

## **IV. Environmental Impact Analysis**

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### **K.1 Utilities and Service Systems—Water Supply and Infrastructure**

#### **1. Introduction**

This section of the Draft EIR provides an analysis of the Project’s potential impacts to water supply and the water infrastructure system serving the Project Site. The analysis includes a description of regional water supplies and the 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 (WSA) 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 January 9, 2018. The WSA for the Project is included in Appendix R of this Draft EIR. In addition, on May 8, 2020, LADWP confirmed that changes to the Project Description since the WSA was issued do not result in a substantial increase in water demand for the Project. This confirmation letter is included as Appendix S of this Draft EIR. The analysis of water infrastructure is based on the *Utility Technical Report: Water, Wastewater, and Energy* (Utility Report), prepared for the Project by KPFF Consulting Engineers, July 2021, which is included in Appendix E of this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) State**

###### *(a) 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 that adequate supplies are available to meet existing and future demands. 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 (AFY) of water must adopt an urban water management plan every five years.<sup>1</sup>

A number of recent requirements regarding 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 in urban water use by December 31, 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.<sup>2</sup>

*(b) Senate Bill X7-7 (California Water Code, Section 10608)*

Senate Bill (SB) X7-7, codified in the California Water Code Section 10608, requires all water suppliers to increase water use efficiency. 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. During the period from June 2015 through March 2017, the state achieved 22.5 percent in cumulative statewide savings.<sup>3</sup>

*(c) Senate Bill 610 (California Water Code, Sections 10910 et seq.)*

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

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<sup>1</sup> Los Angeles Department of Water and Power, *2015 Urban Water Management Plan*, April 2016.

<sup>2</sup> Los Angeles Department of Water and Power, *Water Supply Assessment—Sunset Western Project*, December 12, 2017.

<sup>3</sup> State Water Resources Control Board, *Presentation, Water Conservation Report*, May 2, 2017.

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 provide for the development of 735 multi-family residential units and approximately 95,000 square feet of neighborhood-serving commercial uses. The Project would replace an existing grocery store, vacant commercial space, fast-food restaurant, and associated parking areas that together comprise approximately 100,796 square feet. Since the Project would include more than 500 dwelling units, the preparation and approval of a WSA by LADWP is required.

*(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 2019 California Plumbing Code, which is based on the 2018 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2020.

(e) *Sustainable Groundwater Management Act of 2014*

The Sustainable Groundwater Management Act of 2014, 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 with 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. Furthermore, under the Sustainable Groundwater Management Act, groundwater sustainability agencies responsible for high- and medium-priority basins must adopt groundwater sustainability plans within five to seven years, depending on whether the basin is in critical overdraft.

(f) *Drought Emergency Water Conservation*

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, extends the mandatory water reduction measures outlined in a previous Executive Order B-29-15 and further directs DWR and the SWRCB 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.

On November 30, 2016, State agencies, including the SWRCB 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.<sup>4</sup>

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<sup>4</sup> 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.*

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.<sup>5</sup> 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 SWRCB to maintain urban water use reporting requirements and prohibitions on wasteful practices. Water agencies will continue to strengthen drought readiness and water use efficiency.<sup>6</sup> 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<sup>7</sup>*

As required by Water Code Section 10005(a), the California Water Plan is the state's strategic plan for managing and developing water resources statewide for current and future generations. It 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 California 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 California Water Plan also evaluates coordinated efforts of regional and statewide resource management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. The evaluations and assessments thus help identify effective plan actions and policies for meeting California's resource management objectives in both the short term and long term of future decades. California Water Plan Update 2018 represents the latest update to the Water Plan.

*(h) California Water Action Plan*

While the California Water Plan is required by the Water Code, the California Water Action Plan (Action Plan) was released by Governor Brown's administration. The Action

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<sup>5</sup> *The Counties of Fresno, Kings, Tulare, and Tuolumne remain under a drought state of emergency, per Executive Order B-40-17.*

<sup>6</sup> *Governor Brown Lifts Drought Emergency, Retains Prohibition on Wasteful Practices, Executive Order B-40-17.*

<sup>7</sup> *California Department of Water Resources, About the Water Plan, <https://water.ca.gov/Programs/California-Water-Plan>, accessed February 19, 2021.*

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.<sup>8</sup> Ten actions were presented: (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; (10) Identify sustainable and integrated financing opportunities. 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.

## (2) Regional

### *(a) Metropolitan Water District of Southern California (MWD)*

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.

### *(b) 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. As it was first adopted in 1996, the goal of the IRP has been to ensure that a reliable water system will extend into the future. The IRP has since been updated in 2004, 2010, and most recently for the 2015 IRP Update, which was adopted in January 2016. The 2015 IRP Update 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

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<sup>8</sup> California Department of Natural Resources, *California Water Action Plan 2014*.

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.<sup>9</sup>

*(c) MWD's 2015 Regional 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.<sup>10</sup> Based on its 2015 UWMP, 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 (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix of programs—including those in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage—that enables the region to meet its water supply needs. As set forth in its 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.

*(d) 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 and 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

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<sup>9</sup> *Metropolitan Water District of Southern California, Integrated Water Resources Plan 2015 Update, January 2016.*

<sup>10</sup> *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

imported water supplies is not required.<sup>11</sup> 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.

*(e) 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, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan, which has since been implemented three times, most recently in April 2015.<sup>12</sup> 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 consecutive months from July of a given year through the following June.

(3) Local

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

In June 2016, LADWP adopted its 2015 UWMP. The LADWP UWMP serves two purposes: (i) achieve full compliance with the requirements of California's Urban Water

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<sup>11</sup> *Metropolitan Water District of Southern California, Water Surplus and Drought Management Plan: Report No. 1150, August 1999.*

<sup>12</sup> *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

Management Planning Act (described above); and (ii) serve as a master plan for water supply and resource management consistent with the City's goals and objectives.<sup>13</sup>

A number of important changes have occurred since the LADWP prepared its 2010 UWMP. The year 2012 marked the start of the current multi-year drought in California, to which Governor Brown responded by proclaiming a drought state of emergency in January 2014. In addition, as discussed above, in 2014, the SWRCB implemented its Drought Emergency Water Conservation Regulation, which mandates 25-percent reductions in water use statewide. In October 2014, Mayor Eric Garcetti (Mayor Garcetti) issued Executive Directive No. 5, which sets goals to reduce per capita water use, 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 April 2015, Mayor Garcetti's Sustainable City pLAN (discussed below) was released, establishing targets for the City over the next 20 years to strengthen and promote sustainability. The 2015 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.<sup>14</sup> On February 2, 2017, Mayor Garcetti announced that the City's 20 percent water reduction target had been met.<sup>15</sup>

*(b) Sustainable City pLAN/L.A.'s Green New Deal*

In April 2015, Mayor Garcetti released the City's first Sustainable City pLAN (pLAN), a directive to address challenges of the environment, economy, and equity in the City of Los Angeles. Among its different focuses, the pLAN 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 was updated in April 2019 and renamed L.A.'s Green New Deal. The 2019 Sustainable City pLAN/L.A.'s Green New Deal has established

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<sup>13</sup> Los Angeles Department of Water and Power, *2015 Urban Water Management Plan*, April 2016.

<sup>14</sup> Los Angeles Department of Water and Power, *Water Supply Assessment—5420 Sunset Boulevard Project*, December 12, 2017.

<sup>15</sup> City of Los Angeles, Mayor Garcetti, *Press Release, Los Angeles Achieves Mayor Garcetti's Goal of 20 Percent Water Savings*, released February 2, 2017, <https://www.lamayor.org/los-angeles-achieves-mayor-garcetti%E2%80%99s-goal-20-percent-water-savings>, accessed February 19, 2021.

targets such as sourcing 70 percent of all water locally and recycling 100 percent of wastewater by 2035.<sup>16</sup>

*(c) Los Angeles Municipal Code*

The City has adopted several ordinances 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

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<sup>16</sup> L.A.'s Green New Deal, Sustainability Plan 2019.

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). Section 57.507.3.1 of the Fire Code 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 Commercial and Industrial 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, Industrial and Commercial land uses, such as those of the Project, have a minimum required fire flow of 6,000 to 9,000 gpm from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 psi. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of dwelling unit, first story guest room, and all first story portions of any commercial or industrial building must be within 300 feet of an approved hydrant.

#### *(d) Los Angeles Water Rate Ordinance*

Pursuant to Ordinance No. 184,130, the City Water Rate Ordinance was approved in March 15, 2016 to establish tiered water rate schedules 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. This Water Rate Ordinance is the most recent change by the City's Board of Water and Power Commissioners since the last water base

rate action in 2009. The new water rate structure increases the number of tiers from two to four for single-dwelling unit customers. In addition, this ordinance maintains cost-of-service principles, incremental tier pricing based on the cost of water supply, and added pumping and storage costs. 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 supply.<sup>17</sup>

## **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 (LAA), local groundwater, purchased water from MWD, and recycled water.<sup>18</sup> As shown in Table IV.K.1-1 on page IV.K.1-13, in 2019, the LADWP had an available water supply of 480,539 acre-feet, with the vast majority of this supply from the Los Angeles Aqueducts and MWD. 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.K.1-1, approximately 344,622 acre-feet of LADWP's water supplies were from the Los Angeles Aqueducts in 2019.

Average deliveries from LAA system have been approximately 111,293 acre-feet of water annually from Fiscal Year 2011/12 to 2015/16. 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. On

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<sup>17</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>18</sup> Los Angeles Department of Water and Power, *Water Supply Assessment—5420 Sunset Boulevard Project*, page 28, December 12, 2017.

**Table IV.K.1-1  
LADWP Water Supply**

<b>Calendar Year</b>	<b>Los Angeles Aqueducts</b>	<b>Local Groundwater</b>	<b>MWD</b>	<b>Recycled Water</b>	<b>Transfer, Spread, Spills, and Storage</b>	<b>Total<sup>a</sup></b>
2007	127,392	88,041	439,353	3,595	57	<b>658,438</b>
2008	148,407	64,604	427,422	7,048	(1,664)	<b>645,817</b>
2009	137,261	66,998	351,959	7,570	(554)	<b>563,234</b>
2010	251,126	68,346	205,240	6,900	938	<b>532,550</b>
2011	357,752	49,915	119,481	7,708	153	<b>535,009</b>
2012	166,858	59,109	326,123	5,965	(1,182)	<b>556,873</b>
2013	64,690	66,272	438,534	9,253	2,404	<b>581,153</b>
2014	63,960	96,394	391,325	11,307	(2,020)	<b>560,948</b>
2015	33,244	80,155	378,539	9,829	(430)	<b>501,337</b>
2016	95,573	72,503	314,336	9,095	981	<b>492,487</b>
2017	380,329	14,695	113,033	8,509	(5,730)	<b>510,835</b>
2018	245,942	42,458	212,938	8,832	858	<b>511,027</b>
2019 <sup>b</sup>	344,622	26,433	101,722	8,807	(1,045)	<b>480,539</b>

*Units are in acre-feet.*

<sup>a</sup> *Numbers may not sum due to rounding.*

<sup>b</sup> *Supply data for 2019 are preliminary and may change.*

*Source: LADWP, Water Supply Assessment for the Angels Landing Project, April 28, 2020.*

March 20, 2017, Mayor Garcetti proclaimed a state of local emergency for Los Angeles Aqueducts as a response to the snowpack levels in the Eastern Sierra. The proclamation was issued to assist LADWP in taking immediate steps to protect infrastructure and manage runoff in the Owens Valley including, but not limited to, protection of facilities and diversion of conveyance flows. However, the snowpack in the Eastern Sierra was at 203 percent of an average year on April 1, 2017.<sup>19</sup> On April 1, 2019, the snowpack was 171 percent of an average year.<sup>20</sup>

Various lawsuits, injunctions, and resulting agreements affect water supplies from the Los Angeles Aqueducts. These include an agreement with the County of Inyo

<sup>19</sup> LADWP, *Water Supply Assessment for the Angels Landing Project, April 28, 2020.*

<sup>20</sup> LADWP, *Eastern Sierra Snow Survey Results, April 1, 2019.*

regarding groundwater levels and enhancement and mitigation projects in the Owens Valley, and the imposition of new regulatory requirements by the SWRCB 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 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 measures. 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.<sup>21</sup>

LADWP projects that the average annual long-term Los Angeles Aqueduct delivery between 2020 and 2040 will increase from 275,700 AFY to 286,200 AFY. LADWP anticipates that this increase will be due, in part, to implementation of the Owens Lake Master Plan Project which will allow for the conservation of 20,000 AFY of LADWP LAA supply currently used for dust suppression at the Owens Lake Playa through use instead of waterless dust mitigation measures.<sup>22</sup>

*(b) Groundwater*

LADWP owns water rights in the San Fernando, Sylmar, and Central Basins.<sup>23</sup> All of these basins are adjudicated by judicial decisions of the Superior Court of the State of California.<sup>24</sup>

The San Fernando Basin is the largest of the three basins. LADWP has accumulated 554,500 acre-feet of stored groundwater in the basin as of October 1, 2017 (the latest year for which data is available).<sup>25</sup> This water can be withdrawn from the

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<sup>21</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>22</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>23</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>24</sup> *When multiple parties withdraw water from the same aquifer, groundwater pumpers can ask the court to adjudicate, or hear arguments for and against, to better define the rights that various entities have to use groundwater resources. Through adjudication, the courts can assign specific water rights to water users and can compel the cooperation of those who might otherwise refuse to limit their pumping of groundwater. Watermasters are typically appointed by the court to ensure that pumping conforms to the limits defined by the adjudication. Water Education Foundation, Groundwater Adjudication, [www.watereducation.org/aquapedia/groundwater-adjudication](http://www.watereducation.org/aquapedia/groundwater-adjudication), accessed on February 19, 2021.*

<sup>25</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

basin during normal and dry years or in an emergency, in addition to LADWP's approximately 87,000 AFY entitlement in the basin. The City's current annual entitlement in the Sylmar Basin is 3,570 acre-feet. LADWP's annual entitlement in the Central Basin is 17,236 acre-feet.<sup>26</sup>

As shown in Table IV.K.1-2 on page IV.K.1-16, the City extracted 36,871, five, and one acre-feet of groundwater from the San Fernando, Central and Sylmar Basins, respectively, during the 2018-2019 fiscal year. The City plans to continue to develop production from its groundwater basins in the coming years to offset reductions in imported supplies. However, extraction from the basins may be limited by water quality, sustainable pumping practices, and groundwater elevations.<sup>27</sup>

Both LADWP and DWR have programs in place to monitor wells to prevent overdrafting. LADWP's groundwater pumping practice is based on a "safe yield" operation. Furthermore, basin management is achieved by collective efforts of a court-appointed Watermaster and the Upper Los Angeles River Area (ULARA) Administrative Committee of representatives from five public water supply agencies overlying the ULARA Committee. 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.<sup>28</sup>

*(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 SWP'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 Aqueducts and local groundwater. As of June 30, 2019, LADWP has a preferential right to purchase 18.25 percent of MWD's total water supply.<sup>29</sup>

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

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<sup>26</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>27</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>28</sup> LADWP, *2015 Urban Water Management Plan*, June 2016.

<sup>29</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

**Table IV.K.1-2  
Local Groundwater Basin Supply**

<b>Fiscal Year (Jul–Jun)</b>	<b>San Fernando</b>	<b>Sylmar</b>	<b>Central</b>
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	0.77
2018–2019	36,871	1	5
2019–2020 <sup>a</sup>	90,000	4,170	18,500
2024–2025 <sup>a</sup>	88,000	4,170	18,500
2029–2030 <sup>a</sup>	84,000	4,170	18,500
2034–2035 <sup>a</sup>	92,000	4,170	18,500
2039–2040 <sup>a</sup>	92,000	3,570	18,500

*Units are in acre-feet.*

<sup>a</sup> *Projected groundwater production.*

*Source: LADWP, Water Supply Assessment for the Angels Landing Project, April 28, 2020.*

approximately 441,870 acre-feet.<sup>30</sup> L.A.'s Green New Deal also reaffirms this initiative.<sup>31</sup> To meet these targets, LADWP plans to increase conservation, enhance the ability for 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 AFY in 2025.<sup>32</sup>

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.<sup>33</sup>

<sup>30</sup> LADWP, *Water Supply Assessment for the Angels Landing Project, April 28, 2020.*

<sup>31</sup> *City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAN, 2019.*

<sup>32</sup> LADWP, *Water Supply Assessment for the Angels Landing Project, April 28, 2020.*

<sup>33</sup> LADWP, *2015 Urban Water Management Plan, April 2016.*

As indicated in Table IV.K.1-1 on page IV.K.1-13, LADWP received approximately 101,722 acre-feet of water from MWD in 2019, which was a reduction from previous years. Summaries of MWD’s individual supplies, along with each supply’s challenges and specific responsive actions taken by MWD, 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 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. Of the California apportionment, MWD holds the fourth priority right to 550,000 AFY under a 1931 priority system governing allotments to California. This is the last priority within California’s basic apportionment of 4.4 million acre-feet. Beyond the basic apportionment, MWD holds the fifth priority right to 662,000 acre-feet of water. 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 since 1999 have contributed to a decrease in these claims. The recent 16-year drought has been so severe that it has resulted in major reductions in water deliveries from the Colorado River. In response, the federal government, states and urban and agricultural water districts that depend on the Colorado River worked together toward a solution.<sup>34</sup> MWD’s total supply from the Colorado River Aqueduct in 2020 is at approximately 1.5 million acre-feet.<sup>35</sup>

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. Specifically, under a 1988 water conservation agreement

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<sup>34</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>35</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, Table V, April 28, 2020.

between MWD and the Imperial Irrigation District, MWD provided funding for the Imperial Irrigation District to construct and operate a number of conservation projects that are currently conserving up to 109,460 acre-feet of water per year that is provided to MWD. In addition, 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. Furthermore, in May 2008, MWD joined the Central Arizona Water Conservation District and the Southern Nevada Water Authority in funding the Warren H. Brock Reservoir, which conserves approximately 70,000 AFY of water. 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 Quantification Settlement Agreement, executed in October 2003, and the Transfer Agreement executed in 1998. Additional guidelines and programs that influence management of the Colorado River water supplies include the Interim Surplus Guidelines, the Lower Basin Shortage Guidelines and Coordinated Management Strategies for Lake Powell and Lake Mead, the Intentionally-Created Surplus Program, and the Quagga Mussel Control Program.

*(ii) State Water Project*

MWD imports water from the SWP, owned by the State of California and operated by DWR. The SWP is a water storage and delivery system of pump stations, reservoirs, aqueducts, tunnels, and power plants. The main purpose of the SWP is to divert and store surplus water during wet periods and distribute it to areas throughout the State. Other purposes of the SWP include flood control, power generation, recreation, fish and wildlife protection, and water quality management in the Sacramento–San Joaquin River Delta (Delta). The SWP transports Feather River water stored in and released from Oroville Dam and 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 began receiving water from the SWP in 1972. MWD is the largest of the 29 SWP contractors, holding a contract for 1.912 million acre-feet (MAF) per year, or 46 percent of the total contracted amount of the 4.173 MAF ultimate delivery capacity of the project. Variable hydrology, environmental issues, and regulatory restrictions in the Delta have periodically reduced the quantity of water that the SWP delivers to MWD.<sup>36</sup>

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<sup>36</sup> LADWP, *Water Supply Assessment for the Angels Landing Project, Appendix F, April 28, 2020.*

The SWP, under the original contracted amount at 100 percent allocation, provides MWD with 1,911,500 acre-feet of water each calendar year through December 31, 2035.<sup>37</sup> However, due to water quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, SWP deliveries in the most critically dry years have varied. Contractual amounts were five percent in 2014 and 20 percent in 2015.<sup>38</sup> For 2016, the DWR had provided an estimated an initial allocation of 10 percent but increased the allocation to 60 percent by April, primarily due to changes in hydrologic conditions.<sup>39</sup> Allocation levels were also 60 percent in January 2017 and increased to 85 percent in April 2017.<sup>40</sup> In 2018, however, DWR allocation levels were reduced to 20 percent in January and 35 percent in May.<sup>41</sup>

For the 2019 calendar year, DWR allocation levels were initially further reduced to 15 percent in January, but levels were subsequently increased to 35 percent in February and 75 percent in June.<sup>42</sup> DWR approval of allocation levels are based on precipitation, runoff, and water conditions. Other considerations include the existing storage in SWP conservation reservoirs, SWP operational regulatory constraints (e.g., conditions of the Biological Opinions for Delta Smelt and Salmonids, and the Longfin Smelt incidental take permit), and 2019 contractor demands. Furthermore, DWR may revise the allocation and subsequent allocations if warranted by the year's developing hydrologic and water supply conditions.<sup>43</sup> On December 1, 2020, DWR announced an initial SWP allocation of 10 percent for the 2021 water year.<sup>44</sup>

### Challenges to State Water Project Supply<sup>45</sup>

Litigation and 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

<sup>37</sup> Los Angeles Department of Water and Power, *Water Supply Assessment—5420 Sunset Boulevard Project, Appendix F, December 12, 2017.*

<sup>38</sup> Metropolitan Water District of Southern California, *2015 Urban Water Management Plan, June 2016.*

<sup>39</sup> CA DWR, *Notice to State Water Project Contractors, Nos. 15-07 and 16-06.*

<sup>40</sup> CA DWR, *Notice to State Water Project Contractors, Nos. 17-01 and 17-05.*

<sup>41</sup> CA DWR, *Notice to State Water Project Contractors, Nos. 18-02 and 18-05.*

<sup>42</sup> CA DWR, *Notice to State Water Project Contractors, Nos. 19-03, 19-06, and 19-10.*

<sup>43</sup> CA DWR, *Notice to State Water Project Contractors, No. 19-10.*

<sup>44</sup> CA DWR, "DWR Releases Initial State Water Project Allocation," December 1, 2020, <https://water.ca.gov/News/News-Releases/2020/Dec-20/DWR-Releases-Initial-State-Water-Project-Allocation>, accessed February 19, 2021.

<sup>45</sup> Metropolitan Water District of Southern California, *2015 Urban Water Management Plan, June 2016.*

SWP operations and created more uncertainty in State Water Project supply reliability. Under direction by Governor Gavin Newsom, DWR is beginning an environmental review and planning process for a single tunnel project to address delta conveyance.<sup>46</sup>

In addition, as discussed in DWR's Bulletin 132-17, *Management of the California State Water Project* published in January 2019 (which reports on SWP planning, construction, finance, management, and operations during calendar year 2016), demands for SWP water are expected to increase and change as California's population continues to grow and as the effects of climate change impact the State's water resources. Increasingly, issues such as escalating costs, environmental concerns, and increased non-State Water Project demand for limited water supplies have become important factors affecting the planning and construction of new facilities.<sup>47</sup>

*(iii) Additional MWD Actions to Address Supply*

MWD has been developing plans and making 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. MWD's long-term plans to meet its member agencies' growing reliability needs are through: (1) improvements to SWP, as outlined in the EcoRestore plans; (2) conjunctive management efforts on the Colorado River; (3) water transfer programs; (4) outdoor conservation measures; and (5) development of additional local resources, such as recycling, brackish water desalination, and seawater desalination.<sup>48</sup>

Additionally, MWD has more than 5.0 million acre-feet of storage capacity available in reservoirs and banking/transfer programs. MWD was estimated to have 3.1 million acre-feet of water in Water Surplus Drought Management storage and additional 750,000 acre-feet in emergency storage as of January 1, 2020. Continued efficiency in the region kept demands low in 2019, resulting in available water supplies far exceeding demands. With implementation of new and modified existing storage programs to manage the available surplus supplies, MWD was able to add to storage in 2019. MWD began CY 2020 with approximately 3.1 million acre-feet of water in its dry-year storage portfolio.<sup>49</sup>

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<sup>46</sup> California Department of Water Resources, *State Withdraws WaterFix Approvals, Initiates Planning and Permitting for a Smaller Single Tunnel*, published May 2, 2019, <https://water.ca.gov/News/News-Releases/2019/May/State-Withdraws-WaterFix-Approvals>, accessed January 17, 2020.

<sup>47</sup> California Department of Water Resources, *Bulletin 132-17, Management of the California State Water Project*, January 2019.

<sup>48</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>49</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

MWD's 2015 IRP builds upon the strong foundation of diversification and adaptation developed in previous IRPs. The 2015 IRP reinforces MWD commitment to meeting the region's water supply needs through an evolving long-term strategy that calls for maintaining and stabilizing existing resources along with developing more conservation and new local supplies.<sup>50</sup>

MWD's 2015 UWMP reports on water reliability and identifies projected supplies to meet the long-term demand within MWD's service area. MWD reports it 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.<sup>51</sup>

*(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. The 2018 water year followed California's second-wettest year of record as measured by statewide runoff, ending a historic five-year drought.<sup>52</sup>

The 2021 water year (i.e., October 1, 2020, to September 30, 2021) has been abnormally dry, with the winter to date looking like Water Year 2014, the third year of California's most severe drought since the 1920s to '30s.<sup>53</sup> Specifically, according to the National Drought Mitigation Center, as of February 16, 2021, approximately 99.3 percent of the state was experiencing some degree of drought.<sup>54</sup> This indicates a shift from the previous year, when approximately 59.98 percent of the state was experiencing some degree of drought.<sup>55</sup>

California continues to experience variable weather and precipitation, as does the City of Los Angeles with its many periods of dry years and wet years. Therefore, 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.

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<sup>50</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>51</sup> LADWP, *Water Supply Assessment for the Angels Landing Project*, April 28, 2020.

<sup>52</sup> DWR, *Water Year 2018: Hot and Dry Conditions Return*, September 2018.

<sup>53</sup> DWR, *Water Year 2021: How Are We Doing?*, <https://water.ca.gov/News/Blog/2021/January/Water-Year-2021-How-Are-We-Doing>, January 27, 2021, accessed February 19, 2021.

<sup>54</sup> *United States Drought Monitor, State Drought Monitor, California, February 16, 2021*, <https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA>, accessed February 19, 2021.

<sup>55</sup> *United States Drought Monitor, State Drought Monitor, California, February 16, 2021*, <https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA>, accessed February 19, 2021.

(e) *Climate Change*

As discussed in the LADWP's 2015 UWMP, generally speaking, any 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. 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.

MWD and 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, 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.<sup>56</sup> As mentioned above, with updates published every five years, the most recent *California Water Plan Update 2018* provides recommended actions, funding scenarios, and an investment strategy to bolster efforts by water and resource managers, planners, and decision-makers to overcome California's most pressing water resource challenges.<sup>57</sup>

DWR has also prepared its Climate Action Plan to address climate change in the programs, projects, and activities over which it has authority.<sup>58</sup> Phase I of the Climate Action Plan lays out DWR's GHG emissions reduction goals and strategies; Phase II develops a framework and guidance for consistent incorporation and alignment of analysis for climate change impacts in DWR's project and program planning activities; and Phase III includes both a vulnerability assessment and adaptation plan to help prioritize infrastructure improvements, enhanced maintenance and operation procedures, revised health and safety procedures, and improved habitat management.

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<sup>56</sup> California Department of Water Resources, *California Water Plan Update 2013, Investing in Innovation & Infrastructure, Highlights*, October 2014.

<sup>57</sup> California Department of Water Resources, *Update 2018*, <https://water.ca.gov/Programs/California-Water-Plan/Update-2018>, accessed February 1, 2021.

<sup>58</sup> California Department of Water Resources, *Climate Action Plan*, <https://water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan>, accessed February 1, 2021.

*(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 in the next 25 years. To meet multiple water conservation goals established in Executive Directive 5, the 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. Further, based on LADWP's 2015 UWMP, recycled water use is projected to reach 59,000 AFY by 2025 and further increase to 75,400 AFY by 2040.

Overall, the 2015 UWMP projects a 7-percent lower water demand trend than what was projected in the previous 2010 UWMP.<sup>59</sup> In addition, based on programs and improvements contemplated in the 2015 UWMP, locally developed water supplies will increase from the current 14 percent to 49 percent in dry years, or to 47 percent in average years by 2040.<sup>60</sup>

L.A.'s Green New Deal also has a target to recycle 100 percent of all wastewater for beneficial reuse by 2035.<sup>61</sup> Beneficial reuse includes, but is not limited to, non-potable reuse, groundwater recharge, and supporting environmental and recreational uses such as those in the Los Angeles 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).<sup>62</sup> Table IV.K.1-3 on

<sup>59</sup> Los Angeles Department of Water and Power, *Water Supply Assessment—5420 Sunset Boulevard Project*, December 12, 2017.

<sup>60</sup> Los Angeles Department of Water and Power, *2015 Urban Water Management Plan*, April 2016.

<sup>61</sup> Baseline from LASAN: *In Fiscal Year 2017–2018, 27 percent of wastewater was recycled.*

<sup>62</sup> *Since preparation of the 2015 Urban Water Management Plan, new growth forecasts have become available in SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and 2020–2045 RTP-SCS. However, both the 2016 and 2020 forecasts are lower than the 2012 forecast in terms of current estimates and future projections. Therefore, LADWP's 2015 UWMP is based on a more conservative overall growth scenario.*

page IV.K.1-25 shows the projected water demand from the year 2020 through 2040 for the City of Los Angeles.

As shown in Table IV.K.1-3 on page IV.K.1-25, in 2040 during average year hydrological conditions, the City's water demand is forecasted to be approximately 675,700 AFY. Use of the current demand per capita within this demand 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 available to meet the projected demands of the service areas under normal, single-dry, and multi-dry year conditions through 2040.<sup>63</sup>

#### *(b) Existing On-Site Water Demand*

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with a one-story grocery store, vacant commercial space, and a one-story fast-food restaurant that together comprise approximately 100,796 square feet and associated parking areas. All existing uses would be removed to provide for the Project. As provided in Table IV.K.1-4 on page IV.K.1-32 in the analysis below, based on LADWP billing data, the existing uses on the Project Site have a water demand of approximately 13,827 gallons per day (gpd) or approximately 15.49 AFY.

### (3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by the 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 capacity of 311,000 acre-feet according to the estimates for Fiscal Year 2015–2016.<sup>64</sup> 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.<sup>65</sup>

Domestic water service is available to the Project Site via LADWP water lines within the adjacent streets. According to water service maps obtained from LADWP, there is an

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<sup>63</sup> Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, April 2016, Exhibits 11E-11K.

<sup>64</sup> Los Angeles Department of Water and Power, 2017–2018 Briefing Book, June 2016.

<sup>65</sup> Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.

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

Hydrological Conditions <sup>a</sup>	Years				
	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

*Data are presented as thousand acre-feet per year*

<sup>a</sup> *The LADWP defined three hydrologic conditions: average year (50-year average hydrology from FY 1961–1962 through FY 2010–2011); single dry year (such as a repeat of the FY 2014–2015 drought); and multi-dry year (such as a repeat of FY 2012–2013 through FY 2014–2015.)*

*Source: Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibits 11F, 11G, and 11H.*

8-inch water main in Western Avenue located 75 feet west of the Project Site, an 8-inch water main in Sunset Boulevard located 32 feet north of the Project Site, and another 8-inch water main in Serrano Avenue located 32 feet east of the Project Site.<sup>66</sup>

LADWP also provides water for firefighting services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). According to the Utility Report, based on correspondence with LADWP, there are six existing hydrants adjacent to the Project Site: four on Sunset Boulevard, one on Western Avenue, and another on Serrano Avenue. LADWP has determined that the six nearby hydrants flowing simultaneously have a combined flow of 9,000 gpm at or above 20 psi in accordance with LAMC Section 57.507.3.1.<sup>67</sup>

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to water supply and infrastructure if it would:

<sup>66</sup> *KPFF Consulting Engineers, Sunset and Western Utility Technical Report, July 2021. See Appendix E of this Draft EIR.*

<sup>67</sup> *KPFF Consulting Engineers, Sunset and Western Utility Technical Report, July 2021. See Appendix E of this Draft EIR.*

***Threshold (a): Require or result in the relocation or construction of new or expanded water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.***

***Threshold (b): (Not) 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 are relied upon. The analysis utilizes factors and considerations identified in the 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:

- 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 the Water Supply Assessment for the Project prepared by LADWP pursuant to SB 610. The Water Supply Assessment includes a conservative calculation of the Project's anticipated net water demand (including potential land uses with the highest water demand) by applying the City of Los Angeles Bureau of Sanitation (LASAN) wastewater generation rates to the Project's proposed land uses. The WSA accounts for the water use associated with the existing uses to be removed, as well as the Project's water demand with implementation of water conservation features. In accordance with SB 610, the resulting net demand for water associated with the Project is then analyzed relative to LADWP's existing and planned future water supplies to determine if LADWP would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry years hydrologic conditions. This 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 E 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 Feature is applicable to the Project with regard to water supply and infrastructure:

**Project Design Feature WAT-PDF-1:** In addition to regulatory requirements, the Project design shall incorporate the following design features to support water conservation in excess of LAMC requirements:

- Showerheads with a flow rate of 1.6 gpm or less.
- Non-residential lavatory faucets with a flow rate of 0.35 gpm or less.
- Metering faucets with a flow rate of 0.18 gallon per cycle, or less.
- High-efficiency toilets with a flush volume of 1.12 gallons per flush or less.
- Urinals with a flush volume of 0.11 gallon per flush or less.
- Leak detection system for swimming pools and Jacuzzi.
- Use of proper hydro-zoning/zoned irrigation (grouping plants with similar water requirements together).
- Drought tolerant plants—45 percent of total landscaping.

## d. Analysis of Project Impacts

***Threshold (a): Would the Project require or result in the relocation or construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?***

### (1) Impact Analysis

#### *(a) Construction*

As discussed in the Utility Report included as Appendix E to this Draft EIR and as summarized below, the Project would require the installation of new services and upgrades to existing on-site water services to serve the new buildings and uses. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the lines below surface. In addition, installation of new water infrastructure would include on-site water distribution improvements, off-site work associated with connections to the public main, and upgrades required by LADWP. As the design and installation of new service connections would be required to meet applicable City standards, the Project contractors would coordinate with the LADWP to identify the locations and depth of all lines prior to ground disturbance. Furthermore, 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.I, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-2 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Traffic Management Plan would identify the location of any temporary 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 construction of new water facilities or expansion of existing facilities that would have a significant impact on the environment. In addition, as noted in the Utility Report, the existing water distribution capacity would be adequate to serve the construction of the Project. Furthermore, as discussed above, minor offsite construction impacts associated with installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water service or inconvenience to motorists or pedestrians. **As such, construction-related impacts to water infrastructure would be less than significant.**

*(b) Operation*

As discussed above, 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, fire flow demands have a much greater instantaneous impact on infrastructure and, therefore, are the primary means for analyzing infrastructure capacity.

As discussed in the Utility Report, the Project would incorporate a fire sprinkler suppression system, subject to LAFD review and approval, to reduce or eliminate demand on public hydrants. The maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm for all buildings, which can be supplied to the site by LADWP, according to the approved Service Advisory Request (SAR), which can be found in Exhibit 1 of the Utility Report included as Appendix E of this Draft EIR. In addition to installing automatic fire sprinklers as required, the Project would also be required to meet City of Los Angeles fire flow requirements. Under LAMC Section 57.507.3.1 and established fire flow standards for Industrial and Commercial land uses, the Project is required to maintain a fire flow of 6,000 to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a residual pressure of 20 psi. Additionally, as set forth by LAMC Section 57.507.3.2, the Project must be surrounded by 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants spaced between 300 feet. Currently, there are six hydrants

adjacent to the Project Site: four on Sunset Boulevard, one on Western Avenue, and one on Serrano Avenue. An Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The IFFAR shows the six nearby hydrants flowing simultaneously for a combined flow of 9,000 gpm at or above 20 psi. Therefore, the Project has adequate fire flow availability in compliance with LAMC Section 57.507.3.1.

To ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement its \$6.3 billion five-year water system capital improvement plan, which includes replacement of distribution mainlines, trunk lines, large valves, and water meters, as well as ongoing maintenance and rehabilitation of facilities such as pump stations, pressure regulators, and in-city reservoirs and tanks.<sup>68</sup>

**Accordingly, the Project would not require or result in the construction of new water facilities or expansion of existing facilities. In addition, the water distribution capacity would be adequate to serve the Project. Therefore, the Project's impacts on water infrastructure would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

***Threshold (b): Would the Project 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 cleaning, and soil grading and preparation during the early construction phases. The latter construction phases normally require less water

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<sup>68</sup> LADWP, 2017–18 Water Infrastructure Plan, revised June 2018.

usage. As discussed in the Utility Report, a conservative estimate of construction-related water use would range from 1,000 to 2,000 gpd. This estimate would be substantially less than the Project's net new water consumption at buildout of 80,761 gpd. In addition, the temporary and incremental construction-related water demand of the Project would be offset by the removal of the existing uses, which consume approximately 13,827 gallons per day of water. Furthermore, as concluded in LADWP's 2015 UWMP, 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 is anticipated to be complete in 2026. 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. **As such, construction-related impacts to water supply would be less than significant.**

*(b) Operation*

As described in Section II, Project Description, of this Draft EIR, the Project proposes the development of 735 multi-family residential units and approximately 95,000 square feet of neighborhood-serving commercial uses. The proposed uses would be provided within four buildings that would be up to six stories<sup>69</sup> with a maximum height of 75 feet and would comprise 882,250 square feet of total floor area. To provide for the Project, the existing grocery store, fast-food restaurant, and associated parking areas would be demolished. 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.K.1-1). Specifically, the Project includes greater than 500 residential dwelling units. Therefore, a WSA was prepared for the Project by LADWP and is provided in Appendix R of this Draft EIR. As noted above, the Project Description slightly changed after the WSA was prepared.<sup>70</sup> A summary of these minor changes, and their anticipated effect on the Project's water demand, was sent to LADWP

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<sup>69</sup> *The Project plans dated January 14, 2020, show a total of six stories. The Applicant seeks the flexibility to potentially include a mezzanine level in the commercial space, which could technically count as a story; however, this would not increase the overall height of the building of 75 feet. In addition, any floor area within a mezzanine level would be taken from the existing proposed commercial floor area of 95,000 square feet.*

<sup>70</sup> *These changes include revising the unit mix in the 735 residential units from 198 studios, 353 1-bedrooms, 182 2-bedrooms, and two 3-bedrooms to 251 studios, 336 1-bedrooms, and 148 2-bedrooms. The Project no longer proposes any 3-bedroom units, expanding the market from 60,000 to 69,00 square feet and reducing the retail square footage from 25,820 square feet to 16,000 square feet.*

on May 1, 2020. On May 8, 2020, LADWP confirmed the revised water demand projections would not result in a substantial increase to what was approved in the January 2018 WSA. This confirmation letter is included as Appendix S 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.K.1-4 on page IV.K.1-32, assuming constant water use throughout the year, the Project would result in a net average daily water demand of 80,761 gpd, or approximately 90.52 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.<sup>71</sup> As stated in the WSA, 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. On May 8, 2020, LADWP confirmed the revised water demand projections would not result in a substantial increase to what was approved in the January 2018 WSA. This confirmation letter is included as Appendix S of this Draft EIR.

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 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 No. 5 and the Sustainable City pLAN/L.A.'s Green New Deal. The 2015 UWMP also addresses the current and future SWP supply shortages and concludes that MWD's actions in response to the threats to the SWP would ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP would further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future water shortages. Additionally, as described above, water conservation and recycling will play an increasing role in meeting future water demands in the City.

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<sup>71</sup> *LASAN wastewater generation rates do not account for water conservation features and therefore, the Project's estimated water demand is conservative. With implementation of Project Design Feature WAT-PDF-1, the Project would incorporate sustainability features such as efficient plumbing features, drought-tolerant landscaping, and modern irrigation, that would reduce the Project's net increase in water demand by at least 20 percent pursuant to the City's Green Building Code.*

**Table IV.K.1-4  
Estimated Project Water Demand**

<b>Land Use</b>	<b>No. of Units/ Floor Area</b>	<b>Water Demand Rate (gpd/unit)<sup>a,b</sup></b>	<b>Demand (gpd)</b>
<b>Existing<sup>b</sup></b>			
Grocery Store	78,328 sf		
Commercial Space	18,525 sf		
Restaurant—Fast Food	3,943 sf		
<i>Total Existing</i>			<i>13,827</i>
<b>Residential</b>			
Residential: Studio	251 du	75	18,825
Residential: 1-Bedroom	336 du	110	36,960
Residential: 2-Bedroom	148 du	150	22,200
Base Demand Adjustment			8,890
Required Ordinances Water Savings			(24,274)
<i>Total Residential</i>			<i>62,601</i>
<b>Residential Amenities</b>			
Fitness Center	15,700 sf	0.65	10,205
Leasing/Management Office	9,000 sf	0.12	1,080
Lounge	10,300 sf	0.05	515
Swimming Pool/Spa	2,995 sf		281
Outdoor Kitchen/Barbecue	1,500 sf	0.13	193
Bike Center	2,890 sf	0.65	1,879
Base Demand Adjustment			45
Required Ordinances Water Savings			(809)
<i>Total Residential Amenities</i>			<i>13,389</i>
<b>Commercial</b>			
			<b>s</b>
Retail	16,000 sf	0.025	400
Restaurant: Full Service	500 seat	30	15,000
Market	69,000 sf	0.05	3,450
Required Ordinances Water Savings			(3,663)
<i>Total Commercial</i>			<i>15,187</i>
Landscaping <sup>e</sup>	42,812 sf		4,019
Covered Parking <sup>f</sup>	707,697 sf	0.02	465
Cooling Tower	300 ton	12.96	3,888
Required Ordinances Water Savings			(2,423)
<b>Proposed Water Demand</b>			<b>97,126</b>
Less Existing to be Removed			(13,827)
Less Additional Conservation <sup>g</sup>			(2,538)
<b>Net Additional Water Demand (Proposed – Existing – Additional Conservation)<sup>h</sup></b>			<b>80,761</b>

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

Land Use	No. of Units/ Floor Area	Water Demand Rate (gpd/unit) <sup>a,b</sup>	Demand (gpd)
<p><i>du = dwelling units</i>  <i>gpd = gallons per day</i>  <i>sf = square feet</i>  <i>All totals have been rounded and may not sum due to rounding.</i></p> <p><i><sup>a</sup> This analysis is based on sewage generation rates provided by the City of Los Angeles, Bureau of Sanitation (2012).</i></p> <p><i><sup>b</sup> Existing water demand is based on LADWP billing data (average of 4 years from August 2013 to July 2017).</i></p> <p><i><sup>c</sup> The proposed development land uses will conform to Ordinance No. 184,248, 2013 California Plumbing Code, 2013 California Green Building Code, 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code.</i></p> <p><i><sup>d</sup> Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of LASAN Sewer Generation Rates.</i></p> <p><i><sup>e</sup> Landscaping water use is estimated per CCR Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance.</i></p> <p><i><sup>f</sup> Auto parking water uses are based on LASAN Generation Rates table and 12 times/year cleaning assumption.</i></p> <p><i><sup>g</sup> Water conservation due to additional conservation commitments agreed by the Applicant. Table II of the WSA provides a detailed breakdown of these conservation commitments and is included in Appendix R of this Draft EIR.</i></p> <p><i><sup>h</sup> The approved January 2018 WSA included two errors. The market uses were underestimated by 9,000 square feet and the cooling tower was not included in the total demand. When accounting for these errors, the updated project description reflected here results in 12 gpd more than the approved WSA. As noted above, LADWP confirmed the revised water demand projections would not result in a substantial increase to what was approved in the January 2018 WSA.</i></p> <p><i>Source: Eyestone Environmental 2020 based on Los Angeles Department of Water and Power, Water Supply Assessment—5420 Sunset Boulevard Project, December 12, 2017.</i></p>			

The 2015 UWMP utilized SCAG’s 2012–2035 RTP data that provide for reliable water demand forecasts, taking into account changes in population, housing units and employment. As discussed in Section IV.G, Population and Housing of this Draft EIR, the Project would generate a net of approximately 1,771 new residents and 735 new households. The Project would be consistent with growth projections anticipated by the SCAG and the demographic projection for the City in both the 2012–2035 RTP/SCS, the 2016–2040 RTP/SCS, and 2020–2045 RTP/SCS. Specifically, based on SCAG’s most recent projections for the City of Los Angeles Subregion between 2017 and 2026, the estimated 1,771 residents generated by the Project would represent approximately

0.72 percent of the City's projected population growth, and the estimated 735 households would represent approximately 0.63 percent of the City's projected household growth.<sup>72</sup> Using the 2020–2045 RTP/SCS, the Project's estimated 1,771 residents would represent 0.68 percent of the City's projected population growth, and the estimated 735 households would represent approximately 0.56 percent of the City's projected household growth.<sup>73</sup> Therefore, the Project would be well within SCAG's growth projections for the City of Los Angeles Subregion.

Based on the above, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Thus, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. **Therefore, the Project's operation-related impacts on water supply would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

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<sup>72</sup> Based on a linear interpolation of SCAG's 2012–2040 data. The 2017 values for population and housing are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2017.

Population growth between 2017 (3,981,911 persons) and 2026 (4,227,450 persons) is 245,539 persons. The Project's 1,771 new residents would represent approximately 0.72 percent of this growth  $((1,771 \div 245,539) \times 100 = 0.72)$ .

Household growth between 2017 (1,390,643 households) and 2026 (1,507,900 households) is approximately 117,257 households. The Project's 735 new households would represent approximately 0.63 percent of this growth  $((735 \div 117,257) \times 100 = 0.63)$ .

<sup>73</sup> Based on a linear interpolation of SCAG's 2016–2045 data. The 2017 values for population and housing are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2017.

Population growth between 2017 (3,962,679 persons) and 2026 (4,222,593 persons) is 259,914 persons. The Project's 1,771 new residents would represent approximately 0.68 percent of this growth  $((1,771 \div 259,914) \times 100 = 0.68)$ .

Household growth between 2017 (1,381,690 households) and 2026 (1,513,897 households) is approximately 132,207 households. The Project's 735 new households would represent approximately 0.56 percent of this growth  $((735 \div 132,207) \times 100 = 0.56)$ .

## **e. Cumulative Impacts**

The Project, in conjunction with growth forecasted in the City through 2026 (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 2026 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 100 related development projects are located in the vicinity of the Project Site.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 100 is a conservative assumption, as some of the related projects may not be built out by 2026 (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 100 are fully built out by 2026, unless otherwise noted. In addition, 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 anticipated to be completed in 2026, well before the Hollywood Community Plan Update's horizon year. Moreover, 2026 is a similar projected buildout year as many of the 100 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.

### **(1) 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 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. The Project would comply with LAMC Fire Code requirements, and ongoing evaluations would be conducted by the LADWP, City of Los Angeles Department of Public Works, and the Los Angeles Fire Department to ensure facilities are adequate. Furthermore, as noted above and stated in

the WSA, 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. To ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement its \$6.3 billion five-year water system capital improvement plan, which includes replacement of distribution mainlines, trunk lines, large valves, and water meters, as well as ongoing maintenance and rehabilitation of facilities such as pump stations, pressure regulators, and in-city reservoirs and tanks.<sup>74</sup>

**Therefore, cumulative impacts on the water infrastructure system would be less than significant.**

## (2) Water Supply

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City). 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. The 2015 UWMP prepared by LADWP accounts for existing development within the City, as well as projected growth through the year 2040 based on demographic growth projections in SCAG's 2012 RTP/SCS.<sup>75</sup> Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by California Water Code Section 10912) 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 100 related projects located in the Project vicinity. The estimated water demand of the related projects is shown in Table IV.K.1-5 on page IV.K.1-37. As shown therein, the related projects would generate a total average water demand of approximately 4,187,157 gpd. 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. The Project in conjunction with the related projects would yield a cumulative average water demand of

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<sup>74</sup> LADWP, 2017-18 Water Infrastructure Plan, revised June 2018.

<sup>75</sup> As discussed above, although the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS are now available, the 2012–2035 RTP/SCS was in effect at the time the LADWP's 2015 UWMP was prepared.

**Table IV.K.1-5  
Cumulative Water Demand**

<b>No.</b>	<b>Project<sup>a</sup></b>	<b>Description<sup>b</sup></b>	<b>Size</b>	<b>Generation Factor</b>	<b>Total Daily Demand</b>
1.	Paseo Plaza Mixed-Use 5651 W. Santa Monica Blvd.	Condominiums	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.	Live/Work (JLWQ)	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
		General Retail	10,000 sf	0.025 gpd/sf	250
7.	Mixed-Use 5245 W. Santa Monica Blvd.	Apartments	49 du	190 gpd/du	9,310
		Retail	32,272 sf	0.025 gpd/sf	807
8.	Selma Hotel 6417 W. Selma Ave.	Hotel	180 rm	120 gpd/rm	21,600
		Restaurant	12,840 sf	30 gpd/seat	12,840
9.	Hollywood Production Center 1149 N. Gower St.	Apartments	57 du	190 gpd/du	10,830
10.	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
11.	Pantages Theater Office 6225 W. Hollywood Blvd.	Office	210,000 sf	0.12 gpd/sf	25,200
12.	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
13.	Argyle Hotel Project 1800 N. Argyle Ave.	Hotel	225 rm	120 gpd/rm	27,000
14.	Seward Street Office Project 956 N. Seward St.	Office	126,980 sf	0.12 gpd/sf	15,238
15.	Hotel & Restaurant Project 6381 W. Hollywood Blvd.	Hotel	80 rm	120 gpd/rm	9,600
		Restaurant	15,290 sf	30 gpd/seat	15,290
16.	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	0.05 gpd/sf	1,904
17.	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
18.	Hollywood Center Studios Office 6601 W. Romaine St.	Office	106,125 sf	0.12 gpd/sf	12,735
19.	Selma Community Housing 1603 N. Cherokee Ave.	Apartments	66 du	190 gpd/du	12,540
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

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

No.	Project <sup>a</sup>	Description <sup>b</sup>	Size	Generation Factor	Total Daily Demand
21.	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
22.	Residential 712 N. Wilcox Ave.	Apartments	103 du	190 gpd/du	19,570
23.	Mixed-Use 1600–1610 N. Highland Ave.	Apartments	248 du	190 gpd/du	47,120
		Retail	12,785 sf	0.025 gpd/sf	320
24.	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
25.	Paramount Pictures 5555 W. Melrose Ave.	Retail	15,000 sf	0.025 gpd/sf	375
		Restaurant	34,000 sf	30 gpd/seat	34,000
		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 <sup>c</sup>	21,000 sf	0.05 gpd/sf	1,050
		Support Uses <sup>c</sup>	1,900 sf	0.05 gpd/sf	95
26.	Apartments 1411 N. Highland Ave.	Apartments	76 du	190 gpd/du	14,440
		Commercial	2,500 sf	0.05 gpd/sf	125
27.	Apartment Project 1824 N. Highland Ave.	Apartments	118 du	190 gpd/du	22,420
28.	Hotel 1133 N. Vine St.	Hotel	112 rm	120 gpd/rm	13,440
		Café	661 sf	30 gpd/seat	661
29.	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
30.	Columbia Square Mixed-Use 6121 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Office	422,610 sf	0.12 gpd/sf	50,713
		Retail/Restaurant	41,300 sf	30 gpd/seat	41,300
		Hotel	125 rm	120 gpd/rm	15,000
31.	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
32.	Hotel–Restaurant 1629 N. Griffith Park Blvd.	Hotel	25 rm	120 gpd/rm	3,000
		Restaurant	3,374 sf	30 gpd/seat	3,374
		Bar/Lounge	633 sf	0.72 gpd/sf	456
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.	Sunset & Vine Mixed-Use 1538 N. Vine St.	Apartments	306 du	190 gpd/du	58,140
		Retail	68,000 sf	0.025 gpd/sf	1,700
35.	Condominiums & Retail 5663 Melrose Ave.	Condominiums	96 du	190 gpd/du	18,240
		Retail	3,350 sf	0.025 gpd/sf	84
36.	6250 Sunset (Nickelodeon) 6250 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Retail	4,700 sf	0.025 gpd/sf	118

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

No.	Project <sup>a</sup>	Description <sup>b</sup>	Size	Generation Factor	Total Daily Demand
37.	Hollywood Central Park Hollywood Freeway (US-101)	Park <sup>d</sup>	625,086 sf	0.094 gpd/sf	58,676
		Amphitheater	500 seats	3 gpd/seat	1,500
		Inn	5 rm	120 gpd/rm	600
		Community Center <sup>e</sup>	30,000 sf	0.35 gpd/sf	10,500
		Banquet Space	15,000 sf	0.35 gpd/sf	5,250
		Commercial	29,000 sf	0.05 gpd/sf	1,450
		Low Income Apartment	15 du	190 gpd/du	2,850
38.	Mixed-Use 5901 Sunset Blvd.	Office	274,000 sf	0.12 gpd/sf	32,880
		Supermarket	26,000 sf	0.025 gpd/sf	650
39.	John Anson Ford Theatre 2580 Cahuenga Blvd. E.	Theater	311 seats	3 gpd/seat	933
		Restaurant	5,400 sf	30 gpd/seat	5,400
		Office (30 emp) <sup>f</sup>	7,500 sf	0.12 gpd/sf	900
40.	1717 Bronson Avenue 1717 N. Bronson Ave.	Apartments	89 du	190 gpd/du	16,910
41.	Sunset + Wilcox 1541 N. Wilcox Ave.	Hotel	200 rm	120 gpd/rm	24,000
		Restaurant	9,000 sf	30 gpd/seat	9,000
42.	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
43.	Palladium Residences 6201 W. Sunset Blvd.	Apartments	731 du	190 gpd/du	138,890
		Retail/Restaurant	24,000 sf	30 gpd/seat	24,000
44.	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
45.	5750 Hollywood 5750 Hollywood Blvd.	Apartments	161 du	190 gpd/du	30,590
		Commercial	4,747 sf	0.05 gpd/sf	237
46.	2014 Residential 707 N. Cole Ave.	Apartments	84 du	190 gpd/du	15,960
47.	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
48.	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
49.	Hotel 1921 Wilcox Ave.	Hotel	122 rm	120 gpd/rm	14,640
		Restaurant	4,225 sf	30 gpd/seat	4,225
50.	Mixed-Use 901 N. Vine St.	Apartments	70 du	190 gpd/du	13,300
		Commercial	3,000 sf	0.05 gpd/sf	150
51.	Apartments 525 N. Wilton Pl.	Apartments	88 du	190 gpd/du	16,720
52.	Hardware Store 4905 W. Hollywood Blvd.	Retail	36,600 sf	0.025 gpd/sf	915

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

No.	Project <sup>a</sup>	Description <sup>b</sup>	Size	Generation Factor	Total Daily Demand
53.	Mixed-Use 1233 N. Highland Ave.	Apartments	72 du	190 gpd/du	13,680
		Commercial	12,160 sf	0.05 gpd/sf	608
54.	Mixed-Use 1310 N. Cole Ave.	Apartments	369 du	190 gpd/du	70,110
		Office	2,570 sf	0.12 gpd/sf	308
55.	Restaurants 135 N. Western Ave.	Restaurant	4,066 sf	30 gpd/seat	4,066
56.	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	0.72 gpd/sf	2,178
57.	Hotel & Retail 4110 W. 3rd St.	Hotel	171 rm	120 gpd/rm	20,520
		Retail	2,800 sf	0.025 gpd/sf	70
58.	TAO Restaurant 6421 W. Selma Ave.	Quality Restaurant	17,607 sf	30 gpd/seat	17,607
59.	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
60.	Wilcox Hotel 1717 N. Wilcox Ave.	Hotel	133 rm	120 gpd/rm	15,960
		Retail	3,580 sf	0.025 gpd/sf	90
61.	Apartments 5460 W. Fountain Ave.	Apartments	75 du	190 gpd/du	14,250
62.	Mixed-Use 6220 W. Yucca St.	Hotel	210 rm	120 gpd/rm	25,200
		Apartments	136 du	190 gpd/du	25,840
		Restaurant	6,980 sf	30 gpd/seat	6,980
63.	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
64.	Hollywood De Longpre Apartments 5632 De Longpre Ave.	Apartments	185 du	190 gpd/du	35,150
65.	Ivar Gardens Hotel 6409 W. Sunset Blvd.	Hotel	275 rm	120 gpd/rm	33,000
		Retail	1,900 sf	0.025 gpd/sf	48
66.	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
67.	Mixed-Use 1657 N. Western Ave.	Apartments	91 du	190 gpd/du	17,290
		Retail	15,300 sf	0.025 gpd/sf	383
68.	McCadden Campus (LGBT) 1118 N. McCadden Pl.	Housing	45 du	190 gpd/du	8,550
		Social Service Support Facility <sup>g</sup>	50,325 sf	0.12 gpd/sf	6,039
		Office	17,040 sf	0.12 gpd/sf	2,045
		Commercial Retail/Restaurant	1,885 sf	30 gpd/seat	1,885
		Temporary Housing	100 bed	70 gpd/bed	7,000

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

No.	Project <sup>a</sup>	Description <sup>b</sup>	Size	Generation Factor	Total Daily Demand
69.	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
70.	citizenM Hotel 1718 Vine St.	Hotel	216 rm	120 gpd/rm	25,920
		Restaurant	4,354 sf	30 gpd/seat	4,354
71.	Apartments 1749 Las Palmas Ave.	Apartments	70 du	190 gpd/du	13,300
		Retail	3,117 sf	0.025 gpd/sf	78
72.	Mixed-Use 1868 N. Western Ave.	Apartments	96 du	190 gpd/du	18,240
		Retail	5,546 sf	0.025 gpd/sf	139
73.	6400 Sunset Mixed-Use 6400 Sunset Blvd.	Apartments	232 du	190 gpd/du	44,080
		Restaurant	7,000 sf	30 gpd/seat	7,000
74.	AMCAL—Meridian Apartments 241 N. Vermont Ave.	Apartments	100 du	190 gpd/du	19,000
		Retail	4,134 sf	0.025 gpd/sf	103
75.	4121 Santa Monica Shopping Center 4121 W. Santa Monica Blvd.	Shopping Center	14,322 sf	0.025 gpd/sf	358
76.	6200 West 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
77.	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
78.	6630 West Sunset Boulevard 6630 W. Sunset Blvd.	Apartments	40 du	190 gpd/du	7,600
79.	Sunset-Junction 4000–4301 Sunset Blvd.	Apartments	297 du	190 gpd/du	56,430
		Commercial	25,877 sf	0.05 gpd/sf	1,294
80.	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
81.	Mixed-Use 4914 W. Melrose Ave.	Live/Work	45 du	190 gpd/du	8,550
		Retail	3,760 sf	0.025 gpd/sf	94
82.	Hospital Seismic Retrofit 1300 N. Vermont Ave.	Office	30,933 sf	0.12 gpd/sf	3,712
83.	Postpartum Extended Care & Retail 257 S. Mariposa Ave.	Apartments	112 du	190 gpd/du	21,280
		Commercial	4,630 sf	0.05 gpd/sf	232
84.	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
85.	1600 Schrader 1600 Schrader Blvd.	Hotel	168 rm	120 gpd/rm	20,160
		Restaurant	5,979 sf	30 gpd/seat	5,979

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

No.	Project <sup>a</sup>	Description <sup>b</sup>	Size	Generation Factor	Total Daily Demand
86.	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
87.	Melrose & Beachwood 5570 W. Melrose Ave.	Apartments	52 du	190 gpd/du	9,880
		Commercial	5,500 sf	0.05 gpd/sf	275
88.	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
89.	Montecito Senior Housing 6650 W. Franklin Ave.	Senior Apartments	68 du	190 gpd/du	12,920
90.	Godfrey Hotel 1400 N. Cahuenga Blvd.	Hotel	221 rm	120 gpd/rm	26,520
		Restaurant	3,000 sf	30 gpd/seat	3,000
91.	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
92.	Selma–Wilcox Hotel 6421 W. Selma Ave.	Hotel	114 rm	120 gpd/rm	13,680
		Restaurant	1,993 sf	30 gpd/seat	1,993
93.	Apartments 1601 N. Las Palmas Ave.	Apartments	86 du	190 gpd/du	16,340
94.	Mixed-Use 600 N. Vermont Ave.	Apartments	80 du	190 gpd/du	15,200
		Retail	14,780 sf	0.025 gpd/sf	370
95.	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
96.	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
97.	1719 Whitley Hotel 1719 N. Whitley Ave.	Hotel	156 rm	120 gpd/rm	18,720
98.	Kaiser Hospital Redevelopment 1317–1345 N. Vermont/1328 N. New Hampshire/4760 Sunset/1505 N. Edgemont/1526 N. Edgemont/ 1517 N. Vermont/1424–1430 N. Alexandria	Hospital Expansion	211,992 sf	0.225 gpd/sf	47,698
99.	1276 North Western Avenue 1276 N. Western Ave.	Apartments	75 du	190 gpd/du	14,250
100.	NBC Universal Evolution Plan 100 Universal City Plaza	Studio	307,949 sf	0.05 gpd/sf	15,397
		Studio Office	647,320 sf	0.12 gpd/sf	77,678
		Office	495,406 sf	0.12 gpd/sf	59,449
		Entertainment Area <sup>h</sup>	337,895 sf	0.05 gpd/sf	16,895
		Entertainment Retail	39,216 sf	0.05 gpd/sf	1,961
		Hotel (900,000 sf)	1,385 du	120 gpd/rm	166,200

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

No.	Project <sup>a</sup>	Description <sup>b</sup>	Size	Generation Factor	Total Daily Demand
<b>Related Total</b>					<b>4,187,157</b>
<b>Project</b>					<b>80,761</b>
<b>Related + Project</b>					<b>4,267,918</b>
<p><i>du = dwelling units</i>  <i>emp = employees</i>  <i>sf = square feet</i>  <i>rm = rooms</i>  <i>stu = students</i></p> <p><sup>a</sup> This analysis is based on sewage generation rates provided by LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.</p> <p><sup>b</sup> Number of seats for restaurant uses based on LADWP standard of 1 seat per 30 square feet. In addition, this analysis conservatively assumes all dwelling units are 3-bedroom units.</p> <p><sup>c</sup> Sewage generation rates provided by LASAN do not include rates for stage or support area uses. Therefore, due to the nature of this related project, the most comparable land use rate of 50 gpd per 1,000 square feet for "Studio: Film/TV/Recording" is applied.</p> <p><sup>d</sup> Sewage generation rates provided by LASAN do not include rates for parks uses per acre. Therefore, the wastewater generation rate for park uses is assumed to be equivalent to that of landscaping needs. The wastewater generation rate for landscaping is based on calculations from Los Angeles Department of Water and Power, Water Supply Assessment—5420 Sunset Project, December 12, 2017.</p> <p><sup>e</sup> Sewage generation rates provided by LASAN do not include rates for community center uses per square foot. Therefore, the most comparable land use rate of 350 gpd per 1,000 square feet for "Banquet Room" is applied.</p> <p><sup>f</sup> Sewage generation rates provided by LASAN do not include rates per employee. Therefore, the rate of 4 employees per 1,000 square feet is applied, based on Section IV.N.(1) Water Consumption of the Draft EIR for Village at Playa Vista Draft EIR, August 2003.</p> <p><sup>g</sup> Sewage generation rates provided by LASAN do not include rates for social service support uses. Therefore, the most comparable land use rate of 120 gpd per 1,000 square feet for "Office Building" is applied.</p> <p><sup>h</sup> Sewage generation rates provided by LASAN do not include rates for entertainment area uses. Therefore, the most comparable land use rate of 50 gpd per 1,000 square feet for "Commercial Use" is applied.</p> <p>Source: Eyestone Environmental, 2021.</p>					

approximately 4,267,918 gpd (4,784 af/yr), or one percent of LADWP's water supply in 2019 and 0.75 percent of LADWP's projected water demand in 2025.

As previously stated, 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., 2026, the Project buildout year) based on the growth projections in SCAG's 2012–2035 RTP/SCS. In addition, the water supply assessment 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 water supply assessment that demonstrates how the project's water demand will be met.

Overall, as discussed above, the LADWP's 2015 UWMP demonstrates that the City 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 goals of Executive Directive 5 and the City's Sustainable City 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.<sup>76</sup> 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 the Sustainable City pLAN), it is anticipated that LADWP would be able to meet the net water demands of the Project plus related projects (4,267,918 gpd or approximately 4,784 AFY) and future growth through 2026 and beyond. The 2015 UWMP forecasts adequate water supplies to meet all projected water demand increases in the City through the year 2040. Therefore, no cumulative significant impacts with respect to water supply are anticipated from the development of the Project and the related projects. **Therefore, cumulative impacts on water supply would be less than significant.**

### (3) Mitigation Measures

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

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<sup>76</sup> Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, April 2016.

#### (4) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.