

IV. Environmental Impact Analysis

O.4 Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure

1. Introduction

The following section analyzes the Project’s potential impacts on electric power and natural gas infrastructure and telecommunications facilities. This section focuses on the existing infrastructure serving the Project area and the potential for environmental impacts to occur as a result of any physical improvements that may be necessary to accommodate the Project. The information presented in this section is based on the information provided by the City of Los Angeles Department of Water and Power (LADWP), the *Energy Calculations for Radford Studio Center Project* prepared by Eyestone Environmental, and the *Utility Technical Report for Radford Studio Center Project*, prepared for the Project by KPFF, dated January 2025 (Utility Report), which are included as Appendix G and Appendix M of this Draft EIR, respectively. Potential impacts associated with energy demand and energy conservation policies are discussed in Section IV.E, Energy, of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- United States Department of Energy (Energy Policy Act of 2005)
- California Independent System Operator
- California Public Utilities Commission
- Senate Bill 1389
- City of Los Angeles Information Technology Agency

- Los Angeles Municipal Code Section 10.5.4
- City of Los Angeles Ordinance No. 187,714

(1) Federal

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

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

(2) State

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

(a) California Independent System Operator

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates

the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

(b) California Public Utilities Commission

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

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

(c) Senate Bill 1389

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

(3) Local

(a) City of Los Angeles Information Technology Agency

The City of Los Angeles Information Technology Agency (ITA) is responsible for a broad spectrum of services related to technology services to both internal and external customers. These range from classic IT services, such as computer support, enterprise applications, data networks, and a 24/7 data center to progressive digital services, such as

¹ California Energy Commission, *2021 Integrated Energy Policy Report*, February 2022.

a TV station (LA CityView 35), 3-1-1 Call Center, public safety radio/microwave communications, helicopter avionics, enterprise social media, and more.

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

(b) City of Los Angeles Administrative Code Section 10.5.4

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

(c) City of Los Angeles Ordinance No. 187,714

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

A building that contains no combustion equipment, plumbing for combustion equipment, gas piping, or fuel gas serving any use including, but not limited to, space heating (including fireplaces), water heating (including pools and spas), cooking appliances (including barbecues), and clothes drying, within the building or building property lines, and instead uses electricity as the sole source of energy for all lighting, appliances and/or equipment, including, but not limited to, space heating, water heating, cooking appliances, and drying appliances.

Chapter IX of the LAMC, Section 99.04.106.8 provides exemptions from the requirements for cooking equipment contained within kitchens in a public use area, such as restaurants, commissaries, cafeterias, and community kitchens as long as electrical infrastructure is installed. Gas-powered process equipment in institutions, such as hospitals, industrial, and laboratories, is also exempt.

b. Existing Conditions

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently improved with 1,179,110 square feet of studio-related uses, including 359,730 square feet of sound stages; 255,510 square feet of production support; 450,060 square feet of production office; and 113,810 square feet of general office.

(1) Electricity

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

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2022 Power Strategic Long-Term Resource Plan, LADWP has a net dependable generation capacity greater than 8,101 MW.² In 2017, the LADWP power system experienced an instantaneous peak demand of 6,502 MW.³ Approximately 39.5 percent of LADWP's 2023 electricity purchases were from renewable sources, which exceeds the 36.9-percent statewide percentage of electricity purchases from renewable sources.⁴

LADWP supplies electrical power to the Project Site from electrical service lines located in the Project Site vicinity. According to the Utility Report, the Project Site receives electric power service from LADWP via existing overhead lines from adjacent streets, mainly along Radford Avenue and the alley south of the Project Site. Existing electricity usage was estimated based on the same methodology contained in the GHG analysis included in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR (California Emissions Estimator Model [CalEEMod] Version 2022.1).

It is estimated that existing uses on the Project Site currently consume approximately 22,682,568 kilowatt hours (kWh) of electricity per year.⁵

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

³ LADWP, 2022 Power Strategic Long-Term Resource Plan, p. ES-5, December 2022.

⁴ LADWP, 2023 Power Content Label, 2024.

⁵ Eyestone Environmental, Energy Calculations for Radford Studio Center Project. See Appendix G of this Draft EIR.

(2) Natural Gas

Natural gas is provided to the Project Site by SoCalGas. SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.1 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.⁶

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

SoCalGas supplies natural gas to the Project Site from natural gas service lines located in the Project Site vicinity. According to the Utility Report, existing SoCalGas infrastructure around the Project Site includes a gas main line along Radford Avenue.⁹ It is estimated that existing uses on the Project Site currently consume approximately 19,386,722 cf of natural gas per year.¹⁰

(3) Telecommunications Facilities

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

⁶ SoCalGas, *Company Profile*, www.socalgas.com/about-us, accessed January 9, 2025.

⁷ *California Gas and Electric Utilities, 2022 California Gas Report*, p. 135.

⁸ *California Gas and Electric Utilities, 2022 California Gas Report*, p. 135.

⁹ KPFF, *Utility Technical Report for Radford Studio Center Project, January 2025*. Refer to Appendix M of this Draft EIR.

¹⁰ *Eyestone Environmental, Energy Calculations for Radford Studio Center Project*. See Appendix G of this Draft EIR.

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

3. Project Impacts

a. Thresholds of Significance

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

***Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*¹¹**

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

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

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

b. Methodology

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

¹¹ Refer to the Project's Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater and telecommunications facility impacts and Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, and Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of water infrastructure and wastewater infrastructure impacts.

Will-serve letters from LADWP and SoCalGas included as Exhibits 4 and 5 of Appendix M of this Draft EIR demonstrate that sufficient electricity and natural gas infrastructure exists around the Project Site to serve the Project.

As discussed in Section IV.E, Energy, of this Draft EIR, Project energy usage was calculated using CalEEMod Version 2022.1. During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. During Project operation, energy consumption would include electricity from uses, such as heating, ventilation, and air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. In terms of natural gas, the Project would generally not include the use of natural gas equipment in accordance with City Ordinance No. 187,714 (All-Electric Buildings Ordinance), except as permitted for restaurant uses.

The Project's estimated energy demands were also analyzed relative to LADWP's existing and planned energy supplies in 2028 (i.e., the Project's earliest buildout year) to determine if LADWP would be able to meet the Project's energy demands. Finally, the capacity of local infrastructure to accommodate the Project's estimated electricity demand was assessed based on the Utility Report, included as Appendix M of this Draft EIR.

c. Project Design Features

No specific Project design features are proposed with regard to energy infrastructure. However, the Project includes Project Design Feature GHG-PDF-1 which will prohibit the use of natural gas during Project operations, excluding food operations (e.g., restaurant/commissary uses) as set forth in Ordinance No. 187,714. The Project would comply with the energy efficiency requirements of Title 24, which includes the California Green Building Standards (CALGreen) Code, and the Los Angeles Green Building Code. Compliance with these requirements would reduce the Project's energy demand and the impact such demand would have on the electricity and natural gas infrastructure capacity.

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the

***construction or relocation of which could cause significant environmental effects?*¹²**

(1) Impact Analysis

(a) Construction

(i) Electricity

As discussed above, construction activities at the Project Site would require minor quantities of electricity for lighting, power tools, and other support equipment. Heavy construction equipment would be powered with diesel fuel. As discussed in Section IV.E, Energy, of this Draft EIR, the Project's estimated construction-related electricity usage represents approximately 0.64 percent of the existing annual operational demand of 22,682,568 kWh, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Accordingly, the estimated construction-related electricity usage would be offset by the removal of a portion of the existing on-site uses. Thus, LADWP's existing electrical infrastructure has enough capacity to serve the Project's construction activities. Electricity during Project construction would be obtained from existing electrical lines that connect to the Project Site. Therefore, existing off-site infrastructure would not have to be expanded or newly developed to provide electricity to the Project Site during any phase of construction.

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

Lastly, construction impacts associated with the Project's electrical infrastructure upgrades would primarily be confined to trenching. Infrastructure improvements would comply with all applicable LADWP and City requirements. In addition, while off-site construction activities would be required to connect the existing off-site electricity lines to the proposed on-site electrical infrastructure, any such activities would be minimal, temporary, and would occur within developed areas. In general, the environmental effects associated

¹² Refer to the Project's Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater and telecommunications facility impacts and Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, and Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of water infrastructure and wastewater infrastructure impacts.

with on-site construction activities, including the installation of electricity system improvements, are accounted for in the impact analyses throughout this Draft EIR, as appropriate. Furthermore, a Construction Traffic Management Plan would be implemented, as set forth under Project Design Feature TR-PDF-1 in Section IV.M, Transportation, of this Draft EIR, which would maintain traffic flow and safety and ensure that access to adjacent properties is maintained during construction, including during the installation of electricity infrastructure in any public rights-of-way. **For the reasons discussed above, construction of Project would not result in an increased demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new electric power facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, the Project's impact would be less than significant..**

(ii) Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below the ground surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. **Therefore, construction of the Project would not result in an increased demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, and, as such, the Project's impact would be less than significant.**

(iii) Telecommunications Facilities

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

Nevertheless, for the same reasons discussed above with respect to electricity infrastructure, and because the Project would coordinate the construction of any required telecommunications improvements with applicable regulatory agencies, including the ITA, construction activities associated with the installation of any telecommunications infrastructure that may be required to serve the Project would not adversely impact existing telecommunications facilities, and, as such, impacts would be less than significant. Furthermore, a Construction Traffic Management Plan would be implemented, as set forth under Project Design Feature TR-PDF-1 in Section IV.M, Transportation, of this Draft EIR, which would maintain traffic flow and safety and ensure that access to adjacent properties is maintained during construction, including during the installation of electricity infrastructure in any public rights-of-way.

(b) Operation

(i) Electricity

As shown in Table IV.E-2 in Section IV.E, Energy, of this Draft EIR, the Project-related net annual electricity consumption of 31,119,631 kWh per year in compliance with City Ordinance No. 187,714 and implementation of Project Design Feature PDF-GHG-1, would represent less than 0.15 percent of LADWP's projected sales in 2028¹³ (the earliest anticipated Project buildout year). Under peak conditions, the Project would represent approximately 0.2 percent of the LADWP estimated base peak load conditions (5,832 MW in 2028).¹⁴ Additionally, LADWP has confirmed that the Project's electricity demand can be served by the existing facilities in the Project area.¹⁵ Furthermore, the Project would implement any necessary connections and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project. **As such, operation of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity and would not require the construction of new electrical facilities or expansion of existing facilities. Therefore, the Project's impact would be less than significant.**

(ii) Natural Gas

As shown in Table IV.E-2 in Section IV.E, Energy, of this Draft EIR, the Project would result in a net decrease of approximately 7,647,036 cf per year in the on-site demand for natural gas. Consistent with Ordinance No. 187,714, the Applicant would implement Project

¹³ Based on LADWP's 2022 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2028-2029 fiscal year (the Project's earliest buildout year) will be 21,826 GWh of electricity.

¹⁴ $11,778 \text{ kW} / 5,832,000 \text{ kW} * 100 = 0.2\%$

¹⁵ KPFF, *Utility Technical Report for Radford Studio Center Project*, January 2025. Refer to Appendix M of this Draft EIR.

Design Feature GHG-PDF-1, which will limit the use of natural. Accordingly, the Project would have a less-than-significant impact on SoCalGas's projected sales in 2028. In compliance with City Ordinance No. 187,714, the majority of the proposed Project uses would be all-electric, except potential restaurant cooking uses that may be implemented as part of the Project. **As such, operation of the Project, which would result in a net decrease in on-site natural gas usage, is not anticipated to affect the natural gas infrastructure serving the surrounding uses or utility system capacity and would not require the construction of new natural gas facilities or expansion of existing facilities. Therefore, impacts would be less than significant with regards to natural gas infrastructure.**

(iii) Telecommunications Facilities

The Project would include the installation of on-site telecommunications infrastructure (e.g., phone lines, cable/internet service, broadcast facilities, etc.) to serve the new buildings and connections to the existing telecommunications infrastructure in the surrounding streets. Such services are typically offered by a variety private providers, and service capacities are generally expanded as needed to meet local and regional demands. When the Applicant submits the Project's telecommunications infrastructure plans reflecting the estimated loads and recommended locations for the telecommunications infrastructure to the respective telephone, cable, and internet companies, each company would determine the most cost-effective systems to provide their services to the Project Site. Specifically, the telephone, cable, and internet companies would work with the Applicant's design and civil engineering team to design telecommunications conduits and lines to bring the necessary phone, cable, and internet service to the new buildings on the Project Site in a timely manner. Upgrades for the proposed Project would involve disconnecting existing connections and establishing new connections to proposed structures, as needed. The Project would also relocate existing satellite dishes to other locations on the Project Site. Such improvements would be localized in nature and would utilize existing conduit and service lines, where feasible, to minimize disruption to City streets and sidewalks. Additionally, any work that may affect service from the existing nearby telecommunications lines would be coordinated with the respective service providers to minimize disruptions. **For the same reasons discussed above related to Project construction, and because the Project would coordinate with applicable regulatory agencies regarding telecommunications improvements to adequately serve its needs, the Project would not adversely impact existing telecommunications facilities, and, as such, impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, with a later buildout date, the results of the Project's conservative analyses for electricity, natural gas, and telecommunications would remain unchanged as a long-term buildout scenario would not affect the maximum demand conditions evaluated above. While future years could generate greater service area demands, the existing electricity, natural gas, and telecommunications infrastructure systems in the surrounding area would continue to be expanded and improved in response to any increased demand, and the service providers for these utilities would continue to evaluate the need for infrastructure upgrades and expansion based on long-term growth and demand projections. As such, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. There are 13 related projects in the Project Site vicinity, as listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR. The projected growth associated with these 13 related projects is a conservative assumption regarding future development as some of the related projects may not be built out by 2028, may never be built, or may be approved and built at reduced densities. To provide a conservative analysis, the future baseline forecast assumes that these 13 related projects would be fully built out by 2028.

(1) Impact Analysis

(a) Electricity

Buildout of the Project, the related projects listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. LADWP forecasts that its total energy sales in the 2028-2029 fiscal year (the Project's earliest buildout year) will be 21,826 gigawatt hours (GWh) of electricity. Data used to develop the LADWP demand forecasts take into account population growth, energy efficiency improvements, and economic growth, which includes construction projects.¹⁶ Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk, consistent with LADWP's environmental priorities and reliability standards.

The 2022 Power Strategic Long-Term Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Although detailed information regarding electrical infrastructure for development projects in LADWP's service area is not known, it is reasonably expected that LADWP would provide for necessary improvements specific to each development project. Each of the development projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the service area. As discussed above, will-serve letters are provided for individual projects in which LADWP determines whether sufficient infrastructure is in place to provide electricity to a proposed project. As part of the will-serve letter process, LADWP takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is available. As the will-serve letter for the Project identified adequate infrastructure (see Exhibit 4 of the Utility Report), the estimated power requirement for the Project is a part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.¹⁷

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

¹⁷ KPFF, Utility Technical Report for Radford Studio Center Project, January 2025. Refer to Appendix M of this Draft EIR.

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

(b) Natural Gas

As discussed above, Project operations would result in limited use of natural gas resources due to compliance with the City’s Ordinance No. 187,714 (All-Electric Buildings Ordinance) or a net decrease of 7,647,036 cf per year with implementation of Project Design Feature GHG-PDF-1. In addition, the related projects listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR would also result in a reduction in the use of natural gas resources due to the compliance with the City’s All-Electric Buildings Ordinance. In addition, as with the Project, the related projects would be required to provide electric-ready (wiring installed for all electric appliances) for natural gas appliances, which is consistent with 2022 Title 24 goals. SoCalGas serves the City, the City of Beverly Hills, and the City of West Hollywood. SoCalGas forecasts that its total natural gas consumption in 2028 will be approximately 2.177 billion cf per day.¹⁸ Based on the Project’s estimated net decrease of 7,647,036 cf per year in natural gas consumption, the Project would not affect SoCalGas’s projected sales in 2028. Moreover, SoCalGas’ forecasts consider projected population growth and development based on local and regional plans.

As discussed above, will-serve letters are provided for individual projects, in which SoCalGas determines whether sufficient infrastructure is in place to provide natural gas service to a proposed project. As part of the will-serve letter process, SoCalGas takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is adequate. As discussed above, the Project would comply with the City’s All-Electric Buildings Ordinance, and the will-serve letter for the Project (see Exhibit 4 of the Utility Report) identified adequate infrastructure. As such, Project development would have a less than significant impact on the SoCalGas regional infrastructure.

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

¹⁸ *California Gas and Electric Utilities, 2022 California Gas Report, p. 185.*

(c) Telecommunications Facilities

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

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

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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