Project's estimated net decrease of 4,423,062 cf per year in natural gas consumption or a slight net increase of 153,813 cf per year with implementation of Project Design Feature GHG-PDF-1, the Project would not affect SoCalGas's projected sales in 2026. Moreover, SoCalGas' forecasts consider projected population growth and development based on local and regional plans.

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<sup>17</sup> *Langan, Dry Utility Technical Report for East End Studios Arts District Campus. See Appendix L of this Draft EIR.*

<sup>18</sup> *California Gas and Electric Utilities, 2022 California Gas Report, p. 185.*

As discussed above, will-serve letters are provided for individual projects, in which SoCalGas determines whether sufficient infrastructure is in place to provide natural gas service to a proposed project. As part of the will-serve letter process, SoCalGas takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is adequate. As discussed above, the Project would comply with the City's All-Electric Buildings Ordinance and the will-serve letter for the Project (See Appendix L of this Draft EIR) identified adequate infrastructure. As such, Project development would have no impact on the SoCalGas regional infrastructure.

*(c) Telecommunications Facilities*

As the City's land area is largely built out, upgrades in electrical power, natural gas, and telecommunications capabilities are anticipated primarily due to redevelopment activities to improve outdated or underserved areas, upgrades and replacement of outdated infrastructure due to technological advances over time, and redevelopment projects that increase density or require more sophisticated technology. Similar to the Project, the potential environmental impacts from each of the related projects would be reviewed, including potential impacts related to telecommunications infrastructure. The concentration of business and population in the City and rapid technological advances offer the opportunity to provide an integrated network serving as the regional hub for public and private users. Each of the related projects would be required to coordinate with applicable regulatory agencies, including the ITA, and the telecommunications providers to implement the orderly construction, expansion, removal, and/or relocation of telecommunications facilities, as needed. As with the Project, the related projects would be expected to install the necessary telecommunications facilities concurrently with other utilities within roadway rights-of-way to lessen or eliminate potential environmental effects. Necessary telecommunications infrastructure required to serve the cumulative demand for such services would be evaluated, designed, and installed in coordination with the service providers, as needed, to meet the existing and projected service needs of the area in accordance with infrastructure and capital improvement plans.

*(c) Conclusion*

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

## (2) Mitigation Measures

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

## (3) Level of Significance after Mitigation

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