IV. Environmental Impact Analysis

O.1 Utilities and Service Systems – Water Supply

1. Introduction

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

The data and conclusions regarding water infrastructure in this section are based on the Harvard-Westlake River Park Project (4141 Whitsett Avenue, Studio City, CA 91604) Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Technical Report) prepared for the Project by KPFF Consulting Engineers and is included in Appendix O of this Draft EIR.[1]

2. Environmental Setting

a) Regulatory Framework

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

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

[1] KPFF Consulting Engineers, Harvard-Westlake River Park Project (4141 Whitsett Avenue, Studio City, CA 91604) Utility Infrastructure Technical Report: Water, Wastewater, and Energy, February 2022. Provided in Appendix O of this Draft EIR.

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

(1) State

(a) California Urban Water Management Plan Act

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

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

Two of the state laws addressing the assessment of water supply necessary to serve large-scale development projects, Senate Bill (SB) 610 and SB 221, became effective January

1, 2002. SB 610, codified in Water Code Sections 10910-10915, specifies the requirements for water supply assessments (WSAs) and their role in the California Environmental Quality Act (CEQA) process, and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a).

The WSA must be approved by the public water supplier serving the project at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA. As discussed under subsection 3.b, Methodology, below, the Project does not meet any of the above criteria, and, therefore, a WSA is not required.

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." Since the Project is not a residential subdivision, it is not subject to SB 221.

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

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

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

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

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

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

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

(d) Sustainable Groundwater Management Act of 2014[6]

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.[7] The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The SGMA provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

(e) California Code of Regulations

(i) Title 20

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

(ii) CALGreen Code

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency,

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

7 California Department of Water Resources. SGMA Groundwater Management. https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed February 6, 2022.

8 California Code of Regulations, Title 20, Section 1605.3(h).

water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The mandatory measures for water conservation provide limits for fixture flow rates, which are the same as those for the Title 20 efficiency standards listed above. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

(iii) Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2019 California Plumbing Code, which is based on the 2018 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2019.

(f) Executive Order B-40-17

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

(g) Executive Order N-20-21

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

(2) Regional

(a) Metropolitan Water District

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

(i) 2020 Urban Water Management Plan

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

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.

(ii) 2015 Integrated Resources Plan

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

9 Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021,

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

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

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

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

topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

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

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. IRP Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP, shows the supply reliability and conservation targets. As presented in the IRP, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after conservation is estimated to be 4,273,000 acre-feet and the total supply reliability target is approximately 4,539,000 acre-feet, representing an excess of 266,000 acre-feet.[14]

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

(iii) Water Surplus and Drought Management Plan

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

[14] Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report 1518. page VIII.

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

of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[16]

(iv) Long-Term Conservation Plan

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

(v) Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan (WSAP).The WSAP includes a formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.[17] The allocation period covers 12 consecutive months from July of a given year through the following June.

(3) Local

(a) Los Angeles Department of Water and Power's 2020 Urban Water Management Plan

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

[16] Water Surplus and Drought Management Plan, Report No. 1150. 1999.

[17] Metropolitan water District, 2015 Urban Water Management Plan, page 2-21.

water projections for the City to the year 2045. Long range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

(b) City of Los Angeles Green New Deal

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

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.[19] The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[20] Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

(d) City of Los Angeles General Plan

(i) General Plan Framework Element

The Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[21] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services.

[18] City of Los Angeles, Sustainable City pLAn, 2015, https://www.lacity.org/highlights/sustainable-city-plan. Accessed September 2020.

[19] City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018, https://www.lacitysan.org/cs/groups/sg_owla/documents/document/y250/mdi2/~edisp/cnt026188.pdf. Accessed September 2020.

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

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

Chapter 9, Infrastructure and Public Services, of the City's Framework Element identifies goals, objectives, and policies for City utilities including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[22] The goals, objectives and policies are addressed by the City in its ordinances and preparation of its UWMP.

As shown in **Table IV.O.1-1,** *Relevant General Plan Utilities and Service Systems Goals, Objectives, and Policies,* the following General Plan goals, objectives and policies relate to water supply:

TABLE IV.O.1-1
RELEVANT GENERAL PLAN UTILITIES AND SERVICE SYSTEMS GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/ Policy	Goal/Objective/Policy Description
FRAMEWORK ELEMENT – CHAPTER 9 INFRASTRUCTURE AND PUBLIC SERVICES	
Goal 9C	Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses.
Objective 9.1	Monitor and forecast demand based upon actual and predicted growth.
Objective 9.8	Monitor and forecast water demand based upon actual and predicted growth.
Policy 9.8.1	Monitor water usage and population and job forecast to project future water needs.
Objective 9.9	Manage and expand the City's water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses.
Policy 9.9.1	Pursue all economically efficient water conservation measures at the local and statewide level.
Policy 9.9.7	Incorporate water conservation practices in the design of new projects so as not to impede the City's ability to supply water to its other users or overdraft its groundwater basins.
Objective 9.10	Ensure that water supply, storage, and delivery systems are adequate to support planned development.
Policy 9.10.1	Evaluate the water system's capability to meet water demand resulting from the Framework Element's land use patterns.
Policy 9.10.2	Solicit public involvement, when appropriate, in evaluating options for the construction of new and/or expansion of existing water facilities.
Objective 9.11	Ensure, to the maximum extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.
Policy 9.11.1	Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.

SOURCE: City of Los Angeles, City of Los Angeles General Plan, Framework Element, re-adopted 2001.

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

(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 No. 180,822—amended LAMC Chapter XII, Article 5 to establish water efficiency requirements for new development and renovation of existing buildings, and mandate installation of high efficiency plumbing fixtures in residential and commercial buildings.
- Ordinance No. 181,480—amended LAMC Chapter IX by adding Article 9 (Green Building Code) to the LAMC to incorporate various provisions of the CALGreenCode. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by (1) using water saving fixtures or flow restrictions; and/or (2) demonstrating a 20-percent reduction in baseline water use.
- Ordinance Nos. 181,899 and 183,833—amended LAMC Chapter VI, Article 4.4, Section 64.72, regarding stormwater and urban runoff to include new requirements, including Low Impact Development (LID) requirements that promote water conservation.
- Ordinance No. 182,849—amended LAMC Chapter IX, Article 9 (Green Building Code) to mandate that for new water service or for additions or alterations requiring upgraded water service for landscaped areas of at least 1,000 square feet, separate sub-meters or metering devices shall be installed for outdoor potable water use. This ordinance also required that for new non-residential construction with at least 1,000 square feet of cumulative landscaped area, weather or soil moisture–based irrigation controllers and sensors be installed.
- Ordinance No. 184,692—amended LAMC Chapter IX, Article 4 (Plumbing Code) by adopting by reference various sections of the California Plumbing Code. This ordinance also added requirements for plumbing fixtures and fixture fitting.
- Ordinance No. 184,248—amended LAMC Chapter IX, Article 4 (Plumbing Code) and Article 9 (Green Building Code) to establish Citywide water efficiency standards and mandate a number of new fixture requirements and methods of construction for plumbing and irrigation systems.

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

per square inch (psi) is to remain in the water system with the required gpm flowing. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5 inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

(f) River Improvement Overlay District

The River Improvement Overlay (RIO) District applies to construction projects within proximity to the Los Angeles River. The RIO District's Development regulations apply to all aspects of development, including landscaping, and require that new development incorporate specific plant species that are Watershed Wise, a native species, or a species provided in the Los Angeles County River Master Plan Landscaping Guidelines and Plant Palettes. The purpose of these regulations is to contribute to the environmental and ecological health of the City's watersheds and to provide native habitat and local species that would conserve water required for urban landscaping.

b) Existing Conditions

(1) Water Infrastructure

LADWP maintains the water infrastructure that provides service connections to the Project Site. According to water service maps obtained from LADWP, three water lines are located in the vicinity of the Project Site. There is a westerly 8-inch water line in Whitsett Avenue between Valley Spring Lane and Valleyheart Drive. There is a southerly 6-inch water line in Valley Spring Lane between Bellaire Avenue and Whitsett Avenue. There is a westerly 6-inch water line in Bellaire Avenue between Valley Spring Lane and Valleyheart Drive.[23]

(2) Water Demand

The Project Site is currently occupied by a nine-hole golf course, a putting green, tennis courts, a driving range, a 2,700-square-foot clubhouse with a 10-seat café, a 799-square-foot tennis shack, and associated surface parking area. As shown in **Table IV.O.1-2**, *Existing Project Site Water Consumption*, the existing uses on the Project Site (minus irrigation) are estimated to generate 1.27 gallons per minute (gpm) of domestic water consumption for the existing buildings or 2.05 afy. Existing landscaping uses 34.78 afy. As such, the total existing water demand for the Weddington Golf & Tennis facility (with irrigation) is approximately 1 million gallons per month or 36.83 afy.

[23] KPFF Consulting Engineers, Harvard-Westlake River Park Project (4141 Whitsett Avenue, Studio City, CA 91604) Utility Infrastructure Technical Report: Water, Wastewater, and Energy, February 2022. Provided in Appendix O of this Draft EIR.

TABLE IV.O.1-2
EXISTING PROJECT SITE WATER CONSUMPTION

Building Use	Sewer Generation Rate (gpd/1,000 GSF)	Quantity	Estimated Water Demand[a,b]		
			gpm	gpd	afy
Field Buildings[c]	30	3,900 GSF	0.09	129	-
Parking Lot[d]	20	60,500 GSF	0.93	1,331	-
Clubhouse/Café (to remain)[e]	120	2,700 GSF	0.25	356	-
Existing Domestic Water Consumption (No Irrigation)			***1.27***	***1,816***	***2.05***
Landscape/Golf Course Irrigation			***-***	***31,063***	***34.78[f]***
Total Site Water Consumption			**-**	**32,879**	**36.83**

NOTES: gpd = gallons per day; gpm = gallons per minute; afy = acre-feet per year; SF = square feet; GSF = gross square feet

[a] Water consumption estimates are based on 110 percent of the City' of Los Angeles Bureau of Sanitation, LA Sanitation & Environment (LASAN) sewage generation rates for the existing uses.

[b] Totals may not add up due to rounding.

[c] Field Buildings – Storage: Building/Warehouse 30/1,000 GSF

[d] Parking Lot (surface parking) – Auto Parking (a) 20/1,000 GSF

[e] Clubhouse/Cafe to remain (Visitor Center) – Office Building 120/1,000 GSF

[f] Based on actual water usage invoices from LADWP, monthly water usage for the entire existing Weddington Golf & Tennis facility (with irrigation) is approximately 1 million gallons per month or 36.83 afy. Thus, subtracting the 2.05 afy of water demand from the building uses identified here in Table IV.O.1-2, the irrigation demand would be approximately 34.78 afy.

SOURCE: ESA, 2021.

(3) Water Supply

LADWP is responsible for providing water for the City and various parts of Culver City, South Pasadena, and West Hollywood. LADWP ensures that the delivered water quality meets applicable California health standards for drinking water. Water is supplied to the City from the following sources: Los Angeles Aqueducts (LAA), local groundwater, imported water from the MWD, and recycled water. **Table IV.O.1-3**, *LADWP Water Supply*, summarizes LADWP water supplies from 2012 to 2018. As indicated therein, in 2018, LADWP had an available water supply of 521,915, including 59 percent from the LAA; 4.2 percent from local groundwater; 35 percent from the MWD; and 1.9 percent from recycled water.[24]

[24] Totals may not add up to 100 percent due to rounding.

TABLE IV.O.1-3
LADWP WATER SUPPLY (IN ACRE-FEET PER YEAR)

Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Total
2012	266,634	61,060	210,438	6,850	544,982
2013	113,411	58,811	388,462	7,513	568,197
2014	61,024	79,403	441,991	10,054	592,472
2015	57,716	90,438	362,654	10,421	521,229
2016	57,853	79,056	339,975	9,913	486,797
2017	224,724	50,439	216,299	8,032	499,494
2018	307,617	21,760	182,706	9,778	521,915

SOURCE: City of Los Angeles, LADWP Water Supply in Acre Feet, updated November 20, 2020, https://data.lacity.org/City-Infrastructure-Service-Requests/LADWP-Water-Supply-in-Acre-Feet/qyvz-diiw., accessed March 10, 2021.

As identified in LADWP's UWMP, LADWP's available water supply is generally equivalent to the demand from year to year, as LADWP purchases additional water from MWD only on an as-needed basis. These water sources are described in further detail below.

(a) Los Angeles Aqueducts (LAA)

Water from the LAA comes primarily from streams and groundwater originating from snowmelt runoff from the eastern Sierra Nevada Mountains. In response to varying hydrologic conditions, water supply from these sources can fluctuate yearly. The City holds water rights in the eastern Sierra Nevada where the LAA water supplies originate. Pursuant to various legislative enactments, regulations, and written agreements between LADWP and the Great Basin Unified Air Pollution Control District (GBUAPCD), LADWP's ability to export LAA water is impacted by water levels in Mono Lake and water commitments necessary to implement a dust mitigation program for Owens Lake.[25]

In 2014,the City and the GBUAPCD reached a settlement agreement that defined and limited the full extent of future dust mitigation for LADWP concerning Owens Lake. The agreement also allows LADWP to use water-efficient and waterless dust mitigation measures. LADWP expects to save significant amounts of water in coming years with implementation of the Owens Lake Master Project and other water conservation projects.[26]

Water supply from the LAA during recent years (2012-2018) is shown in Table IV.O.1-3, above. According to the 2020 UWMP, the expected annual long-term LAA delivery over

[25] Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. 4-3.

[26] Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. 4-8.

the next 25 years, using the 30-year median hydrology from FY 1985/86 to 2014/15, is approximately 192,000 afy for average years. Deliveries for a series of dry years, assuming a repeat of FY 1987/88 through 1991/92 hydrology, are expected to range from approximately 71,400 afy to 143,000 afy during FY 2020/21 through FY 2024/25. A single dry year of 71,400 afy is expected with a repeat of FY 1989/1990 hydrology. An annual reduction factor due to climate impacts is applied for average, single dry, and multiple dry years.[27]

(b) Groundwater

The City owns water rights in the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins. LADWP holds adjudicated extraction rights in each of the groundwater basins, meaning the City has been allocated quantified annual pumping and groundwater storage rights in the basins. The San Fernando and Sylmar Basins are subject to the judgment in *City of Los Angeles vs. City of San Fernando*,[28] which requires that pumping be reported to the court-appointed Upper Los Angeles River Area (ULARA) Watermaster. The Central Basin is also subject to a court judgment that requires that pumping be reported to the Water Replacement District of Southern California, which acts as the administrative member of the Central Basin Water Rights Panel.

The City's combined water rights in the five basins are 109,809 afy, of which approximately 87,000 afy are located in the San Fernando Basin, 500 afy in the Eagle Rock Basin, and 3,570 afy in Sylmar Basin. Central Basin water rights were recently increased from 15,000 afy to 17,236 afy as a result of three purchase transactions completed during 2014 and 2016. Water rights in the West Coast Basin are 1,503 afy, which the City may transfer to the Central Basin per the Third Amended Central Basin Judgment.[29]

Historically, LADWP has operated its groundwater resources conjunctively with surface water supplies by reducing pumping during wet periods when more surface water can be used for municipal supply and increasing pumping during dry periods to compensate for reduced availability of surface water supplies. Water supply from the local groundwater supplies during recent years (2012-2018) is shown in Table IV.O.1-3, above. Taking into account all weather conditions and in response to water savings from the Owens Lake Master Project, LADWP's projected groundwater production is expected to increase from a total of 42,927 afy in 2019/20, to 128,415 afy in 2024/25, and 124,815 afy in 2044/45.[30]

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[27] Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. 4-12.

[28] Final Judgment in Case No. 650079, Superior Court for the County of Los Angeles (January 26, 1979); see also City of Los Angeles vs. City of San Fernando (1975) 14 Cal.3d. 212, and cases cited therein.

[29] Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, June 2021, p. 5-3.

[30] Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. 5-24.

(c) Metropolitan Water District of Southern California

MWD is comprised of 26 member agencies, which includes the City. MWD is the largest imported wholesaler water service provider for domestic and municipal uses in Southern California. MWD's primary water supply resources are the Colorado River and the SWP. All of MWD's 26 member agencies have preferential rights to purchase water from MWD. MWD meets the demand for water through assessments of future supply and demand, which are presented in the MWD's RUWMP, which are reports that by statute must be prepared every five years.

The most recent report was the previously discussed 2020 MWD UWMP. The 2020 MWD UWMP projects and plans for MWD's water supplies and demand through the year 2045. Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple dry-year conditions (i.e., under the most challenging weather conditions, such as drought and service interruptions caused by natural disasters) is presented in Table 2-5 of the 2020 MWD UWMP.[31] As shown therein, the projected 2045 demand water is 1,564,000 afy, whereas the projected 2045 supply is 2,239,000 afy based on current programs, for a potential surplus in 2045 of 675,000 afy.

(4) LADWP Service Area Water Demand and Reliability Assessment

LADWP's 2020 UWMP provides water supply and demand projections in five-year increments to 2045 for average year, single dry year, and multiple dry years; refer to **Table IV.O.1-4**, *Service Area Reliability Assessment for Average Weather Year*, **Table IV.O.1-5**, *Service Area Reliability Assessment for Single Dry Year*, and **Table IV.O.1-6**, *Service Area Reliability Assessment for Multiple Dry Years (Year 5 of 5).* The analysis in Table IV.O.1-6 regarding multiple years is based on historic conditions that occurred between 1988 to 1992, with Year 5 (1992) presenting the worse-case conditions when supplies would be at their lowest. These tables show that LADWP can provide reliable water supplies under all three hydrologic scenarios through the 25-year planning period.

In addition, **Table IV.O.1-7**, *Service Area Drought Reliability Assessment*, provides an assessment of near-term water supply from 2021 to 2025, which is based on historic 1988-1992 drought conditions. As shown therein, LADWP can provide near-term reliable water supplies through 2025 under drought conditions.

[31] Metropolitan Water District, 2020 Urban Water Management Plan, p. 2-15, May 2021.

TABLE IV.O.1-4
SERVICE AREA RELIABILITY ASSESSMENT FOR AVERAGE WEATHER YEAR

Demand and Supply Projections (in acre-feet)	Average Year - Fiscal Year Ending on June 30				
Forecast Year	**2025**	**2030**	**2035**	**2040**	**2045**
Total Water Demand[a]	**642,600**	**660,200**	**678,800**	**697,800**	**710,500**
Post-Conservation Demand	**509,500**	**526,700**	**536,100**	**554,500**	**565,800**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14)	133,100	133,500	142,700	143,300	144,700
Los Angeles Aqueduct[d]	190,400	188,900	187,300	185,800	184,200
Groundwater					
Entitlements[e]	109,400	109,400	109,400	108,800	108,800
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
Subtotal (Existing/Planned Supplies)	*461,200*	*480,000*	*495,100*	*493,700*	*493,700*
MWD Water Purchases (With Existing/Planned Supplies)	181,400	180,200	183,700	204,100	216,800
Total Supplies	**642,600**	**660,200**	**678,800**	**697,800**	**710,500**

[a] Total Demand with existing passive conservation prior to FY 2014.

[b] Cumulative "hardware" savings since late 1980s reached 110,822 afy by FYE 2014.

[c] Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.

[d] Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate impacts.

[e] LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 afy from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 afy in 2037.

SOURCE: LADWP, 2020 Urban Water Management Plan, May 2021, Exhibit 11E, page 11-8.

TABLE IV.O.1-5
SERVICE AREA RELIABILITY ASSESSMENT FOR SINGLE DRY YEAR

Demand and Supply Projections (in acre-feet)	Average Year - Fiscal Year Ending on June 30				
Forecast Year	**2025**	**2030**	**2035**	**2040**	**2045**
Total Water Demand[a]	**674,700**	**693,200**	**712,700**	**732,700**	**746,000**
Post-Conservation Demand	**509,500**	**536,700**	**536,100**	**554,500**	**565,800**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14)	165,200	165,500	176,600	178,200	180,200
Los Angeles Aqueduct[d]	70,800	70,200	69,600	69,000	68,500
Groundwater					
Entitlements[e]	121,300	121,300	121,300	120,700	120,700
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
Subtotal (Existing/Planned Supplies)	*385,600*	*406,200*	*423,200*	*423,700*	*425,400*
MWD Water Purchases (With Existing/Planned Supplies)	289,100	287,000	289,500	309,000	320,600
Total Supplies	**674,700**	**693,200**	**712,700**	**732,700**	**746,000**

[a] Total Demand with existing passive conservation prior to FY 2014.

[b] Cumulative "hardware" savings since late 1980s reached 110,822 afy by FYE 2014.

[c] Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.

[d] Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate impacts.

[e] LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 afy from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 afy in 2037.

SOURCE: LADWP, 2020 Urban Water Management Plan, May 2021, Exhibit 11F page 11-9.

TABLE IV.O.1-6
SERVICE AREA RELIABILITY ASSESSMENT FOR MULTIPLE DRY YEARS (YEAR 5 OF 5)

Demand and Supply Projections (in acre-feet)	Multiple Dry Year: Year 5 (1992) - Fiscal Year Ending on June 30				
Forecast Year	**2025**	**2030**	**2035**	**2040**	**2045**
Total Water Demand[a]	**655,700**	**673,600**	**692,600**	**712,000**	**724,900**
Post-Conservation Demand	**507,600**	**536,600**	**536,100**	**554,400**	**565,700**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14)	148,100	147,000	156,500	157,600	159,200
Los Angeles Aqueduct[d]	141,900	140,700	139,500	138,400	137,300
Groundwater					
Entitlements[e]	109,400	109,400	109,400	108,800	108,800
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
Subtotal (Existing/Planned Supplies)	*427,700*	*445,300*	*461,100*	*460,600*	*461,300*
MWD Water Purchases (With Existing/Planned Supplies)	228,000	228,300	231,500	251,400	263,600
Total Supplies	**655,700**	**673,600**	**692,600**	**712,000**	**724,900**

[a] Total Demand with existing passive conservation prior to FY 2014.

[b] Cumulative "hardware" savings since late 1980s reached 110,822 afy by FYE 2014.

[c] Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.

[d] Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate impacts.

[e] LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 afy from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 afy in 2037.

SOURCE: LADWP, 2020 Urban Water Management Plan, May 2021, Exhibit 11G, page 11-12.

TABLE IV.O.1-7
SERVICE AREA DROUGHT RELIABILITY ASSESSMENT

Demand and Supply Projections (in acre-feet)	Drought (1988-1992) - Fiscal Year Ending on June 30				
Forecast Year	**2021**	**2022**	**2023**	**2024**	**2025**
Total Water Demand[a]	**645,900**	**652,600**	**668,600**	**658,600**	**655,700**
Post-Conservation Demand	**494,200**	**497,100**	**500,500**	**504,700**	**507,600**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14)	151,700	155,500	168,000	153,900	148,100
Los Angeles Aqueduct[d]	134,600	120,100	71,000	119,900	141,900
Groundwater					
Entitlements[e]	100,500	104,800	119,300	107,400	109,400
Groundwater Replenishment	0	1,750	3,500	3,500	7,000
Stormwater Recharge (Increased Pumping)	2,000	2,000	2,000	2,000	4,000
Recycled Water – Irrigation and Industrial Use	11,400	12,500	14,300	15,400	17,300
Subtotal (Existing/Planned Supplies)	*400,200*	*396,700*	*378,100*	*402,100*	*427,700*
MWD Water Purchases (With Existing/Planned Supplies)	245,700	255,900	290,500	256,500	228,000
Total Supplies	**645,900**	**652,600**	**668,600**	**658,600**	**655,700**

[a] Total Demand with existing passive conservation prior to FY 2014.

[b] Cumulative "hardware" savings since late 1980s reached 110,822 afy by FYE 2014.

[c] Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017.

[d] Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate impacts.

[e] LADWP Groundwater Remediation projects in the San Fernando basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 afy from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 afy in 2037.

SOURCE: LADWP, 2020 Urban Water Management Plan, May 2021, Exhibit 11H, page 11-13.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to water supply 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 telecommunication facilities, the construction of which would cause significant environmental effects;[32] ***or***

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate water supply impacts include:

- 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 Infrastructure

The water infrastructure analysis is based on information provided in the Utility Infrastructure Technical Report (included as Appendix O of this Draft EIR). The report analyzes the potential impacts of the Project on the existing public water infrastructure by comparing the estimated Project demand with the calculated available capacity of the existing facilities.

[32] Stormwater drainage is addressed in more detail in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR. Electric power, natural gas, and telecommunications are addressed in more detail in Chapter VI, *Other CEQA Considerations*, of this Draft EIR.

The existing and proposed water demand is based upon available site and Project information. Existing water demand calculations are shown in Table IV.O.1-2. As shown therein, water demand for building and parking lots utilizes 110 percent of the City of Los Angeles Bureau of Sanitation, LA Sanitation & Environment (LASAN) sewerage generation rates. For this analysis, 110 percent is used because not all of the water used enters into the sewer system, such as water used in parking areas and other miscellaneous site maintenance activities. Existing irrigation demand is calculated based on actual water invoice data for the Weddington Golf & Tennis facility, as detailed in Table IV.O.1-2. With regard to water demand generated by the Project, water consumption rates for buildings and parking facilities are also based on 110 percent of LASAN sewerage generation rates. An Irrigation Study was prepared to determine the Project's landscaping water demand. The Irrigation Study is included as Exhibit 11 in the Utility Infrastructure Technical Report prepared by KPFF Consulting Engineers, which is included as Appendix O of this Draft EIR.

LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. LADWP's approach consists of analyzing their water system model near the Project Site. Based on the results, LADWP determines whether they can meet the project fire hydrant flow needs based on existing infrastructure. See Exhibit 2 in the Utility Infrastructure Technical Report for the results of the Information of Fire Flow Availability Request (IFFAR).

In addition, LADWP performed a flow test to determine if available water conveyance exists for future development. LADWP's approach consists of data ranging from available static pressure (meaning how much pressure is available at the source before applying the Project's demand), to the available pressure at the maximum demand needed for the Project. Based on the results, LADWP determines whether they can meet the Project's needs based on existing infrastructure. See Exhibit 3 in the Utility Infrastructure Technical Report for the results of the Service Advisory Request (SAR). Impacts regarding the adequacy of water infrastructure for fire-fighting purposes are addressed in Section IV.L.1, *Public Services – Fire Protection*, of this Draft EIR.

(2) Water Supply

The Project is not subject to the requirements of SB 610, as it would not include the development of 500 residential units, retail floor area in excess of 500,000 square feet, or generate a water demand equivalent to or greater than that required by a 500-dwelling unit project.[33] In addition, the Project is not subject to the requirements of SB 221 because

[33] Water demand equivalent to or greater than that required by a 500-dwelling unit project was calculated by using the multi-family dwelling unit size of 2.41 persons per dwelling unit X 106 gallons per day (gpd) per person (per LADWP 2020 UWMP gpcd) X 500 dwelling units = 127,730 gpd. The Project's total gpd would be less than this total gpd for 500 dwelling units (refer to Table IV.1-8). LADWP 106 gpcd average from Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, page 1-8, May 2021.

it is located within an urbanized area and does not propose the development of 500 or more dwelling units. Therefore, a WSA is not required from the water supplier.

In calculating the Project's water demand, a Project-specific irrigation analysis was conducted by the landscape architecture firm Studio-MLA, which includes the required irrigation for the various water features and plant species that will be provided on the Project Site. The Studio-MLA analysis is included as an appendix to the Utility Infrastructure Technical Report. As shown in Exhibit 11 of the Utility Infrastructure Technical Report, the irrigation water demand for the Project was calculated to be 3.3 million gallons per year, which equates to 10.13 afy. The irrigation analysis accounts for the Project's use of artificial turf on Fields A and B, which is included as Project Design Feature WS-PDF-1.

Implementation of Project Design Feature WS-PDF-2 will require the installation of a capture and reuse system; the water captured from this system will be reused for irrigation within the publicly accessible walking paths and wooded areas, which total 5.4 acres (235,224 square feet), as well as for the Project's water features. In order to maintain the conservative nature of the analysis, the Project's irrigation water demand does not account for implementation of Project Design Feature WS-PDF-2.

The Project's water demand was compared to the LADWP's ability to supply water during a normal year, dry year, and multiple-dry years, pursuant to its 2020 UWMP. The water demand for indoor land uses was calculated based on wastewater generation factors provided by LASAN. The net increase in water demand, which is the projected additional water demand of the Project, is calculated by subtracting the existing baseline water demand and water saving amount from the total proposed water demand.

c) Project Design Features

The following Project Design Features related to water supply will be implemented as part of the Project:

> **WS-PDF-1: Artificial Turf.** The Project will use artificial turf on Fields A and B, which would serve to reduce water demand compared to natural grass.
>
> **WS-PDF-2: Capture and Reuse System.** The Project would capture, treat, and store up to one million gallons of stormwater and other urban runoff at a time from the developed portions of the Project Site, as well as from an approximate 38.64-acre off-site drainage area to the north of the Project Site, through a stormwater Low Impact Development (LID) capture and reuse cistern system, which will then use the treated stormwater for irrigation or water features on the Project Site.

Also refer to Project Design Feature TRAF-PDF-1 (Construction Management Plan) in Section IV.M, *Transportation*, of this Draft EIR.

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

(1) Impact Analysis

(a) Construction

Construction would result in an intermittent demand for water during demolition, excavation, grading, and construction activities on-site, including, but not limited to, use in dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other related activities. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd for the Project.[34] Based on measured data from the existing golf course's water bills, existing domestic water use from on-site buildings and parking is 1,829 gpd (without irrigation) and water for irrigation is approximately 31,050 gpd, for a total of 32,879 gpd. The Project's estimated construction water use of 1,000 to 2,000 gpd would be largely similar to the existing domestic water use from on-site buildings and parking, which as discussed below, would be adequately supported by the existing water infrastructure. Further, during Project construction and with approval from LADWP and the City, temporary water supply may be obtained from existing metered water connections or fire hydrants. Accordingly, the existing water infrastructure has capacity to meet the limited and temporary water demand associated with construction of the Project.

The Project would require construction of new, on-site water distribution lines to serve the new buildings, landscaping, and facilities. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below ground surface and would be limited to on-site water distribution and minor off-site work associated with connections to one of the public mains. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.[35] As discussed in Section IV.M, *Transportation,* of this Draft EIR, in accordance with Project Design Feature TRAF-PDF-1, the Project would implement a Construction Management Plan to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of new water lines would impede such access.

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[34] KPFF Consulting Engineers, Harvard-Westlake River Park Project (4141 Whitsett Avenue, Studio City, CA 91604) Utility Infrastructure Technical Report: Water, Wastewater, and Energy, February 2022, page 13. Provided in Appendix O of this Draft EIR.

[35] KPFF Consulting Engineers, Harvard-Westlake River Park Project (4141 Whitsett Avenue, Studio City, CA 91604) Utility Infrastructure Technical Report: Water, Wastewater, and Energy, February 2022, page 13. Provided in Appendix O of this Draft EIR.

Therefore, Project construction would not require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects. Construction impacts under the Project on water infrastructure would be less than significant.

(b) Operation

Water service to the Project Site would continue to be provided by LADWP, as under existing conditions. When analyzing the Project for infrastructure capacity, although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity.

The Project must comply with fire flow requirements set forth in Section 57.507.3 of the LAMC and as determined by the LAFD. The Project Site is zoned as A1-1XL-RIO, classified as Open Space or Agricultural land use and falls within the low-density residential land development category set forth by LAMC Section 57.507.3. Based on the fire flow standards, the required fire flow for the Project is 2,000 gpm from three adjacent fire hydrants running simultaneously. An IFFAR was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The completed IFFAR, included as Exhibit 2 in the Utility Infrastructure Technical Report, shows three nearby hydrants in the vicinity of the Project Site flowing simultaneously for a combined 2,000 gpm. As shown by the IFFAR, adequate fire flow is available to serve the Project Site and to demonstrate compliance with Section 57.507.3 of the LAMC.

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

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

The Project would incorporate a fire sprinkler suppression system as required for all school buildings and recreational uses under Section 903 of the California Fire Code as it pertains to National Fire Protection Association (NFPA) 14-2013 and as adopted by reference in LAMC Section 94.2020. The installation of sprinklers would reduce the public hydrant demands. Such systems would be subject to LAFD review and approval during the design and permitting of the Project. Based on LAMC Section 94.2020.0 that adopts by reference the NFPA 14-2013, including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As

noted, a SAR was submitted to LADWP in order to determine if the existing public water infrastructure could meet the demands of the Project. The approved SAR included as Exhibit 3 of the Utility Infrastructure Technical Report for the water service off Whitsett Avenue shows that a static pressure of 116 pounds per square inch (psi) and a flow of up to 2,500 gpm can be delivered. Per the results of the SAR, the maximum pressure of the 8-inch water line in Whitsett Avenue is 198 psi. The SAR shows that the water flow and pressure demands of the Project can be accommodated, and the 20-psi requirement for the surrounding public hydrants is exceeded. Thus, the existing water infrastructure is adequate to serve the Project.

Therefore, while Project operation would require new connections from existing facilities, with regulatory compliance with LAMC and coordination with LADWP, Project operation would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects. Operational impacts on water infrastructure would be less than significant.

(2) Mitigation Measures

Impacts on the relocation or construction of new or expanded water supply facilities were determined to be less than significant; therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

As stated under Threshold (a), water would be required for Project construction activities, such as dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other related activities. Construction activities would be intermittent, with demand for water consumption variable but generally temporary in nature. As stated above and in the Utility Infrastructure Technical Report, based on a review of construction projects of similar size and duration, a conservative estimate of construction water demand would be approximately 1,000 to 2,000 gpd for the Project.[36] Based on measured data from the existing golf course's water bills, existing domestic water use from on-site

[36] KPFF Consulting Engineers, Harvard-Westlake River Park Project (4141 Whitsett Avenue, Studio City, CA 91604) Utility Infrastructure Technical Report: Water, Wastewater, and Energy, February 2022, page 13. Provided in Appendix O of this Draft EIR.

buildings and parking is 1,816 gpd (without irrigation) and water for irrigation is approximately 31,063 gpd, for a total of 32,879 gpd. The Project's estimated construction water use of 1,000 to 2,000 gpd would be largely similar to the existing domestic water use from on-site buildings and parking. As analyzed below under Operational impacts, adequate water supplies exist to meet the Project's projected operational water demand, in addition to the existing and planned future demands for normal, single-dry, and multiple-dry years on LADWP water supplies. As Project construction would require a nominal amount of water compared to Project operation, the Project's intermittent construction-related water demand would be met by LADWP's available water supplies. For these reasons, adequate water supplies would be available from existing entitlements and resources for Project construction activities. **Therefore, LADWP has sufficient water supplies to serve the Project and reasonably foreseeable future development during normal, dry, and multiple-dry years, and impacts on water supply during construction would be less than significant.**

(b) Operation

Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation rates established by LASAN, which also serves to estimate water demand. The Project water consumption estimates are based on 110 percent of the LASAN sewage generation rates for the Project's various uses.[37] Estimated domestic water demand for the Project, as calculated in the Utility Infrastructure Technical Report, is shown in **Table IV.O.1-8**, *Maximum Estimated Project Domestic Water Demand*.

As indicated in Table IV.O.1-8, the Project would result in a total domestic water demand of 30,821 gpd or 34.52 afy, and a landscape/irrigation demand of 9,051 gpd or 10.13 afy. In total, the Project's overall water demand would be 39,872 gpd or 44.65 afy. The Project, as conservatively analyzed and as further explained below, would result in a net increase of 6,993 gpd or 7.82 afy compared to existing conditions.

Per Project Design Feature WS-PDF-2, stormwater and other urban runoff would be captured, treated, and stored in the 1-million-gallon underground cistern system, where the treated water would be used for on-site irrigation and water features. Depending on rainfall frequency and volume, a minimum of one-third of the Project's total annual irrigation demand is expected to be provided by the Project's 1-million-gallon stormwater capture and reuse system. Thus, with Project Design Feature WS-PDF-2, the Project's irrigation demand would be reduced, at minimum, to 6,064 gpd or 6.8 afy; and, the Project's overall water demand would be reduced to 36,885 gpd or 41.31 afy.

[37] KPFF Consulting Engineers, Harvard-Westlake River Park Project (4141 Whitsett Avenue, Studio City, CA 91604) Utility Infrastructure Technical Report: Water, Wastewater, and Energy, February 20222, page 10. Provided in Appendix O of this Draft EIR.

TABLE IV.O.1-8
MAXIMUM ESTIMATED PROJECT DOMESTIC WATER DEMAND

Land Use	Sewer Generation Rate (gpd/1,000 sf)	Units	Total Water Demand (gpd)[a,b]	Total Water Demand (gpm)[a,b]	Total Water Demand (afy)[a,b]
Gymnasium	200	80,249 sf	17,655	12.26	-
Parking Structure	20	223,580 sf	4,919	3.42	-
Locker Rooms	650	9,323 sf	6,666	4.63	-
Restrooms	250	2,382 sf	655	0.45	-
Storage & Sheds	30	2,420 sf	80	0.06	
Swimming Pools	-	52 meter pool	490[c]	0.34	-
Clubhouse (to remain)	120	2,700 sf	356	0.25	-
Total Estimated Proposed Domestic Water Demand			*30,821*	*21.4*	*34.52*
Total Estimated Landscaping Water Demand[d]			*9,051*	*--*	*10.13*
Total Estimated Domestic + Landscaping Water Demand			*39,872*		*44.65*
Existing Total Domestic + Landscaping Water Demand			32,879	-	36.83
Net Increase in Water Demand (Proposed - Existing)			**6,993**	**-**	**7.82**

NOTES: sf = square feet, gpd = gallons per day, gpm = gallons per minute, afy = acre-feet per year

[a] The Project water consumption estimates are based on 110 percent of the LASAN sewage generation rates for the Project's various uses.

[b] Totals may not add up due to rounding.

[c] Water generation for the proposed swimming pool is based on process flow, which is the assumed daily wastewater flow, limited by backwater filters is 500 gpd. Per LASAN 500 gpd is the max process flow of a swimming pool.

[d] Project landscaping is estimated to require 3,300,000 gallons per year, which is calculated to be 9,051 gpd, and 10.13 afy.

SOURCE: KPFF Consulting Engineers, 2022.

It should also be noted that the LASAN sewer generation rates used to calculate the Project's domestic water demand do not account for current code-required and voluntary water conservation features. The Project would include water conservation features that would reduce the Project's water use, recognizing the City's policy that future water needs must be met by expanding water recycling and conservation. Water conservation measures would include, but not limited to, using reclaimed water from the proposed underground stormwater capture reuse cistern system; planting of RIO District -compliant plant species that are native to California and use significantly less water compared to existing uses; and installation of low flow plumbing fixtures to reduce water use in restrooms and showers. Refer Section IV.C, *Biological Resources*, of this Draft EIR for a discussion of the Project's consistency with City's RIO District Ordinance and Los Angeles River Master Plan Landscape Guidelines and Plant Palettes, which indicates that the Project's plant materials would consist entirely of native plants that have low to medium water demand. The Project would meet standards established in the Water

Efficiency Requirements Ordinance (Ordinance No. 180,822), the Los Angeles Green Building Code Ordinance (Ordinance No. 181,480), and the CALGreen Code. The Project design would also comply with the LID Ordinance and the BMPs contained therein that have stormwater recharge or reuse benefits for the entire Project, as applicable and as discussed in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR. Given that the Project would, at a minimum, comply with current code requirements for water fixtures, irrigation systems, and other water conservation features and would exceed requirements for stormwater capture and reuse (see Project Design Feature WS-PDF-2), water use on the Project Site would be substantially more efficient than under current conditions and, therefore, would generate less demand than calculated in Table IV.O.1-8. For these reasons, the Project's water demand calculations in Table IV.O-8 are highly conservative.

Furthermore, for informational purposes, to illustrate the conservative nature of the Table IV.O-8 calculations, the Utility Infrastructure Technical Report reviewed the water demand from actual data (i.e., water bills) of the existing uses of the Project Site and the existing Harvard-Westlake Upper School campus, located on Coldwater Canyon Avenue less than one mile from the Project Site. The Harvard-Westlake Upper School campus, constituting 19 acres, is typically occupied by more than 1,000 employees, students, and school-related visitors (combined), from 8:00 a.m. to 7:00 p.m. during the weekdays. Based on 2018 and 2019 utility data, the Upper School campus used an average of 540,000 gallons of water per month (equaling approximately 20 afy), a figure that includes both irrigation and domestic water demand. In contrast, the School anticipates that the Project Site would primarily be occupied for school uses weekdays from 3:00 p.m. to 7:00 p.m. Taking a conservative approach to estimating the Project's total water demand by prorating the School's Upper Campus water usage, it is reasonable to assume that the Project's estimated total water demand would be approximately 370,000 gallons per month (equaling approximately 13.6 afy). By comparison, water demand for the existing Project Site is, on average, 1,000,000 gallons per month. This is approximately double the use from the Harvard-Westlake Upper School campus.

In determining whether the projected water demand of the Project would be within the 25-year water demand growth projected in LADWP's 2020 UWMP, in general, projects that conform to the demographic projections from the RTP by SCAG and are currently located in the City's service area are considered to have been included in LADWP's water supply planning efforts; therefore, projected water supplies would meet projected demands. As discussed in further detail in Section IV.J, *Land Use and Planning*, of this Draft EIR, the Project is consistent with the existing allowable use and density for the Open Space land use designation.[38] Also, while the Project does not propose residential uses or new businesses, new employees would be introduced by the Project. On a typical day in which no high attendance events (i.e., fewer than 300 spectators and participants) would take place, there would be a maximum of 80 employees, , on days in which high attendance events do take place (i.e., greater than 300 spectators and participants), there would be

[38] The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, page III-12 describes Open Space as providing for park facilities as well as "recreational and educational opportunities.".

a maximum of approximately 100 employees. A majority of these employees would be comprised of existing coaches and athletic administrators, who currently work at the Upper School campus on Coldwater Canyon Avenue, which is an area already accounted for in the SCAG projections. Approximately 20 percent of employees (or up to approximately 20 new employees) would be new to the Project Site and would include security, custodial, administrative, Information Technology (IT), and landscaping positions. There are approximately 16 employees under existing conditions. Thus, there would be a nominal increase (4 employees) in the overall employee numbers when accounting for new employees at the Project Site and any removed/displaced current employees. Given the small number of new employees, the Project would be substantially consistent with the regional growth projections assumed part the 2020 UWMP. Hence, the water demand for the Project is within the LADWP water demand projections for the service area.

As discussed in LADWP's 2020 UWMP and summarized in Tables IV.O.1-4 to IV.O-1-7, above, LADWP expects to have available water supplies during average year, single dry year, multiple dry years and drought condition scenarios. Assuming the conservative analysis included in Table IV.O.1-8 with a Project water demand of 44.65 afy or a net increase of 7.82 afy above existing conditions, the Project's water demand increase would be well within the City's total increase of 69,200 afy in water demand from 2025 to2045.[39] With its current water supplies, planned future water conservation and planned future water supplies, LADWP has available supplies to meet all demands under all three hydrologic scenarios (average, single dry, and multiple dry years) through the 25-year planning period covered by the 2020 UWMP. In addition, as shown in Table IV.O.1-7, LADWP would have available water supplies to meet water demand under drought conditions in 2025.

Regarding the MWD's ability to sell water to the LADWP, the 2020 MWD UWMP shows that with its investments in storage, water transfers, and improving the reliability of the Delta, water shortages are not expected to occur within the next 25 years.[40] As previously stated, in the 2020 MWD UWMP, the projected 2045 demand for water under the multiple dry-years scenario is 1,564,000 afy, whereas the expected and projected 2045 supply is 2,239,000 afy.[41]

Based on the above, the estimated water demand for the Project would not exceed the available normal, dry, and multiple dry year water supply projected by LADWP. The Project would make the necessary connections to ensure that the water system could meet the domestic demands for the Project. As such, LADWP would be able to meet the

[39] The increase in water demand for the City is derived from Table IV.O.1-6 above for Multi-Dry Years: 2045 total water demand (724,900 afy) – 2025 total water demand (655,700 afy) = 69,200 afy.

[40] Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, page ES-7, June 2021.

[41] Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, page 2-19, June 2021.

water demand of the Project, as well as the existing and reasonably foreseeable future water demands of its service area. **For these reasons, there would be sufficient water supply available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Project's operation-related impacts on water supply would be less than significant.**

(2) Mitigation Measures

Impacts regarding domestic water supplies were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

d) Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analyses on water infrastructure and water supply is the vicinity of the Project Site (i.e., the water infrastructure that would serve the Project and the LADWP service area, respectively). Chapter III, *Environmental Setting*, of this Draft EIR, identifies five related projects within the vicinity of the Project Site. All five related projects are served by LADWP.

(a) Water Infrastructure

Development of the Project, in conjunction with the related projects, would cumulatively increase service demand on the existing water infrastructure system. However, each related project would be subject to City review to ensure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. All projects are required to obtain a SAR, based on flow testing of facilities, to verify that there is available service. Individual projects are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval. Furthermore, LADWP, together with the City's Department of Public Works, conducts ongoing evaluations to ensure facilities are adequate and requires infrastructure system improvements as needed. **Based on these facts and the above analysis relating to the Project's construction and operational impacts on the City's water infrastructure system, the Project's incremental effects on the water infrastructure system would not be cumulatively considerable. Cumulative impacts on water infrastructure would be less than significant.**

(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 water supplies to serve existing

and projected demands. LADWP's 2020 UWMP accounts for existing development within the LADWP service area, as well as projected growth through the year 2045. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that meets certain criteria. The WSAs for such projects, in conformance with the UWMP, would evaluate the reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed, on a project-by-project basis.

The 5 related projects would contribute, in conjunction with the Project, to overall water demand from LADWP.

As indicated in **Table IV.O.1-9**, *Estimated Cumulative Water Demand*, the estimated water demand generated by the related projects would be 362,888 gpd or 406.5 afy. With inclusion of the Project, the cumulative water demand would be 402,760 gpd or 451 afy, which would be well within the City's total increase of 69,200 afy in water demand from 2025 to 2045.[42] Furthermore, in the short-term, even under drought conditions as shown in Table IV.O.1-7, the cumulative water demand would be within the 9,800 afy increase in water demand projected between 2021 and 2025, for which water supplies would be available to meet demand. These estimates are likely conservative (i.e., high) since they do not quantify code-required conservation or applicant conservation commitments that would reduce demand by the related projects or deduct for existing uses and assumes all the related projects would be fully built out.

As reported in the 2020 UWMP, the population within LADWP's service area increased from 2.97 million in 1980 to approximately 4.04 million in 2020, representing an average annual growth rate of approximately 0.8 percent.[43] Per the UWMP, it is anticipated that the LADWP service area would continue to grow over the next 25 years at a rate of 0.64 percent annually. This rate is similar to the historical 0.7 percent annual growth rate from 1980 to 2020 and will lead to approximately 765,112 new residents over the next 25 years, with a service population of 4,806,396 persons in 2045. In the near-term, the service population would be 4,243,478 in 2025, an increase of 203,478 persons from 2020. The total number of housing units increased from 1.10 million in 1980 to approximately 1.44 million in 2020, representing an average annual growth rate of approximately 0.8 percent. The total number of housing units estimated by the UWMP in 2045 is estimated to be 1,924,864, thus representing an increase of 484,864 units between 2020 and 2045. In the near-term, the number of housing units would be 1,534,479 in 2025, an increase of 94,479 units from 2020.The LADWP service area includes all of the City of Los Angeles and portions of the City of West Hollywood. The cumulative increase in population and

[42] The increase in water demand for the City is derived from Table IV.O.1-6 above for Multi-Dry Years: 2045 total water demand (724,900 afy) – 2025 total water demand (655,700 afy) = 69,200 afy.

[43] Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, page ES-6.

housing growth of the Project and the related projects combined within the City of Los Angeles would be well within the LADWP's growth projections between 2020 and 2025.

TABLE IV.O.1-9
ESTIMATED CUMULATIVE WATER DEMAND

Related Project No.	Land Use	Sewer Generation Rate (gpd/1,000 sf)	Units	Estimated Water Demand[a,b] (gpd)
1	Health Club/Restaurant	30 gpd/seat	91.466 ksf (6,098 seats)[c]	201,234
	Retail	50 gpd/ksf	10.747 ksf	591
2	Apartments	150 gpd/du	62 du	10,230
	Other[d]	50 gpd/ksf	1.925 ksf	106
3	Other[d]	50 gpd/ksf	15.7 ksf	864
4	Other[d]	50 gpd/ksf	12.782 ksf	703
5	Apartments	150 gpd/du	504 du	83,160
	Restaurant	30 gpd/seat	30 ksf (2,000 seats)[e]	66,000
		Related Projects Subtotal (without Project)		*362,888 gpd (406.5 afy)*
			Project Total	*39,872 gpd (44.65 afy)*
			Cumulative Total with Project	**402,760 gpd (451 afy)**

NOTES: ksf = thousand square feet; gpd = gallons per day; du = dwelling units

[a] The water consumption estimates are based on 110 percent of the LASAN sewage generation factors for the various related project uses.

[b] Totals may not add up due to rounding.

[c] Conservatively assumed entire square footage for this use is restaurant. Restaurants assume each seat will occupy 15 square feet.

[d] "Other" uses conservatively assumed to be retail uses.

[e] Restaurants assume each seat will occupy 15 square feet.

SOURCE: ESA, 2021.

As discussed in the water reliability section of the 2020 UWMP, LADWP expects to have a reliable supply of up to 724,900 af of water in 2045 under a multiple dry years scenario (See Table IV.O.1-6). Also, under drought conditions, LADWP would have a reliable supply of 655,700 af of water in 2025 (see Table IV.O.1-7). In comparison, the cumulative demand of the related projects and the Project would demand 451 afy of water, which is within the water supply available in the LADWP service area.

Furthermore, in terms of the City's overall water supply, the water demand for projects that are consistent with the allowable land uses, building area, and density contained in the City's General Plan have been taken into account in the planned growth of the water

distribution system. Development of each related project would be evaluated on a case-by case basis to determine if they are consistent with the allowable land uses and densities pursuant to the applicable zoning and land use designations. As previously stated, based on water demand projections through 2045 in LADWP's 2020 UWMP, LADWP determined that it will be able to reliably provide water to its customers through the year 2045, as well as the intervening years (including the Project's buildout year), based on the growth projections in SCAG's RTP/SCS.

For projects that meet the requirements established in Sections 10910-10915 of the State Water Code, a WSA report demonstrating sufficient water availability would be required prior to project approval to ensure LADWP has sufficient capacity to serve the project without affecting regional water supplies. This process provides a planning mechanism to evaluate water demands from major future projects to inform City land use decisions and help ensure that cumulative growth in the City would not exceed the LADWP's future water supplies through 2045 and beyond. Further, the Project and all of the related projects within the City would be required to meet the prescriptive water conservation plumbing fixture requirements of Sections 99.04.303 and 99.05.303 of the CALGreen Code, which would decrease the Project water demand. **Because the LADWP has determined that it can supply the anticipated growth in the City of Los Angeles through the year 2045 based on the growth projections of the 2020 UWMP, and the Project's anticipated water demands are within these growth projections, the Project's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on water supply would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding water infrastructure and water supply were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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