

IV. Environmental Impact Analysis

C. Energy

1. Introduction

This section 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 section evaluates the demand for energy resources attributable to the Project during construction and operation and makes a determination regarding the Project’s use and conservation of energy resources. In addition, this section evaluates the Project’s consistency with adopted energy conservation plans and policies relevant to the Project. This section also 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. The information presented herein is based, in part, on the *Energy Calculations for 1111 Sunset* prepared by Eyestone Environmental, which is included as Appendix F to this Draft EIR and the *Utility Technical Report: Water, Wastewater and Energy* (Utility Report) prepared by KPFF Consulting Engineers (February 2021), which is included as Appendix S.2 of this Draft EIR, respectively.¹

2. Environmental Setting

a. Regulatory Framework

(1) Federal

(a) *Federal Corporate Average Fuel Economy (CAFE) Standards*

First established by the U.S. 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 U.S. Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given for: (1) technological feasibility; (2) economic

¹ Refer to Section IV.N.3, *Utilities and Service Systems—Energy Infrastructure*, of this Draft EIR for a discussion of electric power and natural gas infrastructure.

practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.²

(b) Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national 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.”³

(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 (California Code of Regulations, Title 24, Part 6) were adopted to

² For more information on the CAFE standards, refer to www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy, accessed October 20, 2020.

³ 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.

ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. On May 9, 2018, the CEC adopted the 2019 Title 24 Standards, which went into effect on January 1, 2020. The 2019 standards continue to improve upon the previous (2016) Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings.⁴ The 2019 Title 24 Standards represent “challenging but achievable design and construction practices” that represent “a major step towards meeting the Zero Net Energy (ZNE) goal.” Single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. Nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades.⁵

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

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, most recently 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.⁶ The CalGreen code is updated regularly with the latest version (2019) going into effect January 1, 2020. Most mandatory measure changes in the 2019 CALGreen Code from the previous 2016 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 outdoor water use were clarified to present a more generic reference to irrigation requirements for residential developments. In addition, the 2019 CALGreen Code resulted in minor changes to voluntary measures related to landscaping water usage and indoor air quality. Compliance with the CALGreen Code is enforced through the building permit process.

(b) California’s Renewable Portfolio Standard

First established in 2002 under Senate Bill (SB) 1078, California’s Renewable Portfolio Standards (RPS) require retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020.⁷ The

⁴ CEC, *2019 Building Energy Efficiency Standards*.

⁵ CEC, *2019 Building Energy Efficiency Standards, Fact Sheet*.

⁶ California Building Standards Commission, *Guide to the 2016 California Green Building Standards Code Nonresidential, January 2017*.

⁷ CPUC, *California Renewables Portfolio Standard (RPS)*, www.cpuc.ca.gov/RPS_Homepage/, accessed October 20, 2020.

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 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 greenhouse gas (GHG) emissions 40 percent below their 1990 levels by 2030. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.⁹

(d) Senate Bill 100

Senate Bill (SB) 100, signed September 10, 2018, is the 100 Percent Clean Energy Act of 2018. SB 100 updates the goals of California's Renewable Portfolio Standard 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.E, 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

⁸ CPUC, *California Renewables Portfolio Standard (RPS)*, www.cpuc.ca.gov/RPS_Homepage/, accessed October 20, 2020.

⁹ *Senate Bill 350 (2015–2016 Reg. Session) Stats 2015, ch. 547.*

¹⁰ *Senate Bill 100 (2017–2018) Reg. Session_ Stats 2018, ch. 312.*

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.

(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 It was expected that the Pavley regulations would reduce GHG emissions from California's passenger vehicles by about 30 percent in 2016, while improving fuel efficiency and reducing motorists' costs.¹²

(g) California Air Resources Board

(i) CARB's Advanced Clean Cars Program

Closely associated with the Pavley regulations, the Advanced Clean Cars 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 2015–2025.¹⁴ The components of the Advanced Clean Cars program 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 (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.¹⁵ In March 2017, CARB voted unanimously to continue with the vehicle greenhouse gas

¹¹ CARB, *Clean Car Standards—Pavley, Assembly Bill 1493*, www.arb.ca.gov/cc/ccms/ccms.htm, accessed October 20, 2020.

¹² CARB, *Clean Car Standards—Pavley, Assembly Bill 1493*, www.arb.ca.gov/cc/ccms/ccms.htm, accessed October 20, 2020.

¹³ CARB, *California's Advanced Clean Cars Program*, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed October 20, 2020.

¹⁴ CARB, *California's Clean Cars Program*, www.arb.ca.gov/msprog/acc/acc.htm, accessed October 20, 2020.

¹⁵ CARB, *California's Advanced Clean Cars Program*, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed October 20, 2020.

emission standards and the ZEV program for cars and light trucks sold in California through 2025.¹⁶

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

(h) Sustainable Communities Strategy (SB 375)

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, 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 each 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.¹⁷

The Project Site is located within the planning jurisdiction of the Southern California Association of Governments (SCAG). SCAG’s first-ever SCS was 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

¹⁶ CARB, News Release: CARB finds vehicle standards are achievable and cost-effective, website: <https://ww2.arb.ca.gov/news/carb-finds-vehicle-standards-are-achievable-and-cost-effective>, accessed October 20, 2020.

¹⁷ California State Legislature, SB 375 Transportation planning: travel demand models: sustainable communities strategy, environmental review, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375, accessed October 20, 2020.

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).¹⁸ 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 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 (Public Resources Code [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 Update, addresses a variety of issues including the 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 issues, update on the 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*.¹⁹

(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 significant 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

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

¹⁹ CEC, *2016 Integrated Energy Policy Report Update*, docketed February 28, 2017.

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 including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources;
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

(3) Regional

As discussed in Section IV.H, Land Use and Planning, 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."²⁰ 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 building types. Furthermore, the 2016 RTP/SCS includes transportation investments and land use strategies that encourage carpooling, increase transit use, active transportation opportunities, and promoting more walkable and mixed use communities, which would potentially help to reduce VMT.

²⁰ SCAG, 2016–2040 RTP/SCS.

On September 3, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.²¹ As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.²² The 2020–2045 RTP/SCS was certified by the California Air Resources Board (CARB) on October 30, 2020. The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS as discussed later in this section, the Project would also be consistent with the 2020–2045 RTP/SCS.²³ Because the 2020–2045 RTP/SCS was adopted by SCAG subsequent to both circulation of the Notice of Preparation (NOP) for the Project on May 21, 2018, and approval by LADOT of the Transportation Assessment for the Project on August 8, 2020, this section and the balance of this Draft EIR provided detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

The 2016 RTP/SCS also establishes High-Quality Transit Areas (HQTA), 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.²⁴ Local jurisdictions are encouraged to focus housing and employment growth within QTAs to reduce VMT. The Project Site is located within a HQTA as designated by the 2016 RTP/SCS.²⁵

²¹ SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

²² SCAG, *News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

²³ *For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within a High-Quality Transit Area (HQTA) immediately adjacent to a Metro light rail station and in close proximity to more than a dozen bus routes, would include transit-oriented development, and would implement TDM, all of which would reduce the City's per capita VMT and associated air emissions. Another example is that because the Project would be consistent with the City's existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.*

²⁴ SCAG, *2016–2040 RTP/SCS, p. 8.*

²⁵ SCAG, *2016–2040 RTP/SCS; Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.*

(4) Local

(a) City of Los Angeles Green Building Code

On December 11, 2019, the Los Angeles City Council approved Ordinance No. 186,488, 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 2019 CALGreen Code. Projects filed on or after January 1, 2020, 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) City of Los Angeles Sustainable City pLAn/L.A.’s Green New Deal

In April 2019, Mayor Eric Garcetti released the Green New Deal, a program of actions designed to create sustainability-based performance targets through 2050 and advance economic, environmental, and equity objectives. L.A.’s Green New Deal is the first four-year update to the City’s first Sustainable City pLAn that was released in 2015. The 2019 Sustainable City pLAn/L.A.’s Green New Deal has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling of 100 percent of wastewater by 2035.

b. Existing Conditions

The Project Site is currently developed with five buildings, four of which are vacant. The Elysian apartment building is currently occupied and will remain as part of the Project Site but is not part of the Project. The vacant structures within the Project Site comprise approximately 114,600 square feet. Energy usage is typically associated with building electricity and natural gas consumption while mobile source energy is associated with vehicle trips to and from the Project site. These forms of energy consumption are associated with the Elysian apartment building which is on the Project Site but not part of the Project. The vacant on-site buildings to be removed consume minimal energy and do not generate vehicle trips. To provide a conservative analysis of the Project, existing energy usage associated with the vacant buildings are considered to be *de minimis* (i.e., zero).

(1) Electricity

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours.

The Los Angeles Department of Water and Power (LADWP) provides 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.²⁶ In 2017, the LADWP power system experienced an instantaneous peak demand of 6,432 MW.²⁷ Approximately 32 percent of LADWP's 2018 electricity purchases were from renewable

²⁶ LADWP, *2017 Power Strategic Long-Term Resources Plan*, December 2017.

²⁷ LADWP, *2017 Retail Electric Sales and Demand Forecast*, p. 6.

sources, which is similar to the 31 percent statewide percentage of electricity purchases from renewable sources.²⁸

LADWP supplies electrical power to the Project Site from electrical service lines located in the Project vicinity. According to the Utility Report, there are underground powerlines within the Sunset Boulevard right-of-way as well as the White Knoll Drive right-of-way. According to the LADWP, there is existing electricity infrastructure within the Project vicinity that can be extended to serve the site.

Existing electricity usage was estimated based on the same methodology contained in the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

(2) Natural Gas

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

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

²⁸ California Energy Commission, *Utility Annual Power Content Labels for 2018*.

²⁹ SoCalGas, *Company Profile*, www.socalgas.com/about-us/company-profile, accessed October 20, 2020.

³⁰ California Gas and Electric Utilities, *2018 California Gas Report*, pp. 80.

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 Utility Report, SoCalGas operates a 2-inch gas main, a 12-inch gas main, and a 1.25-inch gas main within Sunset Boulevard 19 feet, 75 feet, and 91 feet west of the property line, respectively. There is a 3-inch gas main along White Knoll Drive 57.5 feet north of the property line.

(3) Transportation Energy

According to the CEC, transportation accounts for nearly 37 percent of California's total energy consumption in 2014.³³ In 2016, California consumed 15.5 billion gallons of gasoline and 3.0 billion gallons of diesel fuel.^{34,35} Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.³⁶ However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined.³⁷ The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels.³⁸ According to CARB's EMFAC Web Database, Los Angeles County on-road

³¹ *California Gas and Electric Utilities, 2018 California Gas Report, pp. 80.*

³² *California Gas and Electric Utilities, 2018 California Gas Report, pp. 80.*

³³ *CEC, 2016 Integrated Energy Policy Report, docketed January 18, 2017, p. 4.*

³⁴ *California Board of Equalization, Net Taxable Gasoline Gallons 10-Year Report.*

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

³⁶ *CEC, 2016–2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, March 2016.*

³⁷ *State Board of Equalization, Economic Perspective, Discussion of Recent Economic Developments, Publication 329, Volume XIX, Number 1, February 2013.*

³⁸ *CEC, 2015 Integrated Energy Policy Report, docketed June 29, 2016, p. 113.*

transportation sources consumed 3.99 billion gallons of gasoline and 1.23 billion gallons of diesel fuel in 2018.³⁹

Persons traveling to and from the Project Site also have the option of using public transportation to reduce transportation-related fuel use. The Project would be serviced by a total of 37 local bus routes, including 11 Metro lines and 26 bus routes from various agencies such as LADOT Commuter Express, DASH, and Foothill Transit, which run within a quarter mile of the Project Site. For further discussion of public transit lines that serve the Project area, refer to Section IV.L, 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 is 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

Appendix G was amended in December 2018 to assess whether a project would result in wasteful, inefficient, or unnecessary energy consumption. As discussed in more detail below, these checklist questions take into account requirements of Appendix F. In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to energy if it would:⁴⁰

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

³⁹ California Air Resources Board, EMFAC2014 Web Database, www.arb.ca.gov/emfac/2014/, accessed September 4, 2020.

⁴⁰ Subsequent to the publication of the Notice of Preparation for this Project, the California Natural Resources Agency recently adopted revisions to the CEQA Guidelines that became effective on December 28, 2018. The adopted revisions include energy as a separate subsection. In addition, Checklist Question XIX.a was reworded to include analysis for facilities of electric power and natural gas.

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:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

In accordance with Appendix F and the *L.A. CEQA Thresholds Guide*, the following 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 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.⁴¹ Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power was calculated based on data provided in South Coast Air Quality Management District (SCAQMD) construction surveys (i.e., construction activity, horsepower, load factor, and hours of use per day).⁴² The SCAQMD construction surveys identified the use of diesel generators to supply construction sites with electrical power. As SCAQMD recommends use of electricity from LADWP instead of diesel generators, the Project would use pole power to the extent feasible. The equivalent use of electrical power based on diesel generator surveys was calculated for 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 F of this Draft EIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of the SCAQMD

⁴¹ *California Air Pollution Control Officers Association, CalEEMod™ version 2016.3.2 User's Guide, November 2017.*

⁴² *CalEEMod Users Guide. Appendix E1, Technical Source Documentation. October 2017.*

CEQA Air Quality Handbook. Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total VMT was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC 2017 model (EMFAC2017). EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker trips were assumed to include 50 percent light duty gasoline auto and 50 percent light duty gasoline trucks. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks. Refer to Appendix F of this Draft EIR for detailed calculations.

(2) Operation

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas was calculated using demand factors provided in CalEEMod as part of the GHG analysis included in Section IV.E, 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 *Transportation Assessment for the 1111 Sunset Boulevard Mixed Use Project, Los Angeles* dated , California October 2020 (Traffic Study), prepared by Gibson Transportation Consulting, Inc. (see Appendix Q.1 of this Draft EIR). As discussed therein, the Project-related VMT was calculated using the LADOT VMT Calculator. The VMT Calculator was developed by the City and LADOT to comply with SB 743, which requires lead agencies to adopt VMT criteria to determine transportation related impacts. The resulting annual VMT was used as part of the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. Based on this annual VMT, gasoline and diesel consumption rates were calculated using the county-specific miles per gallon calculated using EMFAC2017. 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 F 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 2028 (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 Utility Report, included as Appendix S.2 of this Draft EIR.

c. Project Design Features

The Project would include project design features designed to improve energy efficiency as set forth in Section IV.E, Greenhouse Gas Emissions and Section IV.N.1, Utilities and Service Systems—Water Supply and Infrastructure.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under both development scenarios) would be located in the same building (the Sunset Building) and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. The following analysis accounts for both development scenarios and the term “Project” is used unless stated otherwise.

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and water-efficient landscape design. Furthermore, the design of the new buildings will comply with 2019 Title 24, Part 6, California Code requirements. As discussed above, the 2019 Title 24 Standards represent “challenging but achievable design and construction practices” that represent “a major step towards meeting the Zero Net Energy (ZNE) goal.”

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

(1) Impact Analysis

The following analysis considers the 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

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).⁴³

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 of the structures constructed under this Project would include demolition or abandonment of the Project Site with the exception of the existing Elysian apartments. 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, which would be the same under both development scenarios, 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).

⁴³ *Removal activities relate to the life of a project.*

As shown in Table IV.C-1 on page IV.C-21, a total of 37,997 kWh of electricity, 134,610 gallons of gasoline, and 678,537 gallons of diesel is estimated to be consumed during Project construction. The Project is expected to be built out by 2028. However, to provide for a conservative analysis that accounts for the potential for overlapping phases of construction, it was assumed that Project construction phases would overlap with construction completed as early as 2024. As time progresses, construction equipment and trucks are expected to be more efficient (use less fuel and energy) due to regulatory requirements, programs and mandates. Therefore, the analysis of this earlier construction build-out year with overlapping phases of construction is more conservative.

Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. This would be consistent with suggested measures in the *L.A. CEQA Thresholds Guide* to use electricity from power poles rather than temporary gasoline or diesel powered generators.

As shown in Table IV.C-1, a total of approximately 37,997 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 0.43 percent and 0.44 percent of the estimated annual operational demand under the Mixed Use Development Scenario and No-Hotel Development Scenario respectively which, as discussed below, would be within the supply and infrastructure service capabilities of

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

**Table IV.C-1
Summary of Energy Use During Project Construction^a**

Fuel Type	Quantity
Electricity	
Water Consumption	5,288 kWh
Lighting, electronic equipment, and other construction activities necessitating electrical power ^b	32,710 kWh
Total Electricity	37,997 kWh
Gasoline	
On-Road Construction Equipment	134,610 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	134,610 gallons
Diesel	
On-Road Construction Equipment	450,502 gallons
Off-Road Construction Equipment	228,035 gallons
Total Diesel	678,537 gallons
<hr/> <p><i>Numbers may not add up exactly due to rounding.</i></p> <p><i>kWh = kilowatt hours</i></p> <p>^a <i>Detailed calculations are provided in Appendix F of this Draft EIR.</i></p> <p>^b <i>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.</i></p> <p><i>Source: Eyestone Environmental, 2020.</i></p>	

LADWP.⁴⁵ As such, the demand for electricity during construction would not cause wasteful, inefficient, and unnecessary use of energy.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction.

⁴⁵ *The percentage is derived by taking the total amount of electricity usage during construction (37,997 kWh) and dividing that number by the total amount of electricity usage during operation (9,536,915 kWh) for the Mixed Use Development Scenario to arrive at 0.42 percent. Electricity usage during construction is divided by the total amount of electricity usage during operation (9,398,497 kWh) for the No Hotel Development Scenario to arrive at 0.40 percent.*

Transportation Energy

The petroleum-based fuel use summary provided above in Table IV.C-1 on page IV.C-21 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix F, of this Draft EIR. As shown, on- and off-road vehicles would consume an estimated 134,610 gallons of gasoline and approximately 678,537 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.002 percent of the 2021 (construction start year) annual on-road gasoline-related energy consumption and 0.06 percent of the 2021 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix F, of this Draft EIR.⁴⁶

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.C-2 on page IV.C-23, the Project's energy demand would be approximately 9,537 MWh of electricity per year, 18,420,535 cf of natural gas per year, 587,073 gallons of gasoline per year, and 124,013 gallons of diesel fuel per year under the Mixed Use Development Scenario. Under the No-Hotel Development Scenario, energy demand would be approximately 9,398 MWh of electricity per year, 17,541,278 cf of natural gas per year, 551,907 gallons of gasoline per year, and 116,584 gallons of diesel fuel per year. It should be noted that no credits or reductions for energy usage was taken for the existing vacant buildings.

⁴⁶ *Energy modeling for construction assumed a 2021 start year. However, construction may be delayed to start in 2022. If construction were to be delayed, construction vehicles and equipment would be subject to more stringent fuel economy standards, resulting in reduced energy usage. Therefore, analysis of construction starting in year 2021 would be more conservative.*

**Table IV.C-2
Summary of Annual Energy Use During Project Operation^a**

Source	Estimated Energy Demand ^b
Mixed Use Development Scenario	
Electricity^c	
Building	7,946 MWh
Water ^d	984 MWh
EV Charging	100 MWh
Mechanical Parking Lift	508 MWh
Total Electricity	9,537 MWh
Natural Gas	
Building ^e	18,420,535 cf
Total Natural Gas	18,420,535 cf
Transportation	
Gasoline	587,073 gallons
Diesel	124,013 gallons
Total Transportation	711,086 gallons
No-Hotel Development Scenario	
Electricity^c	
Building	7,757 MWh
Water ^d	1,020 MWh
EV Charging	113 MWh
Mechanical Parking Lift	508 MWh
Total Electricity	9,398 MWh
Natural Gas	
Building ^e	17,541,278 cf
Total Natural Gas	17,541,278 cf
Transportation	
Gasoline	551,907 gallons
Diesel	116,584 gallons
Total Transportation	668,491 gallons
<p>Numbers may not add up exactly due to rounding. kWh = kilowatt hours cf = cubic feet</p> <p>^a Detailed calculations are provided in Appendix F of this Draft EIR.</p> <p>^b Electricity and natural gas estimates assume compliance with applicable CALGreen requirements. Transportation fuel estimates include project characteristics consistent with CAPCOA guidance measures.</p> <p>^c As discussed further in Section IV.E, Greenhouse Gas Emissions, the Project would provide 10 percent of code-required parking spaces with EV charging equipment and a total of 30 percent of code-required parking spaces wired for EV ready charging stations, consistent with City codes. Providing infrastructure for EV in itself does not result in</p>	

Table IV.C-2 (Continued)
Summary of Annual Energy Use During Project Operation

Source	Estimated Energy Demand ^b
<p><i>additional electricity usage. These project design features were not included in the electricity calculation for the Project electricity usage.</i></p> <p>^d <i>Calculations assume compliance with Project Design Feature WAT-PDF-1.</i></p> <p>^e <i>GHG-PDF-1 prohibits fireplaces within new residential uses.</i></p> <p><i>Source: Eyestone Environmental, 2020.</i></p>	

Electricity

As shown in Table IV.C-2 on page IV.C-23, with compliance with 2019 CALGreen requirements, buildout of the Project would result in a projected on-site demand for electricity totaling approximately 9,537 MWh per year under the Mixed Use Development Scenario and 9,398 MWh per year under the No-Hotel Development Scenario.

A portion of the Project's parking spaces would be allocated for valet parking. The valet service would use a mechanical parking lift which uses an elevator-type system to place cars in storage (park). Vehicles arriving to the site using the valet service would not need to search for a parking space, reducing emissions from idling and on-site travel. In addition, parking spaces allocated to the mechanical parking lift would not be publicly accessible for safety purposes. As a result, the portion of the parking garage used for the mechanical parking lift would require minimal ventilation and lighting, reducing energy usage. However, the mechanical parking lift is powered by electricity and would increase the Project's overall electricity consumption. Electricity consumption due to operation of the parking lift is included in the Project's total electricity demand and calculations are provided in Appendix F.

In addition to complying with CALGreen, the Project Applicant would also implement Project Design Feature WAT-PDF-1, presented in Section IV.N.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, which states that the Project would incorporate water conservation features, such as high efficiency toilets with a flush volume of 1.1 gallons or less, residential bathroom faucets with a maximum flow rate of 0.5 gallon per minute and showerheads with a maximum flow rate of 1.5 gallons per minute or less, among others. 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 and 50 percent by 2030. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 32 percent of LADWP's overall energy mix in 2018, the most recent year for which data

are available.⁴⁷ 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 2027–2028 fiscal year (the Project's buildout year) will be 24,341 GWh of electricity.^{48,49} As such, the Project-related annual electricity consumption of 9,537 MWh per year under the Mixed Use Development Scenario and 9,398 MWh per year under the No-Hotel Development Scenario would represent less than 0.04 percent of LADWP's projected sales in 2028. 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.C-2 on page IV.C-23, with compliance with 2019 Title 24 standards and applicable CALGreen requirements, buildout of the Project is projected to generate an on-site demand for natural gas totaling approximately 18,420,535 cf per year under the Mixed Use Development Scenario and 17,541,278 cf per year under the No-Hotel Development Scenario. 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 may include use of efficient water heaters, cooking equipment and other major support appliances. Furthermore, the Project Applicant would implement GHG-PDF-1 in Section IV.E, Greenhouse Gases, of this Draft EIR, which states that the Project would prohibit the use of natural gas-fueled fireplaces in the proposed residential units.

As stated above, the Project's estimated demand for natural gas is 18,420,535 cf per year, or approximately 50,467 cf per day under the Mixed Use Development Scenario. Under the No-Hotel Development Scenario, natural gas demand would be 17,541,278 cf per year, or approximately 48,058 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 2.40 billion cf/day in 2028 (the Project's

⁴⁷ California Energy Commission, *Utility Annual Power Content Labels for 2018*.

⁴⁸ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁴⁹ LADWP, *2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1*.

buildout year).⁵⁰ The Project would account for approximately 0.002 percent of the 2028 forecasted consumption in SoCalGas' planning area. In addition, as also previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

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 a HQTAs 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.⁵¹ As discussed in Section IV.L, Transportation, of this Draft EIR, the Project would be serviced by a total of 37 local bus routes, including 11 Metro lines and 26 bus routes from various agencies such as LADOT Commuter Express, DASH, and Foothill Transit, which run within a quarter mile of the Project Site, which would provide service within the Project vicinity and would provide employees, residents, and guests with various public transportation opportunities. The Mixed Use Development Scenario would provide 436 bicycle parking spaces (99 short-term spaces and 337 long-term spaces). The No-Hotel Development Scenario would provide 421 bicycle parking spaces, including 340 long-term and 81 short-term spaces. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed use developments in order to provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as

⁵⁰ *California Gas and Electric Utilities, 2018 California Gas Report p. 100. Interpolated between 2022 and 2025 estimates.*

⁵¹ *The Project Site is also located in a Transit Priority Area as defined by Public Resources Code Section 21099. 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.*

resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed Use Development (MXD) model to calculate trip reductions for multi-use developments.⁵² The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in Appendix F, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a 38-percent reduction in overall VMT and resultant transportation fuel consumption.

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.E, Greenhouse Gas Emissions, of this Draft EIR.

As summarized in Table IV.C-2 on page IV.C-23, when accounting for trip-reduction measures that would be implemented to reduce VMT, the Project's estimated petroleum-based fuel usage would be approximately 587,073 gallons of gasoline and 124,013 gallons of diesel per year, or a total of 711,086 gallons of petroleum-based fuels annually under the Mixed Use Development Scenario. Under the No-Hotel Development Scenario, Project petroleum-based fuel usage would be approximately 551,907 gallons of gasoline and 116,584 gallons of diesel per year, or a total of 668,491 gallons of petroleum-based fuels annually.

(iii) Summary of Energy Requirements and Energy Use Efficiencies

CEQA Guidelines Appendix F 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 using the LADOT VMT Calculator which takes into account VMT reducing measures such as proximity of mass transit stations, distance to job centers, and increased density. The calculations also took into account energy efficiency measures such as Title 24, CalGreen and vehicle fuel economy standards. Table IV.C-1 and Table IV.C-2 on pages IV.C-21 and IV.C-23, respectively, provide a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 38 MWh of electricity would be consumed along with 813,147 gallons of transportation fuel (gasoline and diesel). During Project operations, a total of 9,537 MWh of electricity, 18,420,535 cf of natural gas,

⁵² *Environmental Protection Agency, Mixed Use Trip Generation Model. www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed September 4, 2020.*

and 711,086 gallons of transportation fuel would be consumed on an annual basis under the Mixed Use Development Scenario. Under the No-Hotel Development Scenario, a total of 9,398 MWh of electricity, 17,541,278 cf of natural gas, and 668,491 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 during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 0.42 percent and 0.40 of the estimated annual operational demand under the Mixed Use Development Scenario and No-Hotel Development Scenario respectively which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.⁵³ Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.002 percent of gasoline usage and 0.06 percent of diesel usage within Los Angeles County, respectively. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect local and/or 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 2027–2028 fiscal year (the Project's buildout year) will be 24,341 GWh of electricity.^{54,55} As such, the Project-related annual electricity

⁵³ *The percentage is derived by taking the total amount of electricity usage during construction (37,997 kWh) and dividing that number by the total amount of electricity usage during operation (9,536,915 kWh) for the Mixed Use Development Scenario to arrive at 0.42 percent. Electricity usage during construction is divided by the total amount of electricity usage during operation (9,398,497 kWh) for the No Hotel Development Scenario to arrive at 0.40 percent.*

⁵⁴ *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.*

⁵⁵ *LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.*

consumption of 9,537 MWh per year under the Mixed Use Development Scenario and 9,398 MWh per year under the No-Hotel Development Scenario would represent less than 0.04 percent of LADWP's projected sales in 2028.⁵⁶ Furthermore, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.⁵⁷

As stated above, the Project's estimated demand for natural gas is 18,420,535 cf per year, or approximately 50,467 cf per day under the Mixed Use Option and 17,541,278 cf per year, or approximately 48,058 cf per day under the No Hotel Option. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimated natural gas consumption within SoCalGas' planning area will be approximately 2.40 billion cf/day in 2028 (the Project's buildout year).⁵⁸ The Project under both the Mixed Use and No Hotel Develop Scenarios would account for approximately 0.002 percent of the 2028 forecasted consumption in SoCalGas' planning area.

As energy consumption during Project operations would be relatively negligible and energy requirements are within LADWP's and SoCalGas' service provision, Project operational impacts on energy usage would be less than significant.

(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, 2017.⁵⁹ 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 is 5,854 MW.⁶⁰ Under peak conditions, buildout of land uses on the Project Site (i.e., Project operations) would result in 9,537 MWh of electricity consumed on an annual basis which is equivalent to a daily peak load of 1,990 kW under the Mixed Use Development Scenario. Under the No-Hotel Development Scenario, Project operations would result in 9,398 MWh of electricity consumed on an annual basis which is equivalent to a daily peak load of 1,956 kW. In comparison to the LADWP power grid base

⁵⁶ LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A.

⁵⁷ KPFF Consulting Engineers, 1111 Sunset Utility Technical Report: Water, Wastewater, and Energy, February 2021. See Appendix S.2 of this Draft EIR.

⁵⁸ California Gas and Electric Utilities, 2018 California Gas Report p. 97.

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

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

peak load of 5,854 MW in 2017, the Project operations energy demand would represent approximately 0.03 percent of the LADWP base peak load conditions for both development scenarios. 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 Site.⁶¹ 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.⁶² Electricity and Natural Gas usage during Project operations presented in Table IV.C-2 on page IV.C-23 would comply with 2019 Title 24 standards and applicable 2019 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 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with CAFE fuel economy standards, as required.

Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption.

(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

⁶¹ LADWP, *2017 Retail Electric Sales and Demand Forecast*. p. 6.

⁶² *Energy Independence and Security Act of 2007*. Pub.L. 110-140).

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.⁶³ According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.⁶⁴ 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.⁶⁵ The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above in the 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 32 percent of LADWP's overall energy mix in 2018, the most recent year for which data are available.⁶⁶ 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 discussed in Section II, Project Description, of this Draft EIR, 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,

⁶³ *California Gas and Electric Utilities, 2018 California Gas Report.*

⁶⁴ *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed September 4, 2020.*

⁶⁵ *bp Global, Oil Reserves, www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html#oil-reserves, accessed September 4, 2020.*

⁶⁶ *California Energy Commission, Utility Annual Power Content Labels for 2018.*

biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.⁶⁷

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

As discussed above in Section 3.c(2), the Project would include project features to reduce vehicle miles travelled during operational activities. The Project's high density design and location to job centers and retail uses would allow for more residents to live closer to work and shopping areas, reducing the vehicle miles travelled. The design, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also encourages non-automotive forms of transportation such as walking or biking to destinations. In addition, the Project would be serviced by a total of 37 local bus routes, including 11 Metro lines and 26 bus routes from various agencies such as LADOT Commuter Express, DASH, and Foothill Transit, which run within a quarter mile of the Project Site. As further discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, these measures would reduce VMT by approximately 38 percent in comparison to a standard project as estimated by CalEEMod, with a similar reduction in the Project's petroleum-based fuel usage. Therefore, the Project would encourage the use of efficient transportation alternatives.

(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, the Project would implement measures to further reduce energy consumption during operations such as use of energy efficient appliances and water saving measures (e.g., high-efficiency toilets with flush volume of 1.0 gallon of water per flush, showerheads with a flow rate of 1.5 gallons per minute or less, and drip/subsurface irrigation, among others). Therefore, the Project would incorporate measures that are consistent with or better than current State and City energy conservation requirements.

⁶⁷ CEC, *Wind Resource Area & Wind Resources*, <https://windexchange.energy.gov/states/ca#maps>, accessed September 4, 2020.

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.E, Greenhouse Gas Emissions, the City has published its 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 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce VMT 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.H, Land Use and Planning, 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 locate complementary new residential, hotel, retail, restaurant and office uses in proximity to other existing off-site residential, office, retail and restaurant uses. The Project would provide greater proximity to neighborhood services, jobs, and residences and 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 HQTAs.⁶⁸ The introduction of new housing and job opportunities within a HQTAs, as proposed by the Project, is consistent with numerous policies in the 2016 RTP/SCS related to locating new housing and jobs near transit. The 2016 RTP/SCS would result in an estimated 8-percent decrease in VMT by 2020, an 18-percent decrease in VMT by 2035, and a 21-percent decrease in VMT by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in VMT by 2040 (an additional 3-percent reduction in the 5 years between 2035 [18 percent] and 2040 [21 percent]), the 2016 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Subsequent to adoption of the 2016 RTP/SCS, CARB adopted in 2018 a new target requiring a 19-percent decrease in VMT for the SCAG region by 2035. It is expected that this new target will be incorporated into the next RTP/SCS. The 2016 RTP/SCS and/or the next RTP/SCS are therefore expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

Thus, consistent with the 2016 RTP/SCS, the Project would reduce VMT by 38 percent in comparison to a standard project as estimated by CalEEMod, and, consequently, the Project's petroleum-based fuel usage would be reduced. In addition, the Project would comply with state energy efficiency requirements including Title 24 energy efficiency requirements and would use electricity from LADWP, which has a current renewable energy mix of 32 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. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during based and peak periods would be consistent with electricity and natural gas

⁶⁸ *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.*

future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During construction the Project would comply with on-road fuel economy Title 24 energy efficiency standards where applicable resulting in efficient use of energy. During operations, the Project would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond requirements, such as LEED® Certified equivalency. In summary, the Project's energy demands would not significantly affect available energy supplies, 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.**

(2) Mitigation Measures

Project-level impacts related to Threshold (a) would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to Threshold (a) were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

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 2019 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

With regard to transportation related energy usage, the Project would comply with goals of the SCAG's 2016 RTP/SCS which incorporates VMT targets established by SB 375. The Project's mixed use development and proximity to major job centers and 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 CAFÉ fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

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

(2) Mitigation Measures

Project-level impacts related to Threshold (b) would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to Threshold (b) were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

(a) 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 89 related projects located within the vicinity of the Project Site. The geographic context for the cumulative analysis of electricity is LADWP's service area and the geographic context for the cumulative analysis of natural gas is SoCalGas' service area. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Project in the context of County-wide consumption. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

(i) Electricity

Although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures 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 exceeding Title 24

energy standards. 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 and 50 percent by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 32 percent of LADWP's overall energy mix in 2018, 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. Thus, the Project and related projects would comply with energy conservation plans and efficiency standards required to ensure that energy is used efficiently. **Therefore, the Project and the related projects would not result in significant cumulative impacts related to wasteful, inefficient and unnecessary use of electricity. As such, the Project's contribution would not be cumulatively considerable, and impacts would be less than significant.**

(ii) 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 exceeding Title 24 energy efficiency standards. 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. Thus, the Project and related projects would comply with energy conservation plans and efficiency standards required to ensure that energy is used efficiently. **Therefore, the Project and the related projects would not result in significant cumulative impacts related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of natural gas. As such, the Project's contribution would not be cumulatively considerable, and impacts would be less than significant.**

⁶⁹ California Energy Commission, *Utility Annual Power Content Labels for 2018*.

(iii) Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would consume a total of 587,073 gallons of gasoline and 124,013 gallons of diesel per year, or a total of 711,086 gallons of petroleum-based fuels per year under the Mixed Use Development Scenario. Under the No-Hotel Development Scenario, the Project would consume a total of 551,907 gallons of gasoline and 116,584 gallons of diesel per year, or a total of 668,491 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.01 percent of the 2028 annual on-road gasoline- and diesel-related energy consumption in Los Angeles County under the Mixed Use Development Scenario and the No-Hotel Development Scenario, as shown in Appendix F, 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, gasoline consumption would decline by six percent since 2008, and the CEC predicts that the demand for gasoline will continue to decline over the next 10 years due to improved fuel economy and the use of alternative fuels, such as natural gas, biofuels, and electricity. 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 2016–2040 RTP/SCS and 2020–2045 RTP/SCS. Specifically, the Project would locate complementary new residential, hotel, retail, restaurant and office uses in proximity to other existing off-site residential, office, retail and restaurant uses. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including Metro and LADOT bus lines and rail lines. The Project also would introduce new housing

and job opportunities within a HQTAs, which is consistent with numerous policies in the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS related to locating new jobs near transit.⁷⁰ These features would serve to reduce VMT and associated transportation fuel consumption.⁷¹ Although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.⁷² Implementation of the 2016 RTP/SCS would result in an estimated 8-percent decrease in per capita GHG emissions by 2020, 18-percent decrease in per capita GHG emissions by 2035, and 21-percent decrease in per capita GHG emissions by 2040. As discussed above, CARB updated the SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035. Implementation of the 2020–2045 RTP/SCS will fulfill and exceed the region’s obligations under SB 375 with respect to meeting the State’s GHG emission reduction goals. As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project results in a VMT reduction of approximately 38 percent in comparison to a Project without Reduction Measures, which would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS, as well as CARB’s updated 2035 target.

Although the 2016–2040 and 2020–2045 RTP/SCS is intended to reduce GHG emissions, the reduction in VMT would also result in reduced transportation fuel consumption. By its very nature, the 2016–2040 and 2020–2045 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. In addition, it is assumed that related projects in the Project Site vicinity would reduce VMT, consistent with the goals of the 2016 RTP/SCS. **Therefore, the Project and the related projects would not result in significant cumulative impacts related to wasteful, inefficient and unnecessary use of transportation fuel. As such, the Project’s**

⁷⁰ *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.*

⁷¹ *The Project would comply with City EV charging requirements which includes a minimum of 30 percent of total code-required parking spaces shall be capable of supporting future EVSE and 10 percent equipped with EV charging stations) would also serve to reduced transportation fuel consumption.*

⁷² *SCAG, Final 2016–2040, RTP/SCS, April 2016, p. 153.*

contribution would not be cumulatively considerable, and impacts would 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 of LA 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 2016–2040 RTP/SCS and 2020–2045 RTP/SCS. The Project would be mixed use and located near major job centers and public transit which would result in a VMT reduction. As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project results in a VMT reduction of approximately 38 percent in comparison to a standard project as estimated by CalEEMod, which would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS, as well as CARB’s updated 2035 target. Therefore, the Project is consistent with the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS and would not be cumulatively considerable with regard to consistency with energy conservation plans.

(2) Mitigation Measures

Cumulative impacts related to energy would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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