IV. Environmental Impact Analysis

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

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts with respect to water treatment, facilities, and water supplies serving the Project Site. This section includes a description of the regional water supplies and existing water infrastructure serving the Project Site, estimates the water demand associated with the Project, and assesses whether there is sufficient water supply and infrastructure capacity to meet that demand. The analysis is based on the *1624 Wilcox Avenue Project Utilities Technical Report* (Utility Report), dated May 30, 2018, which was prepared by PSOMAS and is included in Appendix F of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

(a) 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.[1]

[1] *State Water Resources Control Board, Presentation, Water Conservation Report, May 2, 2017.*

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

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

(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 water supply assessment (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. The WSA shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. In addition, it must address water supplies over a 20-year future period and consider average, single-dry, and multiple-dry years. In accordance with California Water Code Section 10912, projects subject to CEQA requiring preparation 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, upon build-out, the Project would include approximately 278,892 square feet of floor area consisting of 260 multi-family residential units, 11,020 square feet of retail uses, 3,580 square feet of office uses, and 3,200 square feet of restaurant uses.[2] Since the Project would not include the development of any of the land use categories listed above or generate an average demand for domestic water that would be greater than the demand generated by 500 residential units, the Project is not subject to the requirements of SB 610 and a WSA is not required for the Project.

(d) Senate Bill 606 and Assembly Bill 1668

On May 31, 2018, Governor Edmund G. "Jerry" Brown Jr. (Governor Brown) signed SB 606 and Assembly Bill (AB) 1668 into law.[3] The pair of bills sets permanent overall targets for indoor and outdoor water consumption. The bills set an initial limit for indoor water use of 55 gallons per person per day in 2022, dropping to 50 gallons per person per day by 2030. The Department of Water Resources (DWR) and the State Water Resources Control Board (SWRCB) will recommend standards for outdoor use by October 2021.

(e) 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.

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[2] *All square footage numbers represent floor area as defined by LAMC Section 12.03.*

[3] *Office of Edmund G. Brown, Jr., "Governor Brown Signs Legislation Establishing Statewide Water Efficiency Goals," May 31, 2018, www.ca.gov/archive/gov39/2018/05/31/governor-brown-signs-legislation-establishing-statewide-water-efficiency-goals/index.html, accessed January 17, 2020.*

(f) Sustainable Groundwater Management Act of 2014[4]

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.

(g) 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

[4] *California Department of Water Resources, Sustainable Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed January 17, 2020.*

water more wisely, eliminating water waste, strengthening local drought resilience, and improving agricultural water use efficiency and drought planning.[5]

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.[6] 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.[7] The regulatory requirements resulting from the existing Executive Orders have been codified in Article 22.5, Drought Emergency Water Conservation, of the CCR.

(h) California Water Plan[8]

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 Water Plan also evaluates different combinations of regional and statewide resource management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. The evaluations and assessments performed for the plan help identify effective actions and policies for meeting California's resource management objectives in the near term and for several decades to come. California Water Plan Update 2018 represents the latest update to the Water Plan.

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[5] *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.*

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

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

[8] *California Department of Water Resources, California Water Plan, https://water.ca.gov/Programs/California-Water-Plan, accessed January 17, 2020.*

(i) Governor's California Water Action Plan

While the California Water Plan is required by the Water Code, the California Water Action Plan (Action Plan) is instead released by Governor Brown's administration. The first Action Plan was published in January 2014 to provide a roadmap for the state's path toward sustainable water management.[9] The Action Plan discusses the challenges for managing the state's water resources supply, scarcity, and quality, and also considers the effects of ecosystems, flooding, population growth, and climate change and floods.[10] 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.

(j) Jobs and Economic Improvement through Environmental Leadership Act

In September 2011, the Governor Brown signed AB 900, the Jobs and Economic Improvement through Environmental Leadership Act, to provide streamlining benefits to "environmental leadership development projects (leadership projects)" under CEQA. To be certified as a leadership project, a project must qualify for LEED Gold® certification or better. Water efficiency measures are worth up to 11 points on the LEED checklist (LEED Gold® is 60-79 points). As discussed in Section II, Project Description, of this Draft EIR, the Project Applicant has been certified as a leadership project under AB 900.

(2) Regional

As discussed in detail below, the Metropolitan Water District of Southern California (MWD) is a primary source of water supply within Southern California. Based on the water supply planning requirements imposed on its member agencies and 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

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[9] *California Department of Natural Resources, California Water Action Plan, http://resources.ca.gov/california_water_action_plan/, accessed January 17, 2020.*

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

developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies.

(a) MWD's Integrated Water Resources Plan

MWD first adopted its Integrated Water Resources Plan (IRP) in 1996. The IRP is updated every five years. The goal of the IRP is for Southern California to have a reliable water system that extends to the future. The 2015 IRP Update, adopted in January 2016, provides MWD's strategy for water resource reliability through the year 2040. The 2015 IRP Update calls for stabilizing and maintaining imported water supplies; meeting future growth through increased water conservation and sustaining and developing new local supplies; pursuing a comprehensive transfers and exchanges strategy; building storage in wet and normal years to manage risks and drought; and preparing for uncertainty with Future Supply Actions. Overall, the strategies presented in the 2015 IRP Update include investments to maintain the reliability of imported water supplies, expansion of local water supplies, and reduction in water demand through a variety of conservation and water use efficiency initiatives.[11]

(b) MWD's 2015 Urban Water Management Plan

MWD's 2015 Urban Water Management Plan (2015 MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2040.[12] Based on the 2015 MWD 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 including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to

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[11] *Metropolitan Water District of Southern California, Integrated Water Resources Plan Draft 2015 Update, January 12, 2016.*

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

meet its water supply needs. As set forth in its 2015 MWD UWMP, MWD will also continue investments in water use efficiency measures to help the region achieve a 20 percent per person potable water use reduction by 2020.

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

In 1999, MWD incorporated the water shortage contingency analysis that is required as part of any urban water management plan into a separate, more detailed plan, called the Water Surplus and Drought Management Plan. The overall objective of the Water Surplus and Drought Management Plan is to ensure that shortage allocation of MWD's imported water supplies is not required.[13] 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.

(d) MWD's Water Supply Allocation Plan

While the Water Surplus and Drought Management Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, MWD adopted a water supply plan called the Water Supply Allocation Plan in February 2008, which has since been implemented three times, most recently in April 2015. 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

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

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's 2015 Urban Water Management Plan

In June 2016, LADWP adopted its 2015 Urban Water Management Plan (2015 UWMP). LADWP's 2015 UWMP serves two purposes: (i) achieve full compliance with the requirements of California's Urban Water 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.[14]

A number of important changes occurred after LADWP adopted its 2010 UWMP. The year 2012 marked the start of a multi-year drought in California, in response to which Governor Brown proclaimed a drought state of emergency in January 2014. In addition, as discussed above, in 2014, the SWRCB implemented its Drought Emergency Water Conservation Regulation, which mandates 25-percent reductions in water use statewide. In October 2014, Mayor Eric Garcetti issued Executive Directive No. 5 (ED 5), which set 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. LADWP's 2015 UWMP incorporates the objectives of these recent initiatives. Overall LADWP's 2015 UWMP projects a water demand trend than that is seven percent lower than what was projected in LADWP's previous 2010 UWMP.[15] On February 2, 2017, Mayor Garcetti announced that the City's 20 percent water reduction target had been met.[16]

(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

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[14] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[15] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[16] *City of Los Angeles, Mayor Eric Garcetti, Press Release, Los Angeles Achieves Mayor Garcetti's Goal of 20 Percent Water Savings, released February 2, 2017, www.lamayor.org/los-angeles-achieves-mayor-garcetti%E2%80%99s-goal-20-percent-water-savings, accessed January 17, 2020.*

Los Angeles. Among its different focuses, the pLAn included 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 pLAn built on ED 5's goals and incorporates water savings goals of reduction in per capita potable water by 20 percent by 2017, by 22.5 percent by 2025, and by 25 percent by 2035, using a 2014 baseline of 131 gallons per capita per day. The pLAn also included targets to continue the remediation of the San Fernando Groundwater Basin aquifer, to reduce LADWP purchases of imported water by 50 percent by 2025, and to source 50 percent of water locally by 2035. As the pLAn presented specific strategies and desired outcomes for conservation, recycled water, and stormwater capture, proposed investments will also contribute to the progress and implementation of state-of-the art technology, rebates and incentives promoting water-efficient appliances, tiered water pricing, a technical assistance program for business and industry, and large landscaped irrigation and water-efficiency programs.[17] In March 2017, the Sustainable City pLAn's Second Annual Report for 2016–2017 was released. It reported that the City had reduced per capita water use by 20 percent to achieve both the City's and the pLAn's water use reduction goal.[18]

The pLAn's Third Annual Report was released in April 2018, noting that on January 17, 2018, Mayor Garcetti broke ground on the North Hollywood West Wellhead Remediation Project (NHWWRP), a project to clean up and restore the use of groundwater for safe, high-quality drinking water in the San Fernando Valley and in the City at large. LADWP was awarded a 44.5 million dollar Proposition 1 grant from the SWRCB in January 2018 to help fund the NHWWRP, which is slated to be complete by 2020. The NHWWRP, in combination with three other planned remediation projects in the San Fernando Valley, advances two key pLAn goals – reducing the purchase of imported water by 50 percent by 2025 and producing 50 percent of City's water locally by 2035. By facilitating the use of additional groundwater from the San Fernando Basin, this project also furthers the goals of increasing recycled water use and stormwater capture. [19]

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 targets such as sourcing 70 percent of all water locally and recycling 100 percent of wastewater by 2035.[20]

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[17] *Mayor's Office of Sustainability, Sustainable City pLAn, April 2015.*

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

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

[20] *L.A.'s Green New Deal, Sustainability Plan 2019.*

(c) Resilient Los Angeles

In March 2018, the City released its Resilient Los Angeles Plan, which includes strategies to fortify the City's infrastructure, protect its economy, and make Los Angeles safer.[21] Goal 11, *Restore, Rebuild, and Modernize Los Angeles' Infrastructure*, includes measures related to water supply. Specific goals include, but are not limited to, expanding the City's seismic resilient pipe network, replacing aging infrastructure, and expanding and protecting water sources to reduce dependence on imported water and strengthen the City's local water supply.

(d) 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.

- 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 (Green Building Code)—amended LAMC Chapter IX, Article 9 to require newly constructed low-rise 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.

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

- Ordinance No. 184,248—amended LAMC Chapter IX, Articles 4 and 9 to establish citywide water efficiency standards and require water-saving systems and technologies in buildings and landscapes.

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

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

- Ordinance Nos. 166,080, 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.

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). Fire Code Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gpm in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 psi is to remain in the water system with the required gpm flowing. Per LAMC Section 57.507.3.1, Industrial and Commercial land uses such as those of the Project have a required fire flow of 6,000 to 9,000 gpm from four 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 a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

(e) 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.[22]

b. Existing Conditions

(1) Water Supply

LADWP is responsible for providing water within the City of Los Angeles limits and ensuring that the water quality meets applicable California health standards for drinking water. As the Project Site is located within the City, LADWP is the water provider for the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, purchased water from MWD, and recycled water.[23] As shown in Table IV.K.1-1 on page IV.K.1-14, in 2018, the most recent year for which data are available, LADWP had an available water supply of 511,517 acre-feet. LADWP 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 (LAA). The LAA's supplies come primarily from snowmelt and secondarily from groundwater pumping, and can fluctuate yearly due to the varying hydrological conditions. The City holds water rights in the Eastern Sierra Nevada where the LAA's water supplies originate. These supplies originate from both streams and from groundwater. As indicated in Table IV.K.1-1, approximately 245,941 acre-feet of LADWP's water supplies were from the Los Angeles Aqueduct in 2018.

According to LADWP, average deliveries from the Los Angeles Aqueducts system from Fiscal Year (FY) 2011/12 through 2015/16 were approximately 111,293 acre-feet of water annually. During this period, the record low snowpack for Los Angeles Aqueducts watershed in the Eastern Sierra Nevada Mountains was recorded on April 1, 2015. Supply conditions have changed drastically since 2015. Snowpack in the Eastern Sierra Nevada Mountains was recorded at 203 percent of an average year on April 1, 2017. As such, Mayor Garcetti had proclaimed a state of local emergency for the Los Angeles Aqueducts in 2017 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

[22] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[23] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

Table IV.K.1-1
LADWP 2007–2018 Water Supply

Calendar Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage	Total
2007	127,392	88,041	439,353	3,595	**57**	**658,438**
2008	148,407	64,604	427,422	7,048	**(1,664)**	**645,817**
2009	137,261	66,998	351,959	7,570	**(554)**	**563,234**
2010	251,126	68,346	205,240	6,900	**938**	**532,550**
2011	357,752	49,915	119,481	7,708	**153**	**535,009**
2012	166,858	59,109	326,122	5,965	**(1,182)**	**556,872**
2013	64,690	66,272	438,534	9,253	**2,404**	**581,153**
2014	63,960	96,394	391,307	11,307	**(2,020)**	**560,948**
2015	33,244	80,155	378,539	9,829	**(430)**	**501,337**
2016	95,573	72,503	314,336	9,095	**981**	**492,487**
2017	380,329	14,695	113,033	8,509	**(5,730)**	**510,835**
2018[a]	245,941	43,100	214,940	8,795	**(1,259)**	**511,517**

Units are in acre-feet.

[a] *2018 water supply data are estimated.*

Source: LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019, Table III.

of conveyance flows. More recently, snowpack in the Eastern Sierra Nevada Mountains was recorded at 171 percent of an average year in April 2019.[24]

Various lawsuits and injunctions, and resulting agreements, also affect water supplies from the Los Angeles Aqueducts. These include an agreement with the County of Inyo regarding groundwater levels and enhancement and mitigation projects in the Owens Valley, and the imposition of new regulatory requirements by the 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 control 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

[24] *LADWP, Eastern Sierra Snowpack Measured at Well Above Average for 2019, April 12, 2019.*

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.

Based on historical hydrological conditions from FY 1961/1962 to 2010/2011, LADWP projects that the average annual long-term delivery from the Los Angeles Aqueducts between 2015 and 2040 is expected to be approximately 278,000 AFY and gradually decline to 267,000 AFY due to projected climate change impacts.[25] However, with completion of the Owens Lake Master Project by 2024, the projected Los Angeles Aqueducts delivery may increase to 286,000 AFY due to water conserved at Owens Lake, which would offset most of the anticipated long-term losses.[26]

(b) Groundwater

LADWP pumps groundwater from three adjudicated basins, including the San Fernando, Sylmar, and Central Basins. LADWP has accumulated 523,529 acre-feet of stored water credits in the San Fernando Basin as of October 1, 2016.[27] This water can be withdrawn from the basin during normal and dry years or in an emergency, in addition to LADWP's approximately 87,000 AFY entitlement in the basin. The City's current annual entitlements also include 3,570 AFY from the Sylmar Basin and 17,236 AFY from the Central Basin.

As shown in Table IV.K.1-2 on page IV.K.1-16, during the FY 2017/18 (July through June), LADWP extracted 22,259 acre-feet from the San Fernando Basin and 0.77 acre-feet from the Central Basin.[28] LADWP plans to continue production from its groundwater basins in the coming years to offset reductions in imported water supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection. Both LADWP and 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.[29] These efforts include operation of groundwater remediation systems, use of an extensive network of groundwater monitoring wells, routine reporting on groundwater elevation and water

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[25] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[26] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[27] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[28] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019, Table IV.*

[29] *LADWP, 2015 Urban Water Management Plan, June 2016, p. 6-3.*

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

Fiscal Year (July–June)	San Fernando Basin (acre-feet)	Sylmar Basin (acre-feet)	Central Basin (acre-feet)
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
2019–2020[a]	90,000	4,170	18,500
2024–2025[a]	88,000	4,170	18,500
2029–2030[a]	84,000	4,170	18,500
2034–2035[a]	92,000	4,170	18,500
2039–2040[a]	92,000	3,570	18,500

[a] *Projected production from LADWP 2015 UWMP, Exhibit 6I.*

Source: LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019, Table IV.

quality, management and mitigation of urban runoff water quality, and development of enhanced stormwater recharge and groundwater replenishment.

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for domestic and municipal uses in Southern California. MWD imports a portion of its water supplies from Northern California through the 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, 2017, LADWP has a preferential right to purchase 18.51 percent of MWD's total water supply.[30]

The Sustainable City pLAn, discussed above, calls for a reduction in purchased imported water by 50 percent by 2025 from the FY 2013/14 level, which was approximately 441,870 acre-feet.[31] L.A.'s Green New Deal also reaffirms this initiative.[32] To meet these targets, LADWP plans to increase conservation, enhance the ability for groundwater

[30] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[31] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

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

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.[33]

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 FY 2010/11 through 2014/15 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.[34] As indicated in Table IV.K.1-1 on page IV.K.1-14, LADWP received approximately 214,940 acre-feet of water from MWD in 2018, which was a reduction from the previous year. 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.[35] 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.[36] 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.

Challenges to Colorado River Supply

As the Colorado River water supplies come from watersheds of the Upper Colorado River Basin, snowpack and runoff can impact storage levels at Lake Powell and Lake Mead, which then affect the likelihood of surplus or shortage conditions in the future.

[33] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[34] *LADWP, 2015 Urban Water Management Plan, June 2016.*

[35] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[36] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

Although the MWD has two principal sources of water supply and is able to utilize supplies from the Colorado River to offset reductions in State Water Project supplies and buffer impacts from drought in California, the MWD also has been developing plans and making efforts to provide additional water supply reliability for the Southern California region.[37]

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.[38] The Colorado River Basin also has experienced a prolonged drought, with runoff in 2012 being among the four driest in history.[39] During these drought conditions, Colorado River system storage decreased to 50 percent of capacity.[40] In response, the federal government, states and urban and agricultural water districts that depend on the Colorado River worked together toward a solution. Their efforts resulted in the adoption and enactment of the Drought Contingency Plan in 2019. The Drought Contingency Plan is a collection of agreements within and among the seven western states in the Colorado River Basin to boost reservoir storage levels in Lake Mead and Lake Powell and prevent the reservoirs from reaching critically low levels.[41]

Federal and state environmental laws protecting fish species and other wildlife species also have the potential to affect Colorado River operations. A number of species that are either endangered or threatened are present in the Lower Colorado River. To address this issue, a state/federal/tribal/private regional partnership comprised of water, hydroelectric power, and wildlife management agencies in Arizona, California, and Nevada developed the Lower Colorado River Multi-Species Conservation Program. The program allows MWD to obtain federal and state permits for any incidental take of protected species resulting from current and future water and power operations of its Colorado River facilities and to minimize any uncertainty from additional listings of endangered species. The Lower Colorado River Multi-Species Conservation Program also covers operations of federal dams and power plants on the river that deliver water and hydroelectric power for use by MWD and other agencies.[42]

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[37] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[38] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[39] *MWD, 2015 Urban Water Management Plan, June 2016.*

[40] *MWD, 2015 Urban Water Management Plan, June 2016.*

[41] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[42] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019, Appendix F.*

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.[43] Specifically, under a 1988 water conservation agreement 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.[44] 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 the 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 is one of the 29 agencies that have long-term contracts for water service from DWR, and is the largest agency in terms of the number of people it serves (approximately

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[43] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019, Appendix F.*

[44] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019, Appendix F.*

19 million), the share of the SWP that it has contracted to receive (approximately 46 percent), and the percentage of total annual payments made to DWR by agencies with State water contracts (approximately 49 percent for 2018).[45]

The SWP, under the original contracted amount at 100 percent allocation, will provide MWD with 1,911,500 acre-feet of water each calendar year through December 31, 2035.[46] However, due to water quality and supply reliability challenges and conflicts associated with variable hydrology and environmental standards that limit pumping operations, SWP deliveries have varied in the most critically dry years. Contractual amounts were 5 percent in 2014 and 20 percent in 2015.[47] 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.[48] Allocation levels were also 60 percent in January 2017 and increased to 85 percent in April 2017.[49] In 2018, however, DWR allocation levels were reduced to 20 percent in January and 35 percent in May.[50]

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.[51] DWR approval of allocation levels are based on precipitation, runoff, and water conditions. Other considerations include the existing storage in SWP conservation reservoirs, State Water Project 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.[52]

Challenges to State Water Project Supply

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 (ESA/CESA) has

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45 *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019, Appendix F.*

46 *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019, Appendix F.*

47 *MWD, 2015 Urban Water Management Plan, June 2016.*

48 *CA DWR, Notice to State Water Project Contractors, Nos. 15-07 and 16-06.*

49 *CA DWR, Notice to State Water Project Contractors, Nos. 17-01 and 17-05.*

50 *CA DWR, Notice to State Water Project Contractors, Nos. 18-02 and 18-05.*

51 *CA DWR, Notice to State Water Project Contractors, Nos. 19-03, 19-06, and 19-10.*

52 *CA DWR, Notice to State Water Project Contractors, No. 19-10.*

constrained 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.[53]

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.[54]

(iii) Additional MWD Actions to Address Supply

To improve water supply reliability for the entire Southern California region, MWD has also been pursuing voluntary water transfer and exchange programs with State, federal, public and private water districts, and individuals. Programs include the Arvin-Edison Storage Program; the Semitropic Storage Program; the San Bernardino Storage Program; the San Gabriel Valley MWD Exchange Program; the Antelope Valley–East Kern Water Agency Exchange and Storage Program; the Kern-Delta Water District Storage Program; the Mojave Storage Program; and the Central Valley Transfer Programs.[55]

In addition, MWD continues to develop plans and make efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of these water resource development plans. As discussed above, MWD's long-term plans to meet its member agencies reliability needs include improvements to the State Water Project, conjunctive management efforts on the Colorado River, water transfer programs and outdoor conservation measures, and development of additional local resources, such as recycling brackish water desalination and seawater desalination.[56]

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[53] *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.*

[54] *California Department of Water Resources, Bulletin 132-17, Management of the California State Water Project, January 2019.*

[55] *MWD, 2015 Urban Water Management Plan, June 2016.*

[56] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

MWD also has more than 5 million acre-feet of storage capacity of available reservoirs and banking/transfer programs, with approximately 2.46 million acre-feet of water in Water Surplus Drought Management storage and an additional 626,000 acre-feet in emergency storage as of January 1, 2018.[57] With implementation of new and modified existing storage programs to manage the available surplus supplies, MWD was able to add storage in 2018 and began 2019 with approximately 2.5 million acre-feet of water in its dry-year storage portfolio. As described in the MWD's 2015 UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under average-year, single dry-year, and multiple dry-year hydrologic conditions.

(d) Precipitation Conditions

During the 2018 water year (i.e., October 1, 2017, through September 30, 2018), California experienced dry conditions statewide, with nearly all the state experiencing below precipitation and much of Southern California receiving half or less of its average annual precipitation. The 2018 water year followed California's second-wettest year of record as measured by statewide runoff, ending a historic five-year drought.[58]

The 2019 water year (i.e., October 1, 2018 to September 30, 2019) ended with significantly more water in storage than the previous year due to above-average snow and precipitation.[59] According to the National Drought Mitigation Center, as of January 16, 2020, approximately 96.39 percent of the California was not experiencing drought conditions, while 3.61 percent was abnormally dry.[60] This indicates a shift from the previous year on January 1, 2019, when approximately 92.23 percent of the State was abnormally dry, 75.17 percent was experiencing moderate drought, 5.54 percent was experiencing severe drought, and 0.71 percent was experiencing extreme drought.[61]

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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[57] *LADWP, Water Supply Assessment—8th, Grand and Hope Project, November 19, 2019.*

[58] *DWR, Water Year 2018: Hot and Dry Conditions Return, September 2018.*

[59] *DWR, Water Year 2020 Begins with Robust Reservoir Storage, October 1, 2019, https://water.ca.gov/News/News-Releases/2019/October-19/Water-Year-2020-Begins-with-Robust-Reservoir-Storage, accessed January 17, 2020.*

[60] *United States Drought Monitor, State Drought Monitor, California, January 16, 2020, https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA, accessed January 17, 2020.*

[61] *United States Drought Monitor, State Drought Monitor, California, January 16, 2020, https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA, accessed January 17, 2020.*

(e) Climate Change

As discussed in 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 LAA. Local sources can expect to see some changes in the future as well. In addition to water supply impacts, changes in local temperature and precipitation are expected to alter water demand patterns. However, there is still general uncertainty within the scientific community regarding the potential impacts of climate change within the City of Los Angeles. LADWP continues to monitor the latest developments in scientific knowledge and will continue to assess future research for the potential impacts of climate change on its water resources.

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.[62] As mentioned above, with updates published every five years, the most recent *California Water Plan Update 2013* will be followed by an update for 2018. DWR has also been in the process of completing its Climate Action Plan since 2012. Phases I and II of the plan include the guidance of the DWR in reducing greenhouse gas emission and the expertise of a climate change technical advisory group formed in 2012, respectively. Phase III of the plan is expected to be completed in 2017 with a vulnerability assessment and adaptation plan of DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.[63] As such, climate change and its impacts on water supplies are key factors of new water supply regulations and urban water management plans

(f) Water Conservation and Recycling[64]

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

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[62] *California Department of Water Resources, California Water Plan Update 2013, Investing in Innovation & Infrastructure, Highlights, October 2014.*

[63] *California Department of Water Resources, DWR Climate Action Plan, https://water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed January 17, 2020.*

[64] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

LADWP's decision-making process to secure a sustainable water supply for the City of Los Angeles in the next 25 years. To meet multiple water conservation goals established in Executive Directive 5, the Sustainable City pLAn, and the Water Conservation Act of 2009, LADWP's 2015 UWMP aims to reduce per capita potable water use by 20 percent by 2017, by 22.5 percent by 2025, and by 25 percent by 2035. 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, LADWP's 2015 UWMP projects a seven percent lower water demand trend than what was projected in its previous 2010 UWMP. In addition, based on programs and improvements contemplated in LADWP's 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.

(2) Water Demand

(a) Regional 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).[65] Table IV.K.1-3 on 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, 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.[66]

As discussed above, as of February 2, 2017, the City has met its goal established by ED 5 and the Sustainable City pLAn to reduce the per capita water use by 20 percent. The City's potable water consumption has been reduced to 104 gallons daily per capita, which

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[65] *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). However, the 2016 forecast is only slightly higher than the 2012 forecast in terms of current (2016) estimates and future (2040) projections.*

[66] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibits 11E–11K.*

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

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

AFY = acre-feet per year

FY = fiscal year

[a] *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.

equates to a 20 percent reduction from the 131 gallons daily per capita baseline of fiscal year ending 2014.[67]

(b) On-Site Water Demand

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by four low-rise commercial buildings that comprise approximately 29,200 square feet and accompanying surface parking. As provided in Table IV.K.1-4 on page IV.K.1-26, the existing uses on the Project Site have a water demand of approximately 2,372 gallons per day (gpd) or approximately 2.66 AFY.

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 7,337 miles of distribution mains, 96 pump stations, and 119 storage tanks and reservoirs within the City, and total storage capacity of

[67] *City of Los Angeles, Mayor Eric Garcetti, Press Release, Los Angeles Achieves Mayor Garcetti's Goal of 20 Percent Water Savings, released February 2, 2017, www.lamayor.org/los-angeles-achieves-mayor-garcetti%E2%80%99s-goal-20-percent-water-savings, accessed January 17, 2020.*

Table IV.K.1-4
Estimated Existing Water Demand

Existing Land Use	Unit	Generation Factor[a]	Existing Water Demand (gpd)
Office	17,280 sf	120 gpd/1,000 sf	2,074
Retail	11,920 sf	25 gpd/1,000 sf	298
Total Existing Water Consumption			**2,372**

gpd = gallons per day

sf = square feet

[a] *Water demand for the existing uses was calculated using the City of Los Angeles Department of Public Works, Bureau of Engineering sewage generation factors.*

Source: Eyestone Environmental, 2020.

315,245 acre-feet according to the estimates for fiscal year end 2014–2015.[68] A large portion 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 LADWP's water service area.[69]

Domestic water service is available to the Project Site via LADWP water lines within the adjacent streets. Based on the Utility Report, included as Appendix F of this Draft EIR, water service in the vicinity of the Project Site is currently available via a 16-inch water main on Hollywood Boulevard, a 6-inch water main on Wilcox Avenue, and 8-inch and 36-inch water mains on Cahuenga Boulevard.

In addition to providing domestic water service, LADWP also provides water for firefighting services in accordance with the City Fire Code (LAMC Chapter V, Article 7). As described in the Utility Report, there are seven existing public fire hydrants in the vicinity of the Project Site. There are two hydrants at the corner of Hollywood Boulevard and Wilcox Avenue, two hydrants at the corner of Hollywood Boulevard and Cahuenga Boulevard, and one hydrant mid-block of Cahuenga Boulevard between Hollywood Boulevard and Selma Avenue. In addition, two hydrants are located off Selma Avenue at the intersections of

[68] *Los Angeles Department of Water and Power, Water—Facts & Figures, www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures;jsessionid=n2RyWwwC6qKclJ29JQ2myX1H8lYxL8rp8ynMgK1X1TSJc4n0vgTk!1471796616?_afrWindowId=null&_afrLoop=418605822626637&_afrWindowMode=0&_adf.ctrl-state=144vztuplf_4#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D418605822626637%26_afrWindowMode%3D0%26_adf.ctrl-state%3D13utp6f8pi_4, accessed January 17, 2020.*

[69] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

Wilcox Avenue and Cahuenga Boulevard. An eighth hydrant is proposed along the western side of Wilcox Avenue, approximately 300 feet south of Hollywood Boulevard.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Require or result in the relocation or construction of new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?[70]

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

In assessing impacts related to water supply and infrastructure in this section, the City will use Appendix G as the thresholds of significance. The following factors from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds:

- 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.

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[70] *Refer to Section IV.K.2, Utilities and Service Systems—Wastewater of this Draft EIR for a discussion of wastewater infrastructure; the Project's Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater impacts; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas infrastructure; and Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts.*

b. Methodology

The analysis of the Project's impacts relative to water supply is based on a calculation of the Project's anticipated net water demand. Consistent with LADWP's methodology, the estimated net water demand for the Project is calculated by applying the City of Los Angeles Bureau of Sanitation's (LASAN) sewer generation factors to the Project's proposed uses. The water demand of the existing uses to be removed was then subtracted from the Project's total water demand to determine the Project's net water demand. The 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.

The analysis with regard to water infrastructure is based on the Utility Report prepared for the Project by Psomas, which is included in Appendix F 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 proposed with regard to water supply:

Project Design Feature WAT-PDF-1: The Project design shall incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

- Reduce indoor water use by a minimum of 35-percent and outdoor water use by 30-percent below Los Angeles Green Building Code baselines by installing water fixtures and appliances that exceed applicable standards:
  - Residential showerheads with a maximum flow rate of 1.75 gallons per minute.
  - Residential lavatory faucets with a maximum flow rate of 1 gallon per minute.
  - Residential kitchen faucets with a maximum flow rate of 1.5 gallons per minute.
  - High efficiency toilets with a maximum flow rate of 1 gallon per flush.
  - Use of high-efficiency Energy Star-rated dishwashers where appropriate.

  - Nonresidential lavatory faucets with a maximum flow rate of 0.5 gallon per minute.
  - Nonresidential toilets with a maximum flow rate of 1.1 gallons per minute.
  - Nonresidential urinals with a maximum flow rate of 0.125 gallon per minute.
- Individual metering and billing for water use of all residential uses and exploration of such metering for commercial spaces.
- Use of proper hydro-zoning, turf minimization, zoned irrigation and use of native/drought-tolerant plant materials.
- Use of landscape contouring to minimize precipitation runoff.

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water or wastewater or storm water, drainage, electric power, natural gas, or telecommunications treatment facilities, the construction or relocation of which could cause significant environmental effects?[71]

(1) Impact Analysis

(a) Construction

As discussed on page 5 of the Utility Report included as Appendix F of this Draft EIR and as summarized below, with the inclusion of an additional fire hydrant, the existing LADWP water infrastructure would be adequate to provide for the water flow necessary to serve the Project during operation. Thus, no upgrades to the mainlines that serve the Project Site would be required. However, the Project would require new service connections to connect to the existing water mainlines adjacent to the Project Site, as well as potential relocation of existing lines. The design and installation of new service connections would be required to meet applicable City standards. Installation of the new water distribution lines would primarily involve on-site trenching to place the lines below the surface, and minor off-site work to connect to the existing public water mains. Coordination with LADWP would be required prior to ground disturbance in order to identify the locations

[71] *Refer to Section IV.K.2, Utilities and Service Systems—Wastewater of this Draft EIR for a discussion of wastewater infrastructure; the Project's Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater impacts; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas infrastructure; and Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts.*

and depth of all lines. In addition, 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 rights-of-way. However, as discussed in Section IV.I, Transportation, of this Draft EIR, a construction management plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The construction management plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

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 could have a significant impact on the environment. In addition, the existing water distribution capacity would be adequate to serve the Project. **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, the analysis provided herein conservatively assesses impacts on water supply infrastructure during a peak demand scenario. Since fire flow demands have a much greater instantaneous impact on infrastructure, they are the primary means for analyzing infrastructure capacity.

Fire flow to the proposed buildings of the Project would be required to meet City fire flow requirements. Specifically, the Project would comply with LAMC Section 57.507.3, which establishes fire flow standards by development type. The Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously with a residual pressure of 20 psi. However, as discussed further below, the LADWP has identified the need for additional fire flow at the Project Site. According to the Utility Report included as Appendix F to this Draft EIR, there are currently seven existing fire hydrants located near the Project Site. Two hydrants are located on the corner of Hollywood Boulevard and Wilcox Avenue, two hydrants are located at the corner of Hollywood Boulevard and Cahuenga Boulevard, two hydrants are located along at the corner of Selma Avenue and Wilcox Avenue, and one hydrant is located along Cahuenga Boulevard.

As part of the Utility Report included in Appendix F of this Draft EIR, an Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP in order to determine if the existing public infrastructure could meet the fire flow demands of the Project. Based on the IFFAR results (included in the Utility Report, Appendix F of this Draft EIR), the Project would require an eighth fire hydrant and a fire flow of 12,000 gpm at 20 psi in order to provide proper hydrant coverage. This proposed hydrant would be located along Wilcox Avenue, approximately 300 feet south of Hollywood Boulevard. In total, the eight fire hydrants would have the capacity to provide the required 12,000 gpm flowing simultaneously with a minimum residual pressure of 20 psi. Therefore, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for the Project. Furthermore, the Project would include the installation of automatic fire sprinklers, which would reduce or eliminate the public hydrant demands.

Based on the page 5 of the Utility Report, the Project would not exceed the available capacity of the existing water facilities including the water distribution infrastructure that would serve the Project Site. Although the fire flow demands of the Project would require the addition of another fire hydrant in the Project vicinity, this would not have an impact on the existing water facilities since sufficient capacity is available in the main lines that serve the hydrants. **Therefore, the Project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant and no mitigation measures are required.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to water supply and infrastructure would be less than significant without mitigation.

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 soil compaction and earthwork, dust control, mixing and placement of

concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption of the Project at buildout. Based on a review of the Project, MATT Construction, the Project's construction consultant, estimates the Project would generate demand for approximately 2,000 gallons of water per week (approximately 286 gpd) during construction,[72] which is less than the 2,372 gpd of existing estimated water consumption at the Project Site and substantially less than the 69,413 gpd of estimated proposed water consumption at the Project Site. Water for construction activities would be conveyed using the existing water infrastructure at the Project Site and no infrastructure improvements would be needed. Furthermore, as concluded on page ES-30 of LADWP's 2015 UWMP, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year in each year from 2015 through 2040. If approved, Project construction is anticipated to be completed in 2023. 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, upon build-out, the Project would include approximately 278,892 square feet of floor area comprised of 260 multi-family residential dwelling units, 11,020 square feet of retail uses, 3,580 square feet of office uses, and 3,200 square feet of restaurant uses. As discussed above, based on the size of proposed land uses and the Project's resulting estimated water demand, the Project is not subject to the requirements of SB 610 regarding preparation of a WSA.

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. 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 rates established by LASAN, which also serve to estimate water demand, to the proposed uses. Accordingly, as shown in Table IV.K.1-5 on page IV.K.1-33, it is estimated that the Project would result in a net increase in the Project Site's average daily water demand of approximately 69,453 gpd, or approximately 77.8 AFY

[72] *Personal communication with Tim Johnson of MATT Construction, October 11, 2017.*

Table IV.K.1-5
Estimated Project Water Consumption

Land Use	Units	Generation Factor[a]	Proposed Water Demand (gpd)
Existing			
Office	17,280 sf	120 gpd/1,000 sf	2,074
Retail	11,920 sf	25 gpd/1,000 sf	298
Subtotal Existing			***2,372***
Proposed			
Apartment: Studio	20 du	75 gpd/du	1,500
Apartment: 1 bed	140 du	110 gpd/du	15,400
Apartment: 2 bed	87 du	150 gpd/du	13,050
Apartment: 3 bed	13 du	190 gpd/du	2,470
Retail	11,020 sf	25 gpd/1,000 sf	276
Restaurant	3,200 sf	720 gpd/1,000 sf	2,304
Office	3,580 sf	120 gpd/1,000 sf	430
Lobby	700 sf	50 gpd/1,000 sf	35
Library	1,600 sf	50 gpd/1,000 sf	80
Gym	2,000 sf	200 gpd/1,000 sf	400
Open Area	29,450 sf	50 gpd/1,000 sf	1,473
Pool	4,600 cf	7.48 gal/cf	34,408[b]
Subtotal Proposed			***71,825***
Existing			***2,372***
Total Net Project Site Water Consumption (Proposed minus Existing)			**69,453**

gpd = gallons per day
sf = square feet
du = dwelling units
cf = cubic feet
gal = gallons

[a] *This analysis is based on sewage generation rates provided by LASAN (2012).*

[b] *This analysis is conservative as it is unlikely that the pool will be drained and refilled daily. Refilling the pool would result in demand for approximately 34,408 gallons each time it is refilled.*

Source: 1624 Wilcox Avenue Project Utilities Technical Report, Psomas, May 30, 2018, and Eyestone Environmental, 2020.

(assuming constant water use throughout the year). However, it should be noted that this figure is highly conservative in that it assumes the pool would be drained and refilled on a daily basis which is unlikely to be the case because of standard practices and the Project's LEED® water reduction commitments. Refilling the pool would result in demand for

approximately 34,408 gallons of water (38.5 AFY), which is included in the 69,453 gallons (77.8 AFY) discussed above. When the pool is not refilled, the Project would result in an average daily water demand of 37,417 gpd (41.9 AFY), or a net increase of 35,045 gpd (39.3 AFY) over existing conditions.

It should be noted that LASAN's wastewater generation factors do not account for water conservation features and therefore, the Project's estimated water demand discussed above is conservative. As discussed above, the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9) requires newly constructed low-rise residential buildings to reduce indoor water use by at least 20 percent below baseline[73] by: (1) using water saving fixtures or flow restrictions; and/or (2) demonstrating a 20-percent reduction in baseline water use. Accordingly, the Project would incorporate sustainability features detailed in Project Design Feature WAT-PDF-1 such as efficient plumbing features, updated landscaping, modern irrigation, and efficient appliances that would reduce the Project's net increase in water demand by at least 35 percent below Los Angeles Green Building Code baselines, which exceeds the required 20-percent reduction. As part of the Project's AB 900 application (refer to Appendix B of this Draft EIR), a separate water use analysis was prepared which accounts for water conservation features and requirements. As demonstrated therein, with water conservation accounted for, the Project is anticipated to use approximately 21,940 gpd, which does not account for the existing uses that would be removed. However, for purposes of this analysis, the more conservative LADWP methodology is relied upon.

LADWP's 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 their 2015 UWMP, LADWP is committed to providing a reliable water supply for the City. LADWP's 2015 UWMP takes into account climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. LADWP's 2015 UWMP also furthers the goals of the City's Executive Directive and Sustainable City pLAn. LADWP's 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 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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[73] *Baseline water use is calculated using Los Angeles Department of Building and Safety Worksheet WS-1.*

LADWP's 2015 UWMP utilized SCAG's RTP data that provide for comprehensive water demand forecasts, taking into account changes in population, housing units and employment.[74] As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, the Project would generate approximately 630 new residents and 260 new households at Project buildout in 2023, and would be consistent with SCAG's 2016–2040 RTP/SCS growth projections for the City of Los Angeles Subregion.[75] Specifically, based on SCAG's projections for the City of Los Angeles Subregion between 2017 and 2023, the estimated 630 new residents generated by the Project would represent approximately 0.39 percent of the population growth of 190,975 persons between 2017 and 2023 and the 260 households would represent approximately 0.33 percent of the projected household growth of 91,200 households between 2017 and 2023.[76] Therefore, the Project would be well within SCAG's 2016–2040 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.**

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[74] *The demand projections in LADWP's 2015 Urban Water Management Plan are based on demographic growth projections in SCAG's 2012–2035 RTP/SCS, the 2000 U.S. Census data and the 2010 U.S. Census data. Since preparation of LADWP's 2015 Urban Water Management Plan, new growth forecasts have become available in SCAG's 2016 RTP/SCS. However, the growth forecasts in SCAG's 2016 RTP/SCS are only marginally higher than the 2012–2035 RTP/SCS in terms of current (2016) estimates and future (2040) projections for the SCAG Region (i.e., 22,091,000 in 2035 under the 2012–2035 RTP/SCS vs. 22,138,000 in 2040 under the 2016–2040 RTP/SCS) and would, therefore, not significantly affect water demand projections.*

[75] *Based on the most recent estimated household size for multi-family housing units in the City of Los Angeles area of 2.42 persons per unit, the Project's proposed 260 residential units would generate approximately 630 persons.*

[76] *Based on a linear interpolation of SCAG's 2012–2020 and 2020–2035 data. See Table 11, Jurisdictional Growth Forecast in SCAG's 2016-2040 RTP/SCS Growth Forecast Appendix.*

The 2017 and 2023 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 2023 (4,145,604 persons) is approximately 163,693 persons. The Project's 630 new residents would represent approximately 0.58 percent of this growth ((630 ÷ 163,693) x 100 = 0.39).

Household growth between 2017 (1,390,643 households) and 2023 (1,468,814 households) is approximately 78,171 households. The Project's 260 new households would represent approximately 0.5 percent of this growth ((260 ÷ 78,171) x 100 = 0.33).

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to water supply and infrastructure would be less than significant without mitigation.

d. Cumulative Impacts

(1) Impact Analysis

(a) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the water infrastructure that would serve the Project and related projects). 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 LADWP, City of Los Angeles Department of Public Works, and the Los Angeles Fire Department to ensure facilities are adequate. **Therefore, Project impacts on water infrastructure would not be cumulatively considerable, and cumulative impacts on the water infrastructure system would be less than significant.**

(b) Water Supply

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City and portions of the cities of West Hollywood, Culver City, South Pasadena, and the Owens Valley). As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update its urban water management plan to plan and provide for water supplies to serve existing and projected demands. LADWP's 2015 UWMP accounts for existing development within the LADWP service area, as well as projected growth through the year 2040. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Water Code Section 10912) within its service area that reaches certain thresholds. The water supply assessment 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 107 specific related projects located in the project vicinity.[77] The estimated water demand of the related projects is shown in Table IV.K.1-6 on page IV.K.1-38. As shown therein, the related projects would generate a total average water demand of approximately 4,399,447 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 or the water demand of the existing uses on project sites that the related projects may remove. The net water demand of the Project would be 69,453 gpd. Accordingly, the Project in conjunction with the related projects would yield a cumulative average water demand of approximately 4,468,900 gpd.

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., 2023) based on the growth projections in SCAG's RTP/SCS. With the available related projects information, this Draft EIR is able to estimate the total cumulative projects' water demand.

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.

Overall, as discussed above, 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

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[77] *As discussed in Section III, Environmental Setting, of this Draft EIR, the Hollywood Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2023 (the Project's buildout year), well before the Community Plan Update's horizon year. Moreover, 2023 is a similar projected buildout year as many of the related projects identified below. 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 Community Plan Update upon its adoption.*

Table IV.K.1-6
Cumulative Water Demand[a]

No.	Project Name	Land Use	Size	Conversion Factor[b,c]	Total Daily Water Demand (gpd)
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	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.	Temple Israel of Hollywood 7300 W. Hollywood Blvd.	Temple Expansion[d]	47,010 sf	0.05 gpd/sf	2,351
8.	Mixed-Use 5245 W. Santa Monica Blvd.	Apartments	49 du	190 gpd/du	9,310
		Retail	32,272 sf	0.025 gpd/sf	807
9.	Selma Hotel 6417 W. Selma Ave.	Hotel	180 rm	120 gpd/rm	21,600
		Restaurant	12,840 sf	30 gpd/seat	12,840
10.	Hollywood Production Center 1149 N. Gower St.	Apartments	57 du	190 gpd/du	10,830
11.	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
12.	Mixed-Use Office/Retail 936 N. La Brea Ave.	Office	88,750 sf	0.12 gpd/sf	10,650
		Retail	12,000 sf	0.025 gpd/sf	300
13.	Pantages Theater Office 6225 W. Hollywood Blvd.	Office	210,000 sf	0.12 gpd/sf	25,200
14.	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
15.	Argyle Hotel Project 1800 N. Argyle Ave.	Hotel	225 rm	120 gpd/rm	27,000
16.	Seward Street Office Project 956 N. Seward St.	Office	126,980 sf	0.12 gpd/sf	15,238
17.	Hotel & Restaurant Project 6381 W. Hollywood Blvd.	Hotel	80 rm	120 gpd/rm	9,600
		Restaurant	15,290 sf	30 gpd/seat	15,290

Table IV.K.1-6 (Continued)
Cumulative Water Demand

No.	Project Name	Land Use	Size	Conversion Factor[b,c]	Total Daily Water Demand (gpd)
18.	Emerson College Project (Student Housing) 1460 N. Gordon St.	Student Housing	224 du	190 gpd/du	42,560
		Faculty/Staff Housing	16 du	190 gpd/du	3,040
		Retail	6,400 sf	0.025 gpd/sf	160
19.	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
20.	Hollywood Center Studios Office 6601 W. Romaine St.	Office	106,125 sf	0.12 gpd/sf	12,735
21.	Selma Community Housing 1603 N. Cherokee Ave.	Apartments	66 du	190 gpd/du	12,540
22.	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
23.	La Brea Gateway 915 N. La Brea Ave.	Supermarket	33,500 sf	0.025 gpd/sf	838
		Apartments	179 du	190 gpd/du	34,010
24.	Target Retail Shopping Center Project 5520 W. Sunset Blvd.	Discount Store	163,862 sf	0.025 gpd/sf	4,097
		Shopping Center	30,887 sf	0.025 gpd/sf	772
25.	Residential 712 N. Wilcox Ave.	Apartments	103 du	190 gpd/du	19,570
26.	Mixed-Use 1600–1610 N. Highland Ave.	Apartments	248 du	190 gpd/du	47,120
		Retail	12,785 sf	0.025 gpd/sf	320
27.	Millennium Hollywood Mixed-Use Project 1740 N. Vine St.	Apartments	1,005 du	190 gpd/du	190,950
		Retail/ Restaurant[e]	30,176 sf	30 gpd/seat	30,176
28.	Paramount Pictures 5555 W. Melrose Ave.	Production Office	635,500 sf	0.12 gpd/sf	76,260
		Office	638,100 sf	0.12 gpd/sf	76,572
		Retail	89,200 sf	0.025 gpd/sf	2,230
		Stage[f]	21,000 sf	0.12 gpd/sf	2,520
		Support Uses[f]	1,900 sf	0.12 gpd/sf	228
29.	Apartments 1411 N. Highland Ave.	Apartments	76 du	190 gpd/du	14,440
		Commercial	2,500 sf	0.05 gpd/sf	125
30.	Apartment Project 1824 N. Highland Ave.	Apartments	118 du	190 gpd/du	22,420
31.	Hotel 1133 N. Vine St.	Hotel	112 rm	120 gpd/rm	13,440
		Café	661 sf	30 gpd/seat	661

Table IV.K.1-6 (Continued)
Cumulative Water Demand

No.	Project Name	Land Use	Size	Conversion Factor[b,c]	Total Daily Water Demand (gpd)
32.	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
33.	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
34.	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
35.	Tutoring Center 927 N. Highland Ave.	School	100 stu	11 gpd/stu	1,100
		Tutoring Employees[g]	18 emp	11 gpd/emp	198
36.	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
37.	Mixed-Use 6915 Melrose Ave.	Condominiums	13 du	190 gpd/du	2,470
		Retail	6,250 sf	0.025 gpd/sf	156
38.	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
39.	Condos & Retail 5663 Melrose Ave.	Condominiums	96 du	190 gpd/du	18,240
		Retail	3,350 sf	0.025 gpd/sf	84
40.	6250 Sunset (Nickelodeon) 6250 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Retail	4,700 sf	0.025 gpd/sf	118
41.	Hollywood Central Park Hollywood Freeway (US-101)	Park (14.35 ac)[h]	625,086 sf	0.098 gpd/sf	60,972
		Amphitheater	500 seats	3 gpd/seat	1,500
		Inn	5 rm	120 gpd/rm	600
		Community Center	30,000 sf	0.05 gpd/sf	1,500
		Banquet Space	15,000 sf	0.35 gpd/sf	5,250
		Commercial	29,000 sf	0.05 gpd/sf	1,450
		Apartments (Low Income)	15 du	190 gpd/du	2,850
42.	Movietown 7302 W. Santa Monica Blvd.	Apartments	371 du	190 gpd/du	70,490
		Office	7,800 sf	0.12 gpd/sf	936
		Restaurant	5,000 sf	30 gpd/seat	5,000
		Commercial	19,500 sf	0.05 gpd/sf	975
43.	Mixed-Use 5901 Sunset Blvd.	Office	274,000 sf	0.12 gpd/sf	32,880
		Supermarket	26,000 sf	0.025 gpd/sf	650

Table IV.K.1-6 (Continued)
Cumulative Water Demand

No.	Project Name	Land Use	Size	Conversion Factor[b,c]	Total Daily Water Demand (gpd)
44.	Mixed-Use 7107 Hollywood Blvd.	Apartments	410 du	190 gpd/du	77,900
		Restaurant	5,000 sf	30 gpd/seat	5,000
		Retail	5,000 sf	0.025 gpd/sf	125
45.	John Anson Ford Theater 2580 Cahuenga Blvd. East	Theater	311 seats	3 gpd/seat	933
		Restaurant	5,400 sf	30 gpd/seat	5,400
		Office Employees[i]	30 emp (7,500 sf)	0.12 gpd/sf	900
46.	1717 Bronson Avenue 1717 N. Bronson Ave.	Apartments	89 du	190 gpd/du	16,910
47.	Sunset + Wilcox 1541 N. Wilcox Ave.	Hotel	200 rm	120 gpd/rm	24,000
		Restaurant	9,000 sf	30 gpd/seat	9,000
48.	Mixed-Use 1350 N. Western Ave.	Apartments	200 du	190 gpd/du	38,000
		Guest Rooms	4 du	190 gpd/du	760
		Retail/ Restaurant	5,500 sf	30 gpd/seat	5,500
49.	Palladium Residences 6201 W. Sunset Blvd.	Apartments	731 du	190 gpd/du	138,890
		Retail/ Restaurant	24,000 sf	30 gpd/seat	24,000
50.	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
51.	5750 Hollywood 5750 Hollywood Blvd.	Apartments	161 du	190 gpd/du	30,590
		Commercial	4,747 sf	0.05 gpd/sf	237
52.	925 La Brea Avenue 925 La Brea Ave.	Retail	16,360 sf	0.025 gpd/sf	409
		Office	45,432 sf	0.12 gpd/sf	5,452
53.	904 La Brea Avenue 904 La Brea Ave.	Apartments	169 du	190 gpd/du	32,110
		Retail	37,057 sf	0.025 gpd/sf	926
54.	2014 Residential 707 N. Cole Ave.	Apartments	84 du	190 gpd/du	15,960
55.	Cahuenga Boulevard Hotel 1525 N. Cahuenga Blvd.	Hotel	64 rm	120 gpd/rm	7,680
		Restaurant/ Lounge	700 sf	30 gpd/seat	700
		Restaurant	3,300 sf	30 gpd/seat	3,300
56.	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
57.	Hotel 6500 Selma Ave.	Hotel	70 rm	120 gpd/rm	8,400
		Restaurant	4,320 sf	30 gpd/seat	4,320
58.	Hotel 1921 Wilcox Ave.	Hotel	122 rm	120 gpd/rm	14,640
		Restaurant	4,225 sf	30 gpd/seat	4,225

Table IV.K.1-6 (Continued)
Cumulative Water Demand

No.	Project Name	Land Use	Size	Conversion Factor[b,c]	Total Daily Water Demand (gpd)
59.	Sunset Mixed-Use 7500–7510 W. Sunset Blvd.	Apartments	213 du	190 gpd/du	40,470
		Restaurant	10,000 sf	30 gpd/seat	10,000
		Retail	20,000 sf	0.025 gpd/sf	500
60.	Mixed-Use 901 N. Vine St.	Apartments	70 du	190 gpd/du	13,300
		Commercial	3,000 sf	0.05 gpd/sf	150
61.	Apartments 525 N. Wilton Pl.	Apartments	88 du	190 gpd/du	16,720
62.	Hardware Store 4905 W. Hollywood Blvd.	Retail	36,600 sf	0.025 gpd/sf	915
63.	Mixed-Use 1233 N. Highland Ave.	Apartments	72 du	190 gpd/du	13,680
		Commercial	12,160 sf	0.05 gpd/sf	608
64.	Mixed-Use 1310 N. Cole Ave.	Apartments	369 du	190 gpd/du	70,110
		Office	2,570 sf	0.12 gpd/sf	308
65.	TAO Restaurant 6421 W. Selma Ave.	Restaurant	17,607 sf	30 gpd/seat	17,607
66.	Hollywood Crossroads 1540–1552 Highland Ave.	Residential	950 du	190 gpd/du	180,500
		Commercial/ Retail	190,000 sf	0.05 gpd/sf	9,500
67.	Wilcox Hotel 1717 N. Wilcox Ave.	Hotel	133 rm	120 gpd/rm	15,960
		Retail	3,580 sf	0.025 gpd/sf	90
68.	Faith Plating 7143 Santa Monica Blvd.	Residential	145 du	190 gpd/du	27,550
		Retail/ Restaurant	7,858 sf	30 gpd/seat	7,858
69.	7811 Santa Monica Boulevard 7811 Santa Monica Blvd.	Hotel	78 rm	120 gpd/rm	9,360
		Residential	88 du	190 gpd/du	16,720
		Commercial	65,888 sf	0.05 gpd/sf	3,294
70.	Apartments 5460 W. Fountain Ave.	Apartments	75 du	190 gpd/du	14,250
71.	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
72.	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
73.	Hollywood De Longpre Apartments 5632 De Longpre Ave.	Apartments	185 du	190 gpd/du	35,150
74.	Ivar Gardens Hotel 6409 W. Sunset Blvd.	Hotel	275 rm	120 gpd/rm	33,000
		Retail	1,900 sf	0.025 gpd/sf	48

Table IV.K.1-6 (Continued)
Cumulative Water Demand

No.	Project Name	Land Use	Size	Conversion Factor[b,c]	Total Daily Water Demand (gpd)
75.	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
76.	Melrose Crossing Mixed-Use 7000 Melrose Ave.	Apartments	40 du	190 gpd/du	7,600
		Retail	6,634 sf	0.025 gpd/sf	166
77.	Mixed-Use 1657 N. Western Ave.	Apartments	91 du	190 gpd/du	17,290
		Retail	15,300 sf	0.025 gpd/sf	383
78.	McCadden Campus (LGBT) 1118 N. McCadden Pl.	Housing	45 du	190 gpd/du	8,550
		Social Service Support Facility[j]	50,325 sf	0.12 gpd/sf	6,039
		Office	17,040 sf	0.12 gpd/sf	2,045
		Commercial/ Retail or Restaurant	1,885 sf	30 gpd/seat	1,885
		Temporary Housing	100 bed	70 gpd/bed	7,000
79.	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
80.	citizenM Hotel 1718 Vine St.	Hotel	216 rm	120 gpd/rm	25,920
		Restaurant	4,354 sf	30 gpd/seat	4,354
81.	7900 Hollywood 7900 Hollywood Blvd.	Apartments	50 du	190 gpd/du	9,500
82.	Apartments 1749 Las Palmas Ave.	Apartments	70 du	190 gpd/du	13,300
		Retail	3,117 sf	0.025 gpd/sf	78
83.	Mixed-Use 1868 N. Western Ave.	Apartments	96 du	190 gpd/du	18,240
		Retail	5,546 sf	0.025 gpd/sf	139
84.	6400 Sunset Mixed-Use 6400 Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Restaurant	7,000 sf	30 gpd/seat	7,000
85.	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
86.	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
87.	6630 West Sunset Boulevard 6630 W. Sunset Blvd.	Apartments	40 du	190 gpd/du	7,600
88.	1001 North Orange Drive 1001 N. Orange Dr	Office	53,537 sf	0.12 gpd/sf	6,424

Table IV.K.1-6 (Continued)
Cumulative Water Demand

No.	Project Name	Land Use	Size	Conversion Factor[b,c]	Total Daily Water Demand (gpd)
89.	Sunset & Western 5420 W. Sunset Blvd.	Apartments	735 du	190 gpd/du	139,650
		Commercial	95,820 sf	0.05 gpd/sf	4,791
90.	Mixed-Use 4914 W. Melrose Ave.	Live/Work	45 du	190 gpd/du	8,550
		Retail	3,760 sf	0.025 gpd/sf	94
91.	Onni Group Mixed-Use Development 1360 N. Vine St.	Condominiums	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
92.	1600 Schrader 1600 Schrader Blvd.	Hotel	168 rm	120 gpd/rm	20,160
		Restaurant	5,979 sf	30 gpd/seat	5,979
93.	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
94.	Melrose & Beachwood 5570 W. Melrose Ave.	Apartments	52 du	190 gpd/du	9,880
		Commercial	5,500 sf	0.05 gpd/sf	275
95.	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
96.	Montecito Senior Housing 6650 W. Franklin Ave.	Senior Apartments	68 du	190 gpd/du	12,920
97.	The Chaplin Hotel Project 7219 W. Sunset Blvd.	Hotel	93 rm	120 gpd/rm	11,160
		Restaurant	2,800 sf	30 gpd/seat	2,800
98.	Godfrey Hotel 1400 N. Cahuenga Blvd.	Hotel	221 rm	120 gpd/rm	26,520
		Restaurant	3,000 sf	30 gpd/seat	3,000
99.	6140 Hollywood 6140 Hollywood Blvd.	Hotel	102 rm	120 gpd/rm	12,240
		Condominiums	27 du	190 gpd/du	5,130
		Restaurant	11,460 sf	30 gpd/seat	11,460
100.	Selma–Wilcox Hotel 6421 W. Selma Ave.	Hotel	114 rm	120 gpd/rm	13,680
		Restaurant	1,993 sf	30 gpd/seat	1,993
101.	Apartments 1601 N. Las Palmas Ave.	Apartments	86 du	190 gpd/du	16,340
102.	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

Table IV.K.1-6 (Continued)
Cumulative Water Demand

No.	Project Name	Land Use	Size	Conversion Factor[b,c]	Total Daily Water Demand (gpd)
103.	Mixed-Use 1370 N. St. Andrews Pl.	Office	32,649 sf	0.12 gpd/sf	3,918
		Restaurant	3,646 sf	30 gpd/seat	3,646
		Conference/ Private Dining Room	633 sf	30 gpd/seat	633
		Outdoor Dining	9,520 sf	30 gpd/seat	9,520
104.	7445 Sunset Grocery 7445 W. Sunset Blvd.	Specialty Grocery	32,416 sf	0.025 gpd/sf	810
105.	1719 Whitley Hotel 1719 N. Whitley Ave.	Hotel	156 rm	120 gpd/rm	18,720
106.	1276 North Western Ave 1276 N. Western Ave.	Apartments	75 du	190 gpd/du	14,250
107.	NBCUniversal Evolution Plan 100 Universal City Plaza	Studio Office	647,320 sf	0.05 gpd/sf	32,366
		Office	495,406 sf	0.12 gpd/sf	59,449
		Entertainment Area[k]	337,895 sf	0.05 gpd/sf	16,895
		Entertainment Retail	39,216 sf	0.025 gpd/sf	980
		Hotel	900,000 sf	120 gpd/rm	166,154
	Hollywood Community Plan Update South of City of Burbank, City of Glendale, and SR 134; west of Interstate 5; north of Melrose Avenue; south of Mulholland Drive, City of West Hollywood, Beverly Hills, including land south of the City of West Hollywood and north of Rosewood Ave. between La Cienega Blvd. and La Brea Ave.	Based on preliminary information available from the City, the draft Hollywood Community Plan Update will propose updates to land use policies and the land use diagram. The proposed changes would primarily increase commercial and residential development potential in and near the Regional Center Commercial portion of the community and along selected corridors in the Community Plan area. The decreases in development potential would be primarily focused on low to medium scale multi-family residential neighborhoods to conserve existing density and intensity of those neighborhoods.			
Related Projects Water Demand					**4,399,447**
Project Water Demand					**69,453**
Total Water Demand for Related Projects and Project					**4,468,900**

du = dwelling units
emp = employees
gpd = gallons per day
rm = rooms

Table IV.K.1-6 (Continued)
Cumulative Water Demand

No.	Project Name	Land Use	Size	Conversion Factor[b,c]	Total Daily Water Demand (gpd)

sf = square feet

stu = students

[a] *The related projects list represents the time of the Project's Notice of Preparation in May 2017. Since that time, a number of these projects have been terminated, denied, or withdrawn. Specifically, Related Project No. 27 is not being built at this time as the EIR and entitlements were overturned in a court ruling; Related Project No. 41 has not been officially filed; Related Project No. 82 was denied September 22, 2017; and Related Project No. 101 was terminated on September 28, 2018. This analysis includes them which represents a conservative scenario.*

[b] *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.*

[c] *Number of seats for restaurant uses based on Los Angeles Department of Water and Power standard of 1 seat per 30 square feet. In addition, this analysis conservatively assumes all dwelling units are 3-bedroom units.*

[d] *Sewage generation rates provided by LASAN do not include rates for temple uses. Therefore, due to the nature of this related project, the most comparable land use rate of 50 gallons per day per 1,000 square feet for "Commercial Use" is applied.*

[e] *The breakdown of retail and restaurant uses is not available, so the higher restaurant rate was used.*

[f] *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 gallons per day per 1,000 square feet for "Studio: Film/TV/Recording" is applied*

[g] *Sewage generation rates provided by LASAN do not include rates per employee for school uses. Therefore, it is assumed that the most comparable land use rate per employee is equivalent to the rate per student for "School" uses.*

[h] *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—6AM Project, August 30, 2017.*

[i] *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. Newer estimates such as the private sector average reported in the Government Services Administration's Workspace Utilization and Allocation Benchmark (July 2012) are lower, with 5 employees per 1,000 square feet. However, the rate from the Village at Playa Vista EIR is used to provide a more conservative estimate.*

[j] *Sewage generation rates provided by LASAN do not include rates for social service support uses. Therefore, the most comparable land use rate of 120 gallons per day per 1,000 square feet for "Office Building" is applied.*

[k] *Sewage generation rates provided by LASAN do not include rates for entertainment area uses. Therefore, the most comparable land use rate of 50 gallons per day per 1,000 square feet for "Commercial Use" is applied.*

Source: Eyestone Environmental, 2020.

the City's Sustainability pLAn. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high-efficiency water fixtures,

providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge.

Based on the related project list and projections provided in adopted plans, it is anticipated that LADWP would be able to meet the water demands of the Project and future growth through 2023 and beyond. **Therefore, cumulative impacts associated water supply would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related to water supply and infrastructure would be less than significant without mitigation.