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MEMORANDUM

To: *Honorable Members of the Planning and Land Use Management (PLUM) Committee*

From: *Stacie Henderson, CAJA Environmental Services*

Date: *October 28, 2019*

Subject: *Flower Market, ENV-2016-3991-EIR, CPC 2016-3390, VTTM 74568*

We understand that the applicant for the proposed Flower Market Project (Project) has requested a modification to Condition 29 so the condition would read as follows:

Electric Vehicle Parking. The project shall include at least 20 percent of total code required parking spaces as capable of supporting future Electric Vehicle Supply Equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Five (5) percent of the total code required parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the 20 percent or five percent results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

The EIR prepared for the Project analyzed the Project's impacts with respect to electricity demand in Section 4.F, Greenhouse Gas Emissions, and Section 4.N.4, Utilities and Service Systems – Energy Conservation. As stated in Draft EIR Table 4.N.4-1 (Draft EIR page 4.N-5), the Project was estimated to demand approximately 4,257,322 kilowatt hours of electricity per year (kw-h/yr), which was determined to account for approximately 0.02 percent of LADWP's forecasted 2022-2023 electricity demand. Based on that fact and other information, the EIR concluded that the Project's long-term demand for electricity during the operational phase of the Project would not result in a wasteful or inefficient use of energy.

The electricity required for electric vehicle charging would be minimal and would not change the conclusions from the EIR. According to Code requirements, the Project would require 479 vehicle parking spaces. Therefore, to comply with the City's standard condition of approval relative to electric vehicle parking, the Project would be required to provide 24 parking spaces (5% of Code required

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parking) with EV chargers and 96 parking spaces (20% of Code required parking) as capable of supporting future electric vehicle supply equipment. As shown in Table 1, below, the electric vehicle charging infrastructure would require approximately 302,400 kw-h/yr of electricity. Note that this is a conservative estimate as it assumes that both the parking spaces with EV chargers installed and the parking spaces that can support future electric vehicle supply equipment would be used for electric vehicle charging each day, even though 20% of the Code required spaces (96 spaces) only need to be able to accommodate future equipment. Nevertheless, adding the electricity required for the vehicle parking spaces (shown in Table 1) to the electricity required for the Project (as provided in Draft EIR Table 4.N.4-1), the Project's on-site electricity demand would be approximately 4,559,722 kw-h/yr, which would still only account for approximately 0.02 percent of LADWP's forecasted 2022-2023 electricity demand.[1]

The LADWP's current and planned electricity supplies have the capacity to support the Project's electricity consumption, including consumption by vehicle charging. The Project would not require the acquisition of additional electricity supplies beyond those that exist and are anticipated by the LADWP. Therefore, although the Project would create additional demands on electricity supplies and distribution infrastructure, the LADWP would be able to provide electricity to the Project Site. Therefore, Project long-term demand for electricity during the operational phase of the Project, including demand from vehicle charging, would not result in a wasteful or inefficient use of energy.

Table 1
Electricity Demand – Electric Vehicle Parking

Land Use	Size	Electricity Rates	Total (kw-h/yr)
Parking – EV chargers (5%) [a]	24 spaces	2,520 kw-h/space/yr	60,480
Parking – future EV (20%) [b]	96 spaces	2,520 kw-h/space/yr	241,920
		Total	**302,400**

kw-h = kilowatt-hour yr = year
[a] As stated in the condition of approval, 5% of Code required parking will be provided with EV chargers.
[b] As stated in the condition of approval, 20% of Code required parking shall be able to accommodate future electric vehicle supply equipment.
Source: US Department of Energy, Alternative Fuels Data Center: https://afdc.energy.gov/fuels/electricity_charging_home.html

As described above, the Project's 24 parking spaces with EV chargers and 96 parking spaces capable of supporting future EV charging would minimally increase the Project's electricity demand and associated GHG emissions with respect to electricity usage. However, as electric vehicles produce fewer life cycle GHG emissions than gasoline-powered vehicles, the Project's EV support infrastructure would be

[1] 4.56 gigawatt hours required for the Project / 24,403 gigawatt hours projected as LADWP's 2022-2023 total electricity sales x 100 = 0.02%.

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expected to contribute to net reductions in GHG emissions. The inclusion of EV infrastructure is consistent with State and City guidelines to reduce transportation-related GHG emissions. Further, the Project would use electricity provided by LADWP, which is required to meet the SB 350 and SB 100 performance standards. LADWP has committed to achieving 50 percent renewables by 2025 and will be required to update its plans to comply with SB 100's revised 2030 60 percent target for renewable energy. LADWP has also launched the LA100 Study to determine a course for achieving a 100% renewable energy supply by 2045. As such, the Project's inclusion of electric vehicle charging infrastructure would result in an overall reduction in GHG emissions from the analysis provided in Section 4.F, Greenhouse Gas Emissions, of the EIR, and impacts would continue to be less than significant.