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 IV, 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.E, Greenhouse Gas Emissions; and Section IV.L.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
- 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
- L.A.'s 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 U.S. Environmental Protection Agency (USEPA) and the 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;

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[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. U.S. Department of Labor, Bureau of Labor Statistics, Green Jobs Overview, www.bls.gov/green/overview.htm, accessed October 10, 2024.*

(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 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] 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.[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.

(i) 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 2023 Integrated Energy Policy Report 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 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.E, Greenhouse Gas Emissions, of this Draft EIR for additional details regarding this regulation.

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

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

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

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

(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 [CCR], Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, effective on January 1, 2023. The 2022 Title 24 standards continue to improve upon the preceding versions of 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 (CCR 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 choices related to new voluntary measures to builders, including battery storage systems, electric heat pump space, and water heating that encourage building electrification. The 2022 CALGreen Code went into effect on January 1, 2023.

(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 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

[8] *California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, 2018.*

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.E, 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 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."

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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, December 2008.*

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

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-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

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

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 CCR Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

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

Because off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the “In-Use Off-Road Diesel Fueled Fleets Regulation” to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of 5 minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October

[14] *CARB, Clean Car Standards—Pavley, Assembly Bill 1493, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program accessed October 10, 2024.*

2023, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines beginning January 1, 2024. 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 2024 through 2028, medium fleets each year from 2016 through 2030, and small fleets each year from 2028 through 2032. 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) and 2024–2050 RTP/SCS reflect 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 was adopted to implement SB 375 required reduction targets.

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 a "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.

On April 4, 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024. Similar to the 2020–2045 RTP/SCS, the 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the existing and future needs of the region through projects, investments, policies and strategies. While Connect SoCal 2024 remains focused on its core responsibilities, and on the requirements of comprehensive regional transportation planning integrated with the development of a sustainable communities strategy, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband and mobility hubs. The primary goals of the 2024–2050 RTP/SCS include:

- Mobility: Build and maintain an integrated multimodal transportation network;
- Communities: Develop, connect and sustain livable and thriving communities;
- Environment: Create a healthy region for the people of today and tomorrow; and
- Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.

While the 2024–2050 RTP/SCS has been adopted by SCAG, the 2024–2050 RTP/SCS has not yet been approved by the California Air Resources Board. In addition, SB 375 does not provide GHG emissions reduction targets specific to the 2024–2050 RTP/SCS that are not also applicable to 2020–2045 RTP/SCS.

(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

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

within 1,500 feet of transit by 2017, reducing VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. The Sustainable City pLAn was intended to be updated every four years.

In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAn renamed as LA's Green New Deal, which consists 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 the City'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.

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

- Increase landfill diversion rate to 90 percent by 2025, 95 percent by 2035, and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds 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.

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

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 barbeques), 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.

(d) 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 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.

[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.*

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, serving approximately 4 million people within a service area of approximately 465 square miles. 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

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

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

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 primarily by an automotive dealership for Toyota that includes a showroom, parts storage structure, auto repair facility with five service bays, and surface parking. The existing structures total approximately 32,000 square feet. Approximately 32,000 square feet of existing commercial uses would be removed for the Project, which currently consume approximately 444,333 kWh of electricity per year.[21]

(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

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

[21] *Eyestone Environmental, Energy Calculations for 6000 Hollywood Boulevard Project. See Appendix D of this Draft EIR. This includes building and water use.*

[22] *SoCalGas, Company Profile, www.socalgas.com/about-us/company-profile, accessed October 10, 2024.*

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

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 on the Project Site currently consume approximately 1,076,922 cubic feet of natural gas per year.[26]

(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, 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 3.98 billion gallons of gasoline and 608 million gallons of diesel fuel in 2023.[32]

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

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

[26] *Eyestone Environmental, Energy Calculations for 6000 Hollywood Boulevard Project. See Appendix D of this Draft EIR.*

[27] *U.S. Energy Information Administration. California State Profile and Energy Estimates. Consumption by Sector: www.eia.gov/state/?sid=CA#tabs, accessed October 10, 2024.*

[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.*

The estimate of annual VMT associated with the existing Project Site uses is 1,540,300 VMT per year.[33] This translates to 55,552 gallons of gasoline and 9,662 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:

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

[33] *Eyestone Environmental, Energy Calculations for 6000 Hollywood Boulevard Project, see Appendix D of this Draft EIR.*

[34] *Eyestone Environmental, Energy Calculations for 6000 Hollywood Boulevard Project, see Appendix D of this Draft EIR.*

- 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.

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 and 2024–2050 RTP/SCS, which includes goals to reduce VMT and fuel consumption, as discussed further in Section IV.E, Greenhouse Gas Emissions, and Section IV.G, 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,

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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.*

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 D of this Draft EIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of the SCAQMD *CEQA Air Quality Handbook*. Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total VMT was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC 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.

(2) Operation

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas (e.g., restaurant cooking use) was calculated using demand factors provided in CalEEMod and accounting for Ordinance No. 187,714 as part of the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.[38]

Energy impacts associated with transportation during operation were also assessed. Daily trip generation used in this analysis was based on *Transportation Assessment for 6000 Hollywood Boulevard Project* dated August 2023 (Transportation Assessment), included as Appendix J of this Draft EIR.[39] 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.E, 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

[38] *In accordance with Ordinance No. 187,714, restaurant cooking uses will consume natural gas.*

[39] *Fehr & Peers, 6000 Hollywood Boulevard Project Transportation Assessment, Los Angeles, California, April 2024.*

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 2029 (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

No project design features are proposed specific to energy. However, the Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment. In addition, as part of the Project, the Applicant would incorporate Project features to support and promote environmental sustainability by complying with all applicable State and local regulatory requirements, including the provisions set forth in the City's Green Building Ordinance. As an example, the Project would comply with applicable City and 2022 CALGreen charging requirements, which includes the provision of at least 40 percent of overall residential parking spaces provided on the Project Site that are capable of supporting future electric vehicle supply equipment (EVSE) with 10 percent of the overall residential parking spaces equipped with EV chargers and 30 percent of overall non-residential parking spaces provided on the Project Site that are capable of supporting future EVSE and 20 percent of the overall non-residential parking spaces equipped with EV chargers. Provision of the EVSE and EV parking spaces would help to facilitate and encourage use of alternative fueled vehicles.

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).[40]

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 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 53,674 kWh of electricity, 169,647 gallons of gasoline, and 415,879 gallons of diesel is estimated to be consumed during Project construction. Project construction is expected to start in 2026 and be completed by 2029.

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

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

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

Fuel Type	Quantity
Electricity	
Water Consumption	9,183 kWh
Lighting and other construction activities necessitating electrical power[b]	36,238 kWh
Electric Equipment	8,254 kWh
Total Electricity	**53,674 kWh**
Gasoline	
On-Road Construction Equipment[c]	169,647 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	**169,647 gallons**
Diesel	
On-Road Construction Equipment[c]	281,806 gallons
Off-Road Construction Equipment[d]	134,073 gallons
Total Diesel	**415,879 gallons**

kWh = kilowatt hours

[a] *Detailed calculations are provided in Appendix D of this Draft EIR. Values may not add up exactly due to rounding.*

[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, 2024.

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.[41]

As shown in Table IV.C-1, a total of approximately 53,674 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

[41] *Analysis conservatively assumes that electrical power during construction will be provided by diesel generators, as this will account for the potential emissions of diesel generators if their use is required.*

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

The estimated construction electricity usage represents approximately 12.1 percent of the annual operational demand of 444,333 kWh currently consumed by the existing uses to be removed, which, as discussed below, would be within the supply capabilities of LADWP.[43] Moreover, construction electricity usage would be somewhat offset by the removal of existing on-site uses, which currently generate a demand for electricity.

Natural Gas

Construction activities, including the construction of new buildings and infrastructure, 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 169,647 gallons of gasoline and approximately 415,879 gallons of diesel fuel throughout the Project's construction period (2026–2029). For comparison purposes, the fuel usage during Project construction would represent approximately 0.005 percent of the 2026 (start year of Project construction) annual on-road gasoline-related energy consumption and 0.067 percent of the 2026 annual diesel fuel-

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

[43] *The percentage is derived by taking the total amount of electricity usage during construction (53,674 kWh) and dividing that number by the total amount of net electricity usage during operation (444,333 kWh) to arrive at 12.1 percent.*

related energy consumption in Los Angeles County, as shown in Appendix D of this Draft EIR.[44]

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.

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.

[44] *The gasoline percentage is derived by taking the total amount of gasoline usage during construction (169,647 gallons) and dividing that number by the total amount of net gasoline usage during operation (3.746 billion gallons) to arrive at 0.005 percent. The diesel percentage is derived by taking the total amount of diesel usage during construction (415,879 gallons) and dividing that number by the total amount of net gasoline usage during operation (622 million gallons) to arrive at 0.067 percent.*

(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-30, the Project's net new energy demand would be approximately 5,284,986 kWh of electricity per year, 214,522 gallons of gasoline per year, and 37,310 gallons of diesel fuel per year. The net reduction of 806,952 cf per year in natural gas is due to the Project's compliance with Ordinance No. 187,714, which requires all new buildings to be all-electric, with the exception of restaurant cooking uses.

Electricity

As shown in Table IV.C-2, with compliance with Title 24 standards and applicable CALGreen Code and City of Los Angeles Code requirements (e.g., requires all new buildings be all-electric buildings with some exceptions), buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 6,644,391 kWh per year. While this would result in a decrease in natural gas usage in comparison to default natural gas usage calculated with CalEEMod, electricity usage would increase as a result in comparison to default electricity usage calculated with CalEEMod. The Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and is consistent with the requirements of Ordinance No. 187,714. In addition, as part of the Project, the Applicant would incorporate Project features to support and promote environmental sustainability by complying with all applicable State and local regulatory requirements, including the provisions set forth in the City's Green Building Ordinance. As an example, the Project would comply with the CALGreen and City's EV charging requirements. The Project would also include water conservation and waste reduction measures consistent with the CALGreen Code requirements. 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.

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

Table IV.C-2
Estimate of Net Increase in Annual Energy Use at Project Buildout (2029)

Source	Estimated Energy Demand		
	Existing	Buildout	Project (Buildout less Existing)
Electricity			
Building	423,840 kWh	6,752,724 kWh	6,328,884 kWh
Water[b]	20,493 kWh	221,097 kWh	200,604 kWh
EV Chargers[c]	0 kWh	114,903 kWh	114,903 kWh
Total Electricity[d]	**444,333 kWh**	**7,088,724 kWh**	**6,644,391 kWh**
Natural Gas			
Building	1,076,922 cf	269,970 cf	-806,952 cf
Total Natural Gas[d]	**1,076,922 cf**	**269,970 cf**	**-806,952 cf**
Transportation (On-Road Vehicles and Off-Road Equipment)			
Gasoline	55,552 gal	270,074 gal	214,522 gal
Diesel	9,662 gal	46,972 gal	37,310 gal
Total Transportation[e]	**65,214 gal**	**317,046 gal**	**251,832 gal**

cf = cubic feet

gal = gallons

kWh = kilowatt-hour

[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.*

[b] *Calculations assume compliance with L.A. 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] *The Project would provide EV chargers consistent with City requirements for EV chargers, which requires that 10 percent of residential parking spaces and 20 percent of non-residential parking spaces be equipped with EV chargers.*

[d] *Electricity and natural gas estimates assume compliance with applicable CALGreen Code requirements and City Ordinance No. 187,714. In addition, the Project includes Project Design Feature GHG-PDF-1 in which implementation would result in the same decrease in natural gas usage and increase in electricity usage as compliance with Ordinance No. 187,714.*

[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, 2024.

are available.[45] 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 2022 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2029–2030 fiscal year (the Project's buildout year) would be 22,339 GWh of electricity.[46,47] As such, the Project-related net increase in electricity consumption of 6,644,391 kWh per year would represent approximately 0.03 percent of LADWP's projected sales in 2029.[48] In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

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 residential component 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 2.161 billion cf per day in 2029 (the Project's buildout year).[49] The Project, with a net decrease in natural gas consumption, would not affect SoCalGas' 2029 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 as designated by the 2020–2045 RTP/SCS and a Livable Corridor/HQTC as

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[45] *LADWP 2022 Power Content Label.*

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

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

[48] *1 GWh = 1,000,000 kWh; 6.64÷22,339=0.03 (approximately 0.03 percent).*

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

designated by the 2024–2050 RTP/SCS, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth," regional planning perspective.[50,51,52] As discussed in Section IV.J, Transportation, of this Draft EIR, the Project Site is approximately 0.25 mile from the Metro B Line Hollywood/Vine Station, which provides connection to the Metro D Line and Union Station, which serves as a regional hub. Additional transit options include LADOT DASH lines Hollywood Loop and Hollywood/Wilshire and Metro local lines 2, 180, 207, and 217. The Project would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. In accordance with the LAMC, the Project would provide short- and long-term bicycle parking spaces consistent with applicable regulations. Additionally, the Project Site would be located in the Hollywood area of Los Angeles, which makes the Project 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.[53] 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.E, Greenhouse Gas Emissions, of this Draft EIR. With

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

51 *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 October 10, 2024; SCAG 2020–2045 RTP/SCS, 2020, "Smart Growth Principles," page 174.*

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

53 *See section IV.J, Transportation, of this Draft EIR, for applicable VMT reduction measures.*

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.[54] 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-30, 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 214,522 gallons of gasoline and 37,310 gallons of diesel per year or a total of 251,832 gallons of petroleum-based fuels annually.

(iii) Summary of Energy Requirements and Energy Use Efficiencies

As discussed previously, the energy calculations took into account energy efficiency measures, such as Title 24, CALGreen Code, and vehicle fuel economy standards. Table IV.C-1 on page IV.C-26 and and Table IV.C-2 provide a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 53,674 kWh of electricity would be consumed along with 585,525 gallons of transportation fuel (gasoline and diesel). During Project operation, a total of 6,644,391 kWh of electricity and 251,832 gallons of transportation fuel would be consumed on an annual basis. Moreover, the Project would result in an 806,952-cf-per-year net reduction of natural gas usage due to compliance with Ordinance No. 187,714. 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

[54] *USEPA, Mixed-Use Trip Generation Model. www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed October 10, 2024.*

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 12.1 percent of the annual operational demand of 444,333 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.[55] 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 infrastructure, 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 0.005 percent of gasoline usage and 0.067 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 2022 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2029–2030 fiscal year (the Project's buildout year)

[55] *The percentage is derived by taking the total amount of electricity usage during construction (53,674 kWh) and dividing that number by the total amount of electricity usage during operation of existing uses to be removed (444,333 kWh) to arrive at 12.1 percent.*

will be 22,339 GWh of electricity.[56,57] As such, the Project-related net increase in electricity consumption of 6,644,391 kWh per year would represent approximately 0.03 percent of LADWP's projected sales in 2029.[58] Furthermore, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.[59] Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

As stated above, the Project's estimated net decrease in demand for natural gas is 806,952 cf per year in comparison to existing uses. Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimated natural gas consumption within SoCalGas' planning area would be approximately 2.161 billion cf per day in 2029 (the Project's buildout year).[60] The Project would not affect the 2029 forecasted consumption in SoCalGas' planning area.

At buildout, the Project would result in an increase of 214,522 gallons of gasoline and 37,310 gallons of diesel per year or a total of 251,832 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 0.008 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 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

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

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

[58] *LADWP, 2022 Power Strategic Long-Term Resources Plan, December 2022, Appendix A.*

[59] *KPFF Consulting Engineers, 6000 Hollywood Boulevard Project*—Utility Infrastructure Technical Report: Water, Wastewater, and Energy*, May 2023.*

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

experienced an all-time high peak of 6,502 MW on August 31, 2017.[61] 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 2029, the base case peak demand for the power grid will be 5,907 MW.[62] Under peak conditions, the Project would consume 1,139 kW.[63] In comparison to the LADWP power grid base peak load of 5,907 MW in 2029, 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.[64] 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 2.161 billion cf per day in 2029 (the Project's buildout year).[65] The Project would not affect the 2029 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.

(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.[66] Electricity and natural gas usage during Project operations presented in Table IV.C-2 on page IV.C-30 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.

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[61] *LADWP, 2022 Power Strategic Long-Term Resources Plan, December 2017.*

[62] *LADWP, 2022 Power Strategic Long-Term Resources Plan, December 2022, Appendix A.*

[63] *Eyestone Environmental, Energy Calculations for 6000 Hollywood Boulevard Project, See Appendix D of this Draft EIR.*

[64] *LADWP, 2022 Power Strategic Long-Term Resources Plan, December 2022, Appendix A.*

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

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

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 2022 Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity.

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.[67] 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.[68] 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. The Project includes Project Design Feature GHG-PDF-1 in which implementation would result in the same increase in natural gas usage and increase in electricity usage as compliance with Ordinance No. 187,714.

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

[68] *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed October 10, 2024.*

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 consumption until 2050.[69] As discussed previously, the Project transportation fuel consumption during operations would represent 0.008 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 short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC and preferred parking for fuel efficient vehicles, resulting in a reduction of transportation fuel usage. Moreover, the Project will provide EV parking space in accordance with the LAMC and CALGreen. In addition, the Project is located within an HQTA as designated by the 2020–2045 RTP/SCS and a Livable Corridor as designated by the 2024–2050 RTP/SCS and is approximately 0.25 mile from the Metro B Line Hollywood/Vine Station that provides connection to the Metro D Line and Union Station, which serves as a regional hub. Additional transit options include LADOT DASH lines Hollywood Loop and Hollywood/Wilshire and Metro local lines 2, 180, 207, and 217, thus, reducing transportation fuel usage during Project operations. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

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 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,

[69] *USEIA, Frequently Asked Questions, Does the world have enough oil to meet our future needs?, https://www.eia.gov/tools/faqs/faq.php?id=38&t=6, accessed October 10, 2024.*

the most recent year for which data are available.[70] 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, as detailed above in the Regulatory Framework subsection, new buildings shall comply with all of the mandatory measures set forth in Title 24, Part 6, Sections 100.0 through 110.12 for all buildings and Sections 160.0 through 170.2 for multifamily residential buildings. Multifamily residential buildings shall also comply with either the performance compliance approach (energy budgets) specified in Title 24, Part 6, Section 170.1 or the prescriptive compliance approach specified in Section 170.2 for the climate zone in which the building will be located. As set forth in Title 24, Part 6, Section 170.1, a building complies with the performance approach if the energy budget calculated for the proposed design building is no greater than the energy budget calculated for the standard design building. As set forth in Title 24, Part 6, Section 170.2, to comply using the prescriptive approach, a building shall be designed with and shall have constructed and installed systems and components meeting the applicable requirements of Sections 160.1 through 160.9, which specify building design requirements for building envelopes, space conditioning systems, water heating systems, indoor lighting, outdoor lighting, signs, covered processes, and photovoltaic and battery storage systems.

Currently, it is anticipated that the performance compliance approach would be used to demonstrate compliance with the nonresidential building requirements of the California Energy Code instead of the prescriptive compliance approach. Although final details regarding specific energy efficiency features and energy systems have not yet been determined, the Project would be required under Title 24 to include a PV system (onsite or offsite) or a combination of PV and battery system as part of the final design.

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

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

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.

(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, thereby 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 is approximately 0.25 miles from the Metro B Line Hollywood/Vine Station that provides connection to the Metro D Line and Union Station, which serves as a regional hub. Additional transit options include LADOT DASH lines Hollywood Loop and Hollywood/Wilshire and Metro local lines 2, 180, 207, and 217. The Project would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. With the reduction in trips, the Project would result in a 34-percent reduction in VMT compared to a Project without reduction features, with a corresponding reduction in the Project's petroleum-based fuel usage.[72] 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

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[71] *NREL, California—Annual Average Wind Speed at 80 m, 2010.*

[72] *VMT reduction calculations provided in Appendix B, Air Quality and Greenhouse Gas, of this Draft EIR, CalEEMod Vehicle Trip Input Calculations, p. B-30.*

include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would 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.[73] 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.

(h) Conclusion Regarding Significance Threshold (a)

As demonstrated in the analysis above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, 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 and natural gas 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**

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

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

(2) Mitigation Measures

Project-level impacts 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

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. 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 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.G, Land Use and Planning, of this Draft EIR, SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS focus 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 and 2024–2050 RTP/SCS focus 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 and 2024–2050 RTP/SCS. Most notably, the Project would be a mixed-use development that would comprise 501,185 square feet of new residential, commercial, and retail floor area contained in multiple structures that would be integrated

with public and private open space 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.[74] 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.[75] The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including the Metro B Line Hollywood/Vine Station, as evidenced by the Project Site's location within a designated HQTA.[76]

The 2024–2050 RTP/SCS does not use the HQTA designation as part of its Priority Development Areas (previously referred to as Priority Growth Areas) and instead uses a new designation referred to as Livable Corridors. Livable Corridors are defined as areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. SCAG also recognizes that many of these key corridors are also High Quality Transit Corridors (HQTCs). The Project would improve mobility and accessibility, encourage transit use, and reduce VMT by intensifying urban density within a Livable Corridor and HQTC in proximity to transit and destinations; providing complementary new uses (i.e., multi-family residential and commercial uses) in proximity to other existing residential, office, retail, restaurant, and hotel uses; providing pedestrian and bicycle improvements; and implementing TDM strategies to reduce single-occupant travel. The Project would also support healthy and equitable communities by encouraging walking and bicycling, providing EV charging stations, facilitating a reduction of VMT, and providing public realm improvements (i.e., widened sidewalks, new street trees and landscaping).

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

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

[76] *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." 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 would improve mobility and accessibility, encourage transit use, and reduce VMT by intensifying urban density within a Livable Corridor and HQTC in proximity to transit and destinations; providing complementary new uses (i.e., multi-family residential and commercial uses) in proximity to other existing residential, office, retail, restaurant, and hotel uses; providing pedestrian and bicycle improvements; and implementing TDM strategies to reduce single-occupant travel. The Project would also support healthy and equitable communities by encouraging walking and bicycling, providing EV charging stations, facilitating a reduction of VMT, and providing public realm improvements (i.e., widened sidewalks, new street trees and landscaping).

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 34-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.[77] With this reduction in VMT, the Project would be consistent with goals of the 2020–2045 RTP/SCS, 2024–2050 RTP/SCS, and SB 375 requirements. In addition, vehicle trips generated during Project operations would result in 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.

The Project would also comply with State energy efficiency requirements and would use electricity from LADWP, which has a current renewable energy mix of 35.6 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the Project would not conflict with adopted energy conservation plans.

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.

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

(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 15 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.[78] This represents the available off-site renewable sources of

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

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, cumulative impacts related to wasteful, inefficient or unnecessary use of electricity would be less than significant.

(ii) Natural Gas

The Project would result in a net reduction in natural gas consumption compared to existing conditions due to compliance with the City's All-Electric Ordinance No. 187,714. In addition, the Project includes Project Design Feature GHG-PDF-1 in which implementation would result in the same decrease in natural gas usage as compliance with Ordinance No. 187,714. 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 a net increase of 214,522 gallons of gasoline and 37,310 gallons of diesel per year, or a total of 251,832 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.

Furthermore, as described above, the Project would be consistent with the energy efficiency policies emphasized by the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS. Specifically, the Project would be a mixed-use 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 is approximately 0.25 mile from the Metro B Line

Hollywood/Vine Station that provides connection to the Metro D Line and Union Station, which serves as a regional hub. Additional transit options include LADOT DASH lines Hollywood Loop and Hollywood/Wilshire and Metro local lines 2, 180, 207, and 217. The Project would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. The Project also would introduce new housing opportunities (generated from the proposed 350 dwelling units, including 44 affordable units) within a HQTA, which is consistent with numerous policies in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS related to locating new housing near transit.[79] Although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2045, the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2045.[80] It is anticipated that in future years, SB 375 would have more stringent reduction targets. Implementation of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS would result in an estimated 19-percent decrease in per capita GHG emissions by 2035. Implementation of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's GHG emission reduction goals.[81] 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 and 2024–2050 RTP/SCS.

The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are regional planning tools that address 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 and 2024–2050 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 and 2024–2050 RTP/SCS for the land use type.

Although the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are intended to reduce GHG emissions, the reduction in VMT would also result in reduced transportation fuel

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

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

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

consumption. By its very nature, the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are regional planning tools that address 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 and 2024–2050 RTP/SCS. Therefore, cumulative impacts related to wasteful, inefficient or unnecessary use of transportation fuel 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, natural gas, 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, 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 the 2022 Title 24 standards 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.

(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 level remains less than significant.