

IV. Environmental Impact Analysis

C. Energy

1. Introduction

This section analyzes impacts on energy resources due to construction and operation of the Project. Section 15126.2 (b) of the California Environmental Quality Act (CEQA) Guidelines states that a project's energy use shall be analyzed to determine the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy, as well as being compliant with building codes and renewable energy features. Section VI, Energy, of the Appendix G Checklist of the State CEQA Guidelines includes questions to assist lead agencies when assessing a project's potential energy impacts. Additionally, State CEQA Guidelines Appendix F provides guidance on information to use when evaluating a project's energy use.

In accordance with the applicable Appendix G sections and utilizing guidance from Appendix F of the State CEQA Guidelines, this Draft EIR includes relevant information and analyses that address the energy implications of the Project, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). Detailed energy calculations can be found in Appendix D of this Draft EIR. Information found herein, as well as other aspects of the Project's energy implications, are discussed in greater detail elsewhere in this Draft EIR, including in Section II, Project Description; Section IV.E, Greenhouse Gas Emissions; and Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding energy at the federal, state, regional, and City of Los Angeles levels that apply to the Project. As described below, these plans, guidelines, and laws include the following:

- Federal Energy Independence and Security Act of 2007
- Federal Corporate Average Fuel Economy Standards

- Federal Energy Policy and Conservation Act
- Federal Public Utility Regulatory Policies Act of 1978
- National Energy Policy Act of 1992
- Federal Energy Policy Act of 2005
- Federal Clean Air Act
- Federal Clean Cities Program
- California Senate Bill 1389
- California Renewables Portfolio Standards
- California Building Standards
 - California Building Energy Efficiency Standards
 - California Green Building Standards
- California Assembly Bill 1493
- California Air Resources Board
 - Scoping Plan
 - Advanced Clean Car Program
 - Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
 - In-Use Off-Road Diesel Fueled Fleets Regulation
- California Senate Bill 375
- Regional Transportation Plan/Sustainable Communities Strategy
- LA100 Plan
- L.A.'s Green New Deal
- City of Los Angeles Green Building Code
- City of Los Angeles Mobility Plan 2035

(1) Federal

(a) Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national greenhouse gas (GHG) emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that require fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014;
- Requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- Establishing miles per gallon (mpg) targets for cars and light trucks and directing the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks, as superseded by the U.S. Environmental Protection Agency (USEPA) and the NHTSA actions described below.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”¹

(b) Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The NHTSA and the USEPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the

¹ A “green job,” as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources. U.S. Department of Labor, Bureau of Labor Statistics, *Green Jobs Overview*, www.bls.gov/green/overview.htm, accessed June 19, 2026.

nation to conserve energy. The standards require an industry-wide fleet average of 50.4 miles per gallon (mpg) in model year (MY) 2031 for passenger cars and light trucks, and an industry fleet-wide average for heavy-duty pickup trucks and vans (HDPUVs) of 2.851 gallons per 100 miles in MY 2035. The CAFE standards increase at a rate of 2 percent per year for passenger cars in MYs 2027–2031 and 2 percent per year for light trucks in model years 2029–2031. The final HDPUV fuel efficiency standards increase at a rate of 10 percent per year in MYs 2030–2032 and 8 percent per year in MYs 2033–2035.²

(c) Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve, the Energy Conservation Program for Consumer Products, and CAFE regulations.

(d) Public Utility Regulatory Policies Act of 1978, Public Law 95-617

The purpose of PURPA is to promote conservation of electric energy. Additionally, PURPA created a new class of nonutility generators (small power producers) from which, along with qualified co-generators, utilities are required to buy power.

PURPA was in part intended to augment electric utility generation with more efficiently produced electricity and to provide equitable rates to electric consumers. Utility companies are required to buy all electricity from qualifying facilities at avoided cost (i.e., the incremental savings associated with not having to produce additional units of electricity). PURPA expanded participation of nonutility generators in the electricity market and demonstrated that electricity from nonutility generators could successfully be integrated with a utility's own supply. In addition, PURPA requires utilities to buy whatever power is produced by qualifying facilities (usually cogeneration or renewable energy). The Fuel Use Act (FUA) of 1978 (repealed in 1987) also helped qualifying facilities become established. Under FUA, utilities were not allowed to use natural gas to fuel new generating technologies, but qualifying facilities were able to take advantage of abundant natural gas and abundant new technologies (such as combined-cycle). The technologies lowered the financial threshold for

² U.S. Department of Transportation, National Highway Traffic Safety Administration, *Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027 and Beyond and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030 and Beyond*, 49 CFR Parts 523, 531, 533, 535, 536, and 537, 2024.

entrance into the electricity generation business, as well as shortened the lead time for constructing new plants.

(e) National Energy Policy Act of 1992

The National Energy Policy Act of 1992 (EPACT92) calls for programs that promote efficiency and the use of alternative fuels. EPACT92 requires certain federal, state, and local government and private fleets to purchase a percentage of light duty alternative fuel vehicles (AFV) capable of running on alternative fuels each year. In addition, EPACT92 has financial incentives. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. EPACT92 also requires states to consider a variety of incentive programs to help promote AFVs.

(f) Energy Policy Act of 2005

The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

(g) Clean Air Act

Clean Air Act (CAA) Section 211(o), as amended by the Energy Policy Act of 2005, requires the Administrator of the USEPA to annually determine a RFS, which is applicable to refineries, importers, and certain blenders of gasoline, and to publish the standard in the Federal Register by November 30 each year. On the basis of this standard, each obligated party determines the volume of renewable fuel that it must ensure is consumed as motor vehicle fuel. This standard is calculated as a percentage, by dividing the amount of renewable fuel that the Energy Policy Act requires to be blended into gasoline for a given year by the amount of gasoline expected to be used during that year, including certain adjustments.

(h) Clean Cities Program

The U.S. Department of Energy's (DOE) Clean Cities Program promotes voluntary, locally based government/industry partnerships for the purpose of expanding the use of alternatives to gasoline and diesel fuel by accelerating the deployment of AFVs and building local AFV refueling infrastructure. The mission of the Clean Cities Program is to advance the nation's economic, environmental, and energy security by supporting local decisions to adopt practices that contribute to the reduction of petroleum consumption. The Clean Cities Program carries out this mission through a network of more than 80 volunteer coalitions, which develop public/private partnerships to promote alternative fuels and vehicles, fuel blends, fuel economy, hybrid vehicles, and idle reduction.

(2) State

(a) Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code [PRC] Sections 25300–25323) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State’s electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State’s economy; and protect public health and safety (PRC Section 25301[a]). The 2023 Integrated Energy Policy Report provides the results of the CEC’s assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles (ZEV), energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

(b) Renewable Portfolio Standards

First established in 2002 under SB 1078, California’s Renewables Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030.³ SB 350, signed on October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. On September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California’s RPS and required retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; and 60 percent by December 31, 2030, and that the California Air Resources Board (CARB) should plan for 100-percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC’s responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility’s renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and

³ California Public Utilities Commission, *California Renewables Portfolio Standard (RPS)*, www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps, accessed June 19, 2026.

(4) establishing the standard terms and conditions used in contracts for eligible renewable energy.⁴

In March 2021, the CEC, CPUC, and CARB issued an SB 100 Joint Agency Report that assesses barriers and opportunities to implementing the 100-percent clean electricity policy.⁵ The report's initial findings suggest that the goals of SB 100 are achievable, though opportunities remain to reduce overall system costs; however, the report also notes that the findings are intended to inform State planning and are not intended as a comprehensive or prescriptive roadmap to 2045, and future work is needed on critical topics, such as system reliability and land use, and further addresses energy equity and workforce needs.⁶ Refer to Section IV.E, Greenhouse Gas Emissions, of this Draft EIR for additional details regarding this regulation.

(c) California Building Standards

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

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2025 Title 24 standards, which became effective on January 1, 2026. The 2026 Title 24 standards continue to improve upon the preceding versions of the Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings, which encourage use of electric heat pumps, requiring newly constructed residences to be electric-ready and introduces solar and battery storage standards as an optional measure to achieve compliance and increases minimum ventilation requirements to improve air quality.

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

The California Green Building Standards Code (CCR Title 24, Part 11) are commonly referred to as the CALGreen Code. The 2025 CALGreen Code includes mandatory measures for residential and non-residential development related to site development,

⁴ California Public Utilities Commission, *RPS Program Overview*, www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps/rps-program-overview, accessed June 19, 2026.

⁵ California Energy Commission, California Public Utilities Commission, and California Air Resources Board, *2021 SB 100 Joint Agency Report Achieving 100 Percent Clean Electricity in California: An Initial Assessment*, CEC-200-2021-001, March 2021.

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

energy efficiency, EV parking, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.⁷ As with the previous version, the 2025 CALGreen Code includes measures in furtherance of the state's goals related to building electrification. The 2025 CALGreen Code went into effect on January 1, 2026.

(d) California Assembly Bill 1493 (AB 1493, Pavley)

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO₂) emissions, Assembly Bill (AB) 1493 (commonly referred to as CARB's Pavley regulations), enacted on July 22, 2002, requires CARB to set GHG emission standards for new passenger vehicles, light duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards for model years 2017–2025.^{8,9} In March 2020, the NHTSA and the USEPA issued the SAFE Vehicles Rule, which amends existing CAFE standards and tailpipe CO₂ emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026. Refer to Section IV.E, Greenhouse Gas Emissions, of this Draft EIR for additional details regarding this regulation.

(e) California Air Resources Board

(i) Scoping Plan

AB 32 required CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (Health and Safety Code [HSC] Section 38561 (h)). The 2008 Climate Change Scoping Plan proposed a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”¹⁰ The 2008 Climate Change Scoping Plan had a range of GHG reduction actions, which included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a Cap-and-Invest Program, and an AB 32 implementation fee to fund the program.

⁷ *California Building Standards Commission, Summary of California Code Changes In the 2025 edition of Title 24, July 2025.*

⁸ *California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493.*

⁹ *United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017–2025 Cars and Light Trucks, 2012.*

¹⁰ *CARB, Climate Change Scoping Plan, December 2008.*

The 2008 Climate Change Scoping Plan called for a “coordinated set of solutions” to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to use energy more efficiently. Utility energy providers were required to include more renewable energy sources through implementation of the RPS.¹¹ Additionally, the 2008 Climate Change Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas will be accomplished through “improving energy efficiency by 25 percent.”

The 2008 Climate Change Scoping Plan identified several specific issues relevant to development projects, including:

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting that:

A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.

- The importance of supporting the Department of Water Resources’ work to implement the Governor’s objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The Climate Change Scoping Plan notes that water use requires significant amounts of energy, including approximately one-fifth of Statewide electricity.
- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

The latest update is the 2022 Scoping Plan, which is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045

¹¹ For a discussion of Renewables Portfolio Standard, refer to subsection California Renewables Portfolio Standard.

and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.¹² Measures to reduce GHG emissions include building decarbonization, energy efficiency improvements and transportation electrification.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

(ii) Advanced Clean Cars Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations.¹³ The program requires a greater number of ZEV models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles and the ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles [EVs]) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered.

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

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 CCR Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from

¹² CARB, *California's 2017 Climate Change Scoping Plan*, 2017.

¹³ CARB, *California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002* (Pavley, <https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley>, accessed June 19, 2026).

diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

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

Because off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the “In-Use Off-Road Diesel Fueled Fleets Regulation” to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and higher. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2023, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines beginning January 1, 2024. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year or has completed the Best Available Control Technology requirements (BACT) requirements. Large fleets have compliance deadlines each year from 2024 through 2028, medium fleets each year from 2026 through 2030, and small fleets each year from 2028 through 2032. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines.

(f) SB 375 (Sustainable Communities Strategy)

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excluding emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) reflects CARB’s updated SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035 relative to 2005.

(3) Regional

(a) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law, it is designated as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. The agency develops long-range regional transportation plans including sustainable communities strategy (SCS) and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the South Coast Air Quality Management District's (SCAQMD) Air Quality management plans (AQMP).¹⁴

On April 4, 2024, SCAG's Regional Council adopted 2024 Connect SoCal, which is SCAG's 2024–2050 RTP/SCS. The 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the needs of the region both today and in the future. The goals for the 2024–2050 RTP/SCS address mobility, communities, environment, and economy, as follows:

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

The 2024–2050 RTP/SCS also includes growth forecasts through 2050 at the regional, county, and local jurisdictional levels, and Traffic Analysis Zones (TAZ). Projections at the jurisdiction level or smaller geographies, including TAZ, are utilized to conduct required modeling, and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. These projections are advisory and non-binding. While the 2024–2050 RTP/SCS remains focused on SCAG's core responsibilities, and on the requirements of comprehensive regional transportation planning integrated with the development of a SCS,

¹⁴ SCAG, *2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*, adopted April 4, 2025.

it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband, and mobility hubs. The 2024–2050 RTP/SCS also includes a detailed project list and strategic investments to bridge local plans with overarching performance targets and goals. If fully implemented, the 2024–2050 RTP/SCS would reduce traffic congestion, improve air quality, and improve the region’s long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern.¹⁵

As part of the 2024–2050 RTP/SCS, SCAG developed a set of Regional Planning Policies to guide decision-making in the region that aligns with the 2024–2050 RTP/SCS’s vision and achievement of SCAG’s goals. These policies carry forward priorities that have been refined over several planning cycles to promote a multimodal transportation system and sustainable land use and development. These policies address Priority Development Areas (PDAs), housing in the region, 15-minute communities, equitable engagement and decision-making, sustainable development, air quality, clean transportation, natural and agricultural lands preservation, and climate resilience. SCAG has identified development within such areas as the framework for implementing the Regional Planning Policies.

The 2024–2050 RTP/SCS defines PDAs as areas within the SCAG region where future growth can be located to help the region reach 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool to facilitate plan development and analysis, and are used for different purposes, such as growth visioning, performance measurement, or grant applications. As a general principle, development in PDAs indicates a greater alignment with the goals of the 2024–2050 RTP/SCS. These PDAs are comprised of Neighborhood Mobility Areas (NMAs), Livable Corridors¹⁶, TPAs, and Spheres of Influence. SCAG also recognizes that many Livable Corridors are also located within High Quality Transit Corridors (HQTCs).¹⁷

¹⁵ SCAG, *2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*, adopted March 25, 2025.

¹⁶ SCAG defines Livable Corridors as areas where local jurisdictions can plan and zone for increased density at nodes along key corridors, and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. Growth at strategic nodes along key corridors, many of which are High Quality Transit Corridors (HQTCs), will make transit a more convenient and viable option. The Livable Corridors network is developed utilizing select variables from past plans and input from local jurisdictions during the Local Data Exchange process. Additionally, this strategy integrates certain transit improvements, including Bus Rapid Transit (BRT) and other features improving bus performance and user experience, and certain active transportation improvements to support safe bicycling and walking.

¹⁷ A high-quality transit corridor is defined in PRC Section 21155(b) as “[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.” The City of Los Angeles (Footnote continued on next page)

(b) South Coast Air Quality Management District Rules

SCAQMD has adopted Rule 1146.2 which requires new large natural gas-fired water heaters, boilers, pool heaters, and process heaters to be zero emission units (i.e., electric instead of natural gas) beginning on January 1, 2028, to reduce NO_x emissions.

(4) Local

(a) LA100 Plan

The LA100 Plan (formerly 2022 Power Strategic Long-Term Resource Plan) serves as a comprehensive roadmap through 2045 that guides the Los Angeles Department of Water and Power's (LADWP) Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. LA100 is largely driven by Mayoral directives and City Council motions that instructed LADWP to prepare an SLTRP to achieve 100 percent carbon-free energy by 2035 for the City.

(b) L.A.'s Green New Deal

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAN, which includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.¹⁸ Specific targets included the construction of new housing units within 1,500 feet of transit by 2017, reducing VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The Sustainable City pLAN was intended to be updated every four years.

In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAN renamed as L.A.'s Green New Deal, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.¹⁹ The Green New Deal augments, expands, and elaborates in more detail the City's vision for a sustainable future, and it tackles the climate emergency with accelerated targets and new aggressive goals.

defines peak hours as Monday through Friday, between 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M.

¹⁸ City of Los Angeles, *Sustainable City pLAN*, April 2015.

¹⁹ City of Los Angeles, *LA's Green New Deal*, 2019.

Within L.A.'s Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025, 25 percent by 2035, and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square foot for all building types 22 percent by 2025, 34 percent by 2035, and 44 percent by 2050 (from a baseline of 68 thousand British thermal units (MBtu) per square foot in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025 and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/ matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050.
- Increase the percentage of EVs and ZEVs in the city to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025, 95 percent by 2035, and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025 and three degrees by 2035.
- Ensure the proportion of Angelenos living within 0.5 miles of a park or open space is at least 65 percent by 2025, 75 percent by 2035, and 100 percent by 2050.

(c) Los Angeles Green Building Code

Article 9 of Chapter IX of the Los Angeles Municipal Code (LAMC) is referred to as the “Los Angeles Green Building Code,” which incorporates by reference portions of the CALGreen Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings. The Los Angeles Green Building Code includes some requirements that are more stringent than State requirements, such as increased requirements for EV charging spaces and water efficiency, which result in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency.

(d) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City’s General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.²⁰ The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. While the Mobility Plan mainly relates to transportation, certain components would serve to reduce VMT and mobile-source GHG emissions.

b. Existing Conditions

(1) Electricity

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

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of

²⁰ *Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.*

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.

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

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to the LA100 Plan, LADWP has a net dependable generation capacity greater than 8,101 MW.²¹ In 2017, the LADWP power system experienced an instantaneous peak demand of 6,502 MW.²² Approximately 41 percent of LADWP's 2024 electricity purchases were from renewable sources, compared to the 45 percent statewide percentage of electricity purchases from renewable sources.²³

LADWP supplies electrical power to the Project Site from electrical service lines located in the Project vicinity. As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with four historic commercial buildings along Wilshire Boulevard and surface parking areas to the south of these buildings. The existing buildings range from one to two stories and include 48,229 square feet of commercial uses and associated surface parking areas. Commercial uses on-site include 20,001 square feet of retail uses, 18,870 square feet of restaurant uses, and 9,358 square feet of office uses. It is estimated that existing uses associated with the Project Site currently consume approximately 1,049,692 kWh of electricity per year (Baseline Year 2023).²⁴

(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

²¹ LADWP, 2022 Power Strategic Long-Term Resources Plan, p. ES-5.

²² LADWP, 2022 Power Strategic Long-Term Resources Plan, p. ES-5.

²³ LADWP, 2024 Power Content Label.

²⁴ Eyestone Environmental, Energy Calculations for Wilshire & Cloverdale Project. See Appendix D of this Draft EIR.

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 21.1 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.²⁵

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.²⁶ The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.²⁷ Gas supply available to SoCalGas from California sources averaged 84 million cf per day in 2023 (the most recent year for which data are available).²⁸ SoCalGas supplies natural gas to the Project Site from natural gas service lines located in the Project vicinity. It is estimated that existing uses associated with the Project Site currently consume approximately 1,978,797 cubic feet of natural gas per year (Baseline Year-2023).²⁹

(3) Transportation Energy

According to the U.S. Energy Information Administration, transportation accounts for nearly 38 percent of California's total energy consumption in 2021.³⁰ In 2022, California

²⁵ SoCalGas, *About Us*, www.socalgas.com/about-us/company-profile, accessed June 19, 2026

²⁶ California Gas and Electric Utilities, *2024 California Gas Report*, p. 119.

²⁷ California Gas and Electric Utilities, *2024 California Gas Report*, p. 120.

²⁸ California Gas and Electric Utilities, *2024 California Gas Report*, p. 119.

²⁹ Eyestone Environmental, *Energy Calculations for the Wilshire & Cloverdale Project*. See Appendix D of this Draft EIR.

³⁰ U.S. Energy Information Administration. *California State Profile and Energy Estimates. Consumption by Sector*, www.eia.gov/state/?sid=CA#tabs, accessed June 19, 2026.

consumed 13.6 billion gallons of gasoline and 3.1 billion gallons of diesel fuel.^{31,32} Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.³³ However, the state is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, and reduce VMT. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels such as natural gas, biofuels, and electricity.³⁴ According to CARB's Emission Factor (EMFAC) Web Database, Los Angeles County on-road transportation sources consumed 3.98 billion gallons of gasoline and 608 million gallons of diesel fuel in 2023.³⁵

The estimate of annual VMT associated with the existing Project Site uses is 4,251,885 VMT per year.³⁶ This translates to 169,234 gallons of gasoline and 25,886 gallons of diesel per year based on current (Baseline Year-2023) fuel economy averages.³⁷

3. Project Impacts

a. Thresholds of Significance

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

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

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

³¹ California Board of Equalization, *Net Taxable Gasoline Gallons 10-Year Report*.

³² California Board of Equalization, *Net Taxable Diesel Gallons 10-Year Report*.

³³ CEC, *2023–2024 Investment Plan Update for the Clean Transportation Program*, March 2024.

³⁴ CEC, *2015 Integrated Energy Policy Report*, docketed June 29, 2016, p. 113.

³⁵ California Air Resources Board, *EMFAC2021 Web Database*, <https://arb.ca.gov/emfac/>. Details provided in Appendix D of this Draft EIR.

³⁶ Eyestone Environmental, *Energy Calculations for the Wilshire & Cloverdale Project*, see Appendix D of this Draft EIR.

³⁷ Eyestone Environmental, *Energy Calculations for the Wilshire & Cloverdale Project*, see Appendix D of this Draft EIR.

With regard to Threshold (a), this analysis relies upon Appendix F of the CEQA Guidelines, prepared in response to the requirement in PRC Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth “[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.”

In addition, with regard to potential impacts to energy, the 2006 *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 2006 *L.A. CEQA Thresholds Guide*, the following factors were considered in determining whether this threshold of significance is met:

1. The project’s energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
3. The effects of the project on peak and base period demands for electricity and other forms of energy;
4. The degree to which the project complies with existing energy standards;
5. The effects of the project on energy resources;
6. The project’s projected transportation energy use requirements and its overall use of efficient transportation alternatives; and
7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

With regard to Threshold (b), the Project will be evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements including the California Energy Code and CALGreen Code, and City building codes. The Project is also evaluated for consistency with the 2024–2050 RTP/SCS, which include goals to reduce VMT and fuel consumption, as discussed further in Section IV.E, Greenhouse Gas Emissions, and Section IV.F, Land Use and Planning, of this Draft EIR.

b. Methodology

CEQA Guidelines Appendix F provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where topics are applicable or relevant to the Project:

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

(1) Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control (including supply and conveyance) and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power.³⁸ Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated

³⁸ *Construction activities include demolition of the existing site, site preparation, grading, building construction, building finishes, landscaping and paving.*

using CalEEMod.³⁹ Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power was calculated based on data provided in SCAQMD construction surveys (i.e., construction activity, horsepower, load factor, and hours of use per day).⁴⁰ Although the Project would use electricity from poles where possible, electricity demand calculations were based on the SCAQMD construction surveys which identify the use of diesel generators to supply construction sites with electrical power.

In terms of natural gas, construction activities typically do not involve the consumption of natural gas and current plans do not involve use of natural gas-powered construction equipment.

Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., the hauling of demolition material to off-site reuse and disposal facilities). Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files included in Appendix D of this Draft EIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of the SCAQMD *CEQA Air Quality Handbook*. Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total VMT was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC 2021 model (EMFAC2021). EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker trips were assumed to include 50 percent light duty gasoline auto and 50 percent light duty gasoline trucks. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks. Refer to Appendix D of this Draft EIR for detailed calculations.

(2) Operation

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas (e.g., restaurant cooking use) was calculated using demand factors provided in CalEEMod and accounting for GHG-PDF-1 as part of the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

³⁹ California Air Pollution Control Officers Association, *CalEEMod™ version 2022.1 User's Guide*, April 2022.

⁴⁰ California Air Pollution Control Officers Association, *CalEEMod Users Guide. Appendix D, Technical Source Documentation*. April 2022.

Energy impacts associated with transportation during operation were also assessed. Daily trip generation used in this analysis was based on *Transportation Assessment for the Wilshire & Cloverdale Project* dated November 2024 (Transportation Assessment), included as Appendix J of this Draft EIR.⁴¹ As discussed therein, the Project daily VMT was calculated using the Los Angeles Department of Transportation (LADOT) VMT Calculator. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the USEPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.⁴² 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. The resulting annual VMT was used as part of the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. Based on this annual VMT, gasoline and diesel consumption rates were calculated using the County-specific mpg calculated using EMFAC2021. The vehicle fleet mix for vehicles anticipated to visit the Project Site was calculated consistent with the CalEEMod default for Los Angeles County. Supporting calculations are provided in Appendix D of this Draft EIR. These calculations were used to determine if Project operation would cause the wasteful, inefficient and/or unnecessary consumption of energy as required by Appendix F of the CEQA Guidelines.

The Project's estimated energy demands were also analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2029 (i.e., the Project buildout year) to determine if these two energy utility companies would be able to meet the Project's energy demands.

c. Project Design Features

No project design features are proposed with regard to energy. However, the Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas within the building envelope during Project operations, excluding restaurant cooking equipment. This PDF further supports compliance with SCAQMD Rule 1146.2 which requires zero emission units to reduce NO_x emissions from large natural gas-fired water heaters, boilers, pool heaters, and process heaters as defined in this rule. This rule is applicable to the Project based on the size of the proposed heating units and buildout date (compliance date of

⁴¹ Fehr & Peers., *Wilshire & Cloverdale Project Transportation Assessment*, Los Angeles, California, November 2024.

⁴² United States Environmental Protection Agency, *Mixed-Use Trip Generation Model*, www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed June 19, 2026.

January 1, 2028). In addition, as part of the Project, the Applicant would incorporate Project features to support and promote environmental sustainability by complying with all applicable State and local regulatory requirements, including the provisions set forth in the City's Green Building Ordinance. As an example, the Project would comply with applicable 2025 CALGreen EV charging requirements. Specifically, the Project would be required to provide Level 2 EV charging receptacles in 373 residential parking spaces and in 3 commercial parking spaces. An additional 13 commercial parking spaces are required to be EV ready capable of supporting future EV supply equipment (EVSE). Provision of the EVSE and EV parking spaces would help to facilitate and encourage use of alternative fueled vehicles. The Project would also include water conservation and waste reduction measures consistent with the CALGreen Code requirements.

d. Analysis of Project Impacts

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

(1) Impact Analysis

The following analysis considers the seven factors described in Subsection IV.C.3.a, Thresholds of Significance, in order to determine whether Threshold (a) would be exceeded.

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

As discussed above, the Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption (during operation only), and transportation fuels such as diesel and gasoline. The analysis below addresses the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (demolition, construction, operation, maintenance and removal activities).⁴³

For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping, and architectural coatings, which could potentially use electricity and petroleum-based fuels. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. After completion of full or partial construction of the Project, removal activities would include demolition or

⁴³ Removal activities relate to the life of a project.

abandonment of the Project Site. However, it is not known if or when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

(i) Construction

As discussed in more detail below, during Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electric equipment, or other construction activities necessitating electrical power. Electricity from these construction activities would be limited in comparison to existing operational electricity usage at the Project Site given that construction activities would be intermittent and temporary. As discussed below, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As shown in Table IV.C-1 on page IV.C-26, a total of 26,199 kWh of electricity, 90,616 gallons of gasoline, and 354,406 gallons of diesel is estimated to be consumed during Project construction. Project construction is expected to start in 2026 and be completed by 2029.

Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and may be used to power lighting, electric 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 2006 *L.A. CEQA Thresholds Guide* to use electricity from power poles rather than temporary gasoline or diesel-powered generators.⁴⁴

As shown in Table IV.C-1, a total of approximately 26,199 kWh of electricity is anticipated to be consumed during all phases of Project construction including demolition. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. In addition long-term construction lighting (longer than

⁴⁴ *Analysis conservatively assumes that electrical power during construction will be provided by diesel generators.*

120 days) providing illumination for the construction site and staging areas would also comply with applicable Title 24 requirements, which include limits on the wattage allowed per

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

Fuel Type	Quantity
Electricity	
Water Consumption	3,026 kWh
Lighting and other construction activities necessitating electrical power ^b	18,094 kWh
Electric Equipment	5,079 kWh
Total Electricity	26,199 kWh
Gasoline	
On-Road Construction Equipment ^c	90,616 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	90,616 gallons
Diesel	
On-Road Construction Equipment ^c	287,579 gallons
Off-Road Construction Equipment ^d	66,827 gallons
Total Diesel	354,406 gallons
<i>kWh = kilowatt hours</i> ^a Detailed calculations are provided in Appendix D of this Draft EIR. Energy consumption includes offsite improvements. ^b Electricity usage is based on SCAQMD construction site survey data and typical requirements for power generators. Such electricity demand would be temporary, limited, and would cease upon the completion of construction. This is a conservative assumption as electrical power will be provided via power poles where available. ^c On-Road equipment includes worker trips, vendor deliveries, and haul trucks. Haul trucks are assumed to be powered by diesel. ^d Off-Road equipment includes on-site heavy equipment which are assumed to be powered by diesel. Source: Eyestone Environmental, 2026.	

specific area, resulting in the conservation of energy.⁴⁵ As such, the demand for electricity during construction would not cause wasteful, inefficient, or unnecessary use of energy. and impacts would be less than significant.

The estimated construction electricity usage represents approximately 2.5 percent of the annual operational demand of 1,049,692 kWh currently consumed by the existing uses to be removed, which, as discussed below, would be within the supply capabilities of

⁴⁵ California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.

LADWP.⁴⁶ Moreover, construction electricity usage would be somewhat offset by the partial removal of existing on-site uses, which currently generate a demand for electricity.

Natural Gas

Construction activities, including the construction of new buildings and infrastructure, typically do not involve the consumption of natural gas, and the use of natural gas-powered equipment is not anticipated as part of Project construction. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated for natural gas during construction. As such, the demand for natural gas during construction would not cause wasteful, inefficient, or unnecessary use of energy and impacts would be less than significant.

Transportation Energy

The petroleum-based fuel use summary provided above in Table IV.C-1 on page IV.C-26 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix D of this Draft EIR. Construction assumptions assume that the maximum activity (equipment usage and truck trips) would be occurring every weekday even though such activity would not occur throughout the entire construction phase. As shown, on- and off-road vehicles would consume an estimated 90,616 gallons of gasoline and approximately 354,406 gallons of diesel fuel throughout the Project's construction (2026–2029). For comparison purposes, the fuel usage during Project construction would represent approximately 0.002 percent of the 2026 (start year of Project construction) annual on-road gasoline-related energy consumption and 0.06 percent of the 2026 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix D of this Draft EIR.⁴⁷

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, vendor trucks, and worker vehicles) would be subject to federal and State fuel efficiency requirements.

⁴⁶ The percentage is derived by taking the total amount of electricity usage during construction (26,199 kWh) and dividing that number by the total amount of electricity usage by the existing uses to be removed (1,049,692 kWh) to arrive at 2.5 percent.

⁴⁷ The gasoline percentage is derived by taking the total amount of gasoline usage during construction (90,616 gallons) and dividing that number by the total amount of gasoline usage in the County (3.746 billion gallons) to arrive at 0.002 percent. The diesel percentage is derived by taking the total amount of diesel usage during construction (354,406 gallons) and dividing that number by the total amount of diesel usage in the County (622 million gallons) to arrive at 0.06 percent.

Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

Construction Materials

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. The production methods and source of construction materials are not known. Also, it is not known how Project building materials (steel, concrete, lumber) would be recycled or disposed at end of life. As energy usage would vary widely depending on the production methods, source location, recycling or disposal methods used for building materials, it would be speculative to assess energy usage for production and disposal of Project building materials. Manufacture and transport of materials related to Project construction and operation is expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

(ii) Operation

As discussed in more detail below, during operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table IV.C-2 on page IV.C-29, the Project's net new energy demand relative to existing conditions would be approximately 166,196 gallons of gasoline per year, 28,906 gallons of diesel fuel per year, 4,104,579 kWh of electricity per year, and 914,728 cf of natural gas per year in compliance with SCAQMD Rule 1146.2 and with implementation of GHG-PDF-1.

Electricity

As shown in Table IV.C-2, with compliance with Title 24 standards, including applicable CALGreen Code requirements, and GHG-PDF-1, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 4,104,579 kWh per year.

Table IV.C-2
Summary of Annual Net New Energy Use at Project Buildout^a

Source	Consumption in Existing Conditions	Consumption at Project Buildout	Net Project Consumption (Buildout less Existing)
Electricity			
Building	989,185 kWh	4,914,028 kWh	3,924,843 kWh
Water ^b	60,507 kWh	154,724 kWh	94,217 kWh
EVSE and EV Charging Stations ^c	0 kWh	85,520 kWh	85,520 kWh
Total Electricity^d	1,049,692 kWh	5,154,271 kWh	4,104,579 kWh
Natural Gas			
Building	1,978,797 cf	2,893,525 cf	914,728 cf
Total Natural Gas^d	1,978,797 cf	2,893,525 cf	914,728 cf
Transportation (On-Road Vehicles and Off-Road Equipment)			
Gasoline	153,348 gal	319,544 gal	166,196 gal
Diesel	26,671 gal	55,576 gal	28,906 gal
Total Transportation^e	180,019 gal	375,121 gal	195,102 gal
<i>cf = cubic feet</i> <i>gal = gallons</i> ^a Detailed calculations are provided in Appendix D of this Draft EIR. Totals may not add up due to rounding. Project energy demand is all net new. ^b Calculations assume compliance with the City's Green Building Code, Chapter 4.303.4 which requires a 20-percent reduction in water usage compared to baseline. ^c The Project would provide EVSE consistent with applicable 2025 CALGreen requirements. Specifically, the Project would be required to provide Level 2 EV charging receptacles in 373 residential parking spaces and in 3 commercial parking spaces. An additional 13 commercial parking spaces are required to be EV ready capable of supporting future EV supply equipment (EVSE). However, this analysis assumes 10 percent of Project VMT would be offset from the use of EV chargers because 1) not all vehicles parked on-site would be electric and 2) not all EVs would be charged on-site. Therefore, this analysis is not tied to a specific number of EV chargers. ^d Electricity and natural gas estimates are based on CalEEMod default electricity and natural gas usage rates and account for compliance with applicable CALGreen requirements, SCAQMD Rule 1146.2, and Project Design Feature GHG-PDF-1. ^e Transportation fuel estimates include project characteristics consistent with the LADOT VMT Calculator. Fuel estimates conservatively do not include reductions in fuel usage associated with implementation of EVSE. Source Eyestone Environmental, 2026.			

As shown in Appendix D, Energy, implementation of GHG-PDF-1 which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment would result in a 46-percent increase in the Project's electricity usage and a corresponding 74-percent reduction in overall Project's natural gas usage in comparison to default electricity

and natural gas usage calculated with CalEEMod 2022.1. Furthermore, in future years, LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. In addition, the Project would be subject to the 2025 Title 24 standards. As CalEEMod is based on 2019 Title 24 standards, this analysis conservatively does not take into account additional energy usage reductions that the Project would undergo under 2025 Title 24. Future iterations of Title 24 are expected to increase energy efficiency requirements, and the Project would be required to comply with the latest Title 24 standards. The Project would also comply with SCAQMD Rule 1146.2 and implement GHG-PDF-1 which does not allow installation of natural gas-powered equipment within the building envelope with the exception of restaurant cooking equipment. While implementation of GHG-PDF-1 would result in a decrease in natural gas usage in comparison to default natural gas usage factors, electricity usage would increase in comparison to default electricity usage factors as a result.

LADWP is required to procure at least 60 percent of their energy portfolio from renewable sources by 2030. The current sources procured by LADWP include wind, solar, geothermal sources, hydroelectric, and biomass/biowaste. These sources account for 41 percent of LADWP's overall energy mix in 2024, the most recent year for which data are available.⁴⁸ This represents the available off-site renewable sources of energy that would meet the Project's energy demand. The use of renewable energy would indirectly reduce use of fossil fuels required for electricity generation (i.e., natural gas, coal, and oil). While the electricity usage rate for a given land use would not be directly affected by the availability of renewable energy, the consumption of fossil fuels required for electricity generation would be reduced as renewable energy generation increases.

Based on LA100 Plan, LADWP forecasts that its total energy sales in the 2029–2030 fiscal year (the Project's buildout year) will be 22,339 GWh of electricity.^{49,50} As such, the Project-related net increase in annual electricity consumption of 4,104,579 kWh per year would represent approximately 0.02 percent of LADWP's projected sales in 2029.⁵¹ 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-29, with compliance with Title 24 standards, including applicable CALGreen Code requirements, SCAQMD Rule 1146.2,

⁴⁸ LADWP, 2024 Power Content Label.

⁴⁹ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁵⁰ LADWP, 2022 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1.

⁵¹ 1 GWh = 1,000,000 kWh

and implementation of GHG-PDF-1, buildout of the Project is projected to generate a net increase in the on-site demand relative to existing uses for natural gas totaling approximately 914,728 cf per year.

Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area would be approximately 2.159 billion cf per day in 2029 (the Project's buildout year).⁵² The Project, with a net increase in natural gas consumption of 2,506 cf/day in compliance with SCAQMD Rule 1146.2 and with implementation of GHG-PDF-1, would represent a maximum of approximately 0.0001 percent of SoCalGas' 2029 forecasted consumption in SoCalGas' planning area. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The Project Site is located a PDA (i.e., Neighborhood Mobility Area [NMA], Livable Corridor, and TPA) as defined by SCAG 2024–2050 RTP/SCS, as well as an HQTIC. As discussed in Section IV.I, Transportation, of this Draft EIR, the Project is located adjacent to the recently opened Metro D Line Wilshire/La Brea Station, as well as several bus lines within 0.25 miles, including Metro Bus Lines 20, 212, and 720, LADOT DASH Fairfax Line, and Antelope Valley Transit Authority (AVTA) Bus Line 786, which provide service within the Project vicinity and would provide residents, employees and guests with various public transportation opportunities. The Project would also provide short- and long-term bicycle parking spaces consistent with applicable regulations of the LAMC. Additionally, the Project would be located in Central Los Angeles area, and in particular, within the City's Miracle Mile Community Design Overlay (CDO), which is conducive to promoting walkability due to the proximity of existing commercial, retail, restaurant, employment, and entertainment uses within the area.

The Project would implement VMT reduction strategies to reduce vehicle trips and associated energy usage.⁵³ Such strategies include increasing the density of uses in comparison to existing on-site uses, and being located close to major job or residential centers (Wilshire–Miracle Mile). As such, the Project's siting would lessen transportation fuel consumption through the reduction of VMT, as described above and discussed further in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. With incorporation of these

⁵² *California Gas and Electric Utilities, 2024 California Gas Report, p. 165.*

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

strategies to reduce the Project's vehicle trips, net transportation-fuel usage would be reduced for both gasoline and diesel fuels.

As summarized in Table IV.C-2 on page IV.C-29, when accounting for the strategies that would be implemented to reduce VMT, the Project's estimated petroleum-based fuel usage would result in a net increase of 166,196 gallons of gasoline and 28,906 gallons of diesel per year, or a total of 195,102 gallons of petroleum-based fuels annually.

(iii) Summary of Energy Requirements and Energy Use Efficiencies

Based on the Project's energy requirements and its energy use efficiencies, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. Therefore, the Project would result in less-than-significant impacts on energy resources.

(b) The effects of the project on local and regional energy supplies and on requirements for additional capacity

(i) Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 2.5 percent of the existing annual operational demand of 1,049,692 kWh currently consumed by the existing uses to be renovated and reconfigured, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.⁵⁴ Accordingly, the electricity demand during construction would be somewhat offset by the removal of a portion of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and infrastructure, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction. Transportation fuel usage during Project construction activities would represent approximately 0.002 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,

⁵⁴ The percentage is derived by taking the total amount of electricity usage during construction (26,199 kWh) and dividing that number by the total amount of electricity usage during operation of existing uses to be removed (1,049,692 kWh) to arrive at 2.5 percent.

the Project would not affect local and regional energy supplies or the requirements for additional capacity in years during the construction period. As such, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction.

(ii) Operation

Based on LA100 Plan, LADWP forecasts that its total energy sales in the 2029–2030 fiscal year (the Project’s buildout year) will be 22,339 GWh of electricity.^{55,56} As such, the Project-related net increase in annual electricity consumption of 4,104,579 kWh per year in compliance with SCAQMD Rule 1146.2 and with implementation of GHG-PDF-1 would represent a maximum of approximately 0.02 percent of LADWP’s projected sales in 2029.⁵⁷ Furthermore, LADWP has confirmed that the Project’s electricity demand can be served by the facilities in the Project area.⁵⁸ Therefore, it is anticipated that LADWP’s existing and planned electricity capacity and electricity supplies would be sufficient to support the Project’s electricity demand.

As stated above, buildout of the Project is projected to result in natural gas usage of 914,728 cf per year. Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimated natural gas consumption within SoCalGas’ planning area will be approximately 2.159 billion cf/day in 2029 (the Project’s buildout year).⁵⁹ The Project, with a maximum net increase in natural gas consumption of 2,506 cf/day relative to existing uses, would represent approximately 0.0001 percent of SoCalGas’ 2029 forecasted consumption in SoCalGas’ planning area.

At buildout, the Project would result in an increase of 166,196 gallons of gasoline and 28,906 gallons of diesel per year, or a total of 195,102 gallons of petroleum-based fuels consumed per year, as shown in Appendix D of this Draft EIR. Transportation fuel usage during Project operational activities would represent approximately 0.005 percent of gasoline and diesel usage within Los Angeles County.

In sum, energy consumption during Project operations would be relatively negligible, the Project would not affect local and regional energy supplies or the requirements for additional capacity within LADWP’s and SoCalGas’ service area. As such, the Project would

⁵⁵ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁵⁶ LADWP, 2022 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1.

⁵⁷ LADWP, 2022 Power Strategic Long-Term Resources Plan, December 2022, Appendix A.

⁵⁸ KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, July 2024.

⁵⁹ California Gas and Electric Utilities, 2024 California Gas Report p. 164.

not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project operation. Therefore, the Project would result in less-than-significant impacts on energy resources.

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

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system experienced an all-time high peak of 6,502 MW on August 31, 2017.⁶⁰ In 2018, the LADWP power system experienced a peak of 6,195 MW on July 6, 2018. The LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2029, the base case peak demand for the power grid would be 5,907 MW.⁶¹ Under peak load conditions, the Project would consume 1,115 kW.⁶² In comparison to the LADWP power grid base peak load of 5,907 MW in 2029, the Project would represent approximately 0.01 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical demand by the Project.⁶³ Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid. As discussed above, natural gas demand during operations, in compliance with SCAQMD Rule 1146.2 and after implementation of GHG-PDF-1, would result in a net increase of 914,728 cf per year of natural gas usage on-site. Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimated natural gas consumption within SoCalGas' planning area would be approximately 2.159 billion cf per day in 2029 (the Project's buildout year).⁶⁴ The Project, with a maximum net increase in natural gas consumption of 2,506 cf/day, would represent approximately 0.0001 percent of SoCalGas' 2029 forecasted consumption in SoCalGas' planning area. As such, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

⁶⁰ LADWP, 2022 Power Strategic Long-Term Resources Plan, p. ES-5.

⁶¹ LADWP, 2022 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1.

⁶² Eyestone Environmental, Energy Calculations for the Wilshire & Cloverdale Project, See Appendix D of this Draft EIR.

⁶³ LADWP, 2022 Power Strategic Long-Term Resources Plan, December 2022, Appendix A.

⁶⁴ California Gas and Electric Utilities, 2024 California Gas Report p. 164.

(d) The degree to which the project complies with existing energy standards

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (including limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act and previous Energy Policy Acts for electrical motors and equipment.⁶⁵ Electricity and natural gas usage during Project operations presented in Table IV.C-2 on page IV.C-29 would comply with 2025 Title 24 standards and applicable CALGreen and Los Angeles Green Building Code requirements. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

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 required CAFE fuel economy. Project-related vehicle trips would also comply with Pavley and LCFS which are designed to not only reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards, as required.

Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption. As such, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

(e) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. LADWP's LA100 Plan identifies adequate resources (i.e., natural gas and coal) to support future generation capacity.

Natural gas supplied to Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California

⁶⁵ *Energy Independence and Security Act of 2007. Pub.L. 110-140.*

region are obtained from locations throughout the western United States, as well as Canada.⁶⁶ 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.⁶⁷ As the Project will comply with SCAQMD Rule 1146.2 and implement GHG-PDF-1 and not consume natural gas within the building envelope, except for restaurant cooking uses, Project construction and operation activities would have a negligible effect on natural gas supply. The Project would represent approximately 0.0001 percent of SoCalGas' 2029 forecasted consumption in SoCalGas' planning area.

With regard to on-site energy resources, the Project Site does not contain any significant sources of renewable (i.e., water, solar, wind, and geothermal) or non-renewable energy, such as coal, natural gas, petroleum. In addition, the Project would not generate power using non-renewable sources or associated energy transmission lines. Therefore, the Project construction and operation activities would not conflict with existing or planned energy resources.

Transportation fuels (i.e., 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 worldwide consumption until 2050.⁶⁸ As discussed previously, the Project transportation fuel consumption during operations would represent 0.001 percent of the gasoline and diesel usage within Los Angeles County. The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also result in lower emissions by complying with Pavley and Low Carbon Fuel Standards which are designed to reduce GHG emissions, but would also result in fuel savings in addition to compliance with CAFE standards. The Project would also include provisions to support alternative modes of transportation by providing for bicycle parking spaces and preferred parking for fuel efficient vehicles, resulting in a reduction of transportation fuel usage. Moreover, the Project will provide EV charging stations in parking spaces in accordance with 2025 CALGreen. In addition, the Project is located within a SCAG-designated PDA (i.e., NMA Livable Corridor and TPA), as well as an HQTIC, as the Project Site is located adjacent to the recently opened Metro D Line Wilshire/La Brea Station and within 0.25 miles of several bus lines, including Metro Bus Lines 20, 212, and 720; LADOT DASH Fairfax Line; and AVTA Bus Line 786, which would encourage use of public transit, further reducing transportation

⁶⁶ *California Gas and Electric Utilities, 2024 California Gas Report.*

⁶⁷ *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed June 19, 2026.*

⁶⁸ *U.S. Energy Information Administration, Frequently Asked Questions, Does the world have enough oil to meet our future needs?, www.eia.gov/tools/faqs/faq.php?id=38&t=6, accessed June 19, 2026.*

fuel usage during Project operations. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above in Subsection 2.a, Regulatory Framework, one of the objectives of SB 350 is to increase procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. However, as of September 2018, SB 100 was signed, which would require retail sellers of electric services to increase procurement from eligible renewable energy resources to 50 percent renewable resources target by December 31, 2026, and 60 percent by December 31, 2030. Accordingly, LADWP is required to procure at least 60 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 41 percent of LADWP's overall energy mix in 2024, the most recent year for which data is available.⁶⁹ This represents the available off-site renewable sources of energy that contribute to meeting the Project's energy demand. The Project's use of renewable energy would indirectly reduce use of fuels required for electricity generation (natural gas, coal, and oil). While the Project's electricity usage rate would not be directly affected by the availability of renewable energy, the Project's usage of renewable energy procured by LADWP would indirectly reduce consumption of fossil fuels.

With regard to on-site renewable energy sources, as detailed above in the Regulatory Framework subsection, new buildings shall comply with all of the mandatory measures set forth in Title 24, Part 6, Sections 100.0 through 110.12 for all buildings and Sections 160.0 through 170.2 for multi-family buildings. Nonresidential buildings shall also comply with either the performance compliance approach (energy budgets) specified in Title 24, Part 6, Section 140.1 or the prescriptive compliance approach specified in Section 140.2 for the climate zone in which the building will be located. As set forth in Title 24, Part 6, Section 140.1, a building complies with the performance approach if the energy budget calculated for the proposed design building is no greater than the energy budget calculated for the standard design building. As set forth in Title 24, Part 6, Section 140.2, to comply using the prescriptive approach, a building shall be designed with and shall have constructed and installed systems and components meeting the applicable requirements of Sections 140.3 through 140.10, which specify building design requirements for building envelopes, space conditioning systems, water heating systems, indoor lighting, outdoor lighting, signs, covered processes, and photovoltaic and battery storage systems.

Currently, it is anticipated that the performance compliance approach would be used to demonstrate compliance with the nonresidential building requirements of the California Energy Code instead of the prescriptive compliance approach. Although final details regarding specific energy efficiency features and energy systems have not yet been determined, the Project would be required under Title 24 to include a photovoltaic

⁶⁹ LADWP, 2024 Power Content Label.

(PV) system (on-site or off-site) or a combination of PV and battery system as part of the final design.

Due to the Project Site's location, it would not be feasible to install other on-site renewable energy sources as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, geothermal, 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.⁷⁰

In sum, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, and Project construction and operation activities would result in less-than-significant impacts on energy resources.

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

The Project's high-density design and proximity to retail and employment uses would allow for more residents to live closer to shopping and employment areas, reducing the VMT. The design, which includes dedicated bicycle parking facilities within the Project Site also encourages non-automotive forms of transportation such as walking or biking to nearby destinations. In addition, the Project is located adjacent to the recently opened Metro D Line Wilshire/La Brea Station, as well as within 0.25 miles of several bus lines, including Metro Bus Lines 20, 212, and 720, LADOT DASH Fairfax Line, and AVTA Bus Line 786. This would result in a reduction in trips due to the accessibility of public transit. The Project would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. With the reduction in trips, the Project results in a 30-percent reduction in VMT compared to a Project without reduction features, with a corresponding reduction in the Project's petroleum-based fuel usage.⁷¹ Therefore, the Project would encourage the use of efficient transportation alternatives. As such, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

⁷⁰ NREL, California – Annual Average Wind Speed at 80 m, https://openei.org/wiki/File:NREL-ca-80m.jpg#_ERR917d1134abf16b54f4fe14ca686429a0, accessed June 19, 2026.

⁷¹ VMT reduction calculations provided in Appendix F, Air Quality and Greenhouse Gas, of this Draft EIR, CalEEMod Vehicle Trip Input Calculations.

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

The Project would be required to comply with the applicable provisions of the Los Angeles Green Building Code and the 2025 Title 24 standards which include the CALGreen Code.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with Ordinance No. 171,687, which requires that development projects include an on-site recycling area or room of specified size.⁷² The Project would also comply with State and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. The City also approved the Waste Hauler Permit Program (Ordinance No. 181,519, LAMC Chapter VI, Article 6, Section 66.32–66.32.5), which requires private waste haulers to obtain AB 939 Compliance Permits to transport construction and demolition waste to City-certified construction and demolition waste processors. Thus, through compliance with the City's solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

Based on the above, with compliance with these requirements, the Project would meet and/or exceed applicable energy conservation measures and regulations.

(h) Conclusion Regarding Significance Threshold a

As demonstrated in the analysis above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local or regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. As discussed previously, gasoline fuel usage for the region

⁷² Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

is expected to decline over the next 10 years. Transportation fuel supply is not expected to decrease significantly over this same period and supplies would be sufficient to meet Project demand. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. During operations, the Project would comply with existing energy efficiency requirements such as the CALGreen Code, as well as include energy conservation measures beyond requirements. **In summary, the Project's energy demands would comply with existing energy efficiency standards and would not cause wasteful, inefficient, or unnecessary use of energy. Therefore, Project impacts related to energy use under Threshold (a) would be less than significant during construction and operation.**

(2) Mitigation Measures

Project-level impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

(1) Impact Analysis

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the Los Angeles Green Building Code. The Project also would comply with SCAQMD Rule 1146.2 and includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas within the building envelope during Project operations, excluding restaurant cooking equipment. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

With regard to transportation uses, the Project design would reduce VMT within the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.F, Land Use and Planning, of this Draft EIR, SCAG's 2024–2050

RTP/SCS focus on creating livable communities with an emphasis on sustainability and integrated planning, and identify mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2024–2050 RTP/SCS focus on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2024–2050 RTP/SCS. Most notably, the Project would be a mixed-use commercial and residential development located in an area characterized by a high degree of pedestrian activity, transit, jobs and services. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including the adjacent future Metro D Line Wilshire/LA Brea Station.

The introduction of new housing as proposed by the Project within a SCAG-designated PDA (i.e., NMA, Livable Corridor, and TPA) and HQTIC, is consistent with policies in the 2024–2050 RTP/SCS related to locating new housing and jobs near transit. The 2024–2050 RTP/SCS are expected to fulfill and exceed SB 375 compliance with respect to meeting the state’s GHG emission reduction goals.

As discussed above, the Project results in a 30-percent reduction in VMT compared to a Project without reduction features when taking into account features such as high-density design, walkability, and access to public transit.⁷³ With this reduction in VMT, the Project would be consistent with goals of the 2024–2050 RTP/SCS and SB 375 requirements. In addition, vehicle trips generated during Project operations would result in reduced emissions in compliance with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

The Project would also comply with State energy efficiency requirements and would use electricity from LADWP, which has a current renewable energy mix of 41 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the Project would not conflict with adopted energy conservation plans.

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

⁷³ VMT reduction calculations provided in Appendix B, CalEEMod Vehicle Trip Input Calculations.

(2) Mitigation Measures

Project-level impacts related to conflicts with plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to conflicts with plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

(a) Threshold (a) (Wasteful, Inefficient, or Unnecessary Use of Energy)

Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. Based on the information presented in Section III, Environmental Setting, of this Draft EIR, there are five related projects located within the vicinity of the Project Site. The geographic context for the cumulative analysis of electricity is LADWP's service area and the geographic context for the cumulative analysis of natural gas is SoCalGas' service area. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Project in the context of County-wide consumption. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy.

(i) Electricity

Although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures making the Project more energy-efficient, and would be consistent with growth expectations for LADWP's service area. The Project also would incorporate energy efficiency measures to comply with the 2025 Title 24 standards. Furthermore, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including the CALGreen Code and State energy standards under Title 24, and incorporate mitigation measures, as necessary.

Additionally, as discussed above, LADWP is required to procure at least 60 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources

accounted for 41 percent of LADWP's overall energy mix in 2024, the most recent year for which data is available.⁷⁴ This represents the available off-site renewable sources of energy that could contribute to meeting the Project's and related projects energy demand. Therefore, the Project and related projects within LADWP's service area would comply with energy conservation plans and efficiency standards required to ensure that energy is used efficiently. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient or unnecessary use of electricity would be less than significant.

(ii) Natural Gas

The Project would result in an increase of 914,728 cf of natural gas consumption compared to existing conditions even in compliance with SCAQMD Rule 1146.2 and with implementation of GHG-PDF-1. Furthermore, future development projects within SoCalGas' service area would be expected to incorporate energy conservation features, comply with State energy standards under Title 24 including applicable regulations in the CALGreen Code, and incorporate mitigation measures, as necessary. As such, cumulative impacts related to wasteful, inefficient and unnecessary use of natural gas would be less than significant.

(iii) Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the State and in the County. As described above, at buildout, the Project would result in an increase of 166,196 gallons of gasoline and 28,906 gallons of diesel per year, or a total of 195,102 gallons of petroleum-based fuels consumed per year, as shown in Appendix D of this Draft EIR.

Related projects in the Project vicinity would also be infill projects locating uses near other residential and commercial uses which would reduce distance 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.

As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions, which in turn, would reduce fuel consumption.

⁷⁴ LADWP, 2024 Power Content Label.

Furthermore, as described above, the Project would be consistent with the energy efficiency policies emphasized by the 2024–2050 RTP/SCS. Specifically, the Project would be a development located in an area that is characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, and would be well-served by existing public transportation, including the recently opened Metro D Line Wilshire/La Brea Station, as well as several bus lines within 0.25 miles, including Metro Bus Lines 20, 212, and 720, LADOT DASH Fairfax Line, and AVTA Bus Line 786. The Project also would introduce new housing opportunities (generated from the proposed 419 dwelling units) within an HQTC and a SCAG-designated PDA (i.e., NMA, Livable Corridor, and TPA), which is consistent with the focus in the 2024–2050 RTP/SCS related to locating new housing near transit.⁷⁵ Related projects in the vicinity would also have access to public transit. The Project and related projects would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. Although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2045, the 2024–2050 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2045.⁷⁶ It is anticipated that in future years, SB 375 would have more stringent reduction targets. Implementation of the 2024–2050 RTP/SCS would result in an estimated 19-percent decrease in per capita GHG emissions by 2035. Implementation of the 2024–2050 RTP/SCS are expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's GHG emission reduction goals.⁷⁷ In addition, the Project and related projects would further reduce VMT through such measures as transit accessibility as estimated by the VMT Calculator, which would be consistent with the goals and land use growth pattern in the 2024–2050 RTP/SCS.

The 2024–2050 RTP/SCS addresses cumulative growth and resulting environmental effects and are applicable to the Project and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies within the 2024–2050 RTP/SCS, such as promotion of alternative forms of transportation, proximity to public transportation options, provisions for encouraging multi-modal and energy efficient transit, such as by accommodating bicycle parking and EVSE at or above regulatory requirements. Furthermore, as with the Project, the related projects within the Project vicinity and within a SCAG-designated PDA (i.e., NMA, Livable Corridor, and TPA) and an HQTC would similarly be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions that would not be in conflict with applicable provisions of the SCAG 2024–2050 RTP/SCS for the land use type.

⁷⁵ SCAG, *SCAG 2024–2050 RTP/SCS*, p. 4.

⁷⁶ SCAG, *2020–2045 RTP/SCS*, September 2020, p. 126.

⁷⁷ SCAG, *2020–2045 RTP/SCS*, September 2020, p. 140.

Although the 2024–2050 RTP/SCS are intended to reduce GHG emissions, the reduction in VMT would also result in reduced transportation fuel consumption. By its very nature, the 2024–2050 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 2024–2050 RTP/SCS. Therefore, cumulative impacts related to wasteful, inefficient, or unnecessary use of transportation fuel would be less than significant.

(iv) Conclusion

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

(b) Consistency with State or Local Plans

Related projects and other future development projects within the Project area would be required to comply with energy conservation and renewable energy plans and policies described above, including the 2025 Title 24 standards and the Los Angeles Green Building Code. As related projects would be required to meet the same energy consumption standards, there would be no significant cumulative impacts with regard to consistency with state or local renewable energy or energy efficiency plans.

As discussed above, the Project would be consistent with the policies emphasized by the 2024–2050 RTP/SCS. The Project is an infill development near transit within an existing urbanized area that would concentrate new residential and commercial uses within a SCAG-designated PDA (i.e., NMA, Livable Corridor, and TPA), as well as an HQTC, thus reducing VMT. This reduction in VMT is substantially better than the goals of the 2024–2050 RTP/SCS. As discussed above, related projects in the Project vicinity would also be infill projects locating uses near other residential and commercial uses, which benefit from similar reductions in VMT and transportation fuel consumption. Therefore, the Project is consistent with the 2024–2050 RTP/SCS, and its contribution to cumulative impacts with regard to consistency with energy conservation plans would not be cumulatively considerable, and thus, would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to energy use and conflicts with State or local plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts related to energy use and conflicts with State or local plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact levels remain less than significant.