IV. Environmental Impact Analysis

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

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 T of this Draft EIR, along with a copy of Resolution No. 021175 approving the WSA. Additional technical information used in the analysis is based on the *District NoHo Utility Infrastructure Technical Report: Water, Wastewater, and Energy* (Utility Report) prepared for the Project in January 2022 and included in Appendix G.

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 (California Water Code Section 10910 et seq.)
- Senate Bill 221 (California Water Code Sections 11010, 65867.5, 66455.3 and 66473.7)

- Senate Bill 7 (California Water Code Section 10608)
- Senate Bill X7-7 (Water Conservation Act of 2009)
- Sustainable Groundwater Management Act of 2014
- California Code of Regulations (Title 20 and Title 24)
- State of Drought Emergency Declarations and Executive Orders B-29-15, B-36-15, B-37-16, and B-40-17
- California Water Plan and the California Water Action Plan
- Metropolitan Water District's 2015 Urban Water Management Plan, Integrated Resources Plan, the Water Surplus and Drought Management Plan, and the Water Supply Allocation Plan
- Los Angeles Department of Water and Power's Urban Water Management Plan
- Green New Deal
- One Water LA 2040 Plan
- City of Los Angles General Plan, including
  - Framework Element; and
  - Community Plan
- Los Angeles Municipal Code (Ordinance Nos. 166,080, 181,288, 183,608, 184,250, 180,822, 181,480, 181,899, 183,833, 182,849, 184,692, and 184,248)
- Los Angeles Water Rate Ordinance

(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 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.[1] 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) Sustainable Groundwater Management Act of 2014[2]

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the

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[1] *State Water Resources Control Board, Final 20 x 2020 Water Conservation Plan, February 2010.*

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

sustainable management of groundwater supplies by local authorities.[3] 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, 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.

(d) California Code of Regulations

(i) Title 20

Title 20, Section 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.[4]

(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,

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[3] *California Department of Water Resources. SGMA Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed March 30, 2021.*

[4] *California Code of Regulations, Title 20, Section 1605.3(h),https://energycodeace.com/site/custom/public/reference-ace-t20/index.html#!Documents/section16053statestandardsfornonfederallyregulatedappliances.htm, accessed March 30, 2021.*

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 California Code of Regulations 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.

(e) State of Drought Emergency Declaration and Executive Orders

In response to California's drought conditions, on January 17, 2014, Governor Brown declared a State of Drought Emergency and directed state officials to take numerous necessary actions with local Urban Water Suppliers and municipalities to reduce the impacts of the ongoing drought conditions that had been occurring in California since approximately 2009.[5] Subsequently, four Executive Orders were issued between April 2015 to April 2017 to address changing drought conditions and provide guidance for addressing the drought conditions.

Executive Order B-29-15 (April 2015) imposed a mandatory 25 percent statewide water reduction on potable water use by Urban Water Suppliers. It prioritized water infrastructure projects, incentivized water efficiencies, and streamlined permitting with new approval processes for water transfers and emergency drinking water projects. Executive Order B-36-15 (November 2015) called for additional actions to build on the state's response to record dry conditions and assisted recovery efforts from devastating wildfires; and Executive Order B-37-16 (May 2016) continued water use restrictions from Executive Order B-29-15 as drought conditions continued to persist. Executive Order B-37-16 called for long-term improvements to local drought preparation across the state, and directed the

[5] *State of California, Office of Governor Edmund G. Brown, Jr., Governor Brown Declares Drought State of Emergency, January 17, 2014, www.ca.gov/archive/gov39/2014/01/17/news18368/index.html, accessed March 30, 2021.*

California State Water Resources Control Board (SWRCB) to develop proposed emergency water restrictions for 2017 if the drought persists.[6]

The regulatory requirements resulting from these Executive Orders were codified in Article 22.5, Drought Emergency Water Conservation of the CCR.

In May 2016, SWRCB adopted a revised emergency water conservation regulation, effective June 2016 through at least February 2017, which rescinded numeric reduction targets for Urban Water Suppliers, instead requiring locally developed conservation standards based upon each agency's specific circumstances.[7]

On April 7, 2017, Executive Order B-40-17 was issued to formally end the drought emergency and lifted the drought emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne. In response to Executive Order B-40-17, on April 26, 2017, the SWRCB partially repealed the emergency regulation in regard to water supply stress test requirements and remaining mandatory conservation standards for urban water suppliers.[8,9] The order also rescinded two drought-related emergency proclamations and four drought-related executive orders. Cities and water districts throughout the state are required to continue reporting their water use each month. Executive Order B-40-17 continued the ban on wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

Finally, on October 19, 2021, Governor Gavin Newsom proclaimed a state of emergency in response to ongoing drought conditions throughout the state.[10]

(f) California Water Plan

Required by the CWC Section 10005(a), the California Water Plan is the state's strategic plan for managing and developing water resources statewide for current and

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6 *State of California, Office of Governor Edmund G. Brown, Jr., Governor Brown Issues Order to Continue Water Savings as Drought Persists, May 9, 2016, www.ca.gov/archive/gov39/2016/05/09/news19408/index.html, accessed March 30, 2021.*

7 *State of California Office of Administrative Law, Notice of Approval of Emergency Regulatory Action, State Water Resources Control Board, Title 23, May 31, 2016.*

8 *State Water Resources Control Board, Emergency Conservation Regulation, 2017.*

9 *State Water Resources Control Board, Resolution No. 2017-0024.*

10 *Office of Governor Gavin Newsom, Governor Newsom Expands Drought Emergency Statewide, Urges Californians to Redouble Water Conservation Efforts, October 19, 2021, www.gov.ca.gov/2021/10/19/governor-newsom-expands-drought-emergency-statewide-urges-californians-to-redouble-water-conservation-efforts/, accessed March 1, 2022.*

future generations.[11] 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 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.

In July 2019, DWR released the Final 2018 Update to the California Water Plan.[12] The document provides recommended actions, funding scenarios, and an investment strategy to bolster efforts by water and resource managers, planners, and decision-makers to overcome the State's most pressing water resource challenges. It reaffirms the State government's role and commitment to sustainable, equitable, long-term water resource management; and introduces implementation tools to inform decision-making. The 2018 Update recommends significant additional investment in infrastructure and ecosystem improvements to overcome challenges to sustainability; and it recommends actions to resolve systemic and institutional issues that contribute to many of the state's water challenges.[13]

(g) California Water Action Plan

The California Water Action Plan is a roadmap for the State's journey towards sustainable water management. The first California Water Action Plan was released in January 2014 under Governor Brown's administration and updated in 2016.[14] The California Water Action Plan discusses the challenges to water in California: uncertain water supplies, water scarcity/drought, declining groundwater supplies, poor water quality,

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[11] *Department of Water Resources, California Water Plan, https://water.ca.gov/Programs/ California-Water-Plan, accessed March 30, 2021.*

[12] *DWR, DWR Releases Final California Water Plan Update 2018, https://water.ca.gov/News/News-Releases/2019/July-19/Final-Water-Plan-Update-2018, accessed March 30, 2021.*

[13] *DWR, California Water Plan Update 2018, Executive Summary, pages ES-1 to ES-2.*

[14] *California Natural Resources Agency, California Water Action Plan, 2016 Update.*

declining native fish species and loss of wildlife habitat, floods, supply disruptions, and population growth and climate change further increasing the severity of these risks.[15]

(2) Regional

As discussed in detail below, the Metropolitan Water District (MWD) of Southern California 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 further below, in response to recent developments in the Sacramento Delta, 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.

(a) Metropolitan Water District's 2015 Urban Water Management Plan

The Metropolitan Water District's (MWD) 2015 Regional UWMP (RUWMP) addresses the future of MWD's water supplies and demand through the year 2040.[16] 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 2-4 of the 2015 RUWMP.[17] The analysis in the 2015 RUWMP concluded that reliable water resources would be available to continuously meet demand through 2040.[18] In the 2015 RUWMP, the projected 2040 demand water is 2,201,000 afy, whereas the expected and projected 2040 supply is 2,941,000 afy based on current programs, and an additional 398,000 afy is expected to become available under programs under development for a potential surplus in 2040 of 1,138,000 afy.[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

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15 *California Natural Resources Agency, California Water Action Plan 2016 Update, pp. 2–3.*

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

17 *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, p. 2-15.*

18 *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, p. 2-15.*

19 *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, p. 2-15.*

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. As set forth in their 2015 RUWMP, MWD also planned investments in water use efficiency measures to help the region achieve the 20 percent per person potable water use reduction by 2020.

(b) MWD's 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.[20] 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 included, 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

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

reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after 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.[21]

(c) MWD's 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.[22]

(d) MWD's 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), which has since been implemented three times, most recently in April 2015 (under the new name Drought Rationing Plan). The WSAP includes a formula for determining 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

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[21] *Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2015 Update, Report 1518, p. VIII.*

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

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.[23] The allocation period covers 12 consecutive months from July of a given year through the following June.

(e) MWD Drought Emergency

In November 2021, the MWD Board of Directors declared a drought emergency and called for increase efforts to maximize conservation.[24] As part of the emergency declaration, MWD called on its member agencies dependent on SWP deliveries to use increased conservation measures or other means to reduce their use of these limited supplies. MWD also approved a series of measures to expand various rebate and water-efficiency programs.

(3) Local

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

(i) 2015 UWMP

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. LADWP adopted the 2015 UWMP on April 27, 2016. The 2015 UWMP complies with the Urban Water Management Planning Act, builds upon the goals and progress made in the 2010 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 2040. Long range projections are based on Southern California Association of Government (SCAG) growth projections. The 2015 UWMP is based on projections in the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

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[23] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, p. 2-21.*

[24] *Metropolitan Water District of Southern California, Metropolitan Declares Drought Emergency, November 9, 2021, www.mwdh2o.com/newsroom-press-releases/metropolitan-declares-drought-emergency/, accessed March 1, 2022.*

The 2015 UWMP takes into account a number of significant changes that have occurred since LADWP prepared its 2010 UWMP.[25] The year 2012 marked the beginning of the current multi-year drought in California. As stated above, in January 2014, Governor Brown proclaimed a drought state of emergency. In July 2014, the SWRCB implemented its Emergency Water Conservation Regulation (Emergency Regulation), as directed by Governor Brown, to take actions to reduce water use by 20 percent statewide. Later, the mandated reductions were increased to 25 percent statewide, with adjustments to account for different climates, expected growth, investment made to create drought-resilient water supplies by different cities through October 2016. In October 2014, Mayor Eric Garcetti issued Executive Directive No. 5 (ED 5) Emergency Drought Response 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. Lastly, in April 2015, the Mayor's Sustainable City pLAn, (updated in 2019 as the City's Green New Deal and discussed further below), was released establishing targets for the City over the next 20 years to strengthen and promote sustainability. The 2015 UWMP incorporates the objectives of these recent initiatives. Overall the 2015 UWMP projects a 7-percent lower water demand trend than what was projected in the previous 2010 UWMP.[26]

The 2015 UWMP includes several Near-Term Conservation Strategies and Long-Term Local Supply Strategies to be implemented by LADWP in order to meet its demand for water supply. The near-term strategies include such provisions as the following: enforcing the existing list of prohibited uses of water; expanding the list of prohibited uses of water; extending outreach efforts to the public through various media options and marketing of expanded water conservation incentive and rebate programs; and encouraging regional conservation measures through coordination with MWD. Long-term supply strategies include the following: increasing water conservation through reduction of outdoor water use and new technology (implementing such mechanisms as conservation rebates and incentives; actions by public agencies; conservation in new developments through the implementation of development codes and standards; and additional future studies regarding conservation procedures); water recycling (with mechanisms such as recycled master planning, implementation of water recycling projects inclusive of a Downtown water recycling project; and public outreach regarding recycled water programs); enhancing stormwater capture; and accelerating clean-up of the San Fernando Basin.[27]

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[25] *LADWP, 2015 Urban Water Management Plan, pp. ES-1 to ES-3.*

[26] *Based on a comparison of water demand in 2035 in Los Angeles Department of Water and Power, 2010 Urban Water Management Plan, Exhibit 2J and Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit 2K.*

[27] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

LADWP has since adopted its 2020 UWMP. However, because the Project's Revised NOP was issued on July 7, 2020, and its WSA was adopted by LADWP on March 23, 2021, both prior to the 2020 UWMP's adoption, the 2015 UWMP is considered throughout this analysis. Nevertheless, a brief discussion of the 2020 UWMP is presented below for informational purposes.

(ii) 2020 UWMP

On May 25, 2021, LADWP adopted the 2020 UWMP. Like the 2015 UWMP, the 2020 UWMP builds upon the goals and progress made in the previous UWMPs 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 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Like the 2015 UWMP, the 2020 UWMP takes into account a number of significant changes that have occurred since LADWP prepared its 2010 UWMP. The year 2012 marked the beginning of the current multi-year drought in California, continued through 2016 and ended with record precipitation in 2017. As stated above, in January 2014, Governor Brown proclaimed a drought state of emergency. In 2019, Mayor Eric Garcetti issued an update to the LA Sustainable City pLAn, which includes targets to increase local water supplies through recycled water, stormwater capture, conservation, and water efficiency. In July 2020, Governor Gavin Newsom's Water Resilience Portfolio was issued. The portfolio outlined goals and actions for the state to address its water challenges. The portfolio focused on three priorities: (1) maintaining access to safe and clean drinking water, (2) establishing voluntary agreements to collaboratively manage water resources and protect fish and wildlife, and (3) advancing the Delta Conveyance Project. The 2020 UWMP incorporates the objectives of these recent initiatives.

(b) Green New Deal

The City released the first Sustainable City pLAn in April 2015,[28] 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 management.[29] 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.[30] 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.[31] 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 Framework Element identifies goals,

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[28] *City of Los Angeles, Sustainable City pLAn, 2015, www.lacity.org/highlights/sustainable-city-plan, accessed March 30, 2021.*

[29] *City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.*

[30] *City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response—Creating a Water Wise City, October 14, 2014.*

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

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.[32] The goals, objectives and policies are addressed by the City in its ordinances and preparation of its UWMP.

The General Plan goals, objectives and policies related to water supply are shown in Table IV.M.1-1 on page IV.M.1-17.

(ii) 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 North Hollywood–Valley Village Community Plan does not include objectives or policies related to water supply and infrastructure.

(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.

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

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

Table IV.M.1-1
Relevant General Plan Utilities and Service Systems Goals, Objectives, and Policies—Framework Element: Chapter 9 Infrastructure and Public Services

Goal/ Objective/Policy	Description
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.
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 General Plan, Framework Element, re-adopted 2001.

Emergency Water Conservation Plan includes penalties for those that violate its requirements.

- 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 California Green Building Standards Code. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by: (1) using water saving fixtures or flow restrictions; and/or (2) demonstrating a 20-percent reduction in baseline water use.

- 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. As set forth in LAMC Section 57.507.3.1, Industrial and Commercial land uses (which the LAFD has classified the Project as) have a minimum required fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 psi unless otherwise determined by LAFD. 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.

(f) Los Angeles Water Rate Ordinance

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

b. Existing Conditions

(1) Water Supply

LADWP is responsible for providing water in the City 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 urban water provider for the Project Site.

Water is supplied to the City from four primary sources: the Los Angeles Aqueducts (LAA), local groundwater, purchased water from MWD, and recycled water.[33] As shown in Table IV.M.1-2 on page IV.M.1-20, LADWP had an available water supply of 487,591 acre-feet (AF) in 2020 (the latest full year for which data is available), with approximately 91 percent of this supply from imported sources including the LAA and MWD.[34] LADWP's water sources are described in further detail below.

(a) Los Angeles Aqueducts

As provided in the WSA prepared for the Project included in Appendix T of this Draft EIR, snowmelt runoff from the Eastern Sierra Nevada Mountains is collected and conveyed to the City via the LAA. The LAA supplies come primarily from snowmelt and secondarily from groundwater pumping, and can fluctuate yearly due to the varying hydrological

[33] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[34] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

Table IV.M.1-2
LADWP Water Supply

Fiscal Year Ending	Los Angeles Aqueducts (AF)	Local Groundwater (AF)	MWD (AF)	Recycled Water (AF)	Transfer, Spread, Spills, and Storage (AF)	Total (AF)
2016	57,853	79,056	339,975	9,913	3,509	490,306
2017	224,724	50,439	216,299	8,032	-9,350	490,144
2018	307,671	21,760	182,706	9,778	200	522,116
2019	312,456	32,233	137,775	7,512	-1,710	488,266
2020	292,095	34,363	152,647	9,641	-1,155	487,591

AF = acre-feet

Source: LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.

conditions. In recent years, LAA supplies have been less than the historical average because of environmental restoration obligations in Mono and Inyo Counties.

The City holds water rights in the Eastern Sierra Nevada where the LAA water supplies originate. These supplies originate from both streams and groundwater. As indicated in Table IV.M.1-2, approximately 292,095 AF of LADWP's water supplies were from the LAA in 2020.

Average deliveries from LAA system have been approximately 238,960 AF annually from Fiscal Year (FY) 2015/16 to 2019/20. This average delivery includes two of the five dry years that began in FY 2012/2013 and ended in FY 2016/2017. On April 1, 2020, the snowpack was 100 percent of an average year.[35] Since LAA supplies vary substantially from year to year, LADWP plans to increase resiliency to address climate change and natural disasters by developing sustainable local water supplies. [36]

Various lawsuits and injunctions, and resulting agreements, affect water supplies from the Los Angeles Aqueduct. 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

[35] *LADWP, Eastern Sierra Snow Survey Results, April 1, 2019.*

[36] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

Pollution Control District (GBUAPCD) was reached wherein LADWP will continue to implement measures to address dust emissions at Owens Lake and implement additional water conservation through increasing use of water efficient and waterless dust measures. As a result, LADWP expects to reduce total lake-wide water use by at least 50 percent, through the strategic use of waterless or water efficient control measures and groundwater under Owens Lake for dust control.[37]

LADWP projects that the average annual long-term LAA delivery between 2020 and 2040 will increase from 275,700 AFY to 286,200 AFY due, in part, to implementation of the Owens Lake Master Plan Project.[38]

(b) Groundwater

As discussed in the WSA prepared for the Project included in Appendix T of this Draft EIR, LADWP pumps groundwater from three adjudicated basins, including the San Fernando, Sylmar, and Central Basins. The San Fernando Basin (SFB) is the largest of the four basins. LADWP has accumulated 591,460 AF of stored groundwater in the SFB as of October 1, 2018 (the latest year for which data is available).[39] A portion of this water is available for the City to withdraw during normal and dry years, or in an emergency, in addition to the City's approximate 87,000 AF annual entitlement. With regards to the Sylmar and Central Basins, the City's current annual entitlements are 3,570 AF and 17,236 AF, respectively. The City has also accumulated 9,014 AF of stored water credits in the Sylmar Basin and 22,943 AF of stored water credits in the Central Basin.[40]

As shown in Table IV.M.1-3 on page IV.M.1-22, the City extracted 35,948 AF, 10 AF, and 2 acre-foot of groundwater from the San Fernando, Central, and Sylmar Basins, respectively, during FY 2019–2020. The City plans to continue to develop production from its groundwater basins in the coming years to offset reductions in imported supplies.[41]

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.

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[37] *LADWP, Owens Lake Master Project, April 2013.*

[38] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[39] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[40] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[41] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

Table IV.M.1-3
Local Groundwater Basin Supply

Fiscal Year (July–June)	San Fernando (AF)	Sylmar (AF)	Central (AF)
2014–2015	80,097	1	6,948
2015–2016	75,958	683	8,395
2016–2017	55,116	0	3,005
2017–2018	22,259	0	0.77
2018–2019	36,871	1	5
2019-2020	35,948	2	10

AF = acre-feet

Historical data from the Upper Los Angeles River Area Watermaster Monthly Reports, July 2014 to June 2019.

Source: LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.

These efforts include operation of groundwater remediation systems, use of an extensive network of groundwater monitoring wells, routine reporting on groundwater elevation and water quality, management and mitigation of urban runoff water quality, and development of enhanced stormwater recharge and groundwater replenishment.[42]

(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 California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct (CRA). As one of the 26 member agencies of MWD, LADWP purchases water from MWD to supplement LADWP water supplies from the LAA and local groundwater. As of June 30, 2020, LADWP has a preferential right to purchase 18.12 percent of MWD's total water supply.[43]

LADWP plans to reduce purchase of MWD water supplies through increased conservation, increased recycle water production, and enhanced groundwater pumping through stormwater capture and groundwater replenishment. This would allow LADWP to

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

[43] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

reach the L.A.'s Green New Deal's goals to reduce imported water supplies by 50 percent by 2025 from FY 2013/2014 levels. [44]

As indicated in Table IV.M.1-2 on page IV.M.1-20, LADWP received approximately 152,647 AF of water from MWD in 2020, which was a substantial reduction from previous years. Summaries of MWD's individual supplies, along with each supply's challenges and specific responsive actions taken by MWD, are presented below.

(i) State Water Project

The SWP is owned by the State of California and operated by DWR, delivering water to two-thirds of the population of California and 750,000 acres of farmland. The SWP facilities include 30 dams, 20 reservoirs, 29 pumping and generating plants, and approximately 700 miles of aqueducts and pipelines. The water stored and delivered by the SWP originates from Northern California's watersheds, where most of the State's precipitation occurs. SWP facilities originate in Northern California at Lake Oroville on the Feather River and is pumped from the Bay-Delta region to contractors in areas north and south of the San Francisco Bay and south of the Bay-Delta.[45]

MWD began receiving water from the SWP in 1972. MWD is the largest of the 29 SWP contractors, holding a contract for 1.912 million acre-feet (MAF) per year, or 46 percent of the total contracted amount of the 4.173 MAF ultimate delivery capacity of the project. Variable hydrology, environmental issues, and regulatory restrictions in the San Francisco Bay/Sacramento-San Joaquin River Delta (Bay-Delta) have periodically reduced the quantity of water that the SWP delivers to MWD.[46]

The SWP, under the original contracted amount at 100 percent allocation, provides MWD with 1,911,500 AF of water each calendar year.[47] However, due to water quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, SWP deliveries in the most critically dry years vary. For 2019, DWR estimated an initial allocation of 10 percent[48] but increased this to 15 percent[49] in January due to changes in precipitation and available water supplies.

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[44] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[45] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[46] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[47] *LADWP, Water Supply Assessment for the District NoHo Project, Appendix F, February 24, 2021.*

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

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

Challenges to State Water Project Supply

Litigation and various regulations have created challenges for the SWP.[50] 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 constrained SWP operations and created more uncertainty in SWP supply reliability. Based on DWR's 2015 *SWP Delivery Capability Report*, future SWP deliveries will continue to be impacted by restrictions on SWP and Central Valley Project Delta pumping, and climate change, which is altering the hydrologic conditions in the State.[51]

(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 AF 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.[52]

Since 2003, due to increased consumption, there has been no such unused, apportioned water available to California. Of the California apportionment, MWD holds the fourth priority right to 550,000 AFY under a 1931 priority system governing allotments to California. This is the last priority within California's basic apportionment of 4.4 million AF. Beyond the basic apportionment, MWD holds the fifth priority right to 662,000 AF of water. Historically, MWD has been able to claim most of its legal entitlement of Colorado River water and could divert over 1.2 million AF in any year, but persistent drought conditions since 1999 have contributed to a decrease in these claims. The recent 16-year drought has been so severe that it has resulted in major reductions in water deliveries from the Colorado River. MWD's Colorado River Aqueduct allocation in 2020 was at approximately 1.5 million AF.[53] In addition, in 2021, water officials from California, Arizona, and Nevada

[50] *LADWP, Water Supply Assessment for the District NoHo Project, Appendix F, February 24, 2021.*

[51] *DWR, The State Water Project—Final Delivery Capability Report 2015, July 2015.*

[52] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[53] *LADWP, Water Supply Assessment for the District NoHo Project, Table V, February 24, 2021.*

began discussing plans to leave an additional 500,000 AF of water in Lake Mead in 2022 and 2023 to prevent the reservoir from falling to dangerously low levels.[54]

(iii) Additional MWD Actions to Address Supply

MWD has been developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of these water resource development plans. MWD's long-term plans to meet its member agencies' growing reliability needs are through: (1) improvements to SWP as outlined in the EcoRestore plans; (2) conjunctive management efforts on the Colorado River; (3) water transfer programs, outdoor conservation measures; and (4) development of additional local resources, such as recycling, brackish water desalination, and seawater desalination.[55]

Additionally, MWD has more than 5.0 million AF of storage capacity available in reservoirs and banking/transfer programs. MWD was estimated to have 3.2 million AF of water in Water Surplus Drought Management storage and additional 750,000 AF in emergency storage as of January 1, 2021. Continued efficiency in the region kept demands low in 2020, resulting in available water supplies far exceeding demands. With implementation of new and modified existing storage programs to manage the available surplus supplies, MWD was able to add to storage in 2020. MWD began 2021 with approximately 3.2 million AF of water in its dry-year storage portfolio.[56]

MWD's 2015 IRP builds upon the strong foundation of diversification and adaptation developed in previous IRPs. 2015 IRP reinforces MWD commitment to meeting the region's water supply needs through an evolving long-term strategy that calls for maintaining and stabilizing existing resources along with developing more conservation and new local supplies.[57]

MWD's 2015 UWMP reports on water reliability and identifies projected supplies to meet the long-term demand within MWD's service area. Tables V and VI in the WSA summarize MWD's water reliability (e.g., water demand, supply, etc.) in five-year increments extending to 2040 and is based on information contained in MWD's 2015

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[54] *Ian James, "California, Arizona and Nevada in talks on new plan to save Colorado River water," Los Angeles Times, November 17, 2021, www.latimes.com/environment/story/2021-11-17/california-agrees-to-reduce-share-colorado-river-water, accessed January 24, 2022.*

[55] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[56] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[57] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

UWMP. As indicated in Tables 2-1, 2-2, and 2-3 of its 2015 UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under average, single dry-, and multiple dry-year hydrologic conditions.[58]

(d) Precipitation Conditions

The City of Los Angeles receives an average of 14.67 inches of precipitation per year according to the National Weather Service.[59] During the 2020-2021 rain season (extending from July 1, 2020, to June 30, 2021), Downtown Los Angeles received 5.82 inches of precipitation.[60]

(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. However, there is still general uncertainty within the scientific community regarding the potential impacts of climate change within the City. LADWP continues to monitor the latest developments in scientific knowledge and will continue to assess future research for the potential impacts of climate change on its water resources.[61]

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] With updates published every five years, the most recent *California Water Plan Update 2018*

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[58] *MWD, 2015 UWMP, June 2016.*

[59] *Los Angeles Almanac, Total Seasonal Rainfall (Precipitation) Downtown Los Angeles—USC Campus, www.laalmanac.com/weather/we13.php, accessed January 25, 2022.*

[60] *Los Angeles Almanac, Total Seasonal Rainfall (Precipitation) Downtown Los Angeles—USC Campus, www.laalmanac.com/weather/we13.php, accessed January 25, 2022.*

[61] *LADWP, 2015 Urban Water Management Plan, June 2016, p. 12-1.*

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

built on its predecessor by identifying specific performance tracking metrics, recommending financing methods with stable revenues, and incorporating principles of sustainability.[63]

DWR has also been in the process of completing its Climate Action Plan since 2012. Phases I and II of the Climate Action Plan include the guidance of DWR in reducing greenhouse gas emission and the expertise of a climate change technical advisory group formed in 2012, respectively. Phase III of the plan was completed in 2017 with a vulnerability assessment and adaptation plan DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.[64] As such, climate change and its impacts on water supplies are key factors of new water supply regulations and UWMPs.

(f) Water Conservation and Recycling

LADWP's 2015 UWMP details the City's efforts to promote the efficient use and management of its water resources and provides the basic policy principles that guide LADWP's decision-making process to secure a sustainable water supply for the City in the next 25 years. To meet multiple water conservation goals established in ED 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 22.5 percent by 2025 and by 25 percent by 2035.[65] Following the target reduction of potable water use per capita by 25 percent by 2035, the Green New Deal adds an additional target for the City to maintain or reduce 2035 per capita water use through 2050.[66] The City also intends to build upon the success of Save the Drop and develop additional water conservation campaigns; continue benchmarking customer use and recognizing innovative water reduction initiatives; improve data gathering to identify program effectiveness; expand top performing conservation incentive programs for landscape transformation, washing machines, etc.; and expand sub-metering and evaluate smart water meter technologies.[67,68]

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.[69] Overall, the 2015

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63 *DWR, California Water Plan Update 2018.*

64 *DWR, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed November 6, 2020.*

65 *LADWP, 2015 Urban Water Management Plan, June 2016.*

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

67 *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

68 *LADWP, 2015 Urban Water Management Plan, June 2016.*

69 *LADWP, 2015 Urban Water Management Plan, June 2016.*

LADWP UWMP projects a 7-percent lower water demand trend than what was projected in the previous 2010 UWMP.[70] In addition, based on programs and improvements contemplated in the 2015 LADWP UWMP, locally developed water supplies (including groundwater replenishment and stormwater capture) will increase from the current 14 percent to 49 percent in dry years, or to 47 percent in average years by 2040.[71] The Green New Deal also has a target to recycle 100 percent of all wastewater for beneficial reuse by 2035.[72] Beneficial reuse includes, but is not limited to, non-potable reuse, groundwater recharge, and supporting environmental and recreational uses such as those in the Los Angeles River.

For informational purposes, based on LADWP's 2020 UWMP, recycled water use is projected to reach 24,300 AFY by 2025 and further increase to 41,000 AFY by 2045.[73] Overall, the 2020 LADWP UWMP reports a 67-percent lower recycled water trend for municipal and industrial uses along with environmental uses than what was projected in the previous 2015 UWMP.[74] In addition, based on programs and improvements contemplated in the 2020 LADWP UWMP, locally developed water supplies (including groundwater replenishment and stormwater capture) will increase from the current 11 percent to 48 percent in dry years, or to 43 percent in average years by 2045.[75]

(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).[76] Table IV.M.1-4 on page IV.M.1-29 shows the projected water demand from the year 2020 through 2040 for the City of Los Angeles.

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

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

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

[73] *LADWP, 2020 Urban Water Management Plan, May 2021.*

[74] *LADWP, 2020 Urban Water Management Plan, May 2021, p. 7-25.*

[75] *LADWP, 2020 Urban Water Management Plan, May 2021, p. 11-7.*

[76] *Since preparation of the 2015 UWMP, new growth forecasts have become available in SCAG's 2016–2040 RTP/SCS and 2020-2045 RTP/SCS. According to SCAG, the 2016 and 2020 forecasts are lower than the 2012 forecast in terms of current estimates and future projections. Therefore, LADWP's 2015 UWMP is based on a more conservative overall growth scenario.*

Table IV.M.1-4
City of Los Angeles Water Demand Projections (2015 UWMP)
(thousand AFY)

Hydrological Conditions	Years				
	2020	2025	2030	2035	2040
Average Year	611.8	644.7	652.9	661.8	675.7
Single Dry Year (FY 2014–2015)	642.4	676.9	685.5	694.9	709.5
Multi-Dry Year (2011–2015)	642.4	676.9	685.5	694.9	709.5

AFY = acre-feet per year

Source: LADWP, 2015 Urban Water Management Plan, Exhibits 11F, 11G, and 11H.

As shown in Table IV.M.1-4, in 2040 during average year hydrological conditions, the City's water demand is forecasted to be approximately 675,700 AFY (with passive water conservation).[77] LADWP's 2015 UWMP concludes that 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.[78] Therefore, the City's water supply projections in LADWP's 2015 UWMP are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with both the 2012 and subsequent 2016 RTPs adopted by SCAG.[79,80]

As noted above, the 2015 UWMP is considered throughout this analysis. Nevertheless, for informational purposes, the 2020 UWMP's water demand projections are provided in Table IV.M.1-5 on page IV.M.1-30. As shown therein, the water demand projections included in the 2020 UWMP are higher than the 2015 UWMP. LADWP's 2020 UWMP concludes that 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 2045.[81] Therefore, the City's water supply projections in LADWP's 2020 UWMP

[77] *LADWP, 2015 Urban Water Management Plan, June 2016, and LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[78] *LADWP, 2015 Urban Water Management Plan, June 2016, and LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[79] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[80] *The WSA for the District NoHo Project does not address the 2020-2045 RTP/SCS. However, as noted above, SCAG's 2020 forecasts are lower than the 2012 forecast in terms of current estimates and future projections. Therefore, LADWP's 2015 UWMP is based on a more conservative overall growth scenario.*

[81] *LADWP, 2020 Urban Water Management Plan, May 2021, pages ES-20 through ES-24.*

Table IV.M.1-5
City of Los Angeles Water Demand Projections (2020 UWMP)
(thousand AFY)

Hydrological Conditions	Years				
	2025	2030	2035	2040	2045
Average Year	642.6	660.2	678.8	697.8	710.5
Single Dry Year (FY 2014–2015)	674.7	693.2	712.7	732.7	746
Multi-Dry Year (based on 1988-1992)[a]	662.3	680.4	699.6	719.2	732.3

AFY = acre-feet per year

[a] *Demand projections shown here are an average of those provided in Exhibit 11G of LADWP's 2020 UWMP.*

Source: LADWP, 2020 Urban Water Management Plan, Exhibits 11E, 11F, and 11G.

are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the 2020 RTP/SCS adopted by SCAG.[82]

(b) Existing Water Demand

The 15.9-acre Project Site includes four sub sites located generally north/east and south/west of Lankershim Boulevard within the North Hollywood–Valley Village Community Plan area of the City. The East Site is comprised of 46 lots totaling approximately 10.7 acres located east of Lankershim Boulevard and is currently improved with the Metro B (Red) Line subway east portal, a surface parking lot, and a local bus plaza. The Northwest, Central, and South Sites are located west of Lankershim Boulevard. The South Site is comprised of 12 lots totaling approximately 1.8 acres and improved with a surface parking lot. A portion is also unimproved and has been used for construction staging and materials laydown. The Central Site is comprised of two lots totaling approximately 2.7 acres and improved with industrial/warehouse buildings, the Metro G (Orange) Line Bus plaza, the B (Red) Line subway west portal, and the historic Lankershim Depot building. The Northwest Site is comprised of seven lots totaling approximately 0.7 acre and improved with one- and two-story industrial/warehouse buildings.[83] The Project also includes two Off-Site Metro Parking Areas. The West Lot is located at the southwest corner of N. Chandler Boulevard and Tujunga Avenue and is developed with industrial/warehouse buildings; the East Lot is on the north side of Chandler Boulevard between Fair and Vineland Avenues and is surface parking. Based on LADWP billing data,

[82] *LADWP, 2020 Urban Water Management Plan, May 2021, pages 1-4 through 1-6.*

[83] *On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.*

the existing water demand associated with the 49,111 square feet of existing industrial/warehouse uses within the Project Site and Off-Site Metro Parking Areas to be removed under the Project is estimated at 3,374 gpd (3.78 AFY).[84]

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site and Off-Site Metro Parking Areas is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 117 storage tanks and reservoirs, 84 pump stations, 7,326 miles of distribution mains and trunk lines within the City, and a total storage capacity of 311,000 AF according to the estimates for Fiscal Year 2018–2019.[85] Much of the water flows north to south, entering Los Angeles at the LAA Filtration Plant in Sylmar, which is owned and operated by LADWP. Water entering the LAA Filtration Plant undergoes treatment and disinfection before being distributed throughout the LADWP's water service area.[86]

Domestic water service is available in the vicinity of the Project Site via LADWP water lines within the adjacent streets. According to the Utility Report, there are nine water mains in the Project Site vicinity, including: a 12-inch water main in Cumpston Street; an 8-inch water main in Fair Avenue; an 8-inch water main in South Chandler Boulevard; two water mains in Lankershim Boulevard (an 8-inch and a 12-inch line); a 36-inch water main in Tujunga Avenue; an 8-inch water main in Chandler Boulevard; a 4-inch water main in Bakman Street; and a 4-inch water main in Weddington Street. In addition, there is an existing water main within the vicinity of the proposed parking structure at the New East Lot: a 12-inch water main within Vineland Avenue.[87]

In addition to providing domestic water service, LADWP provides water to the Project Site for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). According to the Utility Report, there are 11 fire connections to the Project Site. These connections appear to serve 12 public fire hydrants: two along Cumpston Street; three along Lankershim Boulevard; one along Chandler Boulevard; four along Chandler (S) Boulevard; one along Fair Avenue; and one along Vineland Avenue.

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[84] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[85] *LADWP, 2018–2019 Briefing Book, June 2019.*

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

[87] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

These fire hydrants are listed below and their locations are identified graphically in Figure 1 of the Utility Report.[88]

- Eastern corner of Cumpston St. and Lankershim Blvd.
- 498 feet east from the corner of Cumpston St. and Lankershim Blvd.
- Western corner of Cumpston St. and Fair Ave.
- 303 feet south from the corner of Cumpston St. and Fair Ave.
- 325 feet west from the corner of South Chandler Blvd. and Fair Ave.
- 230 feet from the northeast corner of South Chandler Blvd. and Lankershim Blvd.
- Western corner of Chandler Blvd. and Lankershim Blvd.
- Eastern corner of Chandler Blvd. and Tujunga Ave.
- Eastern corner of South Chandler Blvd. and Bakman St.
- Southeast corner South Chandler Blvd. and Lankershim Blvd.
- 162 feet south of the corner of South Chandler Blvd. and Lankershim Blvd.
- 168 feet north of the corner South Chandler Blvd. and Vineland Ave.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.[89]

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[88] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

[89] *Refer to: Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of*

(Footnote continued on next page)

Threshold (b): (Not) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis also utilizes applicable factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions, including the following:

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

b. Methodology

(1) Water Supply

The analysis of the Project's impacts to water supply is based on the WSA for the Project prepared by LADWP pursuant to SB 610 and included as Appendix T of this Draft EIR. The WSA includes a conservative calculation of the Project's anticipated net water demand by applying 100 percent of City Department of Public Works, Bureau of Sanitation (LASAN) wastewater generation rates to the proposed land uses under the Project, including landscaping irrigation, and subtracting existing water demand based on LADWP billing data. The WSA accounts for the reduction in Project water demand associated with the implementation of required and proposed water conservation features. In accordance with SB 610, the resulting net increase in demand for water associated with the Project is then analyzed relative to LADWP's existing and planned future water supplies over the next 20 year period as set forth in LADWP's 2015 UWMP to determine if LADWP would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry

wastewater impacts; Sections IV.C, Energy, and IV.M.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations, of this Draft EIR for a discussion of telecommunications facility impacts. See Section X, Hydrology and Water Quality, of the Initial Study included as Appendix A of this Draft EIR, for a discussion of stormwater impacts.

year hydrologic conditions in combination with LADWP's existing and projected future water commitments.

(2) Water Infrastructure

The analysis of the Project's impacts to water infrastructure is based on the Utility Report included as Appendix G of this Draft EIR. The Utility Report includes a comparison of the estimated net domestic and fire flow water demand for the Project to the available capacity of the existing water infrastructure. Specifically, the Utility Report summarizes the results of the following analyses performed by LADWP:

1. A hydraulic analysis of the water system to determine if adequate fire flow (which requires more water volume and pressure than domestic flow) is available from the existing fire hydrants surrounding the Project Site. LADWP's approach consisted of modeling the portion of their water system in the vicinity of the Project Site. Based on the results, LADWP determined whether their existing water infrastructure can meet the Project's fire hydrant flow needs. See Exhibit 1 of the Utility Report for the results of the Information of Fire Flow Availability Request (IFFAR) for the 11 fire hydrants evaluated.

2. Flow tests to determine if sufficient water conveyance is available for the Project. LADWP's approach provides 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 determined whether they can meet the Project needs based on existing infrastructure. See Exhibit 2 of the Utility Report for the results of the Service Advisory Requests (SARs) for the 12-inch Chandler Street main.

c. Project Design Features

The following water supply and infrastructure-related project design feature is proposed as part of the Project:

Project Design Feature WAT-PDF-1: In addition to regulatory requirements, the Project will incorporate the following block-by-block water conservation features as set for in the Water Conservation Commitment Letter for the Project included as Appendix B of the WSA:

Block 0

- Tankless and on-demand Water Heaters for pantry sink location.
- Individual metering and billing for water use for every retail space.

- Drip/Subsurface Irrigation (Micro-Irrigation) for 100 percent of the irrigation system.
- Point of use Domestic Water Heating System.
- Drip/Subsurface Irrigation (Micro-Irrigation) for 100 percent of the irrigation system.
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- California Friendly® plants or native plants.

Block 1

- ENERGY STAR–Certified Residential Clothes Washers—Front-loading or Top-loading with Integrated Water Factor of 3.0 or less and capacity of 4.8 cubic feet.
- Domestic Water Heating System located in proximity to point(s) of use for retail tenant spaces.
- Individual metering and billing for water use for every residential dwelling unit and retail tenant space.
- Pool/Spa recirculating filtration equipment.
- Install a meter on the pool make-up line so water use can be monitored, and leaks can be identified and repaired.
- Leak Detection System for swimming pools and Jacuzzi.
- Drip/ Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- California Friendly® plants or native plants.

Block 2

- ENERGY STAR–Certified Residential Clothes Washers—Front-loading or Top-loading with Integrated Water Factor of 3.0 or less and capacity of 4.8 cubic feet.
- Domestic Water Heating System located in proximity to point(s) of use for retail tenant spaces.
- Individual metering and billing for water use for every residential dwelling unit and retail tenant space.
- Pool/Spa recirculating filtration equipment.
- Install a meter on the pool make-up line so water use can be monitored, and leaks can be identified and repaired.
- Leak Detection System for swimming pools and Jacuzzi.

- Drip/ Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- California Friendly® plants or native plants.

Block 3

- Individual metering and billing for water use for every residential dwelling unit.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- California Friendly® plants or native plants.

Block 4

- ENERGY STAR–Certified Residential Clothes Washers—Front-loading or Top-loading with Integrated Water Factor of 3.0 or less and capacity of 4.8 cubic feet.
- Domestic Water Heating System located in proximity to point(s) of use for retail tenant spaces.
- Individual metering and billing for water use for every residential dwelling unit and retail tenant space.
- Pool/Spa recirculating filtration equipment.
- Install a meter on the pool make-up line so water use can be monitored, and leaks can be identified and repaired.
- Leak Detection System for swimming pools and Jacuzzi.
- Drip/ Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- California Friendly® plants or native plants.

Block 5/6

- ENERGY STAR–Certified Residential Clothes Washers—Front-loading or Top-loading with Integrated Water Factor of 3.0 or less and capacity of 4.8 cubic feet.
- Domestic Water Heating System located in proximity to point(s) of use at retail tenant spaces.
- Individual metering and billing for water use for every residential dwelling unit and retail tenant space, and separate metering provided for Office level use.

- Tankless and on-demand Water Heaters at pantry sink locations for office tenant spaces.
- Pool/Spa recirculating filtration equipment.
- Install a meter on the pool make-up line so water use can be monitored, and leaks can be identified and repaired.
- Leak Detection System for swimming pools and Jacuzzi.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- California Friendly® plants or native plants.

Block 7

- Individual metering and billing for water use for every residential dwelling unit.
- Drip/ Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- California Friendly® plants or native plants.

Block 8

- High Efficiency Toilets with a flush volume of less than 1.28 gallons per flush.
- Domestic Water Heating System located in proximity to point(s) of use.
- Individual metering and billing for water use for every retail space and separate metering provided for the Office level use.
- Tankless and on-demand Water Heaters for pantry sink locations.
- Drip/Subsurface Irrigation (Micro-Irrigation) for 100 percent of the irrigation system.
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- California Friendly® plants or native plants.

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications

facilities, the construction or relocation of which could cause significant environmental effects?[90]

(1) Impact Analysis

(a) Construction

As discussed in the Utility Report included as Appendix G of this Draft EIR, Project construction activities would require water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects in the region, water use during construction ranges from 1,000 to 2,000 gpd. Because of the size of the Project, it is conservatively estimated that construction of each Project block would require 1,000 to 2,000 gpd.[91] However, the Project would be constructed in phases on a rolling basis over the course of several years which would limit daily construction water demand. In addition, the Project would include the demolition of 49,111 square feet of existing on-site industrial/warehouse uses (estimated to consumed 3,374 gpd) which would partially offset the water demand associated with Project construction activities. Lastly, Project construction water demand would be substantially less than Project operational water demand, and as discussed further below, the existing water infrastructure would be adequate to meet Project operational demand. Hence, the existing water infrastructure would have adequate capacity to meet Project construction-related water demand, and new water mains or upgrades to the existing water mains would not be required.[92]

The Project would require construction of new on-site water distribution lines to serve new buildings and potential relocation of existing lines. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the lines below surface. The installation of new water infrastructure would be limited to on-site water distribution and minor off-site work associated with connections to the public main. The environmental effects associated with the required on-site trenching are already included in the impact analysis throughout this Draft EIR, and the environmental effects associated with the limited and temporary off-site trenching would be

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[90] *Refer to: Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of wastewater impacts; Sections IV.C, Energy, and IV.M.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations, of this Draft EIR for a discussion of telecommunications facility impacts. See Section X, Hydrology and Water Quality, of the Initial Study included as Appendix A of this Draft EIR, for a discussion of stormwater impacts.*

[91] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

[92] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

less than significant both due to the limited scope of the trenching activities and the location of these activities within already developed area. In addition, prior to ground disturbance, project contractors would coordinate with LADWP to identify the locations and depth of all lines, LADWP would be notified in advance of proposed ground disturbance activities, to avoid water lines and disruption of water service, and LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). Lastly, while trenching and installation activities could temporarily affect traffic flow and access on the adjacent streets and sidewalks, a Construction Traffic Management Plan (TR-PDF-1) would be implemented (discussed in Section IV.K, Transportation, of this Draft EIR) which would ensure the safe and efficient flow of vehicular and pedestrian traffic, and that emergency access to the Project Site and adjacent properties would be maintained during the construction period.

Overall, Project construction activities would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project construction-related water infrastructure impacts would be less than significant.

(b) Operation

When analyzing the capacity of the water infrastructure system to serve a project, the estimated operational demands of the project for both fire suppression and domestic water are considered. Although domestic water demand would be the Project's main contributor to water demand in the long term, the Project's fire flow demands have a much greater instantaneous impact on infrastructure and therefore are the primary means for analyzing infrastructure capacity. Conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project as summarized in the Utility Report included as Appendix G of this Draft EIR. Specifically, see Exhibits 1 and 2 of the Utility Report for the results of the IFFAR and SAR, respectively, which demonstrate that adequate water infrastructure capacity exists to serve the Project.[93]

(i) Fire Flow

As stated in its February 4, 2021, service letter included as Appendix M of this Draft EIR, LAFD set the required fire flow for the Project at 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously based on fire flow standards set forth in Section 57.507.3 of the LAMC. An IFFAR was submitted to LADWP regarding available fire

[93] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

hydrant flow to demonstrate compliance. The completed IFFAR, included as Exhibit 1 of the Utility Report, shows 11 nearby hydrants flowing simultaneously for a combined 16,500 gpm. As shown by the IFFAR, the Project would have adequate fire flow available to demonstrate compliance with LAMC Section 57.507.3.[94]

In addition, the Project would incorporate fire sprinkler suppression system in all the proposed buildings to reduce or eliminate the public hydrant demands.[95] Per LAMC 94.2020.0, which adopts by reference National Fire Protection Association 14-2013, including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. Because the SAR submitted to LADWP confirms there is sufficient pressure to serve the Project, adequate water pressure is available to operate the proposed fire sprinkler suppression system.

(ii) Domestic Water Demand

The Project would install new onsite domestic water infrastructure to meet the proposed plumbing demands in compliance with Los Angeles Department of Building and Safety (LADBS) and LADWP requirements. The Project would obtain its domestic water from new laterals (e.g., domestic services) between the proposed on-site buildings and the existing water mains in Lankershim Boulevard, Cumpston Street, Fair Avenue, North and South Chandler Boulevard, and Bakman Avenue. As previously stated, while domestic water demand is the main contributor to water consumption, fire demands have been shown to have the greatest instantaneous impact on infrastructure; therefore, the results of the IFFAR can be utilized as indication that the existing water infrastructure is sufficient. The results of the IFFAR, included as Exhibit 1 of the Utility Report, show that hydrants can be tested with an existing static pressure of greater than 20 psi and therefore the water infrastructure can meet the needs of the Project. In addition, the proposed service laterals would be adequately sized to accommodate fire demand and domestic demand and would include backflows and be metered separately per City requirements.[96]

As discussed further under Threshold (b) below, LADWP estimates that the Project would generate a net increase in water demand of 482,898 gpd after implementation of

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[94] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

[95] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

[96] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

Code-required measures and Project Design Feature WAT-PDF-1.[97] The approved SAR, included as Exhibit 2 of the Utility Report, confirms that sufficient water flow capacity exists in the S. Chandler Boulevard main, and would be provided by the proposed six-inch lateral from this main, to serve the Project.[98]

(c) Conclusion

Based on the above, the Project would not exceed the available capacity of the existing water infrastructure that would serve the Project Site, and new or expanded water facilities would not be required. Accordingly, Project operation 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. Project operations-related water infrastructure impacts would thus be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to water infrastructure were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, 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?

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[97] *As discussed in Section II, Project Description, of this Draft EIR, the Project includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant. Under this scenario, the Project's net increase in average daily water demand would be 390,179 gpd.*

[98] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

(1) Impact Analysis

(a) Construction

As discussed in the Utility Report included as Appendix G of this Draft EIR, Project construction activities would require water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects in the region, water use during construction ranges from 1,000 to 2,000 gpd. Because of the size of the Project, it is conservatively estimated that construction of each Project block would require 1,000 to 2,000 gpd.[99] However, the Project would be constructed in phases on a rolling basis over the course of several years which would limit daily construction water demand. Also, the Project would include the demolition of 49,111 square feet of existing on-site industrial/warehouse uses (estimated to consumed 3,374 gpd[100]) which would partially offset the water demand associated with Project construction activities. In addition, Project construction-related water use would be minimal and temporary. Furthermore, as discussed further below, the WSA for the Project concludes that LADWP water supplies during normal, single-dry, and multiple-dry years would be adequate to meet the Project's operational water demand, and Project construction-related water demand would represent only a small fraction (e.g., 3.3 percent) of the Project's post-conservation measure operational demand.[101] Therefore, LADWP water supplies would be adequate to meet Project construction-related water demand during normal, single-dry, and multiple dry years.

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

(b) Operation

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. In accordance with SB 610, LADWP prepared a WSA for the Project, included as Appendix T of this Draft EIR, as the Project would meet several of the SB 610 criteria as discussed

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[99] *KPFF Consulting Engineers, District NoHo Utility Technical Report: Water, Wastewater, and Energy, January 2022.*

[100] *Based on LADWP billing data. Source: LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[101] *The 3.3 percent estimate was derived using the following formula: (8 blocks x 2,000 gpd per block) / 482,898 gpd = 0.033. 482,898 gpd is the post-conservation measure operational water demand estimate for the Project as indicated in Table IV.M.1-6.*

above. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on estimates of the Project's operational water demand as compared to LADWP's existing and forecasted future water supplies and demand over the next 20 year period during normal, single-dry, and multiple dry years as set forth in LADWP's 2015 UWMP. As indicated in the WSA, the estimates of Project operational water demand in the WSA are based on 100 percent of LASAN sewage generation rates.

Table IV.M.1-6 on page IV.M.1-44 provides estimates of the Project's average operational water demand assuming constant water use throughout the year. As indicated therein, Project operation would result in a net increase in average daily water demand of an estimated 482,898 gpd (540.95 AFY) after implementation of Code-required (approximately 102,634 gpd savings) and voluntary (WAT-PDF-1, approximately 1,338 gpd savings) water conservation measures.[102,103] As stated in the WSA, LADWP has concluded that projected LADWP water supplies during normal, single-dry, and multiple-dry years would be sufficient to meet the Project's estimated water demand in addition to the existing and projected future water demands within LADWP's service area through the year 2040.[104]

In addition, the Department of City Planning (DCP) has determined that a General Plan Amendment is required for the Project to change the land use designation and to permit a zone change as described on page 8 of the June 17, 2020, WSA Request Letter in Appendix A of the WSA. However, according to the WSA, the Project has been determined by DCP to be consistent with the demographic projections for the City from both the 2012 and 2016 RTP/SCS.[105,106] Based on the information from the DCP, the WSA concludes that the anticipated water demand for the Project would be consistent with, and would fall within, LADWP's 2015 UWMP's projected water demand and supply projections for normal, single-dry, and multiple-dry years through the year 2040.[107] Additionally, for informational purposes, because the 2020 UWMP projects greater water demand than the 2015 UWMP, the Project would represent a smaller percentage of LADWP's 2020 UWMP's

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[102] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[103] *As discussed in Section II, Project Description, of this Draft EIR, the Project includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant. Under this scenario, the Project's net increase in average daily water demand would be 390,179 gpd.*

[104] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[105] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021, p. 39.*

[106] *The WSA for the District NoHo Project does not address the 2020-2045 RTP/SCS. However, as noted above, SCAG's 2020 forecasts are lower than the 2012 forecast in terms of current estimates and future projections. Therefore, LADWP's 2015 UWMP is based on a more conservative overall growth scenario.*

[107] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

Table IV.M.1-6
Project Water Demand

Use	Quantity	Water Use Factor[c] (gpd/unit)	Base Demand (gpd)	Required Ordinances Water Savings[d] (gpd)	Proposed Water Demand (gpd)	Proposed Water Demand (AFY)
Existing Use to Be Removed[a]						
Warehouse and other buildings	49,111 sf				3,374	
Total Existing to be Removed[b]					*3,374*	*3.78*
Proposed Use[a]						
Residential: Studio	441 du	75	33,075			
Residential: 1 bd	708 du	110	77,880			
Residential: 2 bd	299 du	150	44,850			
Residential: 3 bd	79 du	190	15,010			
Base Demand Adjustment (Residential Units)[e]			19,236			
Residential Units Total	*1,527 du*		*190,051*	*39,036*	*151,015*	*169.17*
Residential Amenities						
NoHo Square Water Feature	250 sf	0.65	163			
Community Room	1,015 sf	0.12	122			
Resident Services	1,207 sf	0.12	145			
Business Center	1,297 sf	0.12	156			
Case Management	905 sf	0.12	109			
Classroom	27 stu	11.00	297			
Computer Lab and Room	972 sf	0.12	117			
Conference Room	706 sf	0.12	85			
Courtyard	5,142 sf	0.12	617			
Dog Washing Area	370 sf	0.65	241			
Laundry Rooms	35 wm	185.00	6,475			
Media/Recording Studio	1,437 sf	0.12	172			
Screening Room	157 seat	3.00	471			
Fitness Center	6,584 sf	0.65	4,280			
Co-Work	3,301 sf	0.12	396			
Amenity Deck	84,909 sf	0.12	10,189			
Tenant Lounge	9,145 sf	0.05	457			
Pool Deck	23,535 sf	0.20	4,707			
Pool	4,255 sf		406			
Spa	646 sf		62			
Clubhouse	1,230 sf	0.12	148			
Commercial and Office						
Retail	30,125 sf	0.025	753			
Restaurant	3,750 seat	30	112,500			
Office	580,374 sf	0.12	69,645			
Base Demand Adjustment (Residential Units)[e]			1,537			
Amenities and Commercial Total			*214,250*	*23,760*	*190,490*	*213.39*

Table IV.M.1-6 (Continued)
Project Water Demand

Use	Quantity	Water Use Factor[c] (gpd/unit)	Base Demand (gpd)	Required Ordinances Water Savings[d] (gpd)	Proposed Water Demand	
					(gpd)	(AFY)
Landscaping [f]	87,225 sf		8,279	4,554	3,725	4.17
Covered Parking [g]	1,894,810 sf	0.02	1,246	0	1,246	1.40
Cooling Tower Block 1	1,200 ton	35.64	42,768	8,554		
Cooling Tower Block 2	1,000 ton	35.64	35,640	7,128		
Cooling Tower Block 5	1,300 ton	35.64	46,332	9,266		
Cooling Tower Block 8	1,450 ton	35.64	51,678	10,336		
Cooling Tower Total [h]			*176,418*	*35,284*	*141,134*	*158.10*
Proposed Subtotal			590,244	102,634	487,610	546.23
Less Existing to be Removed Total					−3,374	-3.78
Less Additional Conservation[i]					−1,338	-1.50
Net Additional Water Demand					**482,898**	**540.95**

AFY = acre feet per year

bd = bedroom

du = dwelling unit

gpd = gallons per day

sf = square feet

stu = students

wm = washing machines

[a] *Provided by City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter and Scope Confirmation e-mail. See Appendix A. Proposed Uses that do not have additional water demands are not shown here.*

[b] *The existing water demand is based on the LADWP billing data.*

[c] *Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates.*

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

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

[f] *Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.*

[g] *Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption*

[h] *Assumed to operate 24 hours/day, 7 days/week and 55% of chiller capacity.*

[i] *Water conservation due to additional conservation commitments agreed by the Applicant. See Table II.*

Source: LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.

projected water demand projections for normal, single-dry, and multiple-dry years through the year 2045.

Additionally, the WSA indicates that LADWP's 2015 UWMP contains a water shortage contingency plan for multi-year dry hydrological periods. This plan was implemented on June 1, 2009, when the Board adopted Shortage Year Rates, and the City Council implemented the landscape irrigation and prohibited use restrictions contained in the City's Water Conservation Ordinance. This water shortage contingency plan would help to ensure sufficient use of water during multi-year dry periods.[108]

Lastly, as outlined in its 2015 UWMP, LADWP is committed to providing a reliable water supply for the City.[109] The 2015 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling.[110] The 2015 LADWP UWMP also furthers the goals of the City's ED 5 and the Green New Deal, addresses the current and future SWP supply shortages, and concludes that MWD's actions in response to the threats to the SWP will ensure continued reliability of its water deliveries.[111] By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages.[112]

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to water supply were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

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[108] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

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

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

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

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

e. 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 area served by the same water infrastructure as the Project). Development of the Project and the cumulative or related projects within this geographic area would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of a SAR and IFFAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire water demands of each project and would be required to provide water infrastructure improvements to serve the project if the existing infrastructure is inadequate. In addition, to ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement and update its Water Infrastructure Plan (WIP), with the current (2018–2019) WIP containing a five-year water system capital improvement plan that includes $6.3 billion for needed water system infrastructure improvements and maintenance.[113] Furthermore, in accordance with City requirements, prior to ground disturbance, the related projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects.

Like the Project, off-site connection activities and infrastructure improvements associated with the related projects could temporarily affect access in adjacent rights-of-way. However, the related projects would be required to ensure that adequate and safe access remains available within and near the related project sites during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the related project sites and traffic flow is maintained on adjacent rights-of-way.

Based on the above, the Project together with the related projects would not result in significant cumulative water infrastructure impacts related to the construction or expansion water facilities, nor would the Project contribute considerably to significant cumulative water infrastructure impacts. As such, cumulative water infrastructure impacts would be less than significant.

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[113] *LADWP, 2018–2019 Water Infrastructure Plan.*

(b) Water Supply

As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for the water supplies required to serve existing and projected demands within its service area. LADWP's 2015 UWMP accounts for existing development within the City, as well as projected growth through the year 2040.[114]

As identified in Section III, Environmental Setting, of this Draft EIR, there are 34 related projects located in the vicinity of the Project Site, all of which are located within the LADWP service area. The estimated water demand of these related projects is shown in Table IV.M.1-7 on page IV.M.1-49. As indicated therein, the related projects would generate a total average water demand of approximately 415,554 (465 AFY). Together with the approximately 482,898 (540.95 AFY) from the Project, total cumulative water demand would be approximately 898,452 (1,006.43 AFY). These estimates are conservative because, while the water demand estimates for the Project take into account required and proposed water conservation measures and subtract out the water demand associated with the existing uses to be removed, the estimates for the related projects do not.

The total water demand of the Project and related projects of approximately 1,006.43 AFY would represent approximately 0.21 percent of LADWP's 2020 water supply of 487,591 AF, with the Project's share of 540.95 AF representing approximately 0.11 percent of LADWP's 2020 water supply.

As previously stated, the WSA prepared for the Project and included as Appendix T of this Draft EIR concludes that LADWP would be able to meet the water demand of the Project together with the existing and forecasted growth in the City through 2040.[115] Additionally, based on water demand projections through 2040 in its 2015 UWMP, LADWP has determined that it would be able to reliably provide water to its customers through the year 2040, based on demographic growth projections in SCAG's 2012–2035 RTP/SCS which includes the Project and likely the related projects.[116] In addition, 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

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

[115] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

[116] *LADWP, Water Supply Assessment for the District NoHo Project, February 24, 2021.*

Table IV.M.1-7
Cumulative Water Demand

No.	Project Name	Project Location	Description	Size	Demand Factor (gpd)[a]	Water Demand (gpd)
1.	NoHo Lankershim Station	5401 Lankershim Blvd.	Apartments	127 du	190/du	24,130
			Retail	14,500 sf	0.025/sf	363
			Office	1,918 sf	0.12/sf	230
2.	New NoHo Artwalk Project	11126 Chandler Blvd.	Apartments	73 du	190/du	13,870
			Retail	2,900 sf	0.025/sf	73
3.	The Weddington	11120 Chandler Blvd.	Apartments	324 du	190/du	61,560
4.	Apartments	5508 Fulcher Ave.	Apartments	46 du	190/du	8,740
5.	Apartments	5513 Case Ave.	Apartments	90 du	190/du	17,100
6.	Apartments	11112 Burbank Blvd.	Apartments	12 du	190/du	2,280
7.	Apartments	11433 Albers St.	Apartments	59 du	190/du	11,210
8.	Mixed-Use	5553 N. Tujunga Ave.	Apartments	30 du	190/du	5,700
			Retail	4,970 sf	0.025/sf	124
			Office	2,962 sf	0.12/sf	355
9.	Apartments	11410 W. Burbank Blvd.	Apartments	84 du	190/du	15,960
10.	Mixed-Use	5444 N. Vineland Ave.	Self Storage Space	96,444 sf	0.03/sf	2,893
			Office	10,000 sf	0.12/sf	1,200
11.	Fitness Studio	5200 N. Lankershim Blvd.	Health/Fitness Club	2,690 sf	0.65/sf	1,749
12.	Condominium	11525 Chandler Blvd.	Condominiums	60 du	190/du	11,400
13.	Apartments	5633 Farmdale Ave.	Apartments	26 du	190/du	4,940
14.	Camellia Court Apartments	5610 Camellia Ave.	Apartments	62 du	190/du	11,780
15.	Self Storage	5260 N. Vineland Ave.	Self Storage	81,300 sf	0.03/sf	2,439
16.	Apartments	5147 Bakman Ave.	Apartments	33 du	190/du	6,270
17.	Apartments	5110 N. Bakman Ave.	Apartments	51 du	190/du	9,690
18.	Apartments	11246 W. Otsego St.	Apartments	70 du	190/du	13,300

Table IV.M.1-7 (Continued)
Cumulative Water Demand

No.	Project Name	Project Location	Description	Size	Demand Factor (gpd)[a]	Water Demand (gpd)
19.	NoHo Millennium	5107 Lankershim Blvd.	Apartments	287 du	190/du	54,530
			Market	23,733 sf	0.025/sf	593
			Office	1,267 sf	0.12/sf	152
20.	Apartments	11106 Hartsook St.	Apartments	61 du	190/du	5,490
21.	Apartments	11029–11035 Hartsook St.	Apartments	53 du	190/du	10,070
22.	Apartments	5050 N. Bakman Ave.	Apartments	40 du	190/du	7,600
23.	Mixed Use	10821 Magnolia Blvd.	Retail	4,075 sf	0.025/sf	102
			Apartments	40 du	190/du	7,600
24.	School	11600 Magnolia Blvd.	Additional Students	78 stu	9/stu	702
25.	Apartments	5755 N. Tujunga Ave.	Apartments	33 du	190/du	6,270
26.	Apartments	11155 W. Huston St.	Apartments	24 du	190/du	4,560
27.	Wesley School	4832 Tujunga Ave.	Additional Students	91 stu	9/stu	819
28.	Apartments	11443 Riverside Dr.	Apartments	29 du	190/du	5,510
29.	Mixed Use	11311 Camarillo St.	Apartments	60 du	190/du	11,400
			Retail	3,000 sf	0.025/sf	75
30.	Apartments	10804 W. Blix St.	Apartments	21 du	190/du	3,990
31.	Mixed Use	10850 Riverside Dr.	Apartments	179 du	190/du	34,010
			Retail	5,694 sf	0.025/sf	142
32.	Cohen Apartments	10601 Riverside Dr.	Apartments	82 du	190/du	15,580
			Retail	13,327 sf	0.025/sf	333
33.	Apartments	11036 Moorpark St.	Apartments	96 du	190/du	18,240
34.	Gas Station	4377 Vineland Ave.	Expansion of Existing Facilities	1,818 sf	430/stn	430
Total Related Projects						**415,554 (465.48 afy)**
Total Project						**482,898 (540.95 afy)**

Table IV.M.1-7 (Continued)
Cumulative Water Demand

No.	Project Name	Project Location	Description	Size	Demand Factor (gpd)[a]	Water Demand (gpd)
Total Related Projects + Project						**898,452 (1,006.43 afy)**

afy = acre-feet per year
du = dwelling unit
gpd = gallons per day
sf = square feet
stn = station
stu = student
[a] *LASAN wastewater generation rates (2012).*
Source: Eyestone Environmental, 2022.

projects would be required to use fixtures that conserve water in accordance with the California Building Code and the Los Angeles Green Building Code. In addition, like the Project, any related projects meeting the size criteria under SB 610 would be required to prepare and receive LADWP approval of a WSA that demonstrates how the water demand associated with these projects would be met.

Overall, as discussed above, the 2015 LADWP 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 ED 5 and the City's Green New Deal. 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.[117] To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that sufficient water supply continues to be available.

Based on the above, it is anticipated that LADWP would be able to meet the water demands of the Project and future growth within its service area through at least 2040. Therefore, the Project together with the related projects would not result in significant cumulative impacts related to water supply, nor would the Project contribute considerably to significant cumulative water demand impacts. As such, cumulative water supply impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related to water supply and infrastructure were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

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