IV. Environmental Impact Analysis

M.1 Utilities and Service Systems – Water Supply

1. Introduction

This section evaluates potential Project impacts on water supply and whether the Project would require or result in the construction of new water treatment facilities, including conveyance infrastructure, the construction of which would cause significant environmental effects. The Los Angeles Department of Water and Power (LADWP) is the water supplier for the Project Site. This section describes LADWP's available water supplies, current and projected regional water demand, municipal water infrastructure serving the Project Site, and the adequacy of water supplies and infrastructure to meet Project demand. Project consistency with relevant plans and regulations is also assessed.

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on a Water Supply Assessment (WSA) prepared for the Project and adopted by LADWP and included in **Appendix H.2** of this Draft EIR, along with a copy of Resolution No. 018214 approving the WSA. Additional technical information used in the analysis is based on the *Morrison Hotel Project Utility Infrastructure Technical Report: Water* (Infrastructure Technical Report: Water)[1] prepared by KPFF Consulting Engineers, September 23, 2020. The *Infrastructure Technical Report: Water* is included as **Appendix H.1** of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

There are several plans, policies, and programs regarding Water Supply & Infrastructure at the state, regional, and local levels. Described below, these include:

- California Urban Water Management Plan Act
- Senate Bill 610, Senate Bill 221 and Senate Bill 7
- Senate Bill X7-7 (Water Conservation Act of 2009)
- Sustainable Groundwater Management Act of 2014

[1] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Water Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020.*

- California Code of Regulations
    - Title 20
    - CALGreen Code
    - Plumbing Code
- Executive Order B-40-17
- Executive Order N-10-21
- Metropolitan Water District
    - 2015 Urban Water Management Plan
    - 2015 Integrated Resources Plan
    - Water Surplus and Drought Management Plan
    - Long-Term Conservation Plan
    - Water Supply Allocation Plan
- Los Angeles Department of Water and Power's 2020 Urban Water Management Plan
- City of Los Angeles Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan, including:
    - Framework Element,
    - Community Plan
- Los Angeles Municipal Code (Ordinance Nos. 180,822, 181,480, 181,899, 183,833, 182,849, 184,692, and 184,248)

(1) State

(a) California Urban Water Management Plan Act

The California Urban Water Management Planning Act (Water Code, Section 10610, et seq.) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water Suppliers to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000 acre feet per year (afy) of water to customers.

(b) Senate Bill 610, Senate Bill 221, and Senate Bill 7

Two of the state laws addressing the assessment of water supply necessary to serve large-scale development projects, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in Water Code Sections 10910-10915, specifies the requirements for water supply assessments (WSAs) and their role in the California Environmental Quality Act (CEQA) process, and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a

WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments 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 plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a).

The WSA must be approved by the public water supplier serving the project 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.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past 5 years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

SB 221 also addresses water supply in the land use approval process for large residential subdivision projects. However, unlike SB 610 WSAs, which are prepared at the beginning of a planning process, SB 221-required Water Supply Verification (WSV) is prepared at the end of the planning process for such projects. Under SB 221, a water supplier must prepare and adopt a WSV indicating sufficient water supply is available to serve a proposed subdivision, or the local agency must make a specific finding that sufficient water supplies are or will be available prior to completion of a project, as part of the conditions for the approval of a final subdivision map. SB 221 specifically applies to residential subdivisions of 500 units or more. However, Government Code Section 66473.7(i) exempts "…any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate contiguous properties surrounding the residential project site are, or previously have been,

developed for urban uses; or housing projects that are exclusively for very low and low-income households."

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.[2] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

(c) Senate Bill X7-7 – Water Conservation Act

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.[3] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[4] Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.[5]

(d) Sustainable Groundwater Management Act of 2015[6]

The Sustainable Groundwater Management Act (SGMA) 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[7]. The SGMA 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 SGMA 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 SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions,

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2 *California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010.*

3 *State Water Resources Control Board, Fact Sheet, February 2017 Statewide Conservation Data, updated April 4, 2017.*

4 *State Water Resources Control Board, Media Release, "Statewide Water Savings Exceed 25 Percent in February; Conservation to Remain a California Way of Life," April 4, 2017.*

5 *State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, updated October 3, 2017.*

6 *Sustainable Groundwater Management Act [And Related Statutory Provisions from SB1168 (Pavley), AB1739 (Dickinson), and SB1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2016.*

7 *California Department of Water Resources. SGMA Groundwater Management. https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management. Accessed September 2020.*

require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

(e) California Code of Regulations

(i) Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018 is 1.8 gpm at 80 psi; and lavatory faucets manufactured after July 1, 2016 is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016 is 1.28 gallons per flush.[8]

(ii) CalGreen Code

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The mandatory measures for water conservation provide limits for fixture flow rates, which are the same as those for the Title 20 efficiency standards listed above. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

(iii) Plumbing Code

Title 24, Part 5 of the 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, 2019.

[8] *California Code of Regulations, Title 20, Section 1605.3(h), p.306 https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?transitionType=Default&contextData=%28sc.Default%29. Accessed February 2021.*

(f) Executive Order B-40-17

On April 7, 2017, Executive Order B-40-17 was issued. Cities and water districts throughout the state are required to report their water use each month and bans wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

(g) Executive Order No-10-21

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth On July 8, 2021 Executive Order N-10-21 (Order) was issued calling for voluntary cutbacks of water usage by 15 percent from 2020 usage levels. The Order lists commonsense measures Californians can undertake to achieve water usage reduction goals and identifies the State Water Resources Control Board (Water Board) for tracking of monthly reporting on the State's progress.

(2) Regional

(a) Metropolitan Water District

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

(i) 2020 Urban Water Management Plan

The Metropolitan Water District's (MWD) 2020 UWMP (MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.[9] Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions, i.e. under the most challenging weather conditions such as drought and service interruptions caused by natural disasters, is presented in Table 2-5 of the 2020 RUWMP.[10] The analysis in the 2020 RUWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[11] In the 2020 RUWMP, the projected 2045 demand water during multiple-dry year conditions is 1,564,000 afy, whereas the expected and projected 2045 supply is 2,239,000 afy based on current programs, for a potential surplus in 2045 of 675,000 afy.[12]

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[9] *Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, May 2021,*

[10] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, page 2-19.*

[11] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, page 2-19,*

[12] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, page 2-19.*

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 meet its water supply needs.

(ii) 2015 Integrated Resources Plan

The MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply such as water quality, climate change, and regulatory and operational changes. The most recent IRP (2015 IRP) was adopted in January 2016.[13] It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

The 2015 IRP reliability targets identify developments in imported and local water supply, and in water conservation that, if successful, would provide a future without water shortages and mandatory restrictions under planned conditions. For imported supplies, MWD would make investments to maximize Colorado River Aqueduct deliveries in dry years. MWD would make ecologically-sound infrastructure investments to the SWP so that the water system can capture sufficient supplies to help meet average year demands and to refill the MWD storage network in above-average and wet years.

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. IRP Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP, shows the supply reliability and conservation targets. As presented in the IRP, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after

[13] *Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2015 Update, Report No. 1518, 2016.*

conservation is estimated to be 4,273,000 acre-feet and the total supply reliability target is approximately 4,539,000 acre-feet, representing an excess of 266,000 acre-feet.[14]

The 2020 IRP planning process is currently in development.[15] The 2020 IRP analyzes multiple scenarios that could plausibly unfold in the future due to climate change, economic growth, legislation and regulations affecting water sources and demands, and other variables. With the variability of these impacts in mind, MWD is developing four scenarios to help understand the challenges of the future and effectively plan to ensure water reliability in the face of those challenges.

(iii) Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM 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 then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[16]

(iv) Long-Term Conservation Plan

The Long-Term Conservation Plan (LTCP) provides a framework of goals and strategies to reduce per capita water use through conservation and water use efficiency. The plan recognizes the challenges and uncertainties to achieving the IRP target. As a result, the LTCP uses adaptive management and strategies to adjust implementation approaches.

(v) Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan (WSAP). The WSAP includes a formula for determining

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[14] *Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report 1518. page VIII, http://www.mwdh2o.com/PDF_About_Your_Water/2015%20IRP%20Update%20Report%20(web).pdf Accessed February 2021.*

[15] *Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2020.*

[16] *Water Surplus and Drought Management Plan, Report No. 1150. August 1999, http://www.mwdh2o.com/PDF_About_Your_Water/2.4_Water_Supply Drought Management Plan.pdf. Accessed February 2021.*

equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.[17] 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 2020 Urban Water Management Plan (UWMP)

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. LADWP adopted the 2020 UWMP on May 25, 2021, 2016.The 2020 UWMP complies with the Urban Water Management Planning Act, builds upon the goals and progress made in the 2015 UWMP and currently serves as the City's master plan for reliable water supply and resource management consistent with the City goals and objectives. The UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2045. Long range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

(b) City of Los Angeles Green New Deal

The City released the first Sustainable City pLAn in April 2015,[18] which has been updated in 2019 as the City's Green New Deal. The Green New Deal includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability.

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater

[17] *Metropolitan water District, 2015 Urban Water Management Plan, page 2-21.*
[18] *City of Los Angeles, Sustainable City pLAn, 2015, https://www.lacity.org/highlights/sustainable-city-plan. Accessed February 2021.*

management.[19] The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[20] Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

(d) City of Los Angeles General Plan

(i) General Plan Framework Element

The Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[21] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the City's Framework Element identifies goals, objectives, and policies for City utilities including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[22] The goals, objectives and policies are addressed by the City in its ordinances and preparation of its UWMP.

Table IV.M.1-1, **Relevant General Plan Infrastructure and Public Services Goals, Objectives, and Policies,** shows the General Plan goals, objectives and policies related to water supply.

Table IV.M.1-1
Relevant General Plan Infrastructure and Public Services
Goals, Objectives, and Policies

Framework Element – Chapter 9 Infrastructure and Public Services	
Goal 9C	Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses.
Objective 9.1	Monitor and forecast demand based upon actual and predicted growth.
Objective 9.8	Monitor and forecast water demand based upon actual and predicted growth.

[19] *City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018, https://www.lacitysan.org/cs/groups/sg_owla/documents/document/y250/mdi2/~edisp/cnt026188.pdf. Accessed February 2021.*

[20] *City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014, https://www.lamayor.org/sites/g/files/wph446/f/page/file/ED_5_-_Emergency_Drought__Response_-_Creating_a_Water_Wise_City.pdf?1426620015. Accessed February 2021.*

[21] *City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, July 27, 1995.*

[22] *City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Water Supply.*

Table IV.M.1-1
Relevant General Plan Infrastructure and Public Services
Goals, Objectives, and Policies

Framework Element – Chapter 9 Infrastructure and Public Services	
Policy 9.8.1	Monitor water usage and population and job forecast to project future water needs.
Objective 9.9	Manage and expand the City's water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses.
Policy 9.9.1	Pursue all economically efficient water conservation measures at the local and statewide level.
Policy 9.9.7	Incorporate water conservation practices in the design of new projects so as not to impede the City's ability to supply water to its other users or overdraft its groundwater basins.
Objective 9.10	Ensure that water supply, storage, and delivery systems are adequate to support planned development.
Policy 9.10.1	Evaluate the water system's capability to meet water demand resulting from the Framework Element's land use patterns.
Policy 9.10.2	Solicit public involvement, when appropriate, in evaluating options for the construction of new and/or expansion of existing water facilities.
Objective 9.11	Ensure, to the maximum extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.
Policy 9.11.1	Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.
Source: City of Los Angeles, City of Los Angeles General Plan, Framework Element, re-adopted 2001.	

(ii) Central City Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the boundary of the Central City Community Plan. The Central City Community Plan does not contain water supply objectives and policies applicable to the Project.[23]

(e) Los Angeles Municipal Code

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

[23] *Los Angeles City Department of Planning, Central City Community Plan.*

- 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.

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

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

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

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

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

The City of Los Angeles also has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing. 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 double fire hydrants 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.

b) Existing Conditions

The Project Site is located within the South Park subarea of the Central City Community Plan, which is bounded by Figueroa Street and the Harbor Freeway to the west, Main Street to the east, 8th Street to the north, and the Santa Monica Freeway to the south, and is primarily made up of residential, medical, commercial, and retail uses. Warehouse space in one-story unreinforced masonry buildings is scattered throughout the district. The Central City Community Plan anticipates the South Park area will attract large commercial projects that will combine commercial and residential development to take advantage of the downtown area.

The Project Site is approximately 56,325 square feet (1.29 acres) and is currently occupied by multiple commercial buildings and a four-story residential hotel building. The Project fronts both West Pico Boulevard and South Hope Street.

(1) Water Supply

According to the *2015 Urban Water Management Plan*, the primary LADWP sources of water supplies are surface water imported via the Los Angeles Aqueduct, local groundwater, and water purchased from the MWD. In addition, recycled water projects are progressing and expected to be a greater portion of LADWP water supply in the future. Overall, these sources of water provide the necessary water to meet LADWP's water supply needs. The *2015 Urban Water Management Plan* water demand projection for 2040 is approximately 709,500 acre-feet per year, based on normal weather conditions.[24]

(a) Los Angeles Aqueduct

The Los Angeles Aqueduct, local groundwater, and recycled water constitute the City-controlled water supplies. The Los Angeles Aqueduct conveys snowmelt runoff from the eastern Sierra Nevada Mountains and has a capacity of holding a flow of 485 cubic feet per second (cfs) of water. Secondarily, the Los Angeles Aqueduct water supplies are supplemented by groundwater pumping. The Los Angeles Aqueduct supplies fluctuate from year to year due to varying annual snowfall and hydrological conditions. In recent years, the Los Angeles Aqueduct supplies have decreased because of environmental obligations to dedicate water resources to mitigate groundwater pumping in the Owens Valley, restore the water level of Mono Lake, and mitigate dust emissions from Owens Lake.[25]

The Los Angeles Aqueduct system extends approximately 340 miles from the Mono Basin to the City. From 1995 through 2004, the Los Angeles Aqueduct supplied about half of the City's water needs. From 2011-2015 the Los Angeles Aqueduct supplied 29 percent of LADWPs water. The City owns approximately 312,000 acres of property in the Owens Valley and appropriates

[24] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, page ES-22.*

[25] *Los Angeles Department of Water and Power, Facts & History Website, accessed: October 2019.*

groundwater from its lands in the Owens Valley pursuant to a long-term groundwater management plan with Inyo County.[26] The City and Inyo County prepared a long-term groundwater management agreement, known as the *Green Book for the Long-Term Groundwater Management Plan for the Owens Valley and Inyo County*.[27] This agreement sets forth plans and procedures to prevent overdraft conditions from groundwater pumping as well as to manage vegetation in the Owens Valley. In July 1998, LADWP and the Great Basin Unified Air Pollution Control District entered into a Memorandum of Agreement to mitigate dust emissions from Owens Lake.

(b) Groundwater

In addition to groundwater extraction from nine wellfields throughout the Owens Valley, the LADWP also extracts from three local groundwater basins: San Fernando, Sylmar, and Central. The LADWP plans to continue future pumping from the local basins, with limitations based on water quality and overdraft protection. The LADWP's groundwater pumping strategy is based on a "safe yield" strategy, in which the amount of water removed over a period of time equals the amount of water entering the groundwater basin through native and imported groundwater recharge. Further, protection from potential overdraft conditions is provided by the court-appointed Los Angeles River Area Watermaster for the San Fernando and Sylmar Basins, and a court-appointed Watermaster Panel for the Central Basin. The Watermaster Panel consists of three separate arms; the first arm is the Administrative Body, performed by the Water Replenishment District of Southern California (WRD), which administers the Watermaster accounting and reporting functions; the second arm is the Central Basin Water Rights Panel (CBWRP), which enforces issues related to pumping rights defined in the adjudication; and the third arm is the Storage Panel, which is comprised of the CBWRP and the WRD Board of Directors. Annually, the Watermaster prepares a Watermaster Service Report indicating groundwater extractions, replenishment operations, imported water use, recycled water use, finances of Watermaster services, administration of the water exchange pool, and significant water-related events in the Central Basin.[28] Additionally, a long-term groundwater management agreement between the City and Inyo County ensures the protection of LADWP's groundwater resources within Owens Valley from overdraft conditions.

Local groundwater provides approximately 12 percent of the total water supply to the City and has provided nearly 23 percent of the supply in drought years.[29] On average, about 89 percent of the LADWP's groundwater supply is extracted from the Upper Los Angeles River Area, while the Central Basin provides 11 percent. The Upper Los Angeles River Area has three local groundwater basins:

- San Fernando,

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[26] *Los Angeles Department of Water and Power, Facts & History Website, accessed: July 2019.*
[27] *Inyo County and City of Los Angeles, Green Book for the Long-Term Groundwater Management Plan for the Owens Valley and Inyo County, June 1990.*
[28] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, page 6-15.*
[29] *Los Angeles Department of Water and Power, Groundwater Website, accessed: October 11, 2019.*

- Sylmar, and
- Eagle Rock.[30]

LADWP groundwater rights in the basins are adjudicated, meaning they are confirmed and apportioned by judgments of the California Superior Courts. The adjudications are based on maintaining long-term groundwater extractions that will not create an overdraft condition in the basin manages vegetation in the Owens Valley. The San Fernando, Sylmar, and Eagle Rock basins are subject to the judgment in *The City of Los Angeles vs. the City of San Fernando, et al.*[31] Pumping is reported to the court-appointed Upper Los Angeles River Area Watermaster. The average LADWP San Fernando, Sylmar, and Eagle Rock basin entitlements under the judgment are 87,000 acre-feet per year, 3,405 acre-feet per year, and 500 acre-feet per year, respectively.[32] In addition, as of October 2013, LADWP accumulated nearly 537,453 acre-feet of stored water credits in the San Fernando Basin. This stored water credit is water that LADWP can withdraw from the basin during normal and dry years or in an emergency.

The Central Basin and West Coast Basin water rights were established through the Central Basin Judgment and West Coast Basin Judgment, respectively. Pumping is reported to a Watermaster Panel, comprised of WRD and CBWR. The Central Basin Judgment entitlement for the LADWP is 15,000 acre-feet per year.[33] The West Coast Basin Judgment entitles LADWP to approximately 1,503 acre-feet per year. LADWP does not currently exercise its water rights in the West Basin.[34]

As shown in **Table IV.M.1-2, Groundwater Production Forecasts,** LADWP plans to continue production from its groundwater basins in the coming years to offset reductions in imported supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection. Both LADWP and the California Department of Water Resources have programs in place to monitor wells to prevent overdrafting.[35]

In response to contamination issues and declining groundwater levels, the LADWP is working to clean up the San Fernando Basin's groundwater and is making investments to recharge local groundwater basins through stormwater recharge projects, while collaborating on the rehabilitation of aging stormwater capture and spreading facilities, with the long range goal of increasing the contribution of groundwater to overall City water supplies.

30 *Los Angeles Department of Water and Power, Groundwater Website, accessed: October 4, 2019.*
31 *City of Los Angeles v. City of San Fernando et al. (1975) 14 Cal.3d 199.*
32 *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, pages 6-6, 6-13.*
33 *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, pages 6-15, 6-17.*
34 *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, pages 6-15, 6-17.*
35 *Los Angeles Department of Water and Power, Groundwater Website, accessed: October 11, 2019.*

Table IV.M.1-2
Groundwater Production Forecasts

Basin	2014/2015 (Actual)	2019/2020	2024/2025	2029/2030	2034/2035	2039/2040
	AFY					
San Fernando [1]	80,097	90,000	88,000	84,000	92,000	92,000
Sylmar [2]	0	4,170	4,170	4,170	4,170	3,570
Central [2]	6,948	18,500	18,500	18,500	18,500	18,500
Total	87,045	112,670	110,670	106,670	114,670	114,070

[1] *SFB remediation facilities are expected to be in operation in FY 2021/22. Use of groundwater storage credits allows for increased pumping above safe yield.*
[2] *Use of groundwater storage credits in Sylmar Basin and Central Basin allows for temporary increase in pumping above safe yield until stored water credits have been expended.*

(c) MWD – Purchased Water

The remainder of the City's water demand is supplied by purchases from the MWD. The MWD imports its water supplies from Northern California through the State Water Project's (SWP) California Aqueduct and from the Colorado River by way of the MWD's Colorado River Aqueduct. LADWP is one of 26 member-agencies that have preferential rights to purchase water from the MWD. Pursuant to MWD Act Section 135, as of June 30, 2019, LADWP has a preferential right to purchase 18.25 percent of MWD's total water supply.[36] As a percentage of the City's total water supply, purchases of MWD water have historically varied from 4 percent in 1983-84 to 71 percent in 2008-09, with a five-year average 52 percent between 2005-06 and 2009-10. The City relies on the MWD even more in dry years and has increased its dependence in recent years as Los Angeles Aqueduct supply has been reduced. Although the City plans to reduce its reliance on MWD supply, it has made significant investments in the MWD, anticipating that the City will continue to rely on the wholesaler to meet its current and future supplemental water needs.[37] The *2015 UWMP* projects that LADWP's reliance on the MWD water supplies will be reduced significantly; from the five year average of 57 percent of total demand to 11 percent under average weather conditions by 2040.[38]

Accounting for current water supplies, planned future water conservation and planned future water supplies, LADWP projects that it will be able to reliably provide water to its customers through the 25 year planning period covered by the *2015 UWMP*. The MWD's 2010 Regional

[36] *City of Los Angeles, Department of Water and Power, Water Supply Assessment, Morrison Project for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, February 4, 2020, page 27. See* ***Appendix H.2*** *of this Draft EIR.*
[37] *City of Los Angeles, Department of Water and Power, Water Supply Assessment, Morrison Project for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, February 4, 2020., page 8-1. See* ***Appendix H.2*** *of this Draft EIR.*
[38] *City of Los Angeles, Department of Water and Power, Water Supply Assessment, Morrison Project for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, February 4, 2020. See* ***Appendix H.2*** *of this Draft EIR.*

UWMP currently shows that with its investments in storage, water transfers and improving the reliability of the Delta, water shortages are not expected to occur within the next 25 years. Summaries off MWD's individual supplies are presented below.

(i) State Water Project

MWD imports water from the SWP, owned by the state of California and operated by DWR. The SWP is a water storage and delivery system of pump stations, reservoirs, aqueducts, tunnels, and power plants. The main purpose of the SWP is to divert and store surplus water during wet periods and distribute it to areas throughout the State. Other purposes of the SWP include flood control, power generation, recreation, fish and wildlife protection, and water quality management in the Sacramento–San Joaquin River Delta. The SWP transports Feather River water stored in and released from Oroville Dam and conveyed through the Bay-Delta, as well as unregulated flows diverted directly from the Bay-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 18.8 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 52 percent in 2016).[39]

The SWP, under the original contracted amount at 100 percent allocation, provides MWD with 1,911,500 acre-feet of water each calendar year.[40] However, quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, SWP deliveries in the most critically dry years have varied. The initial allocation for 2018 was 15 percent,[41] but due to observed changes in hydrologic and water supply conditions, the allocation levels were subsequently increased to 20 percent[42] in January, 30 percent[43] in April, and 35 percent[44] in May.

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

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[39] *City of Los Angeles, Department of Water and Power, Water Supply Assessment, Morrison Project for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, February 4, 2020., pages 28-29. See* ***Appendix H.2*** *of this Draft EIR.*

[40] *City of Los Angeles, Department of Water and Power, Water Supply Assessment, Morrison Project for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, February 4, 2020., page 28. See* ***Appendix H.2*** *of this Draft EIR.*

[41] *California Department of Water Resources, Notice to State Water Project Contractors, Number 17-10, 2018 State Water Project Initial Allocation – 15 Percent.*

[42] *California Department of Water Resources, Notice to State Water Project Contractors, Number 18-02, 2018 State Water Project Initial Allocation Increase – 20 Percent.*

[43] *California Department of Water Resources, Notice to State Water Project Contractors, Number 18-03, 2018 State Water Project Initial Allocation – 30 Percent.*

[44] *California Department of Water Resources, Notice to State Water Project Contractors, Number 18-05, 2018 State Water Project Initial Allocation – 35 Percent.*

June.[45] 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.[46]

(ii) The Colorado River

MWD owns and operates the Colorado River Aqueduct, which has delivered water from the Colorado River to Southern California since 1942. The Colorado River currently supplies approximately 17 percent of Southern California's water needs, and on average makes up about 15 percent of LADWP's purchases from MWD. MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. California is apportioned the use of 4.4 million acre-feet of water from the Colorado River each year plus one-half of any surplus that may be available for use collectively in Arizona, California, and Nevada. In addition, California has historically been allowed to use Colorado River water apportioned to, but not used by, Arizona or Nevada. Since 2003, due to increased consumption, no such unused apportioned water has been available to California. Historically, MWD has been able to claim most of its legal entitlement of Colorado River water and could divert over 1.2 million acre-feet in any year, but persistent drought conditions have contributed to a decrease in these claims. The recent 16-year drought has been so severe that it has resulted in major reductions in water deliveries from the Colorado River. In response, the federal government, states, and urban and agricultural water districts that depend on the Colorado River adopted and enacted 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 storage levels and prevent reservoirs from reaching critically low levels.[47]

(d) Recycled Water

The use of recycled water reduces the demand for potable water in the area. LADWP presently uses recycled water for industrial and irrigation purposes. LADWP uses recycled water produced by four wastewater treatment plants:

- Los Angeles-Glendale Water Reclamation Plant,
- Donald C. Tillman Water Reclamation Plant,

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[45] *State of California, Department of Water Resources, Notice to State Water Project Contractors, Nos. 19-03, 19-06, and 19-10.*

[46] *State of California, Department of Water Resources, Notice to State Water Project Contractors, Nos. 19-10.*

[47] *City of Los Angeles, Department of Water and Power, Water Supply Assessment, Morrison Project for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, February 4, 2020., page 30. See* ***Appendix H.2*** *of this Draft EIR.*

- Terminal Island Treatment Plant, and
- Hyperion Treatment Plant.

LADWP restores wastewater to a level of quality specified by the California Department of Health Services (DHS) and distributes it for landscaping and industrial uses. The sustainability of the City's water supplies is dependent on the City's ability to maximize water conservation and increase recycled water use. LADWP's Action Plan states that the City will develop significant additional water conservation and water recycling, as well as other water resources, to ensure a reliable water supply. LADWP is currently engaged in an aggressive planning and outreach program to expand recycled water supplies and implement the use of recycled water for groundwater recharge. The City's goal is to increase the use of recycled water to 75,400 acre-feet per year by 2040.[48] Water recycling and reuse is reducing Southern California's demand for potable water.

(e) Global Warming and Climate Change

As discussed in the LADWP's 2015 UWMP, generally speaking, any water supplies that are dependent on natural hydrology are vulnerable to climate change, especially if the water source originates from mountain snowpack. For LADWP, the most vulnerable water sources subject to climate change impacts are imported water supplies from MWD and the LAA, though local sources can also expect to see some changes in the future. In addition to water supply impacts, changes in local temperature and precipitation are expected to alter water demand patterns. 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.[49]

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.[50] As mentioned above, with updates published every five years, the recently released *California Water Plan Update 2018* built on its predecessor by identifying specific performance tracking metrics, recommending financing methods with stable revenues, and incorporating principles of sustainability.[51]

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[48] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, page 4-27.*

[49] *City of Los Angeles, Department of Water and Power, 2015 Urban Water Management Plan, June 2016, page 12-1.*

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

[51] *California Department of Water Resources, California Water Plan Update, 2018.*

(2) Water Demand

(a) Citywide Water Demand

As discussed previously, in accordance with the California Urban Water Management Planning Act of 1984, all urban water suppliers that provide municipal and industrial water to more than 3,000 customers, or supply more than 3,000 acre-feet per year of water, are required to prepare and adopt an UWMP. As previously discussed, according to the UWMP, water use in the City in 2015 was approximately equal to water use in the 1970s, although the City population has increased by over one million people during this period. The UWMP projects yearly water demand to reach approximately 709,500 acre-feet by 2040. California law requires the UWMP to be updated every five years, which includes an update of water supply and demand projections. Additionally, the LADWP's Action Plan strategizes for the implementation of water conservation measures and water recycling to promote a reliable future water supply. The City plans to meet all future increases in water demand through water conservation and recycling efforts, thereby decreasing its reliance on imported water. Further, the MWD's current Integrated Resources Plan aims to outline a strategy for reliable future water supplies through 2030. An Integrated Resources Plan is a plan that examines all types of water supplies and conservation in a holistic and interconnected manner. Successful implementation of the Integrated Resources Plan has resulted in reliable supplemental water supplies for the City from the MWD. Finally, State Water Code Section 350-354 regulates water distribution during periods of extreme drought, ensuring that when the distributor of a public water supply declares a water shortage emergency within its service area, water will be allocated to meet domestic, sanitation, and fire protection needs.

(b) Local Water Infrastructure and Consumption

The Project Site is approximately 56,325 square feet in size and is currently occupied by multiple commercial buildings and a four-story residential hotel building. The Project fronts both West Pico Boulevard and South Hope Street. LADWP owns and maintains the water infrastructure to the Project Site. Based on available record data provided by the City, there is an 8-inch water main South Hope Street and a 12-inch main in West Pico Boulevard. As shown in **Table IV.M.1-3, Existing Average Daily Water Consumption,** the existing uses consume approximately 1,953 gallons per day (gpd) of water.

Table IV.M.1-3
Existing Average Daily Water Consumption

Land Use	Size (square feet)	Consumption Rate [a]	Total Water Consumption (gpd)
Commercial	32,550 sf	54.20 gpd/1,000 sf	1,764
Hotel	111 rooms	NA [b]	-- [b]
Existing Water Consumption			**1,764**

Notes: gpd = gallons per day; sf = square feet
a The average daily flow based on the City of Los Angeles BOS sewerage generation factors.
b The Morrison Hotel has been vacant since 2006 and does not currently consume water.
Source (table): KPFF Consulting Engineers, Morrison Hotel Project, Utility Infrastructure Technical Report: Water, September 23, 2020, Table 1, page 4, ***Appendix H.1*** *to this Draft EIR.*

3. Project Impacts

a) Thresholds of Significance

In accordance with the State *CEQA Guidelines* Appendix G (Appendix G), the Project would have a significant impact related to utilities and service systems if it would:

Threshold a) ***Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects; or***

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes the following factors and considerations identified in the Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions:

- *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 the project completion; and*
- *The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.*

b) Methodology

The environmental impacts of the Project with respect to water are determined based on the proposed increase in water demand and the capacity of existing and proposed infrastructure. The existing water demand is compared to the Project's water demand and water infrastructure capacity, including improvements associated with the Project.

LADWP performs a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. LADWP's approach consists of analyzing their water system model near the Project Site. Based on the results, LADWP determines whether they can meet the Project fire hydrant flow needs based on existing infrastructure.

In addition, LADWP performs a flow test to determine if available water conveyance exists for future development. LADWP's approach consists of data ranging from available static pressure (meaning how much pressure is available at the source before applying the project's demand), to the available pressure at the maximum demand needed for the project. Based on the results,

LADWP determines whether they can meet the project needs based on existing infrastructure. Based on this analysis, a determination is made as to whether the existing water supply and infrastructure can accommodate the Project's projected water consumption.

The analysis with regard to water infrastructure is based on the Utility Report prepared for the Project by KPFF Consulting Engineers, which is included in **Appendix H.1** of this Draft EIR. The Utility Report includes a comparison of the estimated net water demand for the Project to the available capacity of the existing water infrastructure.

c) Project Design Features

The following Project Design Features, based on the Project's WSA commitment letter, are applicable to the Project with regard to water consumption:

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

- Energy Star Certified Residential Clothes Washers with Integrated Water Factor less than or equal to 4.1 for capacity less than or equal to 2.5 cubic feet, less than or equal to 3.1 for front-loading and capacity greater than 2.5 cubic feet, and less than or equal to 4.1 for top-loading and capacity greater than 2.5 cubic feet.
- Energy Star Certified Residential Dishwashers with gallons per cycle less than or equal to 3.47 for standard and less than or equal to 3.0 for compact.
- High Efficiency Toilets with a flush volume of 1.0 gallons per flush or less (less than the current 1.28 gallons per flush code requirement).
- Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less (less than the current 1.8 gpm code requirement).

PDF WAT-2 The Project design shall incorporate the following landscape and irrigation features in addition to those measures required by the City's current codes and ordinances:

- California Friendly plants or native plants shall be used as needed.
- Drip/Subsurface Irrigation (Micro-Irrigation)
- Drought tolerant "No Mow Fescue" shall be uses as needed.
- Micro-Spray.

- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).

PDF WAT-3 The Project design shall incorporate the following pool features in addition to those measures required by the City's current codes and ordinances:

- Install a meter on the pool make-up line so water can be monitored and leaks can be identified and repaired.
- Pool/Spa recirculating filtration equipment.
- Water-Saving Pool Filter.

PDF WAT-4 The Project design shall incorporate the following utility features in addition to those measures required by the City's current codes and ordinances:

- Domestic Water Heating System located in close proximity to point(s) of use.
- Individual metering and billing for water use for every residential dwelling unit and commercial unit.

d) Analysis of Project Impacts

Threshold a) Would the project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?

(1) Impact Analysis

(a) Construction

Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd.[52] This amount of temporary construction water use would be similar to the existing water consumption of 1,764 gpd at the Project Site. Furthermore, this estimated construction-period demand is significantly less than the Project's estimated operational demand, which, as determined by the Project's SAR, can be accommodated by the existing infrastructure, as described below under the operational analysis. It is therefore anticipated that the existing water infrastructure would similarly meet the limited and temporary water demand associated with construction of the Project.

[52] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Water Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, page 7. See* ***Appendix H.1*** *of this Draft EIR.*

However, the Project would require construction of new, on-site water distribution lines to serve the operational needs of the new buildings. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Although no upgrades to the public main are anticipated, minor off-site work is required in order to connect to the public main. Therefore, as part of the Project, pursuant to project design feature PDF TR-1, a construction staging and traffic management plan (detailed in **Section IV.K, Transportation)**, would be implemented to reduce any temporary pedestrian and traffic impacts during construction, ensuring safe vehicle travel and safe pedestrian and emergency vehicle access. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. **Therefore, construction of the Project would not require the relocation or construction of new or expanded water treatment facilities, the construction or relocation of which could cause significant environmental effects and impacts would be less than significant**.

(b) Operation

(i) Water Supply

The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,263 miles of pipes, and more than 100 storage tanks and reservoirs. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. In 2014, ultraviolet treatment was added to the LAAFP treatment process. The LAAFP treats approximately 600 million gallons of water per day.[53] Project water use has been estimated and is presented below in **Table IV.M.1-4, Estimated Daily Water Consumption**.

Table IV.M.1-4
Estimated Daily Water Consumption

Land Use	Size	Consumption Rate (gpd) [a]	Total Consumption (gpd)
Apartment: 1 Bedroom	74 du	110/du	8,140
Apartment: 2 Bedroom	62 du	150/du	9,300
Base Demand Adjustment [b]	--	--	2,110
Hotel	444 rooms	120/room	53,280
Base Demand Adjustment [b]	--	--	4,891
Museum	11,091 sf	30/1,000 sf	333

[53] *Los Angeles Department of Water and Power, 2017 Briefing Book.*

Table IV.M.1-4
Estimated Daily Water Consumption

Land Use	Size	Consumption Rate (gpd) [a]	Total Consumption (gpd)
Gyms [c]	2,476 sf	650/1,000 sf	1,610
Ballroom [d]	17,019 sf	120/1,000 sf	2,042
Bar	2,838 sf	720/1,000 sf	2,043
Restaurant: Full Service [e]	586 seats [f]	30/seat	17,577
Meeting Rooms	1,372	120/1,000 sf	165
Lobbies and Amenities [g]	23,727 sf	50/1,000 sf	1,186
Pool/Spa [h]	1,089 sf	--	102
Landscaping	3,000 sf	--	781
Covered Parking	90,000 sf	0.65/1,000 sf	53
Cooling Tower	1,200 tons	--	21,972
		Total Project Water Consumption	125,585
		Required Water Savings [i]	*-21,896*
		Additional Water Savings [j]	*-3,551*
		Existing Water Consumption	*-1,764*
		Net Project Water Consumption	**98,374**

Notes: gpd = gallons per day; du = dwelling unit; sf = square feet

a Water consumption rate source: City of Los Angeles, Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge, Sewer Generation Factor for Residential and Commercial Categories, 2012.

b Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates.

c Includes both the hotel fitness center and residential gym amenities.

d Includes all ballroom space as well as all adjacent amenity terraces.

e Per the Traffic Assessment, the "Restaurant" land use includes all restaurant space, including the high-turnover restaurant (indoor seating, courtyard, chef's office, bathroom, and sidewalk restaurant space on W. Pico Boulevard and S. Hope Street), the rooftop restaurant/lounge (seating, kitchen/back of house, manager's office, service area, covered amenity space, bathrooms, elevator lobby, and open terrace), and the lobby restaurant/lounge (seating, kitchen, and bathrooms).

f Assumes 30 sf per seat. 17,577 sf / 30 sf per seat = 586 seats.

g Lounge rate was used for hotel lobby, residential lobby, loggia, courtyard, and amenity terraces on Levels 6 and 25 as these land uses do not have a designation in the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates.

h Pool square footage obtained from Architectural Floor Plans and an assumed maximum allowed depth of 3.5 feet per code.

i Required water savings are due to the Project's conformance to the City of Los Angeles Ordinance No. 184,248, 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code.

j Additional water savings are due to additional conservation commitments agreed to by the Project Applicant as detailed under project design features PDF WAT-1 through PDF WAT-4.

Source (table): KPFF Consulting Engineers, Morrison Hotel Project, Utility Infrastructure Technical Report: Water, September 23, 2020, *Table 2, pages 9-10,* ***Appendix H.1*** *to this Draft EIR.*

As shown in **Table IV.M.1-4**, the Project would consume a net total of approximately 98,374 gpd of water. This annual consumption includes reductions based on the Project's compliance with required City Ordinances and codes, including the City's Plumbing Code and Green Building

Code. Furthermore, water consumption would be further reduced as a result of water saving features detailed in project design features PDF WAT-1 through PDF WAT-4. These features include: fixtures (clothes washers, dishwashers, toilets, and showerheads) that result in water savings that exceed code requirements; water-friendly landscaping and irrigation; leak detection, recirculating filtration, and water-saving filters for the pool/spa; and proper siting and individual metering for utilities.

The LADWP *2015 Urban Water Management Plan* confirmed that the rate of water use in the City has remained relatively consistent over the previous five years and about the same as in the 1970s despite the fact that over 1.1 million more people now live in Los Angeles. The *UWMP's* water demand projection for 2040 is approximately 710,800 afy for average years, 753,400 afy for single-dry years, and 725,000 afy for multiple-dry years. The projected water demand from the Project of 98,374 gpd (110.19 afy) would fall within the UWMP's projected water supplies through 2040, representing approximately 0.016 percent of the projected water supply during average years (710,800 afy), approximately 0.015 percent of the projected water supplies during single-dry years (753,400 afy), and approximately 0.015 percent of projected water supplies during multiple-dry years (725,000 afy).[54] The City is also making efforts to increase the availability of water supplies, including increasing recycled water use and identification of alternative water supplies, such as water transfer, desalination, and stormwater runoff reuse, as well as implementing management agreements for long-term groundwater use strategies to prevent overdraft. Consideration of existing sources of supply, coupled with the combined effect of these City efforts to increase available water supplies, it is expected to assure adequate water supplies for the LADWP service area through at least 2040. Therefore, the amount of new annual demand from the Project would be insignificant relative to available supplies through 2040, projected growth in Los Angeles, and planned water resource development by LADWP.

Furthermore, the LADWP has determined that the Project's additional water demand has been accounted for in the City's overall total demand projections and approved the Project for an annual consumption of 120 afy.[55] Accordingly, the Project's estimated annual water consumption of 110.19 afy would fall within this approved amount.

(ii) Water Supply Infrastructure and Fire Flow

The Project proposes to make two connections to the existing 8-inch main in Hope Street. There are two types of connections that can be made to the City main. One type of connection is a combo service, which has one connection to the main and splits to serve both fire and domestic. The second type of connection is to have independent connections for fire and domestic water use. In addition, the services would include backflows and be metered separately per City

[54] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*
[55] *City of Los Angeles, Department of Water and Power, Water Supply Assessment, Morrison Project, February 4, 2020, page 35.*

requirements. The approved Will Serve Letter confirms that sufficient infrastructure capacity is available for the Project.[56]

Article 7 of the Fire Protection and Prevention, Section 57.507 of the LAMC sets the fire flow requirements for the Project. These guidelines, in addition to the requirements set by the City Fire Chief, will prescribe the fire flow requirements and hydrant spacing requirements for the Project. Per Section 57.513, the Fire Chief also determines the supplemental fire protection systems that will be required for the Project. Supplemental fire protection systems consist of the following:

- Fire protection signaling systems
- Fire hydrants
- Automatic fire extinguishing systems
- Smoke removal systems
- Standpipe systems

Based on fire flow standards set forth in LAMC Section 57.507.3, and as determined by the LAFD, the Project falls within the high density residential neighborhood commercial category, which has a required fire flow of 4,000 gallons per minute (gpm) from four adjacent hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). Hydrants can typically deliver up to 1,500 gpm, which is consistent with the requirement for 4,000 gpm from four hydrants simultaneously. Therefore, an Information of Fire Flow Availability Request (IFFAR) identifying four adjacent public hydrants was submitted to LADWP to confirm that LADWP's infrastructure is capable of delivering the required flow of 4,000 gpm while maintaining a minimum pressure of 20 psi. The completed IFFAR shows that four hydrants, flowing simultaneously, are able to deliver 1,500 gpm with a residual pressure of 44-46 psi. As shown by the IFFAR, the Project Site has adequate fire flow available to demonstrate compliance with LAMC Section 57.507.3.[57]

Furthermore, LAMC Section 57.513, Supplemental Fire Protection, states that:

> *Where the Chief determines that any or all of the supplemental fire protection equipment or systems described in this section may be substituted in lieu of the requirements of this chapter with respect to any facility, structure, group of structures or premises, the person owning or having control thereof shall either conform to the requirements of this chapter or shall install such supplemental equipment or systems. Where the Chief determines that any or all of such*

[56] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Water Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, Exhibit 1. See* ***Appendix H.1*** *of this Draft EIR.*

[57] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Water Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, Exhibit 2. See* ***Appendix H.1*** *of this Draft EIR.*

equipment or systems is necessary in addition to the requirements of this chapter as to any facility, structure, group of structures or premises, the owner thereof shall install such required equipment or systems.

The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which would be subject to Fire Department review and approval during the design and permitting of the Project. Based on LAMC Section 94.2020.0 that adopts by reference NFPA 14-2013, including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As noted, a SAR was submitted to LADWP in order to determine if the existing public water infrastructure could meet the demands of the Project. The SAR for the 8-inch main in Hope Street, located approximately 150 feet north of Pico Boulevard, shows a static pressure of 53 pounds per square inch and that a flow of up to 2,100 gpm can be delivered to the Project Site with a residual pressure of 48 pounds per square inch. This exceeds the 20 pounds per square inch requirement for the surrounding public hydrants. An additional SAR for the 8-inch main in Hope Street, located approximately 300 feet north of Pico Boulevard, shows a static pressure of 52 pounds per square inch and that a flow of up to 2,100 gpm can be delivered to the Project Site with a residual pressure of 47 pounds per square inch. This also exceeds the 20 pounds per square inch requirement for the surrounding public hydrants. As demonstrated by the SARs, the existing fire flow would be sufficient to serve the Project.[58] Should it be determined during the plot plan review that the existing fire flow at the Project Site is not sufficient to serve the Project, and that the Project would require the installation of new water lines, meters, private fire hydrants, or other fire safety features, these features would conform to the City's Fire Code and be implemented in consultation with the City of Los Angeles Fire Department.

(iii) Water Conservation Features

Installation of the required water saving fixtures and features described above and compliance with water conservation measures, including Title 20 and 24 of the California Administrative Code, would reduce the projected water demand. Chapter XII of the LAMC comprises the City of Los Angeles Emergency Water Conservation Plan. The Emergency Water Conservation Plan stipulates conservation measures pertaining to water closets, showers, landscaping, maintenance activities, and other uses. At the State level, Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses public utilities and energy, and includes appliance efficiency standards that promote conservation. Various sections of the Health and Safety Code also regulate water use.

[58] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Water Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, Exhibit 3. See* ***Appendix H.1*** *of this Draft EIR.*

(iv) Summary

As detailed above, the amount of new annual demand from the Project is insignificant relative to available supplies of an average (0.0016 percent), single-dry (0.0015 percent), and multiple-dry (0.0015 percent) years through 2040, projected growth in Los Angeles, and planned water resource development by LADWP. Additionally, the Project Site has adequate fire flow available to demonstrate compliance with LAMC Section 57.507.3 and would comply with the maximum allowable fire sprinkler demand requirements of the LAMC Section 94.2020.0. Furthermore, the Project would implement water conservation features as required by local (Chapter XII of the LAMC and the City of Los Angeles Emergency Water Conservation Plan) and State (Title 20 and Title 24 of the California Administrative Code) standards and regulations, as well as water saving features required by the WSA and detailed in project design features PDF WAT-1 through PDF WAT-4, which would reduce the water demand projected for the Project. **Therefore, sufficient water supplies would be available to serve the Project during operation from existing entitlements and the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects would not be required, and impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding water supply facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

(3) Level of Significance After Mitigation

Impacts regarding water supply facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold b) 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

Refer to **Threshold (a)**, above, for an impact analysis discussion on water supply available to serve the Project Site and reasonably foreseeable future development during normal, dry, and multiple dry years. **As detailed there, the Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years and impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e) Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis on water infrastructure and supply is the LADWP service area, which includes the entirety of the City. LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The 2015 UWMP prepared by LADWP accounts for existing development within the City, as well as projected growth through the year 2040.

Additionally, under the provisions of Senate Bill 610, LADWP is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds.[59] The types of projects that are subject to the requirements of Senate Bill 610 tend to be larger projects that may or may not have been included within the growth projections of the 2015 UWMP. The water supply assessment for 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 stated above, the Project and related projects would be required to meet Green Building Code, which requires all projects to reduce the overall potable water use by 20 percent. The baseline used for the 20 percent reduction is the maximum allowable water use per the Plumbing Code.

Furthermore, through LADWP's 2015 UWMP process and the City's Securing L.A.'s Water Supply, the City will meet all new demand for water due to projected population growth to the year of 2040, through a combination of water conservation and water recycling. These plans outline the creation of sustainable sources of water for the City of Los Angeles to reduce dependence on imported supplies. LADWP is planning to achieve these goals by expanding its 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.

There are 172 Related Projects, which consist of, but are not limited to, residential, schools, retail,

[59] *California State Water Code, Section 10912.*

restaurants, museums, hotels, offices, industrial, medical offices, gyms, cinemas, pharmacies, manufacturing, bowling alley, bus maintenance, and event space. The total increase in water demand for the Related Projects would be approximately 11.17 million gallons per day (mgd). Combined with the Project, the net increase in water demand would be approximately 11.27 mgd.[60] The 2015 Urban Water Management plan has estimated a water demand of 475 mgd by the year 2025, which means the Project combined with the Related Projects would account for approximately 2.4 percent of the total daily demand.

Based on the above, LADWP would be able to supply the water demands of the Project as well as future growth. **Therefore, the Project's contribution to cumulative impacts on water supply would not be cumulatively considerable, and cumulative impacts would be less than significant**.

(2) Mitigation Measures

Cumulative impacts to utilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to utilities would be less than significant.

[60] *The tabulation of Related Projects' water consumption is presented in **Appendix M** of this Draft EIR.*