IV. Environmental Impact Analysis
D. Energy

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts on energy resources, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). This analysis evaluates the demand for energy resources attributable to the Project during construction and operation; demonstrates whether the current and planned electrical, natural gas, and petroleum-based fuel supplies and distribution systems are adequate to meet the Project's forecasted energy consumption; and makes a determination regarding the Project's use and conservation of energy resources. The information presented herein is based, in part, on the *Energy Calculations for citizenM Project* provided in Appendix D.1 of this Draft EIR and the *Utility Infrastructure Technical Report: Energy* (Energy Report) prepared by KPFF Consulting Engineers (March 2017), included as Appendix D.2 of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Federal

(a) Federal Corporate Average Fuel Economy Standards

First established by Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and United States Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.[1]

[1] *For more information on the CAFE standards, refer www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy, accessed March 8, 2019.*

(b) Energy Independence and Security Act

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 a mandatory Renewable Fuel Standard (RFS) that requires 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

- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

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."[2]

(2) State

(a) California Building Standards Code (Title 24)

(i) California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (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 2016 Title 24 standards, which became effective on

[2] *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.*

January 1, 2017.[3] The 2016 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting, and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.[4]

(ii) California Green Building Standards (Title 24, Part 11)

The 2016 California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2017. The 2016 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.[5] Most mandatory measure changes, when compared to the previously applicable 2013 CALGreen Code, were related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For example, several definitions related to energy that were added or revised affect electric vehicle (EV) charging and hot water recirculation systems. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional EV charging space requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification.[6]

(b) California's Renewable Portfolio Standard

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020.[7] The California Public Utilities Commission (CPUC) and the California Energy Commission (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

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[3] *CEC, 2016 Building Energy Efficiency Standards, www.energy.ca.gov/title24/2016standards/, accessed March 8, 2019.*

[4] *CEC, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, June 2015.*

[5] *California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, January 2017.*

[6] *California Building Standards Commission, 2016 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, Chapter 4—Residential Mandatory Measures, effective January 1, 2017.*

[7] *CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/RPS_Homepage/, accessed March 8, 2019.*

terms and conditions used in contracts for eligible renewable energy.[8] The CEC's responsibilities include: (1) certifying renewable facilities as eligible for the RPS; and (2) designing and implementing a tracking and verification system to ensure that renewable energy output is counted only once for the purpose of the RPS and verifying retail product claims in California or other states.

(c) Senate Bill 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15, issued in April 2015, which established a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. The objectives of SB 350 are: (1) to increase the procurement of our electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030.[9]

(d) Senate Bill 100

SB 100, signed September 10, 2018, is the 100 Percent Clean Energy Act of 2018. SB 100 updates the goals of California's RPS and SB 350, as discussed above, to the following: achieve 50 percent renewable resources target by December 31, 2026 and achieve a 60 percent target by December 31, 2030. SB 100 also requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.[10]

(e) Assembly Bill 32

As discussed in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, commits the state to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the CPUC and the CEC with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors.

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[8] *CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/RPS_Homepage/, accessed March 8, 2019.*

[9] *SB 350 (2015–2016 Reg. Session) Stats 2015, ch. 547.*

[10] *SB 100 (2017–2018 Reg. Session) Stats 2018, ch. 312.*

(f) Assembly Bill 1493/Pavley Regulations

AB 1493 (commonly referred to as CARB's Pavley regulations) was the first legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks) for model years 2009–2016.[11] The Pavley regulations are expected to reduce GHG emissions from California's passenger vehicles by about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs.[12]

(g) California Air Resources Board

(i) CARB's Advanced Clean Cars Regulation

Closely associated with the Pavley regulations, the Advanced Clean Car Standards emissions-control program was approved by CARB in 2012.[13] The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles for model years 2015–2025. The components of the Advance Clean Car Standards include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (battery electric and hydrogen fuel cell vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) for the 2018–2025 model years.[14]

(ii) Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, CCR, Division 3, Chapter 10, Section 2435) was adopted to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. This section applies to diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. Reducing idling of

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[11] *CARB, Clean Car Standards—Pavley, Assembly Bill 1943, www.arb.ca.gov/cc/ccms/ccms.htm, accessed March 8, 2019.*

[12] *CARB, Clean Car Standards—Pavley, Assembly Bill 1943, www.arb.ca.gov/cc/ccms/ccms.htm, accessed March 8, 2019.*

[13] *CARB, The Advanced Clean Cars Program, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed March 8, 2019.*

[14] *CARB, The Advanced Clean Cars Program, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed March 8, 2019.*

diesel-fueled commercial motor vehicles reduces the amount of petroleum-based fuel used by the vehicle.

(h) Sustainable Communities Strategy (SB 375)

SB 375, the Sustainable Communities and Climate Protection Act of 2008, coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction mandates established in AB 32. SB 375 specifically requires the Metropolitan Planning Organization (MPO) to prepare a "sustainable communities strategy" (SCS) as a part of its Regional Transportation Plan (RTP) that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by reducing vehicle-miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.[15]

The Project Site is located within the planning jurisdiction of the Southern California Association of Governments (SCAG). SCAG's first-ever SCS is included in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), which was adopted by SCAG in April 2012. The goals and policies of the SCS that reduce VMT (and result in corresponding decreases in transportation-related fuel consumption) focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities so there is access to high quality transit service. Specific goals include, actively encourage and create incentives for energy efficiency, where possible (Goal 7) and encourage land use and growth patterns that facilitate transit and active transportation (Goal 8). These goals would serve to reduce transportation fuel usage. SCAG has since adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS).[16] The goals and policies of the 2016 RTP/SCS are substantially the same as those in the 2012–2035 RTP/SCS. See further discussion below.

(i) Assembly Bill 758

AB 758 requires the CEC to develop a comprehensive program to achieve greater energy efficiency in the state's existing buildings. As part of the requirements of AB 758, the AB 758 Action Plan was released March 2015 and provides a 10-year roadmap that would result in accelerated growth of energy efficiency markets, more effective targeting and delivery of building upgrade services, improved quality of occupant and investor decisions, and vastly improved performance of California's buildings in service of those

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[15] *CARB, Sustainable Communities, www.arb.ca.gov/cc/sb375/sb375.htm, accessed May 15, 2018.*

[16] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016.*

who own and occupy them. The AB 758 Action Plan provides a comprehensive framework centered on five goals, each with an objective and a series of strategies to achieve it.

(j) Senate Bill 1389

SB 1389 (PRC Sections 25300–25323) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The most recently completed report, the 2016 Integrated Energy Policy Report, addresses a variety of issues, including the following: environmental performance of the electricity generation system, landscaped-scale planning, the response to the gas leak at the Aliso Canyon natural gas storage facility, transportation fuel supply reliability, Southern California electricity reliability, methane leakage, climate adaptation activities for the energy sector, climate and sea level rise scenarios, and the *California Energy Demand Forecast*.[17]

(k) California Environmental Quality Act

In accordance with CEQA and Appendix F, Energy Conservation, of the CEQA Guidelines, in order to assure that energy implications are considered in project decisions, EIRs are required to include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (PRC Section 21100(b)(3)). Appendix F of the CEQA Guidelines provides a list of energy-related items that may be included throughout the various chapters of an EIR. In addition, while not described or required as significance thresholds for determining the significance of impacts related to energy, 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's life cycle 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;

[17] *CEC, 2016 Integrated Energy Policy Report, docketed February 28, 2017.*

- The effects of the project on energy resources; or
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

(3) Regional

As discussed in Section IV.G, Land Use, of this Draft EIR, SCAG's 2016 RTP/SCS presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. On April 7, 2016, the SCAG Regional Council adopted the 2016 RTP/SCS, the mission of which is "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians."[18] The 2016 RTP/SCS includes land use strategies that focus on urban infill growth and walkable, mixed-use communities in existing urbanized and opportunity areas. More mixed-use, walkable, and urban infill development would be expected to accommodate a higher proportion of growth in more energy-efficient housing types like townhomes, apartments, and smaller single-family homes, as well as more compact commercial buildings types. Furthermore, the 2016 RTP/SCS includes transportation investments and land use strategies that encourage carpooling, increase transit use, provide active transportation opportunities, and promote more walkable and mixed-use communities that would potentially help to reduce VMT.

The 2016 RTP/SCS also establishes High-Quality Transit Areas (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.[19] 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 2016 RTP/SCS.[20]

(4) Local

(a) Green LA: An Action Plan to Lead the Nation in Fighting Global Warming and Climate LA

Green LA: An Action Plan to Lead the Nation in Fighting Global Warming/Climate LA (LA Green Plan) was released in May 2007, sets forth a goal of reducing the City's

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[18] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, dated April 2016.*

[19] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 8.*

[20] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.*

GHG emissions to 35 percent below 1990 levels by the year 2030.[21] Climate LA is the implementation program that provides detailed information about each action item discussed in the Green LA framework. Climate LA includes focus areas addressing environmental issues, including, but not limited to, energy, water, transportation, and waste.[22] The energy focus area includes action items with measures that aim to increase the use of renewable energy to 35 percent by 2020, reduce the use of coal-fired power plants, and present a comprehensive set of green building policies to guide and support private sector development.[23] As both the LA Green Plan and ClimateLA are interrelated, it will be referred to as LA Green Plan/Climate LA.

(b) City of Los Angeles Green Building Code

On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the "Los Angeles Green Building Code," by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference, portions of the 2016 CALGreen Code. Projects filed on or after January 1, 2017, must comply with the provisions of the Los Angeles Green Building 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. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

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.

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[21] *City of Los Angeles, Green LA: An Action Plan to Lead the Nation In Fighting Global Warming, May 2007.*

[22] *City of Los Angeles, Climate LA: Municipal Program Implementing the GreenLA Climate Action Plan, 2008.*

[23] *City of Los Angeles, Climate LA: Municipal Program Implementing the GreenLA Climate Action Plan, 2008.*

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

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2017 Power Strategic Long-Term Resources Plan, the LADWP has a net dependable generation capacity greater than 7,531 MW.[24] In 2017, the LADWP power system experienced an instantaneous peak demand of 6,432 MW.[25] Approximately 30 percent of LADWP's 2017 electricity purchases were from renewable sources, which is similar to the 29 percent statewide percentage of electricity purchases from renewable sources.[26]

LADWP supplies electrical power to the Project Site from electrical service lines located in the Project vicinity. According to the Energy Report, the Project Site receives electric power service via an existing underground conduit in Vine Street. It is estimated that the existing 6,393 square feet of commercial uses on the Project Site currently consume approximately 331,520 kWh of electricity per year.[27]

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

[25] *LADWP, 2017 Retail Electric Sales and Demand Forecast, p. 6.*

[26] *California Energy Commission, Utility Annual Power Content Labels for 2017, www.energy.ca.gov/pcl/labels/2017_index.html, accessed March 8, 2019.*

[27] *Eyestone Environmental, Energy Calculations for citizenM Project, See Appendix D.1 of this Draft EIR.*

(2) Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network, and, therefore, resource availability is typically not an issue. Natural gas provides almost one-third of the state's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel.[28] 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.[29]

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.[30] The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.[31] Gas supply available to SoCalGas from California sources averaged 323 million cf per day in 2017 (the most recent year for which data are available).[32]

SoCalGas supplies natural gas to the Project Site from natural gas service lines located in the Project vicinity. According to the Energy Report, it appears that the Project Site receives natural gas service via a SoCalGas operated six-inch service on the east side

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[28] *U.S. Energy Information Administration, California State Energy Profile, www.eia.gov/state/print.php?sid=CA , accessed March 8, 2019.*

[29] *SoCalGas, Company Profile, www.socalgas.com/about-us/company-profile, accessed March 8, 2019.*

[30] *California Gas and Electric Utilities, 2018 California Gas Report, p. 80.*

[31] *California Gas and Electric Utilities, 2018 California Gas Report, p. 80.*

[32] *California Gas and Electric Utilities, 2018 California Gas Report, p. 80.*

of Vine Street. It is estimated that existing uses on the Project Site currently consume approximately 1,426,190 cf of natural gas per year.[33]

(3) Transportation Energy

According to the CEC, transportation accounts for nearly 37 percent of California's total energy consumption in 2014.[34,35] In 2016, California consumed 15.5 billion gallons of gasoline and 3.0 billion gallons of diesel fuel.[36] Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.[37] However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. The CEC predicts that the demand for gasoline will decline over the next ten years, and there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity.[38] According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources consumed 3.99 billion gallons of gasoline and 0.68 billion gallons of diesel fuel in 2016.[39]

The existing on-site land uses currently generate a demand for transportation-related fuel use as a result of vehicle trips to and from the Project Site. The estimate of annual VMT associated with the existing Project Site uses is 357,334 VMT per year.[40] This translates to 17,914 gallons of gasoline and 3,213 gallons of diesel per year.[41] Persons traveling to and from the Project Site also have the option of using public transportation to reduce transportation-related fuel use. Specifically, three transit service providers operate lines within the Project Site area, including the Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation Downtown Area Shuttle (DASH), and the Los Angeles Department of Transportation Commuter Express. As discussed in Section IV.J, Transportation, of this Draft EIR, the Project Site is

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[33] *Eyestone Environmental, Energy Calculations for citizenM Project, See Appendix D.1 of this Draft EIR.*

[34] *California Energy Commission, 2016 Integrated Energy Policy Report, docketed February 28, 2017.*

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

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

[37] *California Energy Commission, 2016–2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, March 2016.*

[38] *California Energy Commission, 2015 Integrated Energy Policy Report, docketed June 29, 2016, p. 113.*

[39] *California Air Resources Board, EMFAC2014 Web Database, www.arb.ca.gov/emfac/2014/.*

[40] *Eyestone Environmental, Energy Calculations for citizenM Project, See Appendix D.1 of this Draft EIR.*

[41] *Eyestone Environmental, Energy Calculations for citizenM Project, See Appendix D.1 of this Draft EIR.*

located approximately 500 feet from the Metro Red Line Hollywood/Vine Station. In addition, approximately 15 Metro, DASH, and Commuter Express bus lines serve the Project Site, including 10 Metro bus lines, three DASH bus lines, and two Commuter Express bus lines. For further discussion of public transit lines that serve the Project area, refer to Section IV.J, Transportation, of this Draft EIR.

3. Project Impacts

This analysis addresses the Project's potential energy usage, including electricity, natural gas, and transportation fuel. Energy consumption during both construction and operation are assessed. The Project's estimated energy consumption was calculated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. Specific analysis methodologies are discussed below.

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:[42]

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 as well as the *L.A. CEQA Thresholds Guide.* Appendix F of the CEQA Guidelines was 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:

[42] *Subsequent to the publication of the Notice of Preparation for this Project, the California Natural Resources Agency adopted revisions to the CEQA Guidelines that became effective on December 28, 2018. The adopted revisions include energy as a separate subsection.*

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;

- Whether and when the needed infrastructure was anticipated by adopted plans; and

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

In accordance with Appendix G and the *L.A. CEQA Thresholds Guide*, the following criteria will be considered in determining whether this threshold of significance is met:

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

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

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

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

5. The effects of the project on energy resources;

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

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

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

With regard to Threshold (b), the Project will be evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CalGreen and City building codes. Also, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would also be consistent with the SCAG 2016 RTP/SCS which includes goals to reduce VMT and corresponding decrease in fuel consumption.

b. Methodology

(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. Electricity usage associated with the supply and conveyance of water used for dust control during construction (primarily related to the excavation period) was calculated using CalEEMod.[43] Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power would be minimal in comparison to the operational phase of the Project.

In terms of natural gas, construction activities 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 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.1 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 South Coast Air Quality Management District's (SCAQMD) *CEQA Air Quality Handbook*. Fuel consumption from construction worker, vendor, and delivery/haul trucks were 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 2014 model. 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 trucks 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.1 of this Draft EIR for detailed calculations.

[43] *California Air Pollution Control Officers Association, CalEEMod™ version 2016.3.2 User's Guide, November 2017.*

(2) Operation

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas were calculated using demand factors provided in CalEEMod as part of the GHG analysis included in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR. Energy impacts associated with transportation during operation were also assessed. Daily trip generation used in this analysis was based on the *Traffic Impact Analysis for the Revised citizenM Hotel Project* dated May 2018 (Revised Traffic Analysis), prepared by Gibson Transportation Consulting, Inc. (see Appendix H of this Draft EIR). As discussed therein, the trip generation for the Project was determined based on the Institute of Transportation Engineers trip generation factors for the applicable land uses. The daily Project-related trips were then input into CalEEMod, which calculated the annual VMT. The resulting annual VMT was used as part of the GHG analysis included in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR. Based on this annual VMT, gasoline and diesel consumption rates were calculated using the county-specific miles per gallon calculated using EMFAC2014. 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.1 of this Draft EIR. These calculations were used to determine if the Project causes the wasteful, inefficient and/or unnecessary consumption of energy as required by Appendix F guidelines.

The Project's estimated energy demands were also analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2022 (i.e., the Project buildout year) to determine if these two energy utility companies would be able to meet the Project's energy demands. Finally, the capacity of local infrastructure to accommodate the Project's estimated electricity and natural gas demand was assessed based on the Energy Report, included as Appendix D.2 of this Draft EIR.

c. Analysis of Project Impacts

(1) Project Design Features

No specific project design features are proposed with regard to energy conservation and infrastructure. However, the Project would include project design features designed to improve energy efficiency as set forth in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR. The Project would also implement Project Design Feature NOI-PDF-1 in Section IV.H, Noise, of this Draft EIR, which would include the use of solar-powered generators, to the extent feasible, which would promote energy conservation. In addition, as discussed in Section IV.J, Transportation, of this Draft EIR, a Transportation Demand Management (TDM) Program would be developed and would include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips, pursuant to Mitigation Measure TR-MM-1. Furthermore, the Project would also include sustainability features related to

water conservation and waste reduction, as set forth in Section II, Project Description, of this Draft EIR.

(2) Project Impacts

Threshold (a): Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The following analysis considers the eight criteria identified in the Thresholds of Significance subsection above 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, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, maintenance and removal activities).

For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Project removal activities would include demolition or abandonment of the site. However, it is not known 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

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, electronic equipment, or other construction activities necessitating electrical power. 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.D-1 on page IV.D-19, approximately 23,621 kWh of electricity, 27,548 gallons of gasoline, and 96,034 gallons of diesel are estimated to be consumed during Project construction. Project construction is expected to be completed by 2022.

Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control primarily related to the excavation phase and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by LADWP and may be obtained from an existing electrical conduit in Vine Street. This would be consistent with suggested measures in the *L.A. CEQA Thresholds Guide* to use electricity from power poles/underground lines rather than temporary gasoline or diesel powered generators. Furthermore, the electricity demand during construction would be offset by the removal of the existing on-site uses which currently generate a demand for electricity.

As shown in Table IV.D-1, a total of approximately 23,621 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the site and staging areas would also comply with applicable Title 24 requirements which includes limits on the wattage allowed per specific area, which result in the conservation of energy.[44] As such, the demand for electricity during construction would not cause wasteful, inefficient, and unnecessary use of energy.

The estimated construction electricity usage represents approximately 1 percent[45] of the Project's estimated net annual operational demand, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.

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

[45] *The percentage is derived by taking the total amount of electricity usage during construction (23,621 kWh) and dividing that number by the total amount of net electricity usage during operation (2,430,102 kWh) to arrive at one percent.*

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

Energy Type	Quantity
Electricity	
Water Consumption	739 kWh
Lighting, electronic equipment, and other construction activities necessitating electrical power	22,882 kWh
Total Electricity	**23,621 kWh**
Gasoline	
On-Road Construction Equipment	27,548 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	**27,548 gallons**
Diesel	
On-Road Construction Equipment	62,143 gallons
Off-Road Construction Equipment	33,891 gallons
Total Diesel	**96,034 gallons**

kWh = kilowatt hours

[a] *Detailed calculations, based on CalEEMod and EMFAC, are provided in Appendix D.1 of this Draft EIR.*

[b] *Electricity usage is based on SCAQMD construction site survey data and typical requirements for power generators. Such electricity demand would be temporary, limited, and would cease upon the completion of construction.*

Source: Eyestone Environmental, 2019.

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 natural gas demand generated by construction.

Transportation Energy

The petroleum-based fuel use summary provided in Table IV.D-1 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions. As shown, on- and off-road vehicles would consume an estimated 27,548 gallons of gasoline and approximately 96,034 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.0004 percent of the 2017 annual on-road gasoline-related energy consumption and 0.01 percent of the 2017 annual diesel fuel-related energy consumption in Los Angeles

County, as shown in Appendix D.1 of this Draft EIR. Moreover, construction fuel usage would replace the existing fuel usage at the Project Site during construction.

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 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, and unnecessary use of energy.

(ii) Operation

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.D-2 on page IV.D-21, the Project's net new energy demand would be approximately 2,430 MWh of electricity per year, 7,030,152 cf of natural gas per year, 111,756 gallons of gasoline per year, and 20,044 gallons of diesel fuel per year.

Electricity

As shown in Table IV.D-2, with compliance with 2016 Title 24 standards and applicable 2016 CALGreen requirements, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 2,430 MWh per year. In addition to complying with CALGreen, the Project Applicant would also implement Project Design Feature GHG-PDF-1 in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would include features so as to be capable of meeting the standards of LEED Silver® or equivalent green building standards. Furthermore, the Project Applicant would also implement water usage reduction measures, which are identified as sustainable design features in compliance with code requirements, as discussed in Section II, Project Description, and Section IV.L.2, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. These measures would further reduce the Project's energy demand. In addition, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 30 percent of LADWP's overall energy mix in 2017, the most recent year for

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

Energy Type	Estimated Net Energy Demand[b]
Electricity[c]	
Building	2,378 MWh
Water	52 MWh
Total Electricity	**2,430 MWh**
Natural Gas	
Building	7,030,152 cf
Total Natural Gas	**7,030,152 cf**
Transportation	
Gasoline	111,756 gallons
Diesel	20,044 gallons
Total Transportation	**131,800 gallons**

MWh = megawatt hours

cf = cubic feet

[a] *Detailed calculations, based on CalEEMod and EMFAC, are provided in Appendix D.1 of this Draft EIR.*

[b] *Electricity and natural gas estimates assume compliance with applicable 2016 CALGreen requirements and implementation of Project Design Feature GHG-PDF-1 (specific mandatory requirements of achieving LEED Silver® or equivalent), in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR. Transportation fuel estimate assumes implementation of TDM program pursuant to Mitigation Measure TR-MM-1 in Section IV.J, Transportation, of this Draft EIR, and various Project characteristics.*

[c] *Project Design Feature GHG-PDF-2, discussed further in Section IV.F, Greenhouse Gas Emissions, states that that the Project would provide at least 20 percent EV ready charging stations. Project Design Feature GHG-PDF-3 would require 5 percent of the total code-required parking spaces with EV charging stations and/or outlets for plugin. Providing infrastructure for EV in itself does not result in additional electricity usage.*

Source: Eyestone Environmental, 2019.

which data are available.[46] This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Furthermore, the Project would comply with Section 110.10 of Title 24, which includes mandatory requirements for solar-ready buildings, and, as such, would not preclude the potential use of alternate fuels.

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2022–2023 fiscal year (the Project's buildout

[46] *California Energy Commission, Utility Annual Power Content Labels for 2017, www.energy.ca.gov/pcl/labels/2017_index.html, accessed March 8, 2019.*

year) will be 22,802 GWh of electricity.[47,48] As such, the Project-related net increase in annual electricity consumption of 2,430 MWh per year would represent approximately 0.01 percent of LADWP's projected sales in 2022. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

Natural Gas

As provided in Table IV.D-2 on page IV.D-21 with compliance with 2016 Title 24 standards and applicable 2016 CALGreen requirements, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas, totaling approximately 7,030,152 cf per year. As discussed above, in addition to complying with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen), the Project would implement project design features to further reduce energy use. The Project Applicant would implement Project Design Feature GHG-PDF-1 in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of the Project's new building would include features so as to be capable of meeting the standards of LEED Silver® or equivalent green building standards, which entails implementing conservation features to reduce natural gas usage. LEED Silver® or equivalent green building standards may be achieved through a variety of measures some of which are not directly related to energy consumption (e.g. interior lighting, acoustic performance). LEED Silver® requires exceeding Title 24, Part 6 by 10 percent for energy efficiency. In order to meet the LEED energy performance requirement, the Project may include use of efficient water heaters, cooking equipment and other major support appliances.

As stated above, the Project's estimated net increase in demand for natural gas is 7,030,152 cf per year, or approximately 19,261 cf per day. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,503 million cf per day in 2022 (the Project's buildout year).[49] The Project would account for approximately 0.001 percent of the 2022 forecasted consumption in SoCalGas' planning area. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

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

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

[49] *California Gas and Electric Utilities, 2018 California Gas Report, p. 100. Interpolated between 2025 and 2030 estimates.*

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. As noted above, the Project Site is located in an HQTA designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth," regional planning perspective.[50] As discussed in Section IV.J, Transportation, of this Draft EIR, the Project Site is located approximately 0.06 mile from the Metro Red Line (Hollywood/Vine Station). In addition, approximately 15 Metro, DASH, and Commuter Express bus lines serve the Project Site, including 10 Metro bus lines, three DASH bus lines, and two Commuter Express bus lines. The Project would provide bicycle storage areas for Project hotel guests and visitors. Furthermore, the Project is located within direct access to US-101 freeway. The Project would also incorporate characteristics that would reduce trips and VMT as compared to the Project without implementation of VMT reducing measures within the Air Basin as measured by CalEEMod. These relative reductions in vehicle trips and VMT from the Project without implementation of VMT reducing measures within the Air Basin help quantify the GHG emissions reductions achieved by locating the Project on an infill site in an HQTA that promotes alternative modes of transportation. Specifically, the Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*,[51] which identifies the VMT and vehicle trips reductions for the Project Site relative to the standard trip and VMT rates in CalEEMod, which corresponds to reduction in relative GHG emissions. Measures applicable to the Project include the following; a brief description of the Project's relevance to the measure is also provided:

- **CAPCOA Measure LUT-3—Increase Diversity of Urban and Suburban Developments (Mixed-Uses):** The Project would introduce new uses on the Project Site, including new hotel uses. The Project would co-locate complementary hotel and restaurant land uses in proximity to other existing off-site commercial and residential uses. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by

[50] *The Project Site is 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." Also refer to the City's ZIMAS system confirming the location of the Project Site within a Transit Priority Area.*

[51] *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010.*

encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.

- **CAPCOA Measure LUT-5—Increase Transit Accessibility:** The Project would be located approximately 500 feet from the Metro Red Line Hollywood/Vine Station and along several Metro, DASH, and Commuter Express routes. The Project would also provide adequate bicycle parking spaces for guest and commercial uses to encourage utilization of alternative modes of transportation.

- **CAPCOA Measure LUT-9—Improve Design of Development**: The project would include improved design elements including developing ground floor restaurant uses and improved streetscape which would enhance walkability in the project vicinity. The Project would also locate a development in an area with approximately 127 intersections per square mile which improves street accessibility and connectivity.

- **CAPCOA Measure SDT-1—Provide Pedestrian Network Improvements:** Project design would provide pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets to encourage people to walk instead of drive. The Project would provide direct access to the existing off-site pedestrian network including existing off-site sidewalks, to encourage and increase pedestrian activities in the area, which would further reduce VMT and associated transportation-related emissions.

As such, the Project's siting would minimize transportation fuel consumption through the reduction of VMT, as described above and discussed further in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR.

As summarized in Table IV.D-2 on page IV.D-21, when accounting for the features that would be implemented to reduce VMT, the Project's estimated net petroleum-based fuel usage would be approximately 111,756 gallons of gasoline and 20,044 gallons of diesel per year, or a total of approximately 131,800 gallons of petroleum-based fuels annually.

(iii) Summary of Energy Requirements and Energy Use Efficiencies

Appendix F of the CEQA Guidelines recommends quantification of the project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed. The Project's energy requirements were calculated based on the methodology contained in CalEEMod for electricity and natural gas usage. Project VMT data was calculated based on CAPCOA guidelines. The calculations also took into account energy efficiency measures such as Title 24, CalGreen and vehicle fuel economy standards. Table IV.D-1 and Table IV.D-2 on

pages IV.D-19 and IV.D-21, respectively, provide a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 23,261 kWh of electricity would be consumed along with 123,582 gallons of transportation fuel (gasoline and diesel). During Project operations, a total of 2,430,102 MWh of electricity, 7,030,152 cf of natural gas, and 131,800 gallons of transportation fuel would be consumed on an annual basis.

(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 to supply and convey water for dust control primarily related to the excavation phase, 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 over the anticipated construction period represents approximately one percent[52] of the Project's estimated net annual operational electricity demand, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be offset with the removal of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no natural gas demand generated by construction. Transportation fuel usage during Project construction activities would represent approximately 0.0004 percent of the 2017 annual on-road gasoline-related energy consumption and 0.01 percent of the 2017 diesel fuel-related energy consumption within Los Angeles County, respectively. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

(ii) Operation

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2022–2023 fiscal year (the Project's buildout

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[52] *The percentage is derived by taking the total amount of electricity usage during construction (23,261 kWh) and dividing that number by the total amount of net electricity usage during operation (2,430,102 kWh) to arrive at one percent.*

year) will be 22,802 GWh of electricity.[53,54] As such, the Project-related net increase in annual electricity consumption of 2,430 MWh per year would represent approximately 0.01 percent of LADWP's projected sales in 2022, the Project's buildout year. In addition, LADWP has confirmed that the Project's electricity demand can be served by the existing supply and distribution facilities in the Project area.[55] 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 increase in demand for natural gas is 7,030,152 cf per year, or approximately 19,261 cf per day. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,503 million cf per day in 2022, the Project's buildout year.[56] The Project would account for approximately 0.001 percent of the 2022 forecasted consumption in SoCalGas' planning area. In addition, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.[57] Furthermore, the Project would implement any necessary connections and upgrades required by SoCalGas for service to the Project Site.

In sum, energy consumption during Project operations would be relatively negligible and energy requirements are within LADWP's and SoCalGas' service provision.

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

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system experienced an all time high peak of 6,432 MW on August 31, 2017.[58] 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 2017, the base case peak demand for the power grid was 5,854 MW.[59] Under peak conditions, the Project

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53 LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

54 LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A.

55 KPFF Consulting Engineers, Utility Technical Report: Energy, March 15, 2017. Refer to Appendix D.2 of this Draft EIR.

56 California Gas and Electric Utilities, 2018 California Gas Report, p. 100.

57 KPFF Consulting Engineers, Utility Technical Report: Energy, March 15, 2017. Refer to Appendix D.2 of this Draft EIR.

58 LADWP, 2017 Retail Electric Sales and Demand Forecast, p. 6.

59 LADWP, 2017 Retail Electric Sales and Demand Forecast, p. 6.

would consume 2,430 MWh on an annual basis which is equivalent to a peak load of 528 kW. In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.01 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.[60] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

(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 (includes 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.[61] Electricity and natural gas usage during Project operations presented in Table IV.D-2 on page IV.D-21 would comply with 2016 Title 24 standards and applicable 2016 CalGreen requirements and Los Angeles Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks and equipment used during proposed construction activities, the Project will 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 travelling to and from the Project Site are assumed to comply with CAFE fuel economy standards. Project-related vehicle trips would also comply with Pavley and LCFS which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards.

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.

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[60] *LADWP, 2017 Retail Electric Sales and Demand Forecast, p. 6.*

[61] *Energy Independence and Security Act of 2007. (Pub.L. 110-140).*

(e) Effects of the Project on Energy Resources

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

Natural gas supplied to the 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.[62] According to the United States Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.[63] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[64] 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 comply with Pavley and LCFS which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above in Subsection IV.L.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. Accordingly, LADWP is required to procure at least 50 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 30 percent of LADWP's overall energy

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62 *California Gas and Electric Utilities, 2018 California Gas Report.*

63 *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed March 8, 2019.*

64 *BP Global, Oil reserves, www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed March 8, 2019.*

mix in 2017, the most recent year for which data are available.[65] This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, as required by 2016 Title 24, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, 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, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, methane, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[66]

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

As discussed above, the Project would include project features to reduce vehicle miles travelled during operational activities. The Project's design, which includes dedicated bicycle parking facilities and an improved street accessibility and connectivity, encourages non-automotive forms of transportation such as walking or biking to destinations. In addition, the Project would be located approximately 500 feet from the Metro Red Line Hollywood/Vine Station and along several Metro, DASH, and Commuter Express routes, which would encourage alternative modes of transportation. As further discussed in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, these measures would reduce VMT by approximately 48 percent in comparison to a standard project as estimated by CalEEMod, with a corresponding reduction in the Project's petroleum-based fuel usage. Therefore, the Project would encourage the use of efficient transportation alternatives.

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[65] *California Energy Commission, Utility Annual Power Content Labels for 2017, www.energy.ca.gov/pcl/labels/2017_index.html, accessed March 8, 2019.*

[66] *CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26kM6jR-%255Br%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1%26qCw3hR%255Br%255D%3Dt&bL=groad&cE=0&lR=0&mC=34.09773289693434%2C-118.32507133483887&zL=14, accessed March 8, 2019.*

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

The current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). In addition to compliance with the City's Green Building Code, the Project would be capable of achieving at least LEED Silver® equivalent status, which include conservation features to reduce natural gas usage. LEED Silver® equivalent status may be achieved through a variety of measures, some of which are not directly related to energy consumption (e.g. interior lighting, acoustic performance). As discussed above, LEED Silver® requires exceeding Title 24, Part 6 by 10 percent for energy efficiency. Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, 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. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

With implementation of these features along with complying with state and local energy efficiency standards, the Project would meet and/or exceed all applicable energy conservation policies and regulations.

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

As discussed in Section IV.F, Greenhouse Gas Emissions, the City has published the LA Green Plan/ClimateLA in 2007 which outlines goals and actions by the City to reduce GHG emissions. To facilitate implementation of the LA Green Plan/Climate LA, the City adopted the Green Building Code. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2016 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City of Los Angeles Green Building Code.

With regard to transportation uses, the Project design would reduce the vehicle miles travelled throughout 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, of this Draft EIR, SCAG's 2016 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2016 RTP/SCS. Most notably, the Project would be a mixed-use development, consisting of hotel and restaurant uses in proximity to Hollywood Boulevard, a commercial corridor that is characterized by a high degree of pedestrian activity. The Project would be well-served by existing public transportation, including Metro and LADOT bus lines and rail lines. This is evidenced by the Project Site's location within a designated HQTA.[67]

The introduction of new housing and job opportunities within an HQTA, as proposed by the Project, is consistent with numerous policies in the 2016 RTP/SCS. The 2016 RTP/SCS is estimated to result in an 8-percent decrease in VMT by 2020, an 18-percent decrease in VMT by 2035, and a 21-percent decrease in VMT by 2040. In March 2018, CARB adopted updated targets requiring a 19-percent decrease in VMT for the SCAG region by 2035. As the CARB targets were adopted after the 2016 RTP/SCS, it is expected that the updated targets will be incorporated into the next RTP/SCS. The 2016 RTP/SCS and/or the next RTP/SCS are expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals. Thus, consistent with both the 2016 RTP/SCS and CARB's updated targets adopted in March 2018, the Project would reduce VMT by 53 percent in comparison to a standard project as estimated by CalEEMod, and, consequently, the Project's petroleum-based fuel usage would be reduced.

These VMT reducing measures are also consistent with the goals of the Sustainable City pLAn which targets GHG emissions generated by city owned buildings and properties. Although the Sustainable City pLAn targets City generated GHG emissions, the Project would also comply with or not conflict with measures to reduce GHG emission. In addition, the Project would comply with state energy efficiency requirements, would be capable of

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[67] *The Project Site is 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." Also refer to the City's ZIMAS system confirming the location of the Project Site within a Transit Priority Area.*

achieving at least current LEED Silver® equivalent status, and would use electricity from LADWP, which has a current renewable energy mix of 30 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 be consistent with adopted energy conservation plans.

(i) Conclusion

As demonstrated in the analysis above, the Project would not result in potentially significant environmental impact due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. In addition to compliance with the City's Green Building Code, the Project would be capable of achieving at least LEED Silver® equivalent status with implementation of Project Design Feature GHG-PDF-1, which requires exceeding Title 24, Part 6 by 10 percent for energy efficiency. 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. 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 as well as include energy conservation measures beyond requirements such as LEED Silver® equivalency. **In summary, the Project would comply with existing energy efficiency standards and would not cause wasteful, inefficient, or unnecessary use of energy. Therefore, Project impacts related to energy use under Threshold (a) would be less than significant during construction and operation.**

Threshold (b): Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As discussed in Subsection 3.c(2)(h) above, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2016 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. In addition, the Project would implement measures to achieve LEED Silver® equivalency which would exceed Title 24 energy efficiency requirements.

As discussed in greater detail in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project would also be consistent with the LA Green Plan/Climate LA. As discussed therein, Project Design Feature GHG-PDF-1 would require the design of the new buildings to incorporate features to achieve the sustainability intent of the Silver Rating under the LEED® green building program or equivalent green building standards. In

addition, GHG-PDF-1 would require reduction of energy usage by 10 percent over baseline conditions. In order to meet reduction goals in the LA Green Plan/ClimateLA, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and storm water capture. With regard to solid waste, the City implemented the RENEW LA plan to meet solid waste reduction goals by expanding recycling to multifamily dwellings, commercial establishments, and restaurants. The Project would be indirectly affected by these actions and would further reduce water and solid waste generation, thereby meeting the goals of the LA Green Plan/ClimateLA.

With respect to the Sustainable City Plan, as also discussed in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, although the pLAn is not directly applicable to private development projects, the Project would generally be consistent with these aspirations as it is an infill development consisting of hotel and restaurant uses on a Project Site located approximately 500 feet from the Metro Red Line Hollywood/Vine Station. The Project would be well-served by transit and would implement a TDM Program that would encourage transit use. Furthermore, the Project would comply with CALGreen, implement various project design features to reduce energy usage, water conservation measures, and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAn with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project residents and guests.

With regard to transportation related energy usage, the Project would comply with goals of the SCAG's 2016 RTP/SCS which incorporates VMT targets established by SB 375. The Project's mixed-use development and proximity to public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, the Project would not conflict with adopted energy conservation plans, or violate state or federal energy standards. **Therefore, Project impacts associated with regulatory consistency under Threshold (b) would be less than significant.**

4. Cumulative Impacts

a. Wasteful, Inefficient, and 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 106 related projects located within the vicinity of the Project Site and the Hollywood Community Plan Update (Related Project No. 107).[68] The geographic context for the cumulative impact analysis on electricity is the service area of LADWP, and the geographic context for the cumulative impact analysis on 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, as well as the need for energy infrastructure, such as new or expanded energy facilities.

(1) 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 rendering the Project more energy-efficient, and would be consistent with growth expectations for LADWP's service area. The Project would also incorporate additional energy efficiency measures to make the Project capable of achieving LEED Silver® certification, as required by Project Design Feature GHG-PDF-1. Furthermore, other future development projects (related projects) would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary.

Additionally, as discussed above, LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available.[69] This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. Therefore, the Project and related projects would comply with energy conservation plans and efficiency standards required to ensure that energy is used efficiently. **As such, the Project's contribution to cumulative impacts related to potentially significant environmental**

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[68] *As described in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 106, which itself is a conservative assumption, would account for any initial amount of growth that may occur between the adoption of the Hollywood Community Plan Update and Project buildout.*

[69] *California Energy Commission, Utility Annual Power Content Labels for 2017, www.energy.ca.gov/pcl/labels/2017_index.html, accessed March 8, 2019.*

impacts due to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.

(2) Natural Gas

Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SoCalGas' service area. The Project would also incorporate additional energy efficiency measures capable of achieving LEED Silver® certification. Furthermore, future development projects (related projects) would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. Therefore, the Project and related projects would comply with energy conservation plans and efficiency standards required to ensure that energy is used efficiently. **As such, cumulative impacts related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable and, thus, would be less than significant.**

(3) 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 region. As described above, at buildout, the Project would consume a net total of 111,756 gallons of gasoline and 20,044 gallons of diesel per year, or a total of approximately 131,800 gallons of petroleum-based fuels. For comparison purposes, transportation fuel usage during Project construction activities would represent approximately 0.0004 percent of the 2017 annual on-road gasoline-related energy consumption and 0.01 percent of the 2017 diesel fuel-related energy consumption within Los Angeles County, respectively, as shown in Appendix D.1, 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 travelled 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.

Additionally, as described above, petroleum currently accounts for 90 percent of California's transportation energy sources; however, over the last decade the state has

implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled, which would reduce reliance on petroleum fuels. According to the CEC demand forecasts, gasoline consumption would decline by up to 3.7 percent for the next 10 years due to improved fuel economy and the use of alternative fuels, such as natural gas, biofuels, and electricity.[70] 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.

Furthermore, as described above, the Project would be consistent with the energy efficiency policies emphasized by the 2016 RTP/SCS. Specifically, the Project would be a mixed-use development, consisting of hotel and restaurant uses in proximity to Hollywood Boulevard, a commercial corridor that is characterized by a high degree of pedestrian activity. The Project would be well-served by existing public transportation, including Metro and LADOT bus lines and rail lines. This is evidenced by the Project Site's location within a designated HQTA.[71] The introduction of new job opportunities within an HQTA, as proposed by the Project, is consistent with numerous policies in the 2016 RTP/SCS related to locating new housing and jobs near transit. These features would serve to reduce VMT and associated transportation fuel consumption.[72] By its very nature, the 2016 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. In addition, it is assumed that related projects in the Project Site vicinity would reduce VMT, consistent with the goals of the 2016–2040 RTP/SCS. **Since the Project is consistent with the 2016 RTP/SCS, its contribution to cumulative impacts related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of transportation fuel would not be cumulatively considerable and, thus, would be less than significant.**

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[70] *California Energy Commission, 2015 Integrated Energy Policy Report, docketed June 29, 2016, p. 113.*

[71] *The Project Site is 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." Also refer to the City's ZIMAS system confirming the location of the Project Site within a Transit Priority Area.*

[72] *Implementation of Project Design Features GHG-PDF-2 and GHG-PDF-3 (minimum of 20 percent of total code-required parking spaces shall be capable of supporting future EVSE and 5 percent equipped with EV charging stations) would also serve to reduced transportation fuel consumption.*

(4) Conclusion

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

b. Consistency with State or Local Plans

Related and future projects within the Project area would be required to comply with energy conservation and renewable energy plans and polices described above, including Title 24, CALGreen, and the City's 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.

Furthermore, as described above, the Project would be consistent with the policies emphasized by the 2016 RTP/SCS. The Project would be a mixed-use Project and located near public transit which would result in a VMT reduction. As discussed in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project results in a VMT reduction of approximately 53 percent in comparison to a standard project as estimated by CalEEMod, which would be consistent with the reduction in VMT and associated emissions per capita provided in the 2016 RTP/SCS and with CARB's updated 2035 target. **Therefore, the Project is consistent with the 2016 RTP/SCS and would not be cumulatively considerable with regard to consistency with energy conservation plans. Cumulative impacts under Threshold (b) are concluded to be less than significant.**

5. Mitigation Measures

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

6. Level of Significance After Mitigation

a. Energy Use

Project-level and cumulative impacts related to energy use would be less than significant without mitigation.

b. Consistency with State or Local Plans

Project-level and cumulative impacts related to consistency with plans and policies would be less than significant without mitigation.