IV. Environmental Impact Analysis

L.1 Utilities and Service Systems—Water Supply and Infrastructure

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts to water supply and the water infrastructure system serving the Project Site. The analysis describes regional water supplies and existing water infrastructure serving the Project Site, estimates the water demand associated with the Project, and assesses whether there is sufficient water supply and infrastructure capacity to meet that demand. The analysis of water supply is based on the Water Supply Assessment prepared for the Project by the Los Angeles Department of Water and Power (LADWP) and adopted by LADWP's Board of Water and Power Commissioners on July 24, 2018. The Water Supply Assessment (WSA) for the Project is included in Appendix L of this Draft EIR. The analysis of water infrastructure is based on the *Utility Technical Report: Water, Wastewater, and Energy*, prepared for the Project by KPFF Consulting Engineers, dated June 27, 2019 (Utility Report), which is also included in Appendix L of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Federal

No federal regulations are relevant to the thresholds discussed below.

(2) State

(a) Senate Bill 610 (California Water Code Sections 10910 et seq.)

Senate Bill (SB) 610, codified in the California Water Code, Sections 10910 et seq., became effective January 1, 2002. SB 610 requires counties and cities to consider the availability of adequate water supplies for certain new large development projects as part of the California Environmental Quality Act (CEQA) process. Specifically, SB 610 requires that for certain projects subject to CEQA, the urban water supplier must prepare a WSA that determines whether the projected water demand associated with a project is included as part of the most recently adopted urban water management plan.

Specifically, a WSA shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. In addition, it must address water supplies over a 20-year future period and consider average, single-dry, and multiple-dry years. In accordance with Section 10912 of the California Water Code, projects subject to CEQA requiring submittal of a WSA include the following:

- Residential developments of more than 500 dwelling units;
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plant, or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- Mixed-use projects that include one or more of the above-identified categories; or
- A project that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

The WSA must be approved by the public water system at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

As discussed in Section II, Project Description, of this Draft EIR, the Project would preserve and enhance most of the existing buildings on the Sunset Gower Studios and develop new studio-related creative office, production office/production support and storage uses within three new buildings totaling 627,957 square feet of floor area. The Project would remove 160,611 square feet of existing floor area, resulting in a net increase of 466,346 square feet of floor area. Based on the Applicant's experience with office projects of similar scope, the Project would generate more than 1,000 employees assuming four employees per 1,000 square feet of floor area. Therefore, the preparation and approval of a WSA by LADWP is required. As previously noted, a WSA was prepared for the Project and adopted by LADWP's Board of Water and Power Commissioners on July 24, 2018.

(b) Senate Bill X7-7 (Water Conservation Act of 2009)

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 18.4 percent in December 2018 as compared to production in December 2013.[1]

(c) California Urban Water Management Plan Act (California Water Code Sections 10610–10656)

The California Urban Water Management Planning Act (California Water Code, Sections 10610–10656) addresses several state policies regarding water conservation and development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires water suppliers to develop water management plans every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, single-dry, and multiple-dry years. Specifically, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 acre-feet per year of water must adopt an urban water management plan.

A number of recent requirements regarding the preparation of water management plans have been added to the Urban Water Management Planning Act. These additional requirements include: (i) a narrative description of water demand measures implemented over the past five years and future measures planned to meet 20 percent demand reduction targets by 2020; (ii) a standard methodology for calculating system water loss; (iii) a voluntary reporting of passive conservation savings, energy intensity, and climate change; and (iv) an analysis of water features that are artificially supplied with water.[2]

(d) Senate Bill 606 and Assembly Bill 1668

On May 31, 2018, Governor Edmund G. "Jerry" Brown (Governor Brown) signed SB 606 and Assembly Bill (AB) 1668 into law.[3] The pair of bills sets permanent overall targets for indoor and outdoor water consumption. The bills set an initial limit for indoor water use

---

[1] *State Water Resources Control Board, Fact Sheet, May 2018 Statewide Conservation Data, updated July 10, 2018.*

[2] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

[3] *Office of Edmund G. Brown, Jr., "Governor Brown Signs Legislation Establishing Statewide Water Efficiency Goals," May 31, 2018.*

of 55 gallons per person per day in 2022, dropping to 50 gallons per person per day by 2030. The Department of Water Resources (DWR) and the State Water Resources Control Board (SWRCB) will recommend standards for outdoor use by October 2021.

(d) California Plumbing Code

Title 24, Part 5 of the California Code of Regulations (CCR) establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The current 2016 California Plumbing Code, which is based on the 2015 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2017. In addition, the California Building Standards Commission approved an Emergency Supplement to the 2013 California Plumbing Code in 2016, in order to establish new or replacement standards on an emergency basis for insertion in the 2013 California Plumbing Code.[4] This Emergency Supplement is also applicable to the now effective 2016 California Building Code.

(e) Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act of 2014,[5,6] passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities. The Sustainable Groundwater Management Act requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally-based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The Sustainable Groundwater Management Act provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The Sustainable Groundwater Management Act provides local groundwater sustainability agencies the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins.

---

[4] *California Building Standards Commission, Revision Record for the State of California, Emergency Supplement, 2013 Title 24, Part 5, California Plumbing Code.*

[5] *Sustainable Groundwater Management Act [And Related Statutory Provisions from SB 1168 (Pavley), AB 1739 (Dickinson), and SB 1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2016.*

[6] *DWR, SGM Sustainable Groundwater Management, http://wdl.water.ca.gov/groundwater/sgm/, accessed July 20, 2018.*

As required by the Sustainable Groundwater Management Act, in December 2016, the California DWR published on its website the best management practices (BMPs) for sustainably managing groundwater:

- BMP 1. Monitoring Protocols, Standards, and Sites;
- BMP 2. Monitoring Networks and Identification of Data Gaps;
- BMP 3. Hydrogeologic Conceptual Model;
- BMP 4. Water Budget; and
- BMP 5. Modeling.[7]

In November 2017, BMP 6 for Sustainable Management Criteria was released for public comments to be received by January 8, 2018. As of September 2019, BMP 6 is still in draft form.[8] Furthermore, under Section 10720.7 of the Sustainable Groundwater Management Act, groundwater sustainability agencies responsible for high- and medium-priority basins must adopt groundwater sustainability plans by January 31, 2020 or January 31, 2022, depending on whether the basin is in critical overdraft.

(f) Article 22.5 Drought Emergency Water Conservation, California Code of Regulations (Emergency Declaration and Executive Orders B-29-15, B-36-15, and B-37-16)

In response to California's drought conditions, Governor Brown issued numerous Executive Orders regarding water conservation. Executive Order B-37-16, which was issued in May 2016, extended the mandatory water reduction measures outlined in a previous Executive Order B-29-15 and further directed the DWR and the State Water Resources Control Board to develop long term efficiency targets that go beyond the 20-percent reductions mandated by SB X7-7, discussed above. The Executive Order also establishes longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating wasteful practices, strengthening urban drought contingency plans and improving agricultural water management and drought plans.

---

[7] *DWR, Best Management Practices, http://wdl.water.ca.gov/groundwater/sgm/, accessed July 20, 2018.*

[8] *DWR, Best Management Practices, www.water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents, accessed September 19, 2019.*

On November 30, 2016, State agencies, including the State Water Resources Control Board released a public draft of *Making Water Conservation A California Way of Life*, which addresses elements of Executive Order B-37-16 that require State agencies to develop a framework for using water more wisely, eliminating water waste, strengthening local drought resilience, and improving agricultural water use efficiency and drought planning.[9]

Due to improved hydrologic conditions statewide, on April 7, 2017, Governor Brown issued Executive Order B-40-17 lifting the drought emergency in all but four California counties.[10] Executive Order B-40-17 also rescinds the Drought Emergency Proclamations issued in January and April 2014 as well as four drought-related Executive Orders issued in 2014 and 2015. However, Executive Order B-40-17 also directs the State Water Resources Control Board to maintain urban water use reporting requirements and prohibitions on wasteful practices. Water agencies will continue to strengthen drought readiness and water use efficiency.[11] The regulatory requirements resulting from the existing Executive Orders have been codified in Article 22.5, Drought Emergency Water Conservation, of the CCR.

(g) California Water Plan

Required by the California Water Code Section 10005(a), the California Water Plan[12] (Water Plan) is the State's strategic plan for managing and developing water resources statewide for current and future generations. The Water Plan provides a collaborative planning framework for elected officials, agencies, tribes, water and resource managers, businesses, academia, stakeholders, and the public to develop findings and recommendations and make informed decisions for California's water future.

The Water Plan, updated every five years, presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The Water Plan also evaluates different combinations of regional and statewide resource management strategies to reduce water demand, increase water supply, reduce flood risk, improve water

---

[9] *California State Water Resources Control Board, Water Conservation Portal—Emergency Conservation Regulation, State Plan Seeks to Make Water Conservation A Way of Life, November 30, 2016.*

[10] *The Counties of Fresno, Kings, Tulare, and Tuolumne remain under a drought state of emergency, per Executive Order B-40-17*

[11] *Governor Brown Lifts Drought Emergency, Retains Prohibition on Wasteful Practices, Executive Order B-40-17.*

[12] *DWR, About the Water Plan, www.water.ca.gov/waterplan/about_us/index.cfm, accessed December 4, 2017.*

quality, and enhance environmental and resource stewardship. The evaluations and assessments performed for the Water Plan help identify effective actions and policies for meeting California's resource management objectives in the near term and for several decades to come. While the California Water Plan cannot mandate actions or authorize itemized spending, policy-makers and lawmakers have the ability to authorize specific actions and appropriate necessary funding. In addition, while the California Water Plan Update 2013 represents the latest complete update, a public review draft of the California Water Plan Update 2018 was released for public comment on December 21, 2018.

(h) Governor's California Water Action Plan

The first California Water Action Plan (Action Plan) was published in January 2014 to provide a roadmap for the State's path toward sustainable water management.[13] The Action Plan discusses the challenges for managing the State's water resources supply, scarcity, and quality, and also considers the effects of ecosystems, flooding, population growth, and climate change and floods. The following ten actions were presented:[14]

1. Make conservation a California way of life;
2. Increase regional self-reliance and integrated water management across all levels of government;
3. Achieve the co-equal goals for the Delta;
4. Protect and restore important ecosystems;
5. Manage and prepare for dry periods;
6. Expand water storage capacity and improve groundwater management;
7. Provide safe water for all communities;
8. Increase flood protection;
9. Increase operational and regulatory efficiency; and
10. Identify sustainable and integrated financing opportunities.

---

[13] *California Department of Natural Resources, California Water Action Plan, http://resources.ca.gov/california_water_action_plan/, accessed December 4, 2017.*

[14] *California Department of Natural Resources, California Water Action Plan 2014.*

In complementing local efforts, the Action Plan emphasizes collaboration between different levels of government, water agencies, conservationists, tribes, farmers, and other stakeholders. Since the Action Plan Update for 2016 has been released, its implementation progress has also been documented with focuses on policy, funding, and coordinated projects. The Action Plan will continue to be implemented simultaneously with the California Water Plan Update 2018 as it is completed.

(3) Regional

As discussed in detail below, the Metropolitan Water District of Southern California (MWD) is a primary source of water supply within Southern California. Based on the water supply planning requirements imposed on its member agencies and ultimate customers, MWD has adopted a series of official reports on the state of its water supplies. As described in further detail below, in response to recent developments in the Sacramento Delta, the MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies.

(a) MWD's Integrated Water Resources Plan

The Integrated Water Resources Plan (IRP) is the long-term water resources strategy for the MWD in Southern California. First adopted in 1996, the goal of the IRP has been to ensure that a reliable water system will extend into the future. The 2015 IRP Update, adopted in January 2016, provides MWD's strategy for water resource reliability through the year 2040 and establishes targets for a diversified portfolio of water supply investments. The 2015 IRP Update calls for stabilizing and maintaining imported water supplies; meeting future growth through increased water conservation and sustaining and developing new local supplies; pursuing a comprehensive transfers and exchanges strategy; building storage in wet and normal years to manage risks and drought; and preparing for uncertainty with Future Supply Actions. Overall, the strategies presented in the 2015 IRP Update include investments to maintain the reliability of imported water supplies, expansion of local water supplies and reduction in water demand through a variety of conservation and water use efficiency initiatives.[15]

(b) MWD's 2015 Urban Water Management Plan

MWD's 2015 Urban Water Management Plan (UWMP) addresses the future of MWD's water supplies and demand through the year 2040.[16] Based on its 2015 UWMP,

---

[15] *Metropolitan Water District of Southern California, Integrated Water Resources Plan 2015 Update, January 2016.*

[16] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under single dry-year and multiple dry-year hydrologic conditions. MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix including programs in the Colorado River Aqueduct, State Water Project, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs. As set forth in their 2015 UWMP, MWD will also continue investments in water use efficiency measures to help the region achieve the 20 percent per person potable water use reduction by 2020.

(c) MWD's Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water shortage contingency analysis that is required as part of any urban water management plan into a separate, more detailed plan, called the Water Surplus and Drought Management Plan. The overall objective of the Water Surplus and Drought Management Plan is to ensure that shortage allocation of MWD's imported water supplies is not required.[17] The Water Surplus and Drought Management Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The Water Surplus and Drought Management Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The Water Surplus and Drought Management Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside and then outside of the region. The Shortage Actions of the Water Surplus and Drought Management Plan are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as a part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.

---

[17] *Metropolitan Water District of Southern California, Water Surplus and Drought Management Plan: Report No. 1150, August 1999.*

(d) MWD's Water Supply Allocation Plan

While the Water Surplus and Drought Management Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, MWD adopted a water supply plan called the *Water Supply Allocation Plan* in February 2008, that has since been implemented three times, most recently in April 2015.[18] The Water Supply Allocation Plan includes a formula for determining reductions of water deliveries to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen cuts in water supplies). The formula allocates shortages of MWD supplies and seeks to balance the impacts of a shortage at the retail level while maintaining equity on the wholesale level, and takes into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs. The allocation period covers 12 months from July of a given year through the following June.

(4) Local

(a) Los Angeles Department of Water and Power's 2015 Urban Water Management Plan

The City is required to adopt an UWMP every five years. LADWP's 2015 UWMP, adopted in June 2016, serves two purposes: (i) to achieve full compliance with the requirements of California's Urban Water Management Planning Act (discussed above); and (ii) to serve as a master plan for water supply and resource management consistent with the City's goals and objectives.[19]

A number of important changes have occurred since the LADWP prepared its prior 2010 UWMP. The year 2012 marked the start of the most recent multi-year drought in California, in response to which Governor Brown proclaimed a drought state of emergency in January 2014. In addition, as discussed above, in 2014, the State Water Resources Control Board implemented its Drought Emergency Water Conservation Regulation, which mandates 25-percent reductions in water use statewide. In October 2014, City of Los Angeles Mayor Eric Garcetti issued Executive Directive No. 5, which set goals to reduce per capita water use by 20 percent by 2017, reduce purchases of imported potable water by 50 percent, and create an integrated water strategy to increase local supplies and improve water security considering climate change and seismic vulnerability. In addition, in

[18] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

[19] *LADWP, 2015 UWMP, June 2016.*

April 2015, Mayor Garcetti released the first Sustainable City pLAn (discussed further below), establishing targets for the City that strengthen and promote sustainability throughout the year 2035. The 2019 L.A.'s New Green Deal, also discussed below, expands on the vision of the Sustainable City pLAn. LADWP's 2015 Urban UWMP incorporates the objectives of these recent initiatives. Overall, LADWP's 2015 UWMP projects a 7-percent lower water demand trend than what was projected in the previous 2010 UWMP.[20]

(b) Sustainable City pLAn and L.A.'s Green New Deal

The City's first Sustainable City pLAn, released in April 2015, includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability. The Sustainable City pLAn enhances Executive Directive No. 5's goals and incorporates water savings goals of reduction in per capita potable water by 20 percent by 2017, by 22.5 percent by 2025, and by 25 percent by 2035, using a 2014 baseline of 131 gallons per capita per day. The Sustainable City pLAn also includes a reduction in imported water purchases from MWD by 50 percent of the total supply by 2025 and a goal to expand local sources of water to 50 percent of the total water supply by 2035. Specific strategies and desired outcomes for conservation, recycled water, and stormwater capture are included in the Sustainable City pLAn. These include investments in state-of-the art technology, rebates and incentives promoting water-efficient appliances, tiered water pricing, a technical assistance program for business and industry, and large landscaped irrigation and efficiency programs.

In March 2017, the Sustainable City pLAn's Second Annual Report for 2016–2017 was released. It reported that the City had reduced per capita water use by 20 percent to achieve both the City's and the pLAn's water use reduction goal.[21] In April 2018, the Third Annual Report for 2017–2018 was released. It reported that LADWP broke ground on the North Hollywood West Wellhead Remediation Project to restore groundwater quality for potable use and to help achieve the goal of reducing the City's water imports by 50 percent by 2025.[22]

In 2019, the first four-year update to the 2015 Sustainable City pLAn was released. This updated document, known as L.A.'s Green New Deal, expands upon the City's vision

---

[20] *LADWP, 2015 UWMP, June 2016.*

[21] *Mayor's Office of Sustainability, Sustainable City pLAn, Second Annual Report for 2016–2017, March 2017.*

[22] *Mayor's Office of Sustainability, Sustainable City pLAn, Third Annual Report for 2017–2018, April 2018.*

for a sustainable future and provides accelerated targets and new goals.[23] L.A.'s Green New Deal focuses on environmental justice, renewable energy, local water, clean and healthy buildings, housing and development, mobility and public transit, zero emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, and green jobs. In addition, all targets have been aligned with the United Nations Sustainable Development Goals.

L.A.'s Green New Deal provides the following targets related to local water in the City:

- Source 70 percent of L.A.'s water locally and capture 150,000 acre feet per year of stormwater by 2035.
- Recycle 100 percent of all wastewater for beneficial reuse by 2035.
- Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050.
- Reduce potable water use per capita by 22.5 percent by 2025; and 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned buildings and public properties such as parks, by 2035.

L.A.'s Green New Deal also provides specific milestones and initiatives to meet such targets.

(c) Resilient Los Angeles

In March 2018, the City released its Resilient Los Angeles Plan, which includes strategies to fortify the City's infrastructure, protect its economy, and make Los Angeles safer.[24] Goal 11, *Restore, Rebuild, and Modernize Los Angeles' Infrastructure*, includes measures related to water supply. Specific goals include, but are not limited to, expanding the City's seismic resilient pipe network, replacing aging infrastructure, and expanding and protecting water sources to reduce dependence on imported water and strengthen the City's local water supply.

---

[23] *City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.*

[24] *City of Los Angeles, Resilient Los Angeles, March 2018.*

(d) Los Angeles Municipal Code

The City has adopted several ordinances, later codified in the Los Angeles Municipal Code (LAMC), in an effort to reduce water consumption. A summary of the City's key regulations regarding water conservation is provided below.

- Ordinance Nos. 166,080, 181,288, 183,608, and 184,250—amending LAMC Chapter XII, Article 1 to clarify prohibited uses of water and modify certain water conservation requirements of the City's Emergency Water Conservation Plan. The City's Emergency Water Conservation Plan sets forth six different phases of water conservation, which shall be implemented based on water conditions. As part of these requirements, watering is limited to specific days and hours. In determining which phase of water conservation shall be implemented, LADWP monitors and evaluates the projected water supply and demand. In addition, the Emergency Water Conservation Plan includes penalties for those that violate its requirements.

- City Ordinance No. 180,822—amended LAMC Chapter XII, Article 5 to establish water efficiency requirements for new development and renovation of existing buildings, and mandate installation of high efficiency plumbing fixtures in residential and commercial buildings.

- City Ordinance No. 181,480—amended LAMC Chapter IX by adding Article 9 (Green Building Code) to the LAMC to incorporate various provisions of the California Green Building Standards Code. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by: (1) using water saving fixtures or flow restrictions; and/or (2) demonstrating a 20-percent reduction in baseline water use.

- City Ordinance Nos. 181,899 and 183,833—amended LAMC Chapter VI, Article 4.4, Section 64.72 regarding stormwater and urban runoff to include new requirements, including Low Impact Development (LID) requirements that promote water conservation.

- Ordinance No. 182,849—amended LAMC Chapter IX, Article 9 (Green Building Code) to mandate that for new water service or for additions or alterations requiring upgraded water service for landscaped areas of at least 1,000 square feet, separate sub-meters or metering devices shall be installed for outdoor potable water use. This ordinance also required that for new non-residential construction with at least 1,000 square feet of cumulative landscaped area, weather- or soil moisture-based irrigation controllers and sensors be installed.

- City Ordinance No. 184,692—amended LAMC Chapter IX, Article 4 (Plumbing Code) by adopting by reference various sections of the California Plumbing Code. This ordinance also added requirements for plumbing fixtures and fixture fitting.

- Ordinance No. 184,248—amended LAMC Chapter IX, Article 4 (Plumbing Code) and Article 9 (Green Building Code) to establish citywide water efficiency standards and mandate a number of new fixture requirements and methods of construction for plumbing and irrigation systems.

The City of Los Angeles also has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute (gpm) in Low Density Residential areas to 12,000 gpm in High Density Industrial and Commercial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing. As set forth in LAMC Section 57.507.3.1, High Density Industrial and Commercial land uses (which the LAFD has classified the Project as) have a minimum required fire flow of 12,000 gpm available to any block. A minimum residual water pressure of 20 pounds psi is also required. Land uses in the High Density Industrial and Commercial category require one hydrant per 40,000 square feet of land with 300-foot distances between hydrants and 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

(e) Los Angeles Water Rate Ordinance

The City's Water Rate Ordinance was adopted in June 1995 and last amended in 2016 by the City's Board of Water and Power Commissioners pursuant to Ordinance No. 184,130. Effective since April 15, 2016, this City Water Rate Ordinance restructured water rates to help further promote conservation. Specifically, the goal of the ordinance is to incentivize water conservation while recovering the higher costs of providing water to high volume users and accelerating development of sustainable local water supplies. Tiered water rate schedules were established for: single-dwelling unit customers; multi-dwelling unit customers; commercial, industrial, and governmental customers and temporary construction; recycled water service; private water service; publicly-sponsored irrigation, recreational, agricultural, horticultural, and floricultural uses, community gardens and youth sports. The new water rate structure increases the number of tiers from two to four for single-dwelling unit customers. In addition, this ordinance intends to maintain cost-of-service principles, incremental tier pricing based on the cost of water supply, and added pumping and storage costs.

b. Existing Conditions

(1) Water Supply

LADWP is responsible for providing water within the City of Los Angeles limits and ensuring that the water quality meets applicable California health standards for drinking water. As the Project Site is located within the City, LADWP is the water provider for the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, purchased water from MWD, and recycled water.[25] As shown in Table IV.L.1-1 on page IV.L.1-16, in 2017, the LADWP had an available water supply of 510,835 acre-feet, of which approximately 74 percent was from the Los Angeles Aqueducts, approximately 3 percent from local groundwater, approximately 22 percent from the MWD, and approximately 2 percent from recycled water. These water sources are described in further detail below.

(a) Los Angeles Aqueducts

Snowmelt runoff from the Eastern Sierra Nevada Mountains is collected and conveyed to the City via the Los Angeles Aqueducts. The Los Angeles Aqueducts' supplies come primarily from snowmelt and secondarily from groundwater pumping, and can fluctuate yearly due to the varying hydrologic conditions.

The City holds water rights in the Eastern Sierra Nevada where the Los Angeles Aqueducts' water supplies originate. These supplies originate from both streams and groundwater. As indicated in Table IV.L.1-1, approximately 380,329 acre-feet of LADWP's water supplies were from the Los Angeles Aqueducts in 2017. Average deliveries from the Los Angeles Aqueducts system from fiscal year 2011/2012 through fiscal year 2015/2016 were approximately 111,293 acre-feet of water annually. During this period, the record low snowpack for Los Angeles Aqueducts watershed in the Eastern Sierra Nevada Mountains was recorded on April 1, 2015. Supply conditions have changed drastically since 2015. Snowpack in the Eastern Sierra Nevada Mountains was at 203 percent of an average year on April 1, 2017.

Various lawsuits and injunctions, and resulting agreements affect water supplies from the Los Angeles Aqueducts. These include an agreement with the County of Inyo regarding groundwater levels and enhancement and mitigation projects in the Owens Valley, and the imposition of new regulatory requirements by the State Water Resources Control Board regarding export from Mono Lake and restoration and monitoring programs for the Mono Basin. In addition, in November 2014, an agreement between the City and

[25] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

Table IV.L.1-1
Los Angeles Department of Water and Power 2007–2017 Water Supply

Calendar Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage	Total[a]
2007	127,392	88,041	439,353	3,595	**57**	**658,438**
2008	148,407	64,604	427,422	7,048	**(1,664)**	**645,817**
2009	137,261	66,998	351,959	7,570	**(554)**	**563,234**
2010	251,126	68,346	205,240	6,900	**938**	**532,550**
2011	357,752	49,915	119,481	7,708	**153**	**535,009**
2012	166,858	59,109	326,123	5,965	**(1,182)**	**556,873**
2013	64,690	66,272	438,534	9,253	**2,404**	**581,153**
2014	63,960	96,394	391,307	11,307	**(2,020)**	**560,948**
2015	33,244	80,155	378,539	9,829	**(430)**	**501,337**
2016	95,573	72,503	314,336	9,095	**981**	**492,487**
2017	380,239	14,695	112113,033	8,509	**(5,730)**	**510,835**

Units are in acre-feet.

[a] *The figures presented account for the transfer, spread, spill, and storage of the water supply as determined by LADWP.*

Source: LADWP, WSA—1111 Sunset Project, February 12, 2019, Table III.

the Great Basin Unified Air Pollution Control District was reached wherein LADWP will continue to implement measures to address dust emissions at Owens Lake and implement additional water conservation through increasing use of water efficient and waterless dust control measures.[26] Upon completion of the Phase 9/10 Project on December 31, 2017, LADWP had mitigated dust emissions from 48.6 square-miles of Owens Lake. Based on the agreement, the Great Basin Unified Air Pollution Control District's potential future dust mitigation orders to LADWP cannot exceed an additional 4.8 square miles. As a result, LADWP expects to save significant amounts of water over the next 10 years with implementation of the Owens Lake Master Project and other water conservation projects.

[26] *LADWP, LADWP Newsroom, 2014 Archive, City of Los Angeles and Great Basin Unified Air Pollution Control District Reach Historic Comprehensive Agreement on Owens Lake Dust Mitigation, released November 14, 2014, www.ladwpnews.com/city-of-los-angeles-and-great-basin-unified-air-pollution-control-district-reach-historic-comprehensive-agreement-on-owens-lake-dust-mitigation/, accessed September 24, 2019.*

Based on modeling results provided in LADWP's 2015 UWMP, LADWP projects that the average annual long-term Los Angeles Aqueducts delivery between 2015 and 2040 is expected to be approximately 278,000 acre-feet per year and gradually decline to 267,000 acre-feet per year due to projected climate change impacts.[27] However, with completion of the Owens Lake Master Project by 2024, the projected Los Angeles Aqueducts delivery may increase to 286,000 acre-feet per year due to water conserved at Owens Lake, which would off-set most of the anticipated long-term losses.[28]

(b) Groundwater

LADWP owns water rights in the San Fernando, Sylmar, Eagle Rock, Central and West Coast Basins.[29] All of these basins are adjudicated by judicial decisions of the Superior Court of the State of California.

LADWP currently has combined water rights of approximately 109,809 acre-feet per year, of which approximately 87,000 acre-feet per year are located in the San Fernando Basin, 500 acre-feet per year in the Eagle Rock Basin, 1,503 acre-feet per year in the West Coast Basin, 17,236 acre-feet per year in the Central Basin and 3,570 acre-feet per year in the Sylmar Basin.[30] LADWP has accumulated nearly 523,529 acre-feet of stored groundwater in the San Fernando Basin as of October 2016.[31] This water can be withdrawn from the basin during normal and dry years or in an emergency, in addition to LADWP's approximately 87,000 acre-feet per year entitlement in the basin.

As shown in Table IV.L.1-2 on page IV.L.1-18, during the 2017/2018 fiscal year (July through June), LADWP extracted 22,259 acre-feet from the San Fernando Basin and 0.77 acre-feet from the Central Basin.[32] LADWP plans to continue production from its groundwater basins in the coming years to offset reductions in imported water supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection. Both LADWP and the DWR have programs in place to monitor wells to prevent overdrafting. LADWP's groundwater pumping practice is based on a "safe yield" operation, which is defined as the attainment and maintenance of a long-term balance between the annual amount of groundwater withdrawn by pumping and the annual amount of recharge. Furthermore, basin management is achieved by collective efforts of a court-appointed

---

[27] *LADWP, 2015 UWMP, June 2016.*

[28] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

[29] *LADWP, 2015 UWMP, June 2016.*

[30] *LADWP, 2015 UWMP, June 2016.*

[31] *LADWP, WSA—1111 Sunset Project, February 12, 2019.*

[32] *LADWP, WSA—1111 Sunset Project, February 12, 2019.*

Table IV.L.1-2
Local Groundwater Basin Supply

Fiscal Year (July-June)	San Fernando Basin	Sylmar Basin	Central Basin
2010–2011	44,029	225	5,099
2011–2012	50,244	1,330	9,486
2012–2013	50,550	1,952	6,310
2013–2014	68,784	891	9,727
2014–2015	80,097	1	6,948
2015–2016	75,958	683	8,395
2016–2017	55,116	0	3,005
2017–2018	22,259	0	1
2019–2020[a]	90,000	4,170	18,500
2024–2025[a]	88,000	4,170	18,500
2029–2030[a]	84,000	4,170	18,500
2034–2035[a]	92,000	4,170	18,500
2039–2040[a]	92,000	3,570	18,500

Units are in acre-feet.

[a] *Projected groundwater production.*

Source: LADWP, WSA—1111 Sunset Project, February 12, 2019. Table IV.

Watermaster and the Upper Los Angeles River Area (ULARA) Administrative Committee of representatives from five public water supply agencies overlying the ULARA Committee.[33] These efforts include operation of groundwater remediation systems, use of an extensive network of groundwater monitoring wells, routine reporting on groundwater elevation and water quality, management and mitigation of urban runoff water quality, and development of enhanced stormwater recharge and groundwater replenishment.

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for domestic and municipal uses in Southern California. MWD imports a portion of its water supplies from Northern California through the State Water Project's California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct. As one of the 26 member agencies of MWD, LADWP purchases water from MWD to supplement LADWP water supplies from the Los Angeles

[33] *LADWP, 2015 UWMP, June 2016.*

Aqueducts and local groundwater. As of June 30, 2018, LADWP has a preferential right to purchase 18.36 percent of MWD's total water supply.[34]

The Sustainable City pLAn, discussed above, calls for a reduction in purchased imported water by 50 percent by 2025 from the Fiscal Year 2013–2014 level, which was approximately 441,870 acre-feet.[35] L.A.'s New Green Deal also reaffirms this initiative.[36] To meet these targets, LADWP plans to reduce water demand through increased conservation as well as increased local supply development. Local supply development includes enhancing the ability of groundwater pumping through increased stormwater capture projects and groundwater replenishment with highly treated recycled water as well as remediation of contaminated groundwater supplies in the San Fernando Basin. LADWP also plans to increase recycled water use for non-potable purposes. With these initiatives and under average hydrologic conditions, LADWP's 2015 UWMP projects MWD purchases to be approximately 65,930 acre-feet per year in 2025, which would exceed the 50-percent reduction target.[37]

Through continued and additional local supply development and conservation savings, LADWP's reliance on MWD water supplies may be reduced significantly from the five-year average from Fiscal Years 2010–2011 through 2014–2015 of 57 percent of total demand to 11 percent under average weather conditions and to 44 percent under single-dry year conditions by fiscal year 2040.[38] As indicated in Table IV.L.1-1 on page IV.L.1-16, LADWP received approximately 113,033 acre-feet of water from MWD in 2017. Summaries of MWD's individual supplies, along with the challenges facing each supply and specific actions that MWD is taking to meet each of the challenges facing its water supplies, are presented below.

(i) The Colorado River

MWD owns and operates the Colorado River Aqueduct, which has delivered water from the Colorado River to Southern California since 1942. The Colorado River currently supplies approximately 17 percent of Southern California's water needs, and on average makes up about 15 percent of LADWP's purchases from MWD. MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. California is apportioned the use of 4.4 million acre-feet

---

[34] *LADWP, WSA—1111 Sunset Project, February 12, 2019. Table IV.*

[35] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

[36] *City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.*

[37] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

[38] *LADWP, 2015 Urban Water Management Plan, April 2016.*

of water from the Colorado River each year plus one-half of any surplus that may be available for use collectively in Arizona, California, and Nevada. In addition, California has historically been allowed to use Colorado River water apportioned to, but not used by, Arizona or Nevada. Since 2003, due to increased consumption, no such unused apportioned water has been available to California. Historically, MWD has been able to claim most of its legal entitlement of Colorado River water and could divert over 1.2 million acre-feet in any year, but persistent drought conditions have contributed to a decrease in these claims. MWD's total supply from the Colorado River for Calendar Year 2016 was approximately 985,000 acre-feet.[39]

Challenges to Colorado River Supply

MWD has developed a number of supply and conservation programs to increase the amount of supply available from the Colorado River. However, other users along the Colorado River have rights that will allow their water use to increase as their water demands increase. The Colorado River faces long-term challenges of water demands exceeding available supply with additional uncertainties due to climate change. Because MWD holds the lowest priority rights in California during a normal Lake Mead storage condition, the available future supply could decrease.[40]

Federal and state environmental laws protecting fish species and other wildlife species also have the potential to affect Colorado River operations, where a number of endangered or threatened species are present. However, the Lower Colorado River Multi-Species Conservation Program allows MWD to obtain federal and State permits for any incidental take of protected species resulting from current and future water and power operations of its Colorado River facilities and to minimize any uncertainty from additional listings of endangered species.[41]

Management of Colorado River Supply

There are various agreements and guidelines that affect the management of Colorado River water supplies, and MWD has taken steps to augment its share of Colorado River water supplies by entering into agreements with other agencies that have rights to use such water. For example, in August 2004, MWD and the Palo Verde Irrigation District signed an agreement for a Land Management, Crop Rotation and Water Supply Program, which provides up to 133,000 acre-feet of water to be available to MWD in certain years.[42]

---

[39] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

[40] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

[41] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, Appendix F, June 26, 2018.*

[42] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, Appendix F, June 26, 2018.*

Furthermore, in May 2008, MWD joined the Central Arizona Water Conservation District and the Southern Nevada Water Authority in funding of the Warren H. Brock Reservoir, which conserves approximately 70,000 acre-feet per year of water by capturing and storing water that would otherwise be lost from the system. In return for its funding, MWD received 100,000 acre-feet of water stored in Lake Mead for future use. As of January 1, 2016, MWD received 43,992 acre-feet of the water.[43]

MWD is also participating in numerous pilot programs to augment its water supplies. Other agreements and guidelines that continue to affect the management of water supplies from the Colorado River include the 2003 Quantification Settlement Agreement, which amended the 1998 Water Conservation and Transfer Agreement.[44] Additional guidelines and programs that influence management of the Colorado River water supplies include the Interim Surplus Guidelines,[45] the Lower Basin Shortage Guidelines and Coordinated Management Strategies for Lake Powell and Lake Mead,[46] the Intentionally Created Surplus Program,[47] and the Quagga Mussel Control Program.[48]

(ii) State Water Project

MWD imports water from the State Water Project, owned by the State of California and operated by the DWR. The State Water Project is a water storage and delivery system of pump stations, reservoirs, aqueducts, tunnels, and power plants. The main purpose of the State Water Project is to divert and store surplus water during wet periods and distribute it to areas throughout the State. Other purposes of the State Water Project include flood control, power generation, recreation, fish and wildlife protection, and water quality management in the Sacramento–San Joaquin River Delta (Delta). The State Water Project transports Feather River water stored in and released from Oroville Dam and

---

[43] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, Appendix F, June 26, 2018.*

[44] *The Quantification Settlement Agreement is an agreement that limits California's draw on the Colorado River to 4.4 million acre-feet per year. One component of the agreement represented the largest agricultural-to-urban water transfer in U.S. history at the time. As such, approximately 400,000 acre-feet per year of conserved water from Imperial Valley farms must be transferred to urban water agencies, such as the San Diego Water Authority. The agreement also calls for the delivery of flows to the Salton Sea until the end of 2017.*

[45] *The Interim Surplus Guidelines are used to determine the conditions under which certain availability of surplus water could be used within the lower basin states of Arizona, California, and Nevada.*

[46] *The Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead provide additional guidelines for the management and operation of Colorado River reservoirs, particularly for the lower basin states of Arizona, California, and Nevada.*

[47] *Intentionally Created Surplus water is water that has been conserved through a variety of programs using extraordinary conservation measures, such as land fallowing.*

[48] *The Quagga Mussel Control Program was developed in 2007 to control the spreading of the invasive quagga mussels in the Colorado River's canals and reservoirs.*

conveyed through the Delta, as well as unregulated flows diverted directly from the Delta south via the California Aqueduct to four delivery points near the northern and eastern boundaries of MWD's service area.

MWD is one of the 29 agencies that have long-term contracts for water service from the DWR, and is the largest agency in terms of the number of people it serves (approximately 18.8 million)[49], the share of the State Water Project that it has contracted to receive (approximately 46 percent), and the percentage of total annual payments made to the DWR by agencies with State water contracts (approximately 52 percent for 2016).[50]

The State Water Project, under the original contracted amount at 100 percent allocation, provides MWD with 1,911,500 acre-feet of water each calendar year.[51] However, due to water quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, State Water Project deliveries in the most critically dry years have varied. For 2019, DWR estimated an initial allocation of 10 percent[52] but increased the allocation to 15 percent[53] by January 25 and to 35 percent[54] by February 20 due to changes in precipitation and available water supplies.

Challenges to State Water Project Supply[55]

Various regulations have created challenges for the State Water Project. In particular, the listing of several fish species in the Delta as threatened or endangered under the federal and/or California Endangered Species Acts has constrained State Water Project operations and created more uncertainty in State Water Project supply reliability. Based on the DWR's 2015 State Water Project Delivery Capability Report, future State Water Project deliveries will continue to be impacted by restrictions on State Water Project and Central Valley Project Delta pumping, and climate change, which is altering the hydrologic conditions in the State.

---

[49] *LADWP, WSA—1111 Sunset Project, Appendix F, February 12, 2019.*

[50] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, Appendix F, June 26, 2018.*

[51] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, Appendix F, June 26, 2018.*

[52] *DWR, Notice to State Water Project Contractors, Number 18-06, 2019 State Water Project Initial Allocation—10 Percent.*

[53] *DWR, Notice to State Water Project Contractors, Number 19-03, 2019 State Water Project Allocation Increase—15 Percent.*

[54] *DWR, Notice to State Water Project Contractors, Number 19-06, 2019 State Water Project Allocation Increase—35 Percent.*

[55] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

(iii) Additional MWD Actions to Address Supply

The MWD is currently operating several State Water Project storage programs to increase the reliability of supplies from the California Aqueduct. Programs include the Arvin-Edison Storage Program; the Semitropic Storage Program; the San Bernardino Storage Program; the San Gabriel Valley MWD Exchange Program; the Antelope Valley-East Kern Water Agency Exchange and Storage Program; the Kern-Delta Water District Storage Program; the Mojave Storage Program; and the Central Valley Transfer Programs.[56]

In addition, MWD continues to develop plans and make efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of these water resource development plans.[57] As discussed above, MWD's long-term plans to meet its member agencies' reliability needs include improvements to the State Water Project, conjunctive management efforts on the Colorado River, water transfer programs and outdoor conservation measures, and development of additional local resources, such as recycling brackish water desalination and seawater desalination.[58]

Additionally, MWD has more than five million acre-feet of storage capacity of available reservoirs and banking/transfer programs, with approximately 1.25 million acre-feet, inclusive of Intentionally Created Surplus, in that storage, and 626,000 acre-feet in emergency storage as of January 1, 2017. MWD's dry-year storage was 2.46 million acre-feet at the end of 2017.[59] As described in the MWD's 2015 UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under average-year, single dry-year, and multiple dry-year hydrologic conditions.

(d) Precipitation Conditions

During the 2018 water year (i.e., October 1, 2017 through September 30, 2018), California experienced dry conditions statewide, with nearly all the state experiencing below precipitation and much of Southern California receiving half or less of its average annual precipitation. Water year 2018 followed California's second-wettest year of record as measured by statewide runoff, ending a historic five-year drought.[60] The City of Los

---

[56] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

[57] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

[58] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

[59] *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

[60] *DWR, Water Year 2018: Hot and Dry Conditions Return, October 1, 2018.*

Angeles receives an average of 14.77 inches of precipitation per year according to the National Weather Service. As of September 11, 2019, the City had received 18.46 inches of precipitation, exceeding the seasonal average.[61]

According to the National Drought Mitigation Center, as of September 10, 2019, 90.94 percent of the state was not in a drought condition, and 9.06 percent of the state was considered abnormally dry. This indicates a shift from the start of the water year on September 30, 2018, when 87 percent of the state was in a drought condition, including 18 percent under a severe drought and 5 percent under extreme drought conditions.[62] Thus, the State continues to develop and implement necessary strategies and actions to address future drought conditions and account for year-to-year fluctuations in precipitation.

(e) Global Warming and Climate Change

As discussed in the LADWP's 2015 UWMP, generally speaking, water supplies that are dependent on natural hydrology are vulnerable to climate change, especially if the water source originates from mountain snowpack. For LADWP, the most vulnerable water sources subject to climate change impacts are imported water supplies from MWD and the Los Angeles Aqueducts. Local sources can expect to see some changes in the future as well. In addition to water supply impacts, changes in local temperature and precipitation are expected to alter water demand patterns. However, there is still general uncertainty within the scientific community regarding the potential impacts of climate change within the City of Los Angeles. LADWP continues to monitor the latest developments in scientific knowledge and will continue to assess future research for the potential impacts of climate change on its water resources.[63]

MWD and the DWR also continue to study climate change and address the implications of climate change on water supplies. MWD has established a technical process to identify key vulnerabilities from various sources, including climate change, in order to provide comprehensive analyses within its Integrated Water Resources Plans. In addition, the DWR addresses climate change impacts on water supply in its California Water Plan Updates, which also account for uncertainty, risk, and sustainability in planning for the future.[64] As mentioned above, with updates published every five years, the most recent *California Water Plan Update 2018* built on its predecessor by identifying specific

---

[61] *DWR, Daily Precipitation Stations, Los Angeles/USC, https://cdec.water.ca.gov/dynamicapp/QueryDaily?s=USC, accessed September 12, 2019.*

[62] *United States Drought Monitor, State Drought Monitor, California, September 10, 2019.*

[63] *LADWP, 2015 UWMP, June 2016, page 12-1.*

[64] *DWR, California Water Plan Update 2013, Investing in Innovation & Infrastructure, Highlights, October 2014.*

performance tracking metrics, recommending financing methods with stable revenues, and incorporating principles of sustainability.[65]

DWR has also been in the process of completing its Climate Action Plan since 2012. Phases I and II of the Climate Action Plan include the guidance of the DWR in reducing greenhouse gas emission and the expertise of a climate change technical advisory group formed in 2012, respectively. Phase III of the plan was completed in 2017 with a vulnerability assessment and adaptation plan the DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology (including precipitation, snowpack runoff, and flooding), and water supply.[66] As such, climate change and its impacts on water supplies are key factors of new water supply regulations and urban water management plans.

(f) Water Conservation and Recycling

LADWP's 2015 UWMP details the City's efforts to promote the efficient use and management of its water resources and provides the basic policy principles that guide LADWP's decision-making process to secure a sustainable water supply for the City of Los Angeles in the next 25 years. To meet multiple water conservation goals established in Executive Directive 5, the Sustainable City pLAn, and the Water Conservation Act of 2009, LADWP's 2015 UWMP aims to reduce per capita potable water use by 20 percent by 2017, by 22.5 percent by 2025, and by 25 percent by 2035, based on Fiscal Year 2013–2014 levels.[67] Following the target reduction of potable water use per capita by 25 percent by 2035, L.A.'s Green New Deal adds an additional target for the City to maintain or reduce 2035 per capita water use through 2050.[68] The City also intends to build upon the success of Save the Drop and develop additional water conservation campaigns; continue benchmarking customer use and recognizing innovative water reduction initiatives; improve data gathering to identify program effectiveness; expand top performing conservation incentive programs for, landscape transformation, washing machines, etc.; and expand sub-metering and evaluate smart water meter technologies.

Furthermore, the LADWP is projected to increase recycled water use to 59,000 acre-feet per year by 2025 through planned municipal/industrial use and indirect potable reuse (i.e., groundwater replenishment). With the potential growth in customer demand,

---

[65] *DWR, California Water Plan Update 2018 Draft, www.water.ca.gov/Programs/California-Water-Plan/Water-Plan-Updates, accessed May 25, 2018.*

[66] *DWR, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed May 25, 2018.*

[67] *LADWP, 2015 UWMP, June 2016.*

[68] *City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.*

the LADWP projects that recycled water use will reach 75,400 acre-feet per year by 2040.[69] As previously discussed, on February 2, 2017, Mayor Garcetti announced that the City's 20 percent water reduction by 2017 target had been met.[70]

Overall, LADWP's 2015 UWMP projects a 7-percent lower water demand trend than what was projected in the previous 2010 UWMP.[71] In addition, based on programs and improvements contemplated in LADWP's 2015 UWMP, locally developed water supplies would increase from the current 14 percent to 49 percent in dry years, or to 47 percent in average years by 2040.[72] L.A.'s Green New Deal also has a target to recycle 100 percent of all wastewater for beneficial reuse by 2035.[73] Beneficial reuse includes, but is not limited to, non-potable reuse, groundwater recharge, and supporting environmental and recreational uses such as those in the L.A. River.

(2) Water Demand

(a) City Water Demand

LADWP's 2015 UWMP provides water supply and demand projections in five-year increments to 2040, based on projected population estimates provided by the Southern California Association of Governments (SCAG) in its 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS).[74] Table IV.L.1-3 on page IV.L.1-27 shows the projected water demand from the year 2020 through 2040 for the City of Los Angeles.

As shown in Table IV.L.1-3, in 2040 during average year hydrologic conditions, the City's water demand is forecasted to be approximately 675,700 acre-feet per year. Use of the current demand per capita within this forecast provides a conservative estimate of projected future water demand to ensure that water supplies are available to meet projected demands. LADWP's 2015 UWMP anticipates adequate water supplies would be

---

69 *LADWP, 2015 UWMP, June 2016.*

70 *City of Los Angeles, Mayor Eric Garcetti, Press Release, Los Angeles Achieves Mayor Garcetti's Goal of 20 Percent Water Savings, released February 2, 2017, www.lamayor.org/los-angeles-achieves-mayor-garcetti%E2%80%99s-goal-20-percent-water-savings, accessed September 24, 2019.*

71 *LADWP, WSA—Sunset Gower Studios Enhancement Plan Project, June 26, 2018.*

72 *LADWP, 2015 UWMP, June 2016.*

73 *Baseline from LASAN: In Fiscal Year 2017–2018, 27 percent of wastewater was recycled.*

74 *Since preparation of the 2015 UWMP, new growth forecasts have become available in SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). However, the 2016 forecasts are only marginally higher than the 2012 forecasts, in terms of current (2016) estimates and future (2040) projections and would, therefore, not significantly affect water demand projections.*

Table IV.L.1-3
City of Los Angeles Water Demand Projections Based on Hydrologic Conditions
(thousand AFY)

Hydrologic Conditions[a]	Year				
	2020	2025	2030	2035	2040
Average Year	611.8	644.7	652.9	661.8	675.7
Single Dry Year	642.4	676.9	685.5	694.9	709.5
Multi-Dry Year	642.4	676.9	685.5	694.9	709.5

AFY = acre-feet per year

Demands include existing passive conservation.

[a] *The LADWP defined three hydrologic conditions: average year (50-year average hydrology from Fiscal Years 1961–1962 through 2010–2011; single dry year (such as a repeat of the Fiscal Year 2014–2015 drought; and multi-dry year (such as a repeat of Fiscal Years 2012–2013 through 2014–2015.)*

Source: LADWP, 2015 UWMP, June 2016, Exhibits 11F, 11G, and 11H.

available to meet the projected demands of the service areas under normal, single-dry, and multi-dry year conditions through 2040.[75]

(b) On-Site Water Demand

The Project Site is an existing major motion picture and television studio. As described in Section II, Project Description, of this Draft EIR, existing development within the Project Site includes 616,602 square feet of floor area, consisting of 378,978 square feet of creative office space, 56,050 square feet of production support, 175,058 square feet of sound stages, and 6,516 square feet of vacant restaurant space. To provide for the Project, a total of 160,611 square feet of floor area would be removed. As provided in Table IV.L.1-4 on page IV.L.1-35 in the analysis below, the existing uses to be removed generate a water demand of approximately 16,115 gallons per day or approximately 18.05 acre-feet per year.

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 118 storage tanks and reservoirs, 96 pump stations, 7,337 miles of distribution mains and trunk lines within the City, and a total storage

[75] *LADWP, 2015 UWMP, June 2016, Exhibits 11E–11K.*

capacity of 311,000 acre-feet according to the estimates for Fiscal Year 2015–2016.[76] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant in Sylmar, which is owned and operated by LADWP. Water entering the Los Angeles Aqueduct Filtration Plant undergoes treatment and disinfection before being distributed throughout the LADWP's water service area.[77]

Domestic water service is available to the Project Site via water lines within the adjacent streets. According to the Utility Report provided in Appendix L of this Draft EIR, water service is provided via North Beachwood Drive, with additional connections along Gordon Street, North Gower Street, Sunset Boulevard, and Fountain Avenue. The primary water service is supplied by an existing public water main along North Beachwood Drive located approximately 185 feet east of the northern boundary of the Project Site. The public water main has a diameter of 8 inches originating at Sunset Boulevard and decreases to 4 inches at Fountain Avenue. Additionally, there is a 24-inch water main within the North Gower Street right-of-way, an 8-inch water main beneath Gordon Street, an 8-inch main along Sunset Boulevard, and an 8-inch LADWP-owned cement main along Fountain Avenue.

LADWP also provides water for firefighting services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). There are 18 existing fire hydrants surrounding the Project Site, five of which are private and thirteen of which are public. A summary table of the hydrants' locations is provided in the Utility Report, provided in Appendix L of this Draft EIR.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to water supply and 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; or

---

[76] *LADWP, 2017–2018 Briefing Book, June 2016.*

[77] *LADWP, 2015 UWMP, June 2016.*

Threshold (b): Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

For this analysis, the Appendix G Thresholds listed above are relied upon. The 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 questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate water supply and infrastructure impacts:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of project completion; and,
- The degree to which scheduled water infrastructure or project design features would reduce or offset service impacts.

b. Methodology

The analysis of the Project's impacts relative to water supply is based on a calculation of the Project's anticipated net water demand. Consistent with LADWP's methodology presented in the Project's WSA, the estimated water demand for the Project is calculated by applying the City of Los Angeles Bureau of Sanitation's (LASAN) sewer generation factors to the Project's proposed uses. The water demand of the existing uses to be removed was then subtracted from the Project's total water demand to determine the Project's net water demand. The Project's total water demand also accounted for the water saving features required by the LAMC and the water saving features above LAMC requirements to be implemented by the Project. The resulting net demand for water associated with the Project is then analyzed to determine if LADWP would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry years hydrologic conditions.

The analysis with regard to water infrastructure is based on the Utility Report prepared for the Project by KPFF Consulting Engineers, which is included in Appendix L of this Draft EIR. The Utility Report includes a comparison of the estimated net water demand for the Project to the available capacity of the existing water infrastructure.

c. Project Design Features

The following project design features are proposed with regard to water:

Project Design Feature WAT-PDF-1: The Project design shall incorporate the following design features to support water conservation in excess of LAMC requirements.

- High Efficiency Toilets with a flush volume of 1.0 gallons per flush.
- Waterless urinals.
- High Efficiency Showerheads with a flow rate of 1.5 gallons per minute.
- Domestic Water Heating System located in close proximity to point(s) of use.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Bubblers for trees.
- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).
- Drought Tolerant Plants—60 percent of landscaped area.

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? [78]

(1) Impact Analysis

(a) Construction

As discussed in the Utility Report included as Appendix L of this Draft EIR and as summarized below, the Project's construction activities would not require or result in the construction of new water facilities or expansion of existing facilities as the existing water distribution capacity would be adequate to serve the Project during construction. The

[78] *Refer to Section IV.L.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of wastewater impacts; Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations for a discussion of telecommunications facility and stormwater impacts.*

Project would require the installation of new service connections to connect the proposed buildings to the existing water mains adjacent to the Project Site. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the lines below surface. Installation of water distribution lines would also include on-site water distribution improvements and off-site work associated with connections to the public main. With regard to potential impacts to the existing water distribution system, the Project contractors would coordinate with the LADWP to identify the locations and depth of all existing water lines prior to ground disturbance and LADWP would be notified in advance of proposed ground disturbance activities in order to avoid water lines and disruption of water service.

The limited off-site connection activities could also temporarily affect access in adjacent right-of-ways. However, as discussed in Section IV.J, Transportation, of this Draft EIR, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The construction management plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways.

Overall, construction activities associated with the Project would not require or result in the relocation or construction of new water facilities or expansion of existing facilities that could cause a significant environmental effect. As such, construction-related impacts to water infrastructure would be less than significant.

(b) Operation

The Project's operation would not require or result in the construction of new water facilities or expansion of existing facilities as the existing water distribution capacity would be adequate to serve the Project. Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. While domestic water demand is typically the main contributor to operational water consumption, water infrastructure capacity was analyzed based on the Project's fire flow demands, which are short-term but typically exponentially larger than daily operational water demands, and therefore, have a much greater instantaneous impact on infrastructure. Nevertheless, conservative analyses for both fire suppression and domestic water flows have been completed by LADWP for the Project. These analyses are summarized below and described in more detail in the Utility Report included as Appendix L of this Draft EIR.

Fire flow to the Project would be required to meet City fire flow requirements. Specifically, the Project would comply with LAMC Section 57.507.3.1, which establishes fire flow standards by development type. The Project is categorized under the High Density Industrial and Commercial category, which has a minimum required fire flow of required fire flow of 12,000 gpm available to any block as well as a residual pressure of 20 psi. . As part of the Utility Report, included as Appendix L of this Draft EIR, an Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP to determine available fire hydrant flow from nine existing public fire hydrants adjacent to the Project Site, including one fire hydrant along De Longpre Avenue, two fire hydrants along Gordon Street, three fire hydrants along Fountain Avenue, and three fire hydrants along West Sunset Boulevard. Based on the completed IFFAR (see Exhibit 5 of Appendix L of this Draft EIR), the nine existing public fire hydrants flowing simultaneously can deliver a combined flow of 12,000 gpm at a minimum residual pressures ranging from 78 to 88 psi. Therefore, based on the IFFAR, the Project has adequate fire flow available to comply with the standards specified in LAMC Section 57.507.3.1.

Furthermore, the Project will incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which will be subject to LAFD review and approval during the design and permitting of the Project. As discussed on page 17 of the Utility Report, based on the Service Advisory Requests (SAR) (see Exhibit 6 of Appendix L of this Draft EIR), LADWP determined that the existing public water infrastructure would provide adequate water pressure to serve the Project Site's anticipated water demand.

With regard to the domestic water infrastructure, new domestic services would be connected from the existing 8-inch water line along North Beachwood Drive. No expanded main water facilities would be required by the Project. In addition, based on the LADWP Water Will-Serve Letter (see Exhibit 1 of Appendix L of this Draft EIR), the existing water infrastructure along Sunset Boulevard has sufficient capacity to serve the Project's anticipated water demand. Additionally, as set forth below, LADWP has sufficient supplies available to serve the Project. Therefore, the Project would not result in a demand for new water pumping, extraction or purification facilities.

Based on the above, the Project would not exceed the available capacity of the existing water distribution infrastructure that would serve the Project Site. Accordingly, the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project's operational impacts to water infrastructure would be less than significant.

(2) Mitigation Measures

Project-level impacts related to water infrastructure would be less than significant, and no mitigation is required.

(3) Level of Significance After Mitigation

Project-level impacts related to water infrastructure 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): Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

(1) Impact Analysis

(a) Construction

Construction activities for the Project would result in a temporary demand for water associated with dust control, equipment and site cleanup, excavation and export, soil compaction and earthwork, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. As discussed in the Utility Report, a conservative estimate of construction-related water use would range from 1,000 gallons per day to 2,000 gallons per day. This estimate would be less than the estimated existing water consumption of the existing uses to be removed of 16,115 gallons per day. Furthermore, as concluded in LADWP's 2015 UWMP (page ES-20), projected water demand for the City would be met by the available supplies during all hydrologic conditions (average year, single-dry year, and multiple-dry year) in each year from 2020 through 2040. Construction of the Project would be complete by 2028. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction.

Based on the above, LADWP would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Project's construction-related impacts on water supply would be less than significant.

(b) Operation

As described in Section II, Project Description, of this Draft EIR, the Project would preserve and enhance most of the existing buildings on the Sunset Gower Studios and develop new studio-related creative office, production office/production support and storage uses within three new buildings totaling 627,957 square feet of floor area. The Project would remove 160,611 square feet of existing floor area, consisting of 125,521 square feet of creative office floor area, 29,444 square feet of production support floor area, and 5,646 square feet of sound stage floor area. The approximately 1,400 square feet of existing service areas would also be removed. Overall, the Project would result in a net increase of 466,346 square feet of floor area. Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site.

Based on the proposed land uses and the Project's resulting estimated water demand, the Project is subject to the requirements of SB 610 (preparation of a WSA, as described above in Section 2.a(1)(a) on page IV.L.1-1). Accordingly, a WSA was prepared for the Project by LADWP and is provided in Appendix L of this Draft EIR. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation factors established by LASAN, which also serve to estimate water demand to the proposed uses. As shown in Table IV.L.1-4 on page IV.L.1-35, assuming constant water use throughout the year and accounting for removal of some existing uses, the Project would result in a net average daily water demand of 83,509 gallons per day, or approximately 93.56 acre-feet per year, including water savings as required by the LAMC and additional water saving features as set forth in Project Design Feature WAT-PDF-1, above. As provided in the WSA for the Project, LADWP concluded that the projected water supplies for normal, single-dry, and multiple-dry years reported in LADWP's 2015 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2040.

The 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City for normal, single-dry, and multiple-dry years through the year 2040. Furthermore, as outlined in the 2015 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2015 UWMP takes into account climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2015 UWMP also furthers the goals of the City's Executive Directive and Sustainable City pLAn. The 2015 UWMP also addresses the current and future State Water Project supply shortages and concludes that MWD's actions in response to the threats to the State Water Project would ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water

Table IV.L.1-4
Estimated Project Water Demand

Land Use	No. of Units/ Floor Area	Water Demand Rate (gpd/unit)[b,e]	Demand (gpd)
Existing Uses to be Removed[a]			
Creative Office[c]	125,521 sf	0.12	15,063
Production Support[d]	29,444 sf	0.03	883
Sound Stages[d]	5,646 sf	0.03	169
Total Existing to be Removed			***16,115***
Proposed[a]			
Creative Office[c]	599,350 sf	0.12	71,922
Cafeteria	100 seat	30	3,000
Production Support[d]	27,000 sf	0.03	816
Base Demand Adjustment[g]			3,015
Total Proposed[h]			***78,753***
Landscaping[i]			3,269
Covered Parking[j]	403,056 sf	0.02	265
Cooling Tower: Normal Business Hours	1,500 ton	15.06	22,589
Cooling Tower: Cooling Peak	400 ton	35.64	14,256
Subtotal Water Demand			**119,132**
Less Required Ordinances Water Savings[f]			(17,532)
Proposed Water Demand			**101,600**
Less Existing to be Removed			16,115
Less Additional Conservation[k]			(1,976)
Net Additional Water Demand (Proposed – Existing – Additional Conservation)			**83,509**

gpd = gallons per day

sf = square feet

Note: Some numbers do not add up perfectly due to rounding.

[a] *Provided by Department of City Planning in the Request for WSA letter and Scope Confirmation email, included in Appendix A of the WSA.*

[b] *The plumbing fixtures in the existing uses to be removed have been replaced over the years, beginning in 2008. Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[c] *Creative office uses are similar to office uses.*

[d] *Production support and sound stage uses are similar to warehouse uses.*

[e] *Proposed indoor water uses based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[f] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code.*

[g] *Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.*

Table IV.L.1-4 (Continued)
Estimated Project Water Demand

Land Use	No. of Units/ Floor Area	Water Demand Rate (gpd/unit)[b,e]	Demand (gpd)
[h] *Commercial uses also includes a Bicycle Storage Facility.*			
[i] *Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Modal Water Efficient Landscape Ordinance.*			
[j] *Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.*			
[k] *Water conservation due to additional conservation commitments agreed to by the Applicant.*			
Source: LADWP, WSA—Sunset Gower Studios Enhancement Plan Project; Eyestone Environmental, 2019.			

supplies, LADWP would further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, as reaffirmed by L.A.'s Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.

Based on the above, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Project's operation-related impacts on water supply would be less than significant.

(2) Mitigation Measures

Project-level impacts related to water supply would be less than significant, and no mitigation is required.

(3) Level of Significance After Mitigation

Project-level impacts related to water supply 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

The Project, in conjunction with growth forecasted in the City through 2028 (i.e., the Project's buildout year), would cumulatively increase the demand for water, thus potentially resulting in cumulative impacts on water infrastructure and water supplies. Cumulative

growth in the Project Site vicinity through 2028 includes specific known development projects, growth that may be projected as a result of the land use designation and policy changes contained in the Hollywood Community Plan Update, as well as general ambient growth projected to occur. As described in Section III, Environmental Setting, of this Draft EIR, a total of 104 related development projects are located in the vicinity of the Project Site. In addition, Related Project No. 105, the Hollywood Community Plan Update, is identified.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 104 is a conservative assumption, as some of the related projects may not be built out by 2028 (i.e., the Project's buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 104 are fully built out by 2028, unless otherwise noted. Related Project No. 105 is the Hollywood Community Plan Update, which once adopted, will be a long-range plan designed to accommodate growth in Hollywood through 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2028, well before the Hollywood Community Plan Update's horizon year. Moreover, 2028 is a similar projected buildout year as many of the related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption, as discussed above, would account for any overlapping growth that may be assumed by the Hollywood Community Plan Update upon its adoption.

(a) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the water infrastructure that would serve the Project). Development of the Project and future new development in the vicinity of the Project Site would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, other new development projects would be subject to LADWP review to assure that the existing public infrastructure would be adequate to meet the domestic and fire service water demands of each project, and individual projects would be subject to LADWP and City requirements regarding infrastructure improvements needed to meet respective water demands, flow and pressure requirements, etc. Furthermore, LADWP, Los Angeles Department of Public Works, and the LAFD would conduct ongoing evaluations of its infrastructure to ensure facilities are adequate. **Therefore, the Project and related projects would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Cumulative impacts on the water infrastructure system would be less than significant.**

(b) Water Supply

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City and portions of the cities of West Hollywood, Culver City, South Pasadena, and the Owens Valley). As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update its urban water management plan to plan and provide for water supplies to serve existing and projected demands. LADWP's 2015 UWMP accounts for existing development within the LADWP service area, as well as projected growth through the year 2040. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The WSA for such projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed.

As identified in Section III, Environmental Setting, of this Draft EIR, there are 105 related projects located in the Project Site vicinity. As shown in Table IV.L.1-5 on page IV.L.1-39, the related projects would generate a total average water demand of approximately 4,214,837 gallons per day. The estimate of the related projects' water demand is conservative as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code or the water demand of the existing uses on project sites that the related projects may remove.

As shown in Table IV.L.1-4 on page IV.L.1-35, the net water demand of the Project would be 83,509 gallons per day. Accordingly, as provided in Table IV.L.1-5, the Project in conjunction with the related projects would yield a cumulative average water demand of approximately 4,298,346 gallons per day. Based on water demand projections through 2040 in LADWP's 2015 UWMP, LADWP determined that it will be able to reliably provide water to its customers through the year 2040, as well as the intervening years (i.e., 2035, the Project's buildout year) based on demographic growth projections in SCAG's 2012–2035 RTP/SCS. In addition, the WSA prepared by LADWP for the Project concluded that LADWP will be able to meet proposed water demand of the Project together with the existing and planned future water demands of the City. Compliance of the Project and other future development projects with the numerous regulatory requirements that promote water conservation described above would also reduce water demand on a cumulative basis. For example, certain related projects would be subject to the City's Green Building Code requirement to reduce indoor water use by at least 20 percent and all projects would be required to use fixtures that conserve water. In addition, certain large related projects meeting the thresholds under SB 610 would be required to prepare and receive LADWP approval of a WSA that demonstrates how the project's water demand will be met.

Table IV.L.1-5
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
1	Paseo Plaza Mixed-Use 5651 W. Santa Monica Blvd.	Condominium	375 du	190 gpd/du	71,250
		Retail	377,900 sf	0.05 gpd/sf	18,895
2	BLVD 6200 Mixed-Use 6200 W. Hollywood Blvd.	JLWQ Units	28 du	190 gpd/du	5,320
		Apartments	1,014 du	190 gpd/du	192,660
		Retail	175,000 sf	0.05 gpd/sf	8,750
3	Sunset Bronson Studios 5800 W. Sunset Blvd.	Office	404,799 sf	0.12 gpd/sf	48,576
4	Yucca Street Condos 6230 W. Yucca St.	Apartments	114 du	190 gpd/du	21,660
		Commercial	2,697 sf	0.05 gpd/sf	135
5	Hollywood 959 959 N. Seward St.	Office	241,568 sf	0.12 gpd/sf	28,988
6	Archstone Hollywood Mixed-Use Project 6901–6911 W. Santa Monica Blvd.	Apartments	231 du	190 gpd/du	43,890
		High-Turnover Restaurant	5,000 sf	30 gpd/seat	5,000
		Retail	10,000 sf	0.025 gpd/sf	250
7	7445 Sunset Grocery 7445 W. Sunset Blvd.	Specialty Grocery Store	32,416 sf	0.025 gpd/sf	810
8	Mixed-Use 5245 W. Santa Monica Blvd.	Apartments	49 du	190 gpd/du	9,310
		Retail	32,272 sf	0.025 gpd/sf	807
9	Selma Hotel 6417 W. Selma Ave.	Hotel	180 rm	120 gpd/rm	21,600
		Restaurant	12,840 sf	30 gpd/seat	12,840
10	Hollywood Production Center 1149 N. Gower St.	Apartments	57 du	190 gpd/du	10,830
11	Mixed-Use Office/Retail 936 N. La Brea Ave.	Office	88,750 sf	0.12 gpd/sf	10,650
		Retail	12,000 sf	0.025 gpd/sf	300
12	Pantages Theater Office 6225 W. Hollywood Blvd.	Office	210,000 sf	0.12 gpd/sf	25,200

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
13	Selma & Vine Office Project 1601 N. Vine St.	Office	100,386 sf	0.12 gpd/sf	12,046
		Commercial	2,012 sf	0.05 gpd/sf	101
14	1723 North Wilcox Residential 1723 N. Wilcox Ave.	Apartments	68 du	190 gpd/du	12,920
		Retail	3,700 sf	0.025 gpd/sf	93
15	Seward Street Office Project 956 N. Seward St.	Office	126,980 sf	0.12 gpd/sf	15,238
16	Hotel & Restaurant Project 6381 W. Hollywood Blvd.	Hotel	80 rm	120 gpd/rm	9,600
		Restaurant	15,290 sf	30 gpd/seat	15,290
17	Television Center (TVC Expansion) 6300 W. Romaine St.	Office	114,725 sf	0.12 gpd/sf	13,767
		Gym	40,927 sf	0.02 gpd/sf	819
		Dance Studio	38,072 sf	0.025 gpd/sf	952
18	Hollywood Center Studios Office 6601 W. Romaine St.	Office	106,125 sf	0.12 gpd/sf	12,735
19	Apartments 1601 N. Las Palmas Ave.	Apartments	86 du	190 gpd/du	16,340
20	Hudson Building 6523 W. Hollywood Blvd.	Restaurant	10,402 sf	30 gpd/seat	10,402
		Office	4,074 sf	0.12 gpd/sf	489
		Storage	890 sf	0.03 gpd/sf	27
21	La Brea Gateway 915 N. La Brea Ave.	Supermarket	33,500 sf	0.025 gpd/sf	838
		Apartments	179 du	190 gpd/du	34,010
22	Target Retail Shopping Center Project 5520 W. Sunset Blvd.	Discount Store	163,862 sf	0.05 gpd/sf	8,193
		Shopping Center	30,887 sf	0.025 gpd/sf	772
23	Residential 712 N. Wilcox Ave.	Apartments	103 du	190 gpd/du	19,570
24	Mixed-Use 1600–1610 N. Highland Ave.	Apartments	248 du	190 gpd/du	47,120
		Retail	12,785 sf	0.025 gpd/sf	320

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
25	Millennium Hollywood Mixed-Use Project 1740 N. Vine St.	Apartments	492 du	190 gpd/du	93,480
		Hotel	200 rm	120 gpd/rm	24,000
		Office	100,000 sf	0.12 gpd/sf	12,000
		Fitness Club	35,000 sf	0.02 gpd/sf	700
		Retail	15,000 sf	0.025 gpd/sf	375
		Restaurant	34,000 sf	30 gpd/seat	34,000
26	Paramount Pictures 5555 W. Melrose Ave.	Production Office	635,500 sf	0.12 gpd/sf	76,260
		Office	638,100 sf	0.12 gpd/sf	76,572
		Retail	89,200 sf	0.025 gpd/sf	2,230
		Stage	21,000 sf	0.12 gpd/sf	2,520
		Support Uses	1,900 sf	0.12 gpd/sf	228
27	Apartments 1411 N. Highland Ave.	Apartments	76 du	190 gpd/du	14,440
		Commercial	2,500 sf	0.05 gpd/sf	125
28	Apartment Project 1824 N. Highland Ave.	Apartments	118 du	190 gpd/du	22,420
29	Hotel 1133 N. Vine St.	Hotel	112 rm	120 gpd/rm	13,440
		Café	661 sf	30 gpd/seat	661
30	The Lexington Mixed-Use 6677 W. Santa Monica Blvd.	Apartments	695 du	190 gpd/du	132,050
		Commercial	24,900 sf	0.05 gpd/sf	1,245
31	Selma–Wilcox Hotel 6421 W. Selma Ave.	Hotel	114 rm	120 gpd/rm	13,680
		Restaurant	1,993 sf	30 gpd/seat	1,993
32	Mixed-Use (High Line West) 5550 W. Hollywood Blvd.	Apartments	280 du	190 gpd/du	53,200
		Retail	12,030 sf	0.025 gpd/sf	301
33	Las Palmas Residential (Hollywood Cherokee) 1718 N. Las Palmas Ave.	Residential	224 du	190 gpd/du	42,560
		Retail	985 sf	0.025 gpd/sf	25
34	Mixed-Use 6915 Melrose Ave.	Condominium	13 du	190 gpd/du	2,470
		Retail	6,250 sf	0.025 gpd/sf	156

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
35	6140 Hollywood 6140 Hollywood Blvd.	Hotel	102 rm	120 gpd/rm	12,240
		Condominium	27 du	190 gpd/du	5,130
		Restaurant	11,460 sf	30 gpd/seat	11,460
36	Condos & Retail 5663 Melrose Ave.	Condominium	96 du	190 gpd/du	18,240
		Retail	3,350 sf	0.025 gpd/sf	84
37	6250 Sunset (Nickelodeon) 6250 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Retail	4,700 sf	0.025 gpd/sf	118
38	Hollywood Central Park Hollywood Freeway (US-101)	Park (38 ac)			N/A
39	1276 North Western Avenue 1276 N. Western Ave.	Apartments	75 du	190 gpd/du	14,250
40	Godfrey Hotel 1400 N. Cahuenga Blvd.	Hotel	221 rm	120 gpd/rm	26,520
		Restaurant	3,000 sf	30 gpd/seat	3,000
41	Modera Argyle 1546 N. Argyle Ave.	Apartments	276 du	190 gpd/du	52,440
		Retail	9,000 sf	0.025 gpd/sf	225
		Restaurant	15,000 sf	30 gpd/seat	15,000
42	Mixed-Use 5901 Sunset Blvd.	Office	274,000 sf	0.12 gpd/sf	32,880
		Supermarket	26,000 sf	0.025 gpd/sf	650
43	Mixed-Use 7107 Hollywood Blvd.	Apartments	410 du	190 gpd/du	77,900
		Restaurant	5,000 sf	30 gpd/seat	5,000
		Retail	5,000 sf	0.025 gpd/sf	125
44	John Anson Ford Theater 2580 Cahuenga Blvd. E.	Theater	311 seats	3 gpd/seat	933
		Restaurant	5,400 sf	30 gpd/seat	5,400
		Office	30 emp	11 gpd/emp	330
45	1717 Bronson Avenue 1717 N. Bronson Ave.	Apartments	89 du	190 gpd/du	16,910

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
46	Sunset + Wilcox 1541 N. Wilcox Ave.	Hotel	200 rm	120 gpd/rm	24,000
		Restaurant	9,000 sf	30 gpd/seat	9,000
47	Mixed-Use 1350 N. Western Ave.	Apartments	200 du	190 gpd/du	38,000
		Guest Rooms	4 rm	120 gpd/rm	480
		Retail/Restaurant	5,500 sf	30 gpd/seat	5,500
48	Palladium Residences 6201 W. Sunset Blvd.	Apartments	731 du	190 gpd/du	138,890
		Retail/Restaurant	24,000 sf	30 gpd/seat	24,000
49	5600 West Hollywood Boulevard 5600 W. Hollywood Blvd.	Apartments	33 du	190 gpd/du	6,270
		Commercial	1,289 sf	0.05 gpd/sf	64
50	5750 Hollywood Boulevard 5750 Hollywood Blvd.	Apartments	161 du	190 gpd/du	30,590
		Commercial	4,747 sf	0.05 gpd/sf	237
51	925 La Brea Avenue 925 La Brea Ave.	Retail	16,360 sf	0.025 gpd/sf	409
		Office	45,432 sf	0.12 gpd/sf	5,452
52	904 La Brea Avenue 904 La Brea Ave.	Apartments	169 du	190 gpd/du	32,110
		Retail	37,057 sf	0.025 gpd/sf	926
53	2014 Residential 707 N. Cole Ave.	Apartments	84 du	190 gpd/du	15,960
54	Cahuenga Boulevard Hotel 1525 N. Cahuenga Blvd.	Hotel	64 rm	120 gpd/rm	7,680
		Rooftop Restaurant/Lounge	700 sf	30 gpd/seat	700
		Restaurant	3,300 sf	30 gpd/seat	3,300
55	Academy Square 1341 Vine St.	Office	285,719 sf	0.12 gpd/sf	34,286
		Apartments	200 du	190 gpd/du	38,000
		Restaurant	16,135 sf	30 gpd/seat	16,135
56	Hotel 1921 Wilcox Ave.	Hotel	122 rm	120 gpd/rm	14,640
		Restaurant	4,225 sf	30 gpd/seat	4,225

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
57	Sunset Mixed-Use 7500–7510 W. Sunset Blvd.	Apartments	219 du	190 gpd/du	41,610
		Restaurant	10,000 sf	30 gpd/seat	10,000
		Retail	20,000 sf	0.025 gpd/sf	500
58	Mixed-Use 901 N. Vine St.	Apartments	70 du	190 gpd/du	13,300
		Commercial	3,000 sf	0.05 gpd/sf	150
59	Apartments 525 N. Wilton Pl	Apartments	88 du	190 gpd/du	16,720
60	Hardware Store 4905 W. Hollywood Blvd.	Retail	36,600 sf	0.025 gpd/sf	915
61	Mixed-Use 1233 N. Highland Ave.	Apartments	72 du	190 gpd/du	13,680
		Commercial	12,160 sf	0.05 gpd/sf	608
62	Mixed-Use 1310 N. Cole Ave.	Apartments	369 du	190 gpd/du	70,110
		Office	2,570 sf	0.12 gpd/sf	308
63	Kaiser Hospital Redevelopment Various parcels near Vermont Ave. & Sunset Blvd.	Hospital Expansion	211,992 sf	0.225 gpd/sf	47,698
64	Melrose & Beachwood 5570 W. Melrose Ave.	Apartments	52 du	190 gpd/du	9,880
		Commercial	5,500 sf	0.05 gpd/sf	275
65	Hollywood Crossroads 1540–1552 Highland Ave.	Residential	950 du	190 gpd/du	180,500
		Hotel	308 rm	120 gpd/rm	36,960
		Office	95,000 sf	0.12 gpd/sf	11,400
		Commercial/Retail	185,000 sf	0.05 gpd/sf	9,250
66	Wilcox Hotel 1717 N. Wilcox Ave.	Hotel	133 rm	120 gpd/rm	15,960
		Retail	3,580 sf	0.025 gpd/sf	90
67	1719 Whitley Hotel 1719 N. Whitley Ave.	Hotel	156 rm	120 gpd/rm	18,720

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
68	Mixed-Use 5939 W. Sunset Blvd.	Apartments	299 du	190 gpd/du	56,810
		Office	38,440 sf	0.12 gpd/sf	4,613
		Restaurant	5,064 sf	30 gpd/seat	5,064
		Retail	3,739 sf	0.025 gpd/sf	93
69	Apartments 5460 W. Fountain Ave.	Apartments	75 du	190 gpd/du	14,250
70	Mixed-Use 6220 W. Yucca St.	Hotel	210 rm	120 gpd/rm	25,200
		Apartments	136 du	190 gpd/du	25,840
		Retail	3,450 sf	0.025 gpd/sf	86
		Restaurant	9,120 sf	30 gpd/seat	9,120
71	SunWest Project (Mixed-Use) 5525 W. Sunset Blvd.	Apartments	293 du	190 gpd/du	55,670
		Commercial	33,980 sf	0.05 gpd/sf	1,699
72	Hollywood De Longpre Apartments 5632 De Longpre Ave.	Apartments	185 du	190 gpd/du	35,150
73	Ivar Gardens Hotel 6409 W. Sunset Blvd.	Hotel	275 rm	120 gpd/rm	33,000
		Retail	1,900 sf	0.025 gpd/sf	48
74	Selma Hotel 6516 W. Selma Ave.	Hotel	212 rm	120 gpd/rm	25,440
		Bar/Lounge	3,855 sf	0.72 gpd/sf	2,776
		Rooftop Bar/Event Space	8,500 sf	0.72 gpd/sf	6,120
75	Melrose Crossing Mixed-Use 7000 Melrose Ave.	Apartments	40 du	190 gpd/du	7,600
		Retail	6,634 sf	0.025 gpd/sf	166
76	Mixed-Use 1657 N. Western Ave.	Apartments	91 du	190 gpd/du	17,290
		Retail	15,300 sf	0.025 gpd/sf	383

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
77	McCadden Campus (LGBT) 1118 N. McCadden Pl.	Housing	45 du	190 gpd/du	8,550
		Social Service Support Facility	50,325 sf	0.12 gpd/sf	6,039
		Office	17,040 sf	0.12 gpd/sf	2,045
		Commercial/Retail or Restaurant	1,885 sf	30 gpd/seat	1,885
		Temporary Housing	100 bed	70 gpd/bed	7,000
78	4900 Hollywood Mixed-Use 4900 W. Hollywood Blvd.	Apartments	150 du	190 gpd/du	28,500
		Retail	13,813 sf	0.025 gpd/sf	345
79	citizenM Hotel 1718 Vine St.	Hotel	216 rm	120 gpd/rm	25,920
		Restaurant	4,354 sf	30 gpd/seat	4,354
80	Apartments 1749 Las Palmas Ave.	Apartments	70 du	190 gpd/du	13,300
		Retail	3,117 sf	0.025 gpd/sf	78
81	Mixed-Use 1868 N. Western Ave.	Apartments	96 du	190 gpd/du	18,240
		Retail	5,546 sf	0.025 gpd/sf	139
82	6400 Sunset Mixed-Use 6400 Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Restaurant	7,000 sf	30 gpd/seat	7,000
83	6200 W Sunset Boulevard 6200 W. Sunset Blvd.	Apartments	270 du	190 gpd/du	51,300
		Quality Restaurant	1,750 sf	30 gpd/seat	1,750
		Pharmacy	2,300 sf	0.025 gpd/sf	58
		Retail	8,070 sf	0.025 gpd/sf	202
84	747 North Western Avenue 747 N. Western Ave.	Apartments	44 du	190 gpd/du	8,360
		Retail	7,700 sf	0.025 gpd/sf	193
85	6630 West Sunset Boulevard 6630 W. Sunset Blvd.	Apartments	40 du	190 gpd/du	7,600
86	1001 North Orange Drive 1001 N. Orange Dr	Office	53,537 sf	0.12 gpd/sf	6,424

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
87	Hollywood & Wilcox 6430–6440 W. Hollywood Blvd.	Apartments	260 du	190 gpd/du	49,400
		Office	3,580 sf	0.12 gpd/sf	430
		Retail	11,020 sf	0.025 gpd/sf	276
		Restaurant	3,200 sf	30 gpd/seat	3,200
88	Mixed-Use 4914 W. Melrose Ave.	Live/Work	45 du	190 gpd/du	8,550
		Retail	3,760 sf	0.025 gpd/sf	94
89	Hospital Seismic Retrofit 1300 N. Vermont Ave.	Replace Existing Hospital and Ancillary Uses with 30,933 sf Office	30,933 sf	0.12 gpd/sf	3,712
90	Onni Group Mixed-Use Development 1360 N. Vine St.	Condominium	429 du	190 gpd/du	81,510
		Grocery	55,000 sf	0.025 gpd/sf	1,375
		Retail	5,000 sf	0.025 gpd/sf	125
		Restaurant	8,988 sf	30 gpd/seat	8,988
91	1600 Schrader 1600 Schrader Blvd.	Hotel	168 rm	120 gpd/rm	20,160
		Restaurant	5,979 sf	30 gpd/seat	5,979
92	NBC Universal Evolution Plan 100 Universal City Plaza	Studio Office	647,320 sf	0.12 gpd/sf	77,678
		Office	495,406 sf	0.12 gpd/sf	59,449
		Entertainment Area	337,895 sf	0.05 gpd/sf	16,895
		Entertainment Retail	39,216 sf	0.025 gpd/sf	980
		Hotel (900,000 sf)	1,385 rm	120 gpd/rm	166,154
93	Hollywood Gower Mixed-Use 6100 W. Hollywood Blvd.	Apartments	220 du	190 gpd/du	41,800
		Restaurant	3,270 sf	30 gpd/seat	3,270
94	Sunset & Western 5420 W. Sunset Blvd.	Apartments	735 du	190 gpd/du	139,650
		Supermarket	59,100 sf	0.025 gpd/sf	1,478
		Retail	36,720 sf	0.025 gpd/sf	918
95	Montecito Senior Housing 6650 W. Franklin Ave.	68 Senior Apartments	68 du	190 gpd/du	12,920

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
96	Mixed-Use 7113 W. Santa Monica Blvd.	Apartments	184 du	190 gpd/du	34,960
		Commercial/Retail	13,350 sf	0.05 gpd/sf	668
97	The Chaplin Hotel Project 7219 W. Sunset Blvd.	Hotel	93 rm	120 gpd/rm	11,160
		Restaurant	2,800 sf	30 gpd/seat	2,800
98	Select @ Los Feliz (Mixed-Use) 4850 W. Hollywood Blvd.	Apartments	101 du	190 gpd/du	19,190
		Restaurant	10,000 sf	30 gpd/seat	10,000
99	Restaurants 135 N. Western Ave.	Restaurant (Addition)	4,066 sf	30 gpd/seat	4,066
100	Western Galleria Market 100 N. Western Ave.	Apartments	187 du	190 gpd/du	35,530
		Retail	76,500 sf	0.025 gpd/sf	1,913
101	City Lights Mixed-Use 1515 N. Hillhurst Ave.	Apartments	202 du	190 gpd/du	38,380
		Retail	5,350 sf	0.025 gpd/sf	134
		Restaurant	5,050 sf	30 gpd/seat	5,050
		Coffee/Donut Shop	3,025 sf	30 gpd/seat	3,025
102	Mixed-Use 600 N. Vermont Ave.	Apartments	120 du	190 gpd/du	22,800
		Retail	14,600 sf	0.025 gpd/sf	365
103	Mixed-Use 6436 W. Hollywood Ave.	Apartments	220 du	190 gpd/du	41,800
		Retail	8,800 sf	0.025 gpd/sf	220
104	Mixed-Use 900 S. Vermont Ave.	Apartments	193 du	190 gpd/du	36,670
		Retail	24,200 sf	0.025 gpd/sf	605
105	Hollywood Community Plan Update	The Hollywood Community Plan Update proposes updates to land use policies and maps. The proposed changes would primarily increase commercial and residential development potential in and near the Regional Center Commercial portion of the community and along selected corridors in the Community Plan Area. The decreases in development potential would be primarily focused on low- to			

Table IV.L.1-5 (Continued)
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Rate[a,b]	Total Daily Demand (gpd)
		medium-scale multi-family residential neighborhoods to conserve existing density and intensity of those neighborhoods. The projected population growth has been captured in the conservative ambient growth rate and the Related Projects defined above. The Project Study Area is fully contained within the Community Plan Area			
Total Related					**4,214,837**
Project					**83,509**
Related + Project					**4,298,346**

ac = acres

du = dwelling units

emp = employees

gpd = gallons per day

rm = rooms

sf = square feet

[a] *Cumulative water demand was calculated using LASAN's sewage generation factors. Uses not listed are estimated by the closest type of use available.*

[b] *Conservatively assumes rate for 3-bedroom units for all dwelling units. In addition, number of seats for restaurant uses based on LADWP standard of 1 seat per 30 square feet.*

Source: Eyestone Environmental, 2019.

Overall, LADWP's 2015 UWMP demonstrates that LADWP will meet all new water demands from projected population growth, through a combination of water conservation and water recycling. LADWP's 2015 UWMP specifically outlined the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP's 2015 UWMP also incorporates the water conservation goals of Executive Directive No. 5 and the City's Sustainability pLAn. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high-efficiency water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that water supply continues to be available.

Based on the related project list and projections provided in adopted plans (e.g., MWD's 2015 UWMP, LADWP's 2015 UWMP, and Sustainable City pLAn), it is anticipated that LADWP would be able to meet the water demands of the Project and future growth through 2035 and beyond. The 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2040. **Therefore, sufficient water supplies would be available to serve the Project and related projects from existing entitlements and resources, and cumulative impacts with respect to water supply would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to water supply and infrastructure would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to water supply and infrastructure 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.