

IV. Environmental Impact Analysis

K.2 Utilities and Service Systems—Energy Infrastructure

1. Introduction

The following section analyzes the Project's potential impacts upon electric power and natural gas infrastructure. This section focuses on the existing infrastructure serving the Project area and the potential for environmental impacts to occur as a result of any physical improvements that may be necessary to accommodate the Project. The information presented in this section is based, in part, on the information provided by the Los Angeles Department of Water and Power (LADWP), the *Energy Calculations for 130 College Project* prepared by Eyestone Environmental, which is included as Appendix D of this Draft EIR. Potential impacts associated with energy demand and energy conservation policies are discussed in Section IV.C, Energy, of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- United States Department of Energy (Energy Policy Act of 2005)
- California Independent System Operator
- California Public Utilities Commission
- Senate Bill 1389
- Senate Bill 649
- California Independent System Operator

(1) Federal

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

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

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority.

(2) State

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

(a) California Independent System Operator

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by

a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

(b) California Public Utilities Commission

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

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

(c) Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The most recent Integrated Energy Policy Report was adopted in 2024 which highlights the actions necessary to accelerate connection of clean resources to the electrical grid, potential growth of clean and renewable hydrogen, and actions to ensure California's energy system remains reliable and resilient.

b. Existing Conditions

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, lighting, a shipping container, six electric bus chargers, and fencing.

(1) Electricity

LADWP provides electrical service throughout the City, serving approximately 4 million people within a service area of approximately 465 square miles. Electrical service

provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within LADWP's Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2022 Power Strategic Long-Term Resource Plan, now known as the LA100 Plan, LADWP has a net dependable generation capacity greater than 8,101 MW.¹ In 2017, the LADWP power system experienced an instantaneous peak demand of 6,502 MW.² Approximately 41 percent of LADWP's 2023 electricity purchases were from renewable sources, which is slightly less than the 45 percent Statewide percentage of electricity purchases from renewable sources.³

LADWP supplies electrical power to the Project Site from electrical service lines located in the Project Site vicinity. Based on a topographic survey of the Project Site, the Project Site receives electric power service from LADWP via existing overhead power lines on College Street and Main Street. 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 from the use of a surface parking lot).

(2) Natural Gas

Natural gas is provided to the Project Site by SoCalGas. SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.1 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.⁴

SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada, as well as local California supplies.⁵ The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. Gas supply available to

¹ LADWP, 2022 Power Strategic Long-Term Resource Plan, p. ES-5, December 2022.

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

³ LADWP, 2024 Power Content Label.

⁴ SoCalGas, Company Profile, www.socalgas.com/about-us/company-profile, accessed May 20, 2024.

⁵ California Gas and Electric Utilities, 2024 California Gas Report, p. 119.

SoCalGas from California sources averaged 86 million cubic feet (cf) per day in 2023 (the most recent year for which data are available).⁶

As noted in the Utility Report, based on the SoCalGas Gas Transmission Pipeline Interactive Map - Los Angeles, there is an existing natural gas line along Main Street adjacent to the Project Site.⁷ 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).⁸

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?⁹

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

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

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

⁶ *California Gas and Electric Utilities, 2024 California Gas Report, Table 36, p. 163.*

⁷ *SoCalGas, Gas Transmission Pipeline Interactive Map—Los Angeles, <https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335>, accessed August 18, 2025.*

⁸ *Eyestone Environmental, Energy Calculations for 130 College Project. See Appendix D of this Draft EIR.*

⁹ *Refer to the Project's Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater and telecommunications facility impacts and Section IV.K.1, Utilities and Service Systems—Water Supply, of this Draft EIR, for a discussion of water infrastructure and wastewater infrastructure impacts.*

b. Methodology

This analysis evaluates the potential impact of the Project on existing energy infrastructure by comparing the estimated Project energy demand with the available capacity. Will-serve letters from LADWP and SoCalGas included in Appendix D to this Draft EIR demonstrate that sufficient electricity and natural gas infrastructure exists around the Project Site to serve the Project.

Project energy usage was calculated using CalEEMod Version 2022.1. During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control (including supply and conveyance) and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. In terms of natural gas, construction activities typically do not involve the consumption of natural gas, and current plans do not involve use of natural gas-powered construction equipment. During Project operation, energy consumption would include electricity from uses, such as heating, ventilation, and air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. In terms of natural gas, the Project would not include the use of natural gas equipment in accordance with Project Design Feature GHG-PDF-1, as discussed below, except as permitted for restaurant uses and the emergency generator. Additional details regarding Project energy usage are provided in Section IV.C, Energy, and Appendix D to this Draft EIR.

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

c. Project Design Features

No specific project design features are proposed with regard to energy infrastructure other than the proposed improvements described in Section II, Project Description, of this Draft EIR. However, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and emergency generators. The Project would comply with the energy efficiency requirements of the California Building Standards Code (Title 24), which includes the California Green Building Standards (CALGreen) Code, and the Los Angeles Green Building Code. Compliance with these requirements would reduce the Project's energy demand and the impact such demand would have on the electricity and natural gas infrastructure capacity.

d. Analysis of Project Impacts

***Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*¹⁰**

(1) Impact Analysis

(a) Construction

(i) Electricity

As discussed above, construction activities at the Project Site would require minor quantities of electricity for lighting, power tools and other support equipment. Heavy construction equipment would be powered with diesel fuel. Thus, LADWP's existing electrical infrastructure currently has enough capacity to provide service for construction activities because, as discussed in Section IV.C, Energy, of this Draft EIR, electricity consumption during construction would be less than during operation, and LADWP has confirmed it can serve the Project in its will-serve letter dated June 25, 2024.¹¹ Electricity during Project construction would be obtained from existing electrical lines that connect to the Project Site. This would be consistent with suggested measures in the *2006 L.A. CEQA Thresholds Guide* to use electricity from power poles rather than temporary gasoline or diesel-powered generators. Therefore, existing off-site infrastructure would not have to be expanded or newly developed to provide electricity to the Project Site during any phase of construction.

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

¹⁰ Refer to the Project's Initial Study included as Appendix A of this Draft EIR, for a discussion of stormwater and telecommunications facility impacts and Section IV.K.1, Utilities and Service Systems—Water Supply, of this Draft EIR, for a discussion of water infrastructure and wastewater infrastructure impacts.

¹¹ Included as part of the Energy Calculations for 130 College Project included as Appendix D of this Draft EIR.

that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new electric power facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and the Project's impact would be less than significant.

(ii) Natural Gas

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. Since the Project Site is located in an area already served by existing natural gas infrastructure, the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Specifically, based on the SoCalGas Gas Transmission Pipeline Interactive Map - Los Angeles, there is an existing natural gas line along Main Street adjacent to the Project Site.¹² Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below the ground surface. In addition, prior to ground disturbance, Project contractors would be required to notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. **Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.**

(b) Operation

(i) Electricity

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, accounting for Project Design Feature GHG-PDF-1 which prohibits the use of natural gas during Project operation except for restaurant cooking operations and the emergency generator and the 500 kw solar array required by the California Energy Code, the Project-related annual electricity consumption of 5,755,458 kWh per year would represent approximately 0.03 percent of LADWP's projected sales in 2028 (the Project's buildout year).^{13,14} In

¹² SoCalGas, Gas Transmission Pipeline Interactive Map—Los Angeles, <https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335>, accessed August 18, 2025.

¹³ $5.756 \text{ GWh} / 21,826 \text{ GWh} \times 100 = 0.03$

¹⁴ 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. (Footnote continued on next page)

addition, during peak conditions, the Project would represent approximately 0.02 percent of the LADWP estimated peak load.¹⁵

Additionally, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.¹⁶ Furthermore, the Project would implement any necessary connections and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project. As such, operation of the Project would not adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity and would not require the construction of new electrical facilities or expansion of existing facilities. **Therefore, operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new electrical facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and the Project's impacts would, therefore, be less than significant.**

(ii) Natural Gas

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, the Project would result in a net increase in the on-site demand for natural gas totaling approximately 394,056 cf per year, which would represent approximately 0.02 percent of SoCalGas's projected sales in 2028.^{17,18} In compliance with Project Design Feature GHG-PDF-1, the Project would be all-electric, except for restaurant cooking uses and the emergency generator.

(c) Conclusion

As demonstrated in the analysis above, construction and operation of the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. **Therefore, Project impacts related to energy**

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.

¹⁵ $1.088 \text{ MW} / 5,832 \text{ MW} \times 100 = 0.019$

¹⁶ *Included as part of the Energy Calculations for 130 College Project included as Appendix D of this Draft EIR.*

¹⁷ $394,056 \text{ cf} / 2,177,000,000 \text{ cf} \times 100 = 0.02$

¹⁸ *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. 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.*

infrastructure capacity would be less than significant during construction and operation.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

(a) Electricity

Buildout of the Project along with the 21 related projects listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. LADWP forecasts that its total energy sales in the 2028-2029 fiscal year (the Project's buildout year) will be 21,826 gigawatt hours (GWh) of electricity. Based on the Project's estimated electrical consumption of 5,755,458 kWh per year, the Project would account for approximately 0.03 percent of LADWP's projected sales for the Project's buildout year.^{19,20} In addition, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.²¹ Data used to develop the LADWP demand forecasts take into account population growth, energy efficiency improvements, and economic growth, which includes construction projects.²² Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. LADWP would continue to expand delivery capacity as needed to

¹⁹ $5.756 \text{ GWh} / 21,826 \text{ GWh} \times 100 = 0.03$

²⁰ 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. 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.

²¹ Included as part of the Energy Calculations for 130 College Project included as Appendix D of this Draft EIR.

²² LADWP, 2022 Power Strategic Long-Term Resource Plan, Appendix A, Table A-1, p. A-7, December 2022.

meet demand increases within its service area at the lowest cost and risk, consistent with LADWP's environmental priorities and reliability standards.

The LA100 Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Although detailed information regarding electrical infrastructure for development projects in LADWP's service area is not known, it is reasonably expected that LADWP would provide for necessary improvements specific to each development project. Each of the development projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the service area. As discussed above, will-serve letters are provided for individual projects in which LADWP determines whether sufficient infrastructure is in place to provide electricity to a proposed project. As part of the will-serve letter process, LADWP takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is adequate. As the will-serve letter for the Project identified adequate infrastructure, the estimated power requirement for the Project is a part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.²³

(b) Natural Gas

As discussed above, Project operations would not result in the use of natural gas resources, except for restaurant cooking and the emergency generator, in compliance with Project Design Feature GHG-PDF-1. SoCalGas forecasts that its total natural gas consumption in 2028 will be 2.177 billion cf/day.²⁴ Based on the Project's estimated net increase in natural gas consumption of 394,056 cf per year, the Project would represent approximately 0.02 percent of SoCalGas' 2028 forecasted consumption in SoCalGas' planning area.²⁵ Moreover, SoCalGas' forecasts consider projected population growth and development based on local and regional plans.

²³ *Included as part of the Energy Calculations for 130 College Project included as Appendix D of this Draft EIR.*

²⁴ *California Gas and Electric Utilities, 2024 California Gas Report, p. 164.*

²⁵ *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. 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.*

As discussed above, will-serve letters are provided for individual projects, in which SoCalGas determines whether sufficient infrastructure is in place to provide natural gas service to a proposed project. As part of the will-serve letter process, SoCalGas takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is adequate. As discussed above, the will-serve letter for the Project identified adequate infrastructure.²⁶ Therefore, construction of the Project would not significantly affect the SoCalGas regional infrastructure.

(c) Conclusion

Based on the analysis provided above, cumulative impacts related to electricity and natural gas infrastructure would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance after Mitigation

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

²⁶ Included as part of the Energy Calculations for 130 College Project included as Appendix D of this Draft EIR.