

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 CEQA Guidelines includes questions to assist lead agencies when assessing a project's potential energy impacts. Additionally, 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 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:

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

- Federal Energy Policy and Conservation Act
- Phase 1 and 2 Heavy-Duty Vehicle GHG Standards
- Public Utility Regulatory Policies Act of 1978
- National Energy Policy Act of 1992
- Energy Policy Act of 2005
- Clean Air Act
- Clean Cities Program
- Senate Bill 1389
- Renewables Portfolio Standards
- California Building Standards
 - California Building Energy Efficiency Standards
 - California Green Building Standards
- California Assembly Bill 1493
- California Air Resources Board
 - Scoping Plan
 - Advanced Clean Car Program
 - Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
 - In-Use Off-Road Diesel Fueled Fleets Regulation
- Senate Bill 375
- Regional Transportation Plan/Sustainable Communities Strategy
- 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 NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks, as superseded by the U.S. Environmental Protection Agency (USEPA) and the National Highway Traffic Safety Administration (NHTSA) actions described below.

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

(b) Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The NHTSA and the USEPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given for: (1) technological feasibility; (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. US Department of Labor, Bureau of Labor Statistics, Green Jobs Overview, www.bls.gov/green/overview.htm, accessed August 14, 2025.

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 Public Utility Regulatory Policies Act (PURPA) of 1978, Public Law 95 617, sought to promote conservation of electric energy. Additionally, PURPA created a new class of nonutility generators (small power producers) from which, along with qualified co-generators, utilities are required to buy power.

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

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

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

(b) Renewable Portfolio Standards

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

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

³ California Public Utilities Commission, *California Renewables Portfolio Standard (RPS)*, 2018.

(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 2022 Title 24 standards, effective on January 1, 2023. The 2022 Title 24 standards continue to improve upon the preceding versions of Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings, which encourage use of electric heat pumps, requiring newly constructed residences to be electric-ready and introduces solar and battery storage standards as an optional measure to achieve compliance and increases minimum ventilation requirements to improve air quality.

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

The California Green Building Standards Code (CCR Title 24, Part 11) are commonly referred to as the CALGreen Code. The 2022 CALGreen Code includes mandatory measures for non-residential development related to site development, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and

⁴ California Public Utilities Commission, *RPS Program Overview*, 2018.

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.

environmental quality.⁷ The 2022 CALGreen Code improves upon the preceding versions of the CALGreen Code by simplifying the code and its application by offering choices related to new voluntary measures to builders, including battery storage systems, electric heat pump space, and water heating that encourage building electrification. The 2022 CALGreen Code went into effect on January 1, 2023.

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

In response to the transportation sector accounting for more than half of California's carbon dioxide (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-Trade Program, and an AB 32 implementation fee to fund the program.

⁷ California Building Standards Commission, *Guide to the 2016 California Green Building Standards Code Nonresidential*, 2018.

⁸ CARB, *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, and indicates 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 2.a.(b) above.

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 zero-emissions vehicle (ZEV) models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles and the ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered.

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

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

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

¹³ CARB, *Clean Car Standards—Pavley, Assembly Bill 1493*, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed August 14, 2025.

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

Because off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the “In-Use Off-Road Diesel Fueled Fleets Regulation” to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of 5 minutes for all off-road vehicles 25 horsepower and 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 (BACT) requirements. Large fleets have compliance deadlines each year from 2024 through 2028, medium fleets each year from 2016 through 2030, and small fleets each year from 2028 through 2032. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines.

(f) SB 375 (Sustainable Communities Strategy)

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associate with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and 2024–2050 RTP/SCS reflect CARB’s updated SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035 relative to 2005.

(3) Regional

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

SB 375 requires each MPO to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and, thereby, reduce GHG emissions from these sources. For the SCAG region, the 2024–2050 RTP/SCS, adopted in April 2024, is the current RTP/SCS and is an update to the 2020–20245 RTP/SCS.

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

- 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.

SCAG’s determination that the 2024–2050 RTP/SCS meets the state’s GHG emissions reduction targets has been accepted by CARB. This acceptance confirms that the SCAG 2024–2050 RTP/SCS meets the state’s GHG emissions reduction targets consistent with AB 32 and SB 32.

(4) Local

(a) LA100 Plan

The LA100 Plan (formerly the 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.¹⁴ 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 LA's Green New Deal, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.¹⁵ The City's Green New Deal augments, expands, and elaborates in more detail the City's vision for a sustainable future, and it tackles the climate emergency with accelerated targets and new aggressive goals.

Within the City'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.

¹⁴ City of Los Angeles, *Sustainable City pLAn*, April 2015.

¹⁵ City of Los Angeles, *LA's Green New Deal*, 2019.

- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/ matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050.
- Increase the percentage of electric vehicles (EVs) and ZEVs in the city to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025, 95 percent by 2035, and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025 and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within 0.5 mile of a park or open space is at least 65 percent by 2025, 75 percent by 2035, and 100 percent by 2050.

(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, 2016.¹⁶ 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 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 4 million people within a service area of approximately 465 square miles. Electricity provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within LADWP’s Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to the LA100 Plan, LADWP has a net dependable generation capacity

¹⁶ *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.*

greater than 8,101 MW.¹⁷ In 2017, the LADWP power system experienced an instantaneous peak demand of 6,502 MW.¹⁸ Approximately 41 percent of LADWP's 2024 electricity purchases were from renewable sources, which is slightly less than the 45 percent Statewide percentage of electricity purchases from renewable sources.¹⁹

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 a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site, but there is a billboard, parking lights, a cargo storage container, six electric bus chargers, and fencing. To provide a conservative analysis of the Project, existing electricity usage is considered *de minimis* (i.e., the analysis did not assume any existing electricity usage).²⁰

(2) Natural Gas

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

Natural gas is provided to the Project Site by the Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.1 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.²¹

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

¹⁷ LADWP, 2022 Power Strategic Long-Term Resources Plan, p. ES-5.

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

¹⁹ LADWP, 2024 Power Content Label.

²⁰ Eyestone Environmental, Energy Calculations for 130 College Project. See Appendix D of this Draft EIR.

²¹ SoCalGas, Company Profile, www.socalgas.com/about-us/company-profile, accessed August 14, 2025.

California supplies.²² 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.²³ Gas supply available to SoCalGas from California sources averaged 86 million cf per day in 2023 (the most recent year for which data are available).²⁴ SoCalGas supplies natural gas to the Project Site from natural gas service lines located in the Project vicinity. As discussed above, the Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site, but there is a billboard, parking lights, a cargo storage container, six electric bus chargers, and fencing. To provide a conservative analysis of the Project, existing natural gas usage is considered *de minimis* (i.e., the analysis did not assume any existing natural gas usage).²⁵

(3) Petroleum-Based Energy

According to the U.S. Energy Information Administration, transportation accounted for 44.5 percent of California's total energy consumption in 2023.²⁶ In 2020, California consumed approximately 14 billion gallons of gasoline and 3.1 billion gallons of diesel fuel.^{27,28} Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.²⁹ 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.³⁰ According to CARB's Emission FACTor (EMFAC) Web Database, Los Angeles County on-road

²² *California Gas and Electric Utilities, 2024 California Gas Report*, p. 119.

²³ *U.S. Energy Information Administration, California State Profile and Energy Estimates*, www.eia.gov/state/?sid=CA#tabs-2, accessed August 14, 2025.

²⁴ *California Gas and Electric Utilities, 2024 California Gas Report*, Table 36, p. 163

²⁵ *Eyestone Environmental, Energy Calculations for 130 College Project*. See Appendix D of this Draft EIR.

²⁶ *U.S. Energy Information Administration. California State Profile and Energy Estimates. Consumption by Sector*: www.eia.gov/state/?sid=CA#tabs, accessed August 14, 2025.

²⁷ *California Board of Equalization, Net Taxable Gasoline Gallons 10-Year Report*.

²⁸ *California Board of Equalization, Net Taxable Diesel Gallons 10-Year Report*.

²⁹ *CEC, 2023–2024 Investment Plan Update for the Clean Transportation Program*, March 2024.

³⁰ *CEC, 2015 Integrated Energy Policy Report*, docketed June 29, 2016, p. 113.

transportation sources consumed 3.95 billion gallons of gasoline and 609 million gallons of diesel fuel in 2023.³¹

As discussed above, the Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site, but there is a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. To provide a conservative analysis of the Project, existing fuel usage is considered *de minimis*.³²

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by case basis, considering the following factors:

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

³¹ CARB, EMFAC2021 Web Database, <https://arb.ca.gov/emfac/>. Details provided in Appendix D of this Draft EIR.

³² Eyestone Environmental, Energy Calculations for 130 College Project, see Appendix D of this Draft EIR.

- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

In accordance with Appendix F and the *L.A. CEQA Thresholds Guide*, the following factors were considered in determining whether this threshold of significance is met:

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

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

b. Methodology

(1) Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water (including supply and conveyance) used for dust

control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power.³³ Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated using California Emissions Estimator Model (CalEEMod).³⁴ Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power was calculated based on data provided in South Coast Air Quality Management District (SCAQMD) construction surveys (i.e., construction activity, horsepower, load factor, and hours of use per day).³⁵ Although the Project Site 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. Refer to Appendix D of this Draft EIR for detailed calculations.

In terms of natural gas, construction activities typically do not involve the consumption of natural gas, and the Project is not anticipated to involve the use of natural gas-powered construction equipment. In general, this energy analysis assumes heavy-duty construction equipment would be diesel-fueled, as is the typical case. However, natural gas-fueled heavy duty construction equipment could be used to replace some diesel-fueled heavy-duty construction equipment. If this does occur, diesel fuel demand would be slightly reduced and replaced by a small amount of temporary natural gas demand. Because the change would result in a very small change in demand, these changes would not significantly affect the energy analysis or conclusion provided in this Draft EIR and in Appendix D. Therefore, natural gas associated with construction activities was not calculated for the Project.

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

³³ Construction activities include demolition of the existing site, site preparation, grading, building construction, building finishes, landscaping and paving.

³⁴ California Air Pollution Control Officers Association, *CalEEMod™ Version 2022.1 User's Guide*, April 2022.

³⁵ California Air Pollution Control Officers Association, *CalEEMod Users Guide, Appendix D, Technical Source Documentation*, April 2022.

(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 Project Design Feature GHG-PDF-1 which will prohibit the use of natural gas during Project operations excluding food operations (e.g., restaurant uses) and the emergency generator in furtherance of state goals related to electrification as part of the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. Appendix D of this Draft EIR also includes a CalEEMod model for the Project without Project Design Feature GHG-PDF-1. Although the Project would include a diesel emergency backup generator, operation would be limited to routine maintenance/testing or approximately one hour per month unless a loss of power occurs. Fuel usage related to testing of the emergency generator was conservatively based on a maximum of 200 hours per year of operation (the maximum fuel usage for potential Project emergency generator makes and models).

Energy impacts associated with transportation during Project operation were also assessed. Daily trip generation used in this analysis was based on the *Transportation Assessment for 130 College Project* dated October 2024 (Transportation Assessment), included as Appendix I of this Draft EIR. As discussed therein, the Project daily VMT was calculated using the Los Angeles Department of Transportation (LADOT) VMT Calculator. The resulting annual VMT was used as part of the GHG analysis included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. Based on this annual VMT, gasoline and diesel consumption rates were estimated 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 the Project would cause the wasteful, inefficient and/or unnecessary consumption of energy as required by Appendix F of the CEQA Guidelines.

The Project's estimated energy demands were also analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2028 (i.e., the Project buildout year) to determine if these two energy utility companies would be able to meet the Project's energy demands.

c. Project Design Features

No specific project design features are proposed with regard to energy. However, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project includes Project Design Feature GHG-PDF-1, which will prohibit the use of natural gas during Project operations excluding food operations (e.g., restaurant uses) and the emergency generator. 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, including the provision of a 500 kW solar system and two 250 kW inverters.

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 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 (i.e., demolition, construction, operations, maintenance, and removal activities).³⁶

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, the Project may be removed in the future and may include demolition or abandonment of the Project Site. However, it is not known if or when

³⁶ Removal activities relate to the life of a project.

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 or abandonment was not analyzed.

(i) Construction

As discussed in more detail in Subsection 3.d.(1)(a)(i)(a) 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-24, a total of 20,239 kWh of electricity, 52,271 gallons of gasoline, and 187,330 gallons of diesel is estimated to be consumed during Project construction. Project construction is expected to start in 2027 and be completed by 2028.

(a) Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electric equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. This would be consistent with suggested measures in the *L.A. CEQA Thresholds Guide* to use electricity from power poles rather than temporary gasoline or diesel-powered generators.³⁷

As shown in Table IV.C-1, a total of approximately 20,239 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 so as to avoid unnecessary energy consumption. In addition long-term construction lighting (longer than 120 days) providing illumination for the construction site and staging areas would also comply

³⁷ *Analysis conservatively assumes that electrical power during construction will be provided by diesel generators, as this will account for the potential emissions of diesel generators if their use is required.*

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

Fuel Type	Quantity
Electricity	
Water Consumption	3,657 kWh
Lighting and other construction activities necessitating electrical power ^b	16,582 kWh
Total Electricity	20,239 kWh
Gasoline	
On-Road Construction Equipment ^c	52,271 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	52,271 gallons
Diesel	
On-Road Construction Equipment ^c	144,424 gallons
Off-Road Construction Equipment ^d	42,906 gallons
Total Diesel	187,330 gallons
<i>kWh = kilowatt hours</i> ^a Detailed calculations are provided in Appendix D of this Draft EIR. ^b Electricity usage is based on SCAQMD construction site survey data and typical requirements for power generators. Such electricity demand would be temporary, limited, and would cease upon the completion of construction. 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, 2025.	

with applicable Title 24 requirements, which include limits on the wattage allowed per specific area, resulting in the conservation of energy.³⁸ As such, the demand for electricity during construction would not cause wasteful, inefficient, or unnecessary use of energy.

(b) 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, Project construction would not result in wasteful, inefficient, or unnecessary use of natural gas.

³⁸ California Building Energy Efficiency Standards, Title 24, Part 6, Sections 110.9, 130.0, and 130.2.

(c) Petroleum-Based Energy

The petroleum-based fuel use summary provided in Table IV.C-1 on page IV.C-24 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix D of this Draft EIR. Construction assumptions assume that the maximum activity (equipment usage and truck trips) would be occurring every day even though such activity would not occur throughout the entire construction phase. As shown, on- and off-road vehicles would consume an estimated 52,271 gallons of gasoline and approximately 187,330 gallons of diesel fuel throughout the Project's construction (i.e., 2027 through 2028). For comparison purposes, the fuel usage during Project construction would represent approximately 0.001 percent of the 2027 (start year of Project construction) annual on-road gasoline-related energy consumption and 0.03 percent of the 2027 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix D of this Draft EIR.³⁹

Trucks and equipment used during Project 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. Furthermore, on-road vehicles (i.e., haul trucks, worker vehicles, and vendor vehicles) would be subject to federal and State fuel efficiency requirements. Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

(d) 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 (e.g., steel, concrete, lumber) would be recycled or disposed at end of life. As

³⁹ The gasoline percentage is derived by taking the total amount of gasoline usage during construction (52,271 gallons) and dividing that number by the total amount of gasoline usage in the County (3.678 billion gallons) to arrive at 0.001 percent. The diesel percentage is derived by taking the total amount of diesel usage during construction (187,330 gallons) and dividing that number by the total amount of diesel usage in the County (623 million gallons) to arrive at 0.03 percent.

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 and, as such, would not result in wasteful, inefficient, or unnecessary use of energy.

(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, and 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-27, the Project's new energy demand would be approximately 5,755,458 kWh of electricity per year, 394,056 cf of natural gas per year, 221,035 gallons of gasoline per year, and 41,094 gallons of diesel fuel per year.

(a) Electricity

As shown in Table IV.C-2, accounting for Project Design Feature GHG-PDF-1 which prohibits the use of natural gas during Project operations with the exception of restaurant cooking operations and the emergency generator and installation of the 500 kw solar array required by the 2022 California Energy Code, buildout of the Project would result in a projected increase in the on-site demand for electricity totaling approximately 5,755,458 kWh per year.⁴⁰ While this would result in a decrease in natural gas usage, electricity usage would increase as a result of converting uses typically powered by natural gas (e.g., water heaters, space heating, etc.) to electric powered. In addition, as part of the Project, the Applicant would incorporate Project features to support and promote environmental sustainability by complying with all applicable State and local regulatory requirements, including the provisions set forth in the City's Green Building Ordinance. As an example, the Project would comply with the City's EV charging requirements. The Project would also include water conservation and waste reduction measures consistent with the CALGreen Code requirements. In addition, the Project would be subject to the 2022 Title 24 standards, which represent an improvement over the previous standards. As CalEEMod is based on 2019 Title 24 standards, with the exception of the 500 kw solar array as noted above, this analysis

⁴⁰ As shown in Appendix D of this Draft EIR, without Project Design Feature GHG-PDF-1, the Project's projected on-site demand for electricity would be 4,216,965 kWh per year and the Project's demand for natural gas would be 4,992,713 cf per year. Impacts would be less than significant under either scenario.

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

Source	Project Estimated Energy Demand
Electricity	
Building	5,999,112 kWh
Solar System	(773,129) kWh
Water ^b	288,870 kWh
EV Chargers ^c	240,604 kWh
Total Electricity^d	5,755,458 kWh
Natural Gas	
Building	394,056 cf
Total Natural Gas^d	394,056 cf
Petroleum-Based Fuels (On-Road Vehicles, Off-Road Equipment, and Emergency Generators)	
Emergency Generator (Diesel)	3,100 gal
Gasoline	221,035 gal
Diesel	37,994 gal
Total Transportation^e	262,129 gal
<i>kWh = kilowatt hours</i> <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. ^b Calculations assume compliance with the Los Angeles Green Building Code, Chapter 4.303.4 which requires a 20-percent reduction in water usage compared to baseline. ^c Consistent with the LAMC, the Project would provide at least 30 percent of code-required parking spaces with the capability of supporting electric vehicle supply equipment (EVSE) and that a minimum of 10 percent of code-required parking spaces would be further equipped with EV charging stations. ^d With the exception of the 500 kw solar array required by the 2022 California Energy Code, electricity and natural gas estimates are based on CalEEMod default electricity and natural gas usage rates which are based on 2019 Title 24 standards and assume compliance with applicable 2019 CALGreen Code requirements. As such, this analysis conservatively does not take into account additional energy usage reductions under the 2022 Title 24 standards As shown in Appendix D of this Draft EIR, without Project Design Feature GHG-PDF-1, the Project's projected on-site demand for electricity would be 4,216,965 kWh per year and the Project's demand for natural gas would be 4,992,713 cf per year. Impacts would be less than significant under either scenario. ^e Transportation fuel estimates include Project characteristics consistent with the LADOT VMT Calculator. Fuel estimates conservatively do not include reductions in fuel usage associated with implementation of EV charging stations. Fuel usage includes emergency generator consumption. Source Eyestone Environmental, 2025.	

conservatively does not take into account additional energy usage reductions under the 2022 Title 24 standards. 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.

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 accounted for approximately 41 percent of LADWP's overall energy mix in 2024, the most recent year for which data are available and represents the available off-site renewable sources of energy that would meet the Project's energy demand.⁴¹ The use of renewable energy would indirectly reduce use of fossil fuels required for electricity generation (natural gas, coal, oil). While the electricity usage rate for a given land use would not be directly affected by the availability of renewable energy, the consumption of fossil fuels required for electricity generation would be reduced as renewable energy generation increases.

Based on the LA100 Plan, LADWP forecasts that its total energy sales in the 2028–2029 fiscal year (the Project's buildout year) will be 21,826 GWh of electricity.^{42,43} As such, the Project-related increase in annual electricity consumption of 5,755,458 kWh per year would represent approximately 0.03 percent of LADWP's projected sales in 2028.^{44,45} In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage. As such, the Project's demand for electricity during operation would not cause the wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.

(b) Natural Gas

As provided in Table IV.C-2 on page IV.C-27, accounting for Project Design Feature GHG-PDF-1 which prohibits the use of natural gas during Project operations with the exception of restaurant cooking operations and the emergency generator and installation of the 500 kw solar array required by the 2022 California Energy Code, buildout of the Project is projected to generate an increase in the on-site demand for natural gas totaling

⁴¹ LADWP, 2024 Power Content Label.

⁴² LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁴³ LADWP, 2022 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1.

⁴⁴ 1 GWh = 1,000,000 kWh

⁴⁵ The Project's increase in electricity demand without Project Design Feature GHG-PDF-1 of 4,216,965 kWh would represent 0.02 percent of LADWP's projected sales in 2028.

approximately 394,056 cf per year.⁴⁶ As discussed above, the Project would be subject to the 2022 Title 24 standards. As CalEEMod is based on 2019 Title 24 requirements, this analysis conservatively does not take into account energy efficiency improvements under 2022 Title 24. In order to meet the Title 24 energy performance requirement, the Project will include use of efficient water heaters, cooking equipment, and HVAC equipment.

Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.177 billion cf per day in 2028 (the Project's buildout year).⁴⁷ The Project, with an increase in natural gas consumption of 394,056 cf per day, would represent approximately 0.02 percent of SoCalGas' 2028 forecasted consumption in SoCalGas' planning area.⁴⁸ As such, the demand for natural gas during operation would not cause the wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.

(c) Stationary Sources

The Project would include a diesel emergency generator, which would be used on an intermittent, short-term basis and is not expected to provide long-term power generation. The generator would require periodic testing and maintenance, which would consume a limited amount of diesel fuel, as noted in Table IV.C-2, above. As such, the demand for diesel related to emergency generator usage during operation would not cause the wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.

(d) Petroleum-Based Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The Project Site is located in a High Quality Transit Corridor (HQTC) designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from

⁴⁶ As shown in Appendix D of this Draft EIR, without Project Design Feature GHG-PDF-1, the Project's projected on-site demand for electricity would be 4,216,965 kWh per year and the Project's demand for natural gas would be 4,992,713 cf per year. Impacts would be less than significant under either scenario.

⁴⁷ California Gas and Electric Utilities, 2024 California Gas Report, p. 164.

⁴⁸ The Project's increase in natural gas demand without Project Design Feature GHG-PDF-1 of 4,992,713 cf would represent 0.2 percent of SoCalGas' forecasted consumption in 2028.

a “smart growth,” regional planning perspective.^{49,50,51} As discussed in Section IV.I, Transportation, of this Draft EIR, the Project Site is approximately 0.15 miles from the Metro A Line Chinatown Station, which provides a connection to Downtown Los Angeles. This would provide service within the Project vicinity and would provide residents and guests with various public transportation opportunities. In accordance with the LAMC, the Project would provide short- and long-term bicycle parking spaces consistent with applicable regulations. Additionally, the Project is located within the Downtown area of the City, which is conducive to promoting walkability due to the proximity of other existing commercial, retail, residential, and entertainment uses within the area.

The Project would implement VMT reduction strategies to reduce vehicle trips and associated energy usage.⁵² Such VMT reduction strategies include increasing the density of commercial uses in comparison to existing on-site uses, and being located close to other major job centers or residential neighborhoods (e.g., Downtown Los Angeles and Hollywood). The Project would also implement a Transportation Demand Management (TDM) Program as required by the LAMC that includes a reduction in parking supply compared to LAMC, promotions and marketing, and provision of bike parking in excess of LAMC requirements to support alternative modes of transportation. As such, the Project’s siting would lessen transportation fuel consumption through the reduction of VMT, as

⁴⁹ The City’s ZIMAS identifies the Project Site as also located in a Transit Priority Area as defined by Public Resources Code (PRC) Section 20199 as an area within 0.5 miles of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods. The Project Site is approximately 0.15 miles from the Metro A Line Chinatown Station. Source: City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

⁵⁰ Smart growth is an approach to development that encourages a mix of building types and uses, diverse housing and transportation options, development within existing neighborhoods, and community engagement. Smart growth includes the following 10 principles: mix land uses; take advantage of compact building design; create a range of housing opportunities and choices; create walkable neighborhoods; foster distinctive, attractive communities with a strong sense of place; preserve open space, farmland, natural beauty, and critical environmental areas; strengthen and direct development towards existing communities; provide a variety of transportation choices; make development decisions predictable, fair, and cost effective; and encourage community and stakeholder collaboration in development decisions. Source: United States Environmental Protection Agency and the International City/County Management Association, *This is Smart Growth*, 2014; Smart Growth America, *What is smart growth?*, www.smartgrowthamerica.org/smart-growth/key-principles/, accessed August 14, 2024; SCAG 2024–2050 RTP/SCS, “Smart Growth Principles,” page 174-175.

⁵¹ SCAG, 2024–2050 RTP/SCS, 2024; Exhibit 3.8: Priority Growth Area – High Quality Transit Areas. Note that while SCAG now uses the designation HQTCS, this exhibit still refers to High Quality Transit Areas used in the previous RTP/SCS.

⁵² See Section IV.I, Transportation, of this Draft EIR, for applicable VMT reduction measures.

described above and discussed further in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. With implementation of these strategies to reduce the Project's vehicle trips, net transportation-fuel usage would be reduced for both gasoline and diesel fuels.

Prior to July 1, 2020 and SB 743, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA 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 developed equations known as the USEPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.⁵³ The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for Project features, such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites.

As summarized in Table IV.C-2 on page IV.C-27, when accounting for the strategies that would be implemented to reduce VMT, such as high density development and proximity to alternative modes of transportation, the Project's estimated petroleum-based fuel usage would result in an increase of 221,035 gallons of gasoline and 37,994 gallons of diesel per year. As shown in Appendix D of this Draft EIR, incorporation of USEPA MXD VMT reduction features and City requirements applicable to the Project results in a 31-percent reduction in overall VMT compared to the baseline ITE trip generation rates. Conservatively, this calculation does not account for Mitigation Measure MM-TR-1 (Transportation Demand Program) set forth in Section IV.I, Transportation, of this Draft EIR, which includes pricing workplace parking and promotions and marketing to reduce VMT by an additional 5 percent. The Project would also consume diesel from testing of the emergency generator. Annual usage from emergency generator testing would result in an increase of 3,100 gallons of diesel fuel. The Project would result in a total of 262,129 gallons of petroleum-based fuels annually.

Based on the incorporation of VMT reduction features noted above, which would reduce fuel usage, the Project's demand for petroleum-based fuel usage during operation would not cause the wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.

⁵³ USEPA, *Mixed-Use Trip Generation Model*. www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed August 14, 2025.

(iii) Summary of Energy Requirements and Energy Use Efficiencies

As discussed previously, the energy calculations took into account energy efficiency measures, such as Title 24 (including the CALGreen Code requirements), and vehicle fuel economy standards. The calculations also take into account Project Design Feature GHG-PDF-1 which prohibits the use of natural gas during Project operation with the exception of restaurant cooking operations and the emergency generator and the 500 kw solar array included consistent with the 2022 California Energy Code. As CalEEMod is based on 2019 Title 24 standards, with the exception of the 500 kw solar array as noted above, this analysis conservatively does not take into account additional energy usage reductions under the 2022 Title 24 standards. 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. Table IV.C-1 and Table IV.C-2 on pages IV.C-24 and IV.C-27 provide a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 20,239 kWh of electricity would be consumed along with 239,601 gallons of transportation fuel (i.e., gasoline and diesel). During Project operation, a total of 5,755,458 kWh of electricity, 394,056 cf of natural gas, and 262,129 gallons of transportation fuel would be consumed on an annual basis.⁵⁴ Details are provided in Appendix D of this Draft EIR. Based on the Project's energy requirements and its energy use efficiencies, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. Therefore, the Project would result in less-than-significant impacts on energy resources.

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

(i) Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. 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

⁵⁴ As shown in Appendix D of this Draft EIR, without Project Design Feature GHG-PDF-1, the Project's projected on-site demand for electricity would be 4,216,965 kWh per year and the Project's demand for natural gas would be 4,992,713 cf per year. Impacts would be less than significant under either scenario.

would represent approximately 0.001 percent of gasoline usage and 0.03 percent of diesel usage within Los Angeles County, respectively.⁵⁵ As energy consumption during Project construction activities would be relatively negligible, the Project would not affect local and regional energy supplies or the requirements for additional capacity in years during the construction period. As such, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during Project construction and would result in less-than-significant impacts on energy resources.

(ii) Operation

Based on the LA100 Plan, LADWP forecasts that its total energy sales in the 2028–2029 fiscal year (the Project’s buildout year) will be 21,826 GWh of electricity.^{56,57} As such, the Project-related net increase in electricity consumption of 4,319,880 kWh per year would represent approximately 0.02 percent of LADWP’s projected sales in 2028.^{58,59} Furthermore, LADWP has confirmed that the Project’s electricity demand can be served by the facilities in the Project area.⁶⁰ Therefore, LADWP’s existing and planned electricity capacity and electricity supplies would be sufficient to support the Project’s electricity demand.

As stated above, the Project’s estimated net demand for natural gas is 394,056 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 2.177 billion cf/day in 2028 (the Project’s buildout year).^{61,62} As the Project’s natural gas consumption would represent 0.02 percent of daily regional gas consumption, the Project would not affect the 2028 forecasted consumption in SoCalGas’ planning area. SoCalGas has also confirmed that they have facilities in the area to serve the Project.⁶³ Based on the

⁵⁵ California Air Resources Board, EMFAC2021 Web Database, <https://arb.ca.gov/emfac/>. Details provided in Appendix D of this Draft EIR.

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

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

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

⁵⁹ The Project’s increase in electricity demand without Project Design Feature GHG-PDF-1 of 4,216,965 kWh would represent 0.02 percent of LADWP’s projected sales in 2028.

⁶⁰ Included in the Energy Calculations included as Appendix D of this Draft EIR.

⁶¹ California Gas and Electric Utilities, 2024 California Gas Report, p. 164.

⁶² The Project’s increase in natural gas demand without Project Design Feature GHG-PDF-1 of 4,992,713 cf would represent 0.2 percent of SoCalGas’ forecasted consumption in 2028.

⁶³ Included in the Energy Calculations included as Appendix D of this Draft EIR.

SoCalGas Gas Transmission Pipeline Interactive Map - Los Angeles, there is an existing natural gas line along Main Street adjacent to the Project Site.⁶⁴

At buildout, operation of the Project would result in a net increase of 221,035 gallons of gasoline and 41,094 gallons of diesel per year, or a total of 262,129 gallons of petroleum-based fuels consumed per year, as shown in Appendix D of this Draft EIR. Petroleum-based fuel usage during Project operational activities would represent approximately 0.006 percent of gasoline and diesel usage within Los Angeles County.⁶⁵

In sum, as energy consumption during Project operations would be relatively negligible in comparison to the available energy supply for the region, the Project would not affect local and regional energy supplies or the requirements for additional capacity within LADWP's and SoCalGas' service area. As such, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during Project operation and 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, 2017.⁶⁶ 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 2028, the base case peak demand for the power grid was 5,832 MW.⁶⁷ Under peak conditions, the Project would consume 1,403 kW during peak load conditions.⁶⁸ In comparison to the LADWP power grid base peak load of 5,832 MW in 2028, the Project would represent approximately 0.02 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to

⁶⁴ SoCalGas, Gas Transmission Pipeline Interactive Map—Los Angeles, <https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335>, accessed August 18, 2025.

⁶⁵ Gas: 221,035 gal / 3,573,808,379 gal × 100 = 0.006. Diesel: 41,094 gal / 621,398,931 gal × 100 = 0.006. CARB, EMFAC2021 Web Database, <https://arb.ca.gov/emfac/>. Details provided in Appendix D of this Draft EIR.

⁶⁶ LADWP, 2022 Power Strategic Long-Term Resources Plan, p. ES-5.

⁶⁷ LADWP, 2022 Power Strategic Long-Term Resources Plan, Appendix A, Table A-1.

⁶⁸ Eyestone Environmental, Energy Calculations for 130 College Project. See Appendix D of this Draft EIR.

account for future electrical demand by the Project.⁶⁹ Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

As discussed above, natural gas demand during operations would result in an increase of 394,056 cf 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 2.177 billion cf per day in 2028 (the Project's buildout year).⁷⁰ As the Project's natural gas consumption would represent 0.02 percent of daily regional gas consumption, the Project would not affect the 2028 forecasted consumption in SoCalGas' planning area.⁷¹ As such, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

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

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (including limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.⁷² Electricity and natural gas usage during Project operations presented in Table IV.C-2 on page IV.C-27 would comply with Title 24 standards, including applicable CALGreen Code requirements, and Los Angeles Green Building Code requirements.⁷³ As CalEEMod is based on 2019 Title 24 standards, with the exception of the 500 kw solar array as noted above, the electricity demand shown in Table IV.C-2, conservatively does not take into account additional energy usage reductions under the 2022 Title 24 standards. 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. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

⁶⁹ LADWP, 2022 Power Strategic Long-Term Resources Plan, Appendix A, p. A-7.

⁷⁰ California Gas and Electric Utilities, 2024 California Gas Report, p. 164.

⁷¹ The Project's increase in natural gas demand without Project Design Feature GHG-PDF-1 of 4,992,713 cf would represent 0.2 percent of SoCalGas' forecasted consumption in 2028.

⁷² Energy Independence and Security Act of 2007. Pub.L. 110-140.

⁷³ As shown in Appendix D of this Draft EIR, without Project Design Feature GHG-PDF-1, the Project's projected on-site demand for electricity would be 4,216,965 kWh per year and the Project's demand for natural gas would be 4,992,713 cf per year. Impacts would be less than significant under either scenario.

With regard to transportation fuels, trucks and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles traveling to and from the Project Site are assumed to comply with required CAFE fuel economy standards. Project-related vehicle trips would also comply with Pavley regulations and the 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 wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

(e) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal wind, and hydropower. The LADWP's most recently adopted 2022 Power Strategic Long-Term Resources Plan (i.e., LA100) identifies adequate resources (e.g., 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 region are obtained from locations throughout the western United States, as well as Canada.⁷⁴ According to the U.S. Energy Information Administration, the United States currently has approximately 86 years of natural gas reserves based on 2021 consumption.⁷⁵ As discussed above, Project construction would not consume natural gas and, as the Project will be all not consume natural gas, except restaurant cooking uses and emergency generator use per Project Design Feature GHG-PDF-1, Project operation would have only a negligible effect on natural gas supply, as the Project's natural gas consumption would represent 0.02 percent of total regional gas consumption.

With regard to on-site energy resources, the Project Site does not contain any significant sources of renewable (i.e., water, solar, wind, geothermal) or non-renewable

⁷⁴ California Gas and Electric Utilities, 2024 California Gas Report.

⁷⁵ U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed October 30, 2025.

energy, such as coal, natural gas, and petroleum. However, the Project would include a 500 kw PV system consistent with 2022 California Energy Code requirements and would comply with LADWP interconnection requirements related to energy transmission lines. Therefore, the Project construction and operation activities would not conflict with existing or planned energy resources.

Petroleum-based 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 consumption until 2050.⁷⁶ As discussed previously, the Project transportation fuel consumption during operations would be a total of 262,129 gallons per year, which would represent 0.006 percent of the gasoline and diesel usage within Los Angeles County.⁷⁷ 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 regulations and the LCFS, which are designed to not only 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 would provide EV parking spaces in accordance with the LAMC. In addition, the Project is located within an HQTIC as designated by the 2024–2050 RTP/SCS, which would encourage use of mass transit, further reducing transportation fuel usage during Project operations. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above in Subsection 2.a, Regulatory Framework, one of the objectives of SB 350 is to increase procurement of California’s electricity from renewable sources from 33 percent to 50 percent by 2030. However, in 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 approximately 41 percent of LADWP’s overall energy mix in 2024, the most recent year for which data are available.⁷⁸ This represents the available off-site renewable sources of energy that would meet the Project’s energy demand.

⁷⁶ 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 August 14, 2025.

⁷⁷ California Air Resources Board, *EMFAC2021 Web Database*, <https://arb.ca.gov/emfac/>. Details provided in Appendix D of this Draft EIR.

⁷⁸ LADWP, *2024 Power Content Label*.

The Project's use of renewable energy would indirectly reduce use of fuels required for electricity generation (i.e., 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 Regulatory Framework Subsection 2.a, new nonresidential 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 120.0 through 130.5 for nonresidential 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 PV 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. Under the performance compliance approach, the Project would be required to model energy usage taking into account energy efficiency measures, PV system size and battery systems. The Project would include a 500-kW PV system as part of the final design consistent with Title 24 PV system requirements.

Due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles 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.⁷⁹

⁷⁹ NREL, *California—Annual Average Wind Speed at 80 m, 2010*.

In sum, the Project would not result in 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 proximity to residential, retail, and employment uses would allow for more employees to potentially work closer to their residence nearby and to shopping and entertainment areas, thereby reducing the VMT. The Project design, which includes dedicated bicycle parking facilities within the Project Site in compliance with LAMC requirements, also encourages non-automotive forms of transportation, such as walking or biking to nearby destinations. In addition, the Project Site is located in a TPA and HQTC 0.15 miles southwest of the Metro A Line Chinatown Station located directly across the street from the Project Site on the northwestern corner of the intersection of West College Street and North Spring Street. The Project Site is also located in close proximity to stops for Metro Lines 70 and 76, the DASH Lincoln Heights/Chinatown stop, DASH Downtown Routes A, B, D, and E, and Santa Clarita Transit Lines 794 and 799. Moreover, the Project Site is located approximately 0.5 miles north of Union Station along Alameda Street, which is a hub for all major public transit lines for the region. This would result in a reduction in trips due to the accessibility of mass transit. With the reduction in trips, the Project results in a 31-percent reduction in VMT compared to a Project without reduction features, with a corresponding reduction in the Project's petroleum-based fuel usage.^{80,81} Mitigation Measure MM-TR-1 (TDM measures above code) identified in Section IV.I, Transportation, of this Draft EIR, includes a ride-share program and designated parking/loading areas for rideshare vehicles which would reduce VMT by an additional 5 percent. Therefore, the Project would encourage the use of efficient transportation alternatives. As such, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and the Project would result in less-than-significant impacts on energy resources.

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

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

⁸⁰ *The Project without reduction features scenario does not account for energy efficiency measures that would exceed the Title 24 Building Standards Code or trip reductions.*

⁸¹ *VMT reduction calculations provided in Appendix B, Air Quality and Greenhouse Gas, of this Draft EIR, CalEEMod Vehicle Trip Input Calculations.*

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's Solid Waste Management Policy Plan to increase trash diversion from landfills; the RENEW LA Plan, which would maximize recycling and reuse; the City's Space Allocation Ordinance (Ordinance No. 171,687), which requires recycling of construction debris and recycling bins at new developments; and the City's Exclusive Franchise System Ordinance (Ordinance No. 182,986), which would help the City meet the diversion goals of AB 939. These aforementioned 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.⁸² The Project would also comply with State and City waste diversion goals, such as L.A.'s Green New Deal, 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 State and City's solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

Based on the above, with compliance with applicable State and local energy efficiency standards, the Project would meet and/or exceed applicable energy conservation policies and regulations. 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.

(h) Conclusion Regarding Significance Threshold (a)

As demonstrated in the analysis above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. As discussed previously in Subsection 2.b.(3) on page IV.C-17 above, gasoline fuel usage for the region is expected to decline over the next 10 years. Regional petroleum-based fuel supply is not expected to decrease significantly

⁸² Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

over this same period and supplies would be sufficient to meet Project demand. Regional electricity generation capacity and supplies of natural gas and petroleum-based fuels would also be sufficient to meet the needs of Project-related construction and operations. During operations, the Project would comply with applicable existing energy efficiency requirements, such as CALGreen Code, as well as include energy conservation measures beyond requirements. **In summary, the Project's energy demands would comply with applicable 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 2025 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the Los Angeles Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

With regard to transportation uses, the Project design would reduce VMT within the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.G, Land Use and Planning, of this Draft EIR, SCAG's 2024–2050 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three

principles most critical to the future of the region. As part of the approach, the 2024–2025 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2024–2050 RTP/SCS. Most notably, the Project would be a commercial development located in an area characterized by a high degree of pedestrian activity, transit, other commercial, and retail services. The 2024–2050 RTP/SCS also identifies HQTCs, which are described as generally walkable transit villages or corridors defined by PRC Section 21155(b) as “[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours”.⁸³ Local jurisdictions are encouraged to focus housing and employment growth within HQTCs to reduce VMT. As noted previously, the Project Site is located within an HQTC as designated by the 2024–2050 RTP/SCS.⁸⁴ The Project would provide the Chinatown community greater opportunities for neighborhood services, jobs, and retail services and would be well-served by existing public transportation, including the Metro A Line Chinatown Station, as evidenced by the Project Site’s location within a designated HQTC.

The Project's introduction of new job opportunities within an infill area is consistent with numerous policies in the 2024–2050 RTP/SCS related to locating new jobs near transit. The incorporation of USEPA MXD VMT reduction features applicable to the Project and the TDM Program consistent with the LAMC would result in an approximately 31-percent reduction in overall VMT which would support the reduction goals provided in the 2024–2050 RTP/SCS. Mitigation Measure MM-TR-1 (TDM measures above code) identified in Section IV.I, Transportation, of this Draft EIR includes a ride-share program and designated parking/loading areas for rideshare vehicles which would reduce VMT by an additional 6.8 percent. With this reduction in VMT, the Project would be consistent with goals of the 2020–2045 RTP/SCS and SB 375 requirements.

The Project would be consistent with the energy efficiency policies addressed in the 2024–2050 RTP/SCS that actively encourage and create incentives for energy efficiency. As discussed in Section II, Project Description, of this Draft EIR, the Project would incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen Code, which would reduce energy consumption. Furthermore, the Project would, at a minimum, comply with the 2022 Title 24 Standards.

⁸³ SCAG, 2024–2050 RTP/SCS, p. 165.

⁸⁴ SCAG, 2024–2050 RTP/SCS, 2024; Exhibit 3.8: Priority Growth Area – High Quality Transit Areas. Note that while SCAG now uses the designation HQTCs, this exhibit still refers to High Quality Transit Areas used in the previous RTP/SCS.

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

(2) Mitigation Measures

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

(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 21 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, such as use of Energy Star appliances and LED lighting, and would be consistent with growth expectations for LADWP's service area. As discussed in Subsection 3.d.(1)(c) on page IV.C-34 above, Project peak electricity usage would represent 0.02 percent of the LADWP base peak load conditions which is consistent with LADWP's growth projection of the electrical power grid of 0.4 percent. The Project also would incorporate energy efficiency measures to comply with

the applicable Title 24 standards. Furthermore, other future development projects, including the related 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 approximately 41 percent of LADWP's overall energy mix in 2024, the most recent year for which data are available.⁸⁵ This represents the available off-site renewable sources of energy that could meet the Project's and related projects' energy demand. Therefore, the Project and related projects within LADWP's service area would comply with energy conservation plans and efficiency standards required to ensure that energy is used efficiently. As such, cumulative impacts related to wasteful, inefficient, or unnecessary use of electricity would be less than significant.

(ii) Natural Gas

The Project would result in an increase in natural gas consumption even accounting for Project Design Feature GHG-PDF-1 which prohibits natural gas usage with the exception of restaurant cooking and emergency generator usage compared to existing conditions. As noted above, 21 related projects are located in the vicinity of the Project Site. The related projects comprise a variety of uses, including apartments, condominiums, restaurants, hotels, office space, and retail uses, as well as mixed-use developments incorporating some or all of these elements, a data center, and the Los Angeles Aerial Rapid Transit project. Based on the Project's estimated net new natural gas consumption of 394,056 cf per year, the Project would account for approximately 0.02 percent of SoCalGas' projected consumption for the Project's buildout year.⁸⁶ Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SoCalGas' service area. Furthermore, future development projects within SoCalGas' service area would be expected to incorporate energy conservation features; comply with applicable regulations, including the CALGreen Code and State energy standards under Title 24; and incorporate mitigation measures, as necessary. As such, cumulative impacts related to wasteful, inefficient, or unnecessary use of natural gas would be less than significant.

⁸⁵ LADWP, 2024 Power Content Label.

⁸⁶ The Project's increase in natural gas demand without Project Design Feature GHG-PDF-1 of 4,992,713 cf would represent 0.2 percent of SoCalGas' forecasted consumption in 2028.

(iii) Petroleum-Based Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for petroleum-based fuel in the State and in the County. As described above, at buildout, the Project would result in an increase of 221,035 gallons of gasoline and 41,094 gallons of diesel per year, or a total of 262,129 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 include infill projects locating uses near other residential and commercial uses which would reduce distance traveled, as well as consumption of transportation fuel. As analyzed above, Project petroleum-based 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 consistent with SCAG's 2024–2050 RTP/SCS which, in turn, would reduce fuel consumption.

Furthermore, as described in Subsection 3.d.(1)(h) on page IV.C-40 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 Metro A Line Chinatown Station located directly across the street from the Project Site on the northwestern corner of the intersection of West College Street and North Spring Street. The Project Site is also located in close proximity to stops for Metro Lines 70 and 76, the DASH Lincoln Heights/Chinatown stop, DASH Downtown Routes A, B, D, and E, and Santa Clarita Transit Lines 794 and 799. Moreover, the Project Site is located approximately 0.5 miles north of Union Station along Alameda Street, which is a hub for all major public transit lines for the region. 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 2045.⁸⁷ 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 and be expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's

⁸⁷ SCAG, 2024–2050 RTP/SCS, April 2024, p. 187.

GHG emission reduction goals.⁸⁸ 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 is a regional planning tool that addresses cumulative growth and resulting environmental effects and is applicable to the Project and related projects with respect to transportation energy efficiency. Under CEQA, related projects would be required to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by 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 EV charging stations at or above regulatory requirements. Furthermore, as with the Project, the related projects within the Project vicinity and 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 2020–2045 RTP/SCS for the land use type.

Although the 2024–2050 RTP/SCS is intended to reduce GHG emissions, the reduction in VMT would also result in reduced petroleum-based 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, based on the analysis conducted for the Project, it is assumed that related projects in the Project Site vicinity would similarly reduce VMT, consistent with the goals of the 2024–2050 RTP/SCS. Lastly, while many of the related projects would be expected to have an emergency generator like the Project, this represents only a small portion of total petroleum-based fuel demand. Therefore, cumulative impacts related to wasteful, inefficient, or unnecessary use of petroleum-based fuels would be less than significant.

(b) Consistency with State or Local Plans

Similar to the Project, related projects and other future development projects within the Project area would be required to comply with the applicable State and local energy conservation and renewable energy plans and policies described above, including the applicable Title 24 standards and the Los Angeles Green Building Code. As the related projects would be required to meet the same applicable energy consumption standards and plans as the Project, cumulative impacts related to consistency with energy plans would be less than significant.

⁸⁸ SCAG, 2024–2050 RTP/SCS, April 2024, p. 242.

(c) Conclusion

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