IV. Environmental Impact Analysis

M.1 Utilities and Service Systems – Water Supply

1. Introduction

This section of the Draft EIR evaluates the 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 regarding the provision of water is also discussed.

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on a Water Supply Assessment (WSA) prepared for the Project and adopted by LADWP and included in **Appendix M-2** of this Draft EIR, along with a copy of Resolution No. 021085 approving the WSA. Additional technical information used in the analysis is based on a Utility Infrastructure Technical Report: Water (Infrastructure Report) prepared for the Project by KPFF Consulting Engineers and included in **Appendix M-1**. Additionally, as the Project's development program was refined after the WSA was approved, an updated WSA request letter was submitted to LADWP. LADWP recalculated the Project's water demand based on the Project Description as described in Chapter II of this Draft EIR, and determined the Project's total water demand would not result in a substantial increase to the previous water demand as approved by the Board of Water and Power on November 17, 2020. As such, no additional WSA is required for the refinements to the Project' s development program. The email received from LADWP on May 9, 2023, confirming that no additional WSA is required is included in **Appendix M-3**.

2. Environmental Setting

a) Regulatory Framework

There are several plans, policies, and programs regarding Water Supply and Infrastructure at the State, regional, and local levels that apply to the Project. 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
- 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
- Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan, including:
  - Framework Element
  - Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Community Plan
- Los Angeles Municipal Code (Ordinance Nos. 180,822, 181,480, 181,899, 183,833, 182,849, 184,692, and 184,248)

(1) State

(a) California Urban Water Management Plan Act

The California Urban Water Management Planning Act (Water Code, Section 10610, et seq.) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water Suppliers to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands

during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water to customers.

Recent changes to the California Urban Water Management Planning Act further enhance state policies which promote resilience of the State's water supplies. For example, Senate Bill (SB) 606 requires Urban Water Management Plans to include contingency plans addressing the possibility of prolonged water shortage conditions and further requires consideration of climate change impacts on water supplies. Additionally, SB 606 and Assembly Bill (AB) 1414 require drought risk assessment for a five-year historic drought sequence.

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

Two of the state laws addressing the assessment of water supply necessary to serve large-scale development projects, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in Water Code Sections 10910–10915, specifies the requirements for water supply assessments (WSAs) and their role in the California Environmental Quality Act (CEQA) process and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs, where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use projects that include one or more of the projects specified in this subdivision; or

- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155[a]).

The WSA must be approved by the public water supplier serving the project at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

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

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

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20-percent-per-capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.[1] As such, each updated UWMP must 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.

[1] California State Water Resources Control Board (SWRCB), 20 x 2020 Water Conservation Plan, February 2010.

(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.[2] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[3] 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.[4] As provided in LADWP's 2020 Urban Water Management Plan, in accordance with SB X7-7, LADWP developed a final reported 2020 target of 142 gallons per capita per day. LADWP's actual gallons per capita per day in 2020 was 106 gallons per capita per day, less than the 2020 target.[5]

(d) Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act (SGMA) of 2014,[6] 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, 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

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

3 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.

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

5 City of Los Angeles, Los Angeles Department of Water and Power. 2020 Urban Water Management Plan for the Los Angeles Department of Water & Power, page 1-8.

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 January 2023.

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 (gallons per minute) at 80 pounds per square inch (psi) and for lavatory faucets manufactured after July 1, 2016, is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.[8]

(ii) CALGreen Code

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

(iii) Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2022 California Plumbing Code, which is based on the 2021 Uniform

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8 California Code of Regulations, Title 20, Section 1605.3(h), https://energycodeace.com/site/custom/public/reference-ace-t20/index.html#!Documents/section16053state standardsfornonfederallyregulatedappliances.htm. Accessed January 2023.

Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2023.

(f) Executive Order B-40-17

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

(g) Executive Order N-10-21

On July 8, 2021, Executive Order N-10-21 (Order) was issued calling for voluntary cutbacks of water usage by 15% 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. The Order also directs State agencies, led by the Department of Water Resources and in coordination with local agencies, to encourage actions by all Californians, in their residential, industrial, commercial, agricultural, or institutional use, to reduce water usage, including through the statewide Save Our Water conservation campaign. Thirdly, the Order directs the Department of Water Resources to monitor hydrologic conditions such as cumulative precipitation, reservoir storage levels, soil moisture and other metrics, and the Water Board to monitor progress on voluntary conservation as ongoing indicators of water supply risk that may inform future drought response actions.

(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

MWD's 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 MWD UWMP.[10] The analysis in the MWD UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[11] In the MWD UWMP, 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

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 current 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

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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 1518, page VIII.

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 (af) and the total supply reliability target is approximately 4,539,000 af, representing an excess of 266,000 af.[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. These four scenarios include (a) low demand, stable imports; (b) high demand, stable imports; (c) low demand, reduced imports; and (d) high demand, reduced imports.[16,17]

(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

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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.

16 Metropolitan Water District of Southern California, Preliminary Gap Analysis of the 2020 Integrated Resources Plan, December 15, 2020. Low demand = slow economic growth; stable imports = gradual climate change and low regulatory impacts; high demand = high economic growth; and reduced imports = severe climate impacts and high regulatory impacts.

17 Preliminary Gap Analysis of the 2020 Integrated Resources Plan, https://www.mwdh2o.com/media/17999/12152020-irp-6b-presentation.pdf. Accessed December 21, 2022.

Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[18]

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

18 Water Surplus and Drought Management Plan, Report No. 1150, August 1999.

19 Metropolitan Water District, 2015 Urban Water Management Plan, June 2016, page 2-21.

(3) Local

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

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at five-year intervals. LADWP adopted the 2020 UWMP on May 25, 2021.The 2020 UWMP complies with the Urban Water Management Planning Act, builds upon the goals and progress made in the 2015 UWMP, and currently serves as the City's master plan for reliable water supply and resource management consistent with the City goals and objectives. The UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2050. Long range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). LADWP's water use efficiency goals include reducing per capita water use to 100 gallons per capita per day (GPCD) by 2035 and to maintain this usage through 2050.

(b) Green New Deal

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAn, which includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[20] The Sustainable City pLAn was intended to be updated every four years.

In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAn, which has been renamed as L.A.'s Green New Deal, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.[21] The Green New Deal augments, expands, and elaborates in more detail the City's vision for a sustainable future and 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

20 City of Los Angeles, Sustainable City pLAn, April 2015.

21 City of Los Angeles, L.A.'s Green New Deal, 2019.

stormwater management.[22] 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.[23] 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 General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[24] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, 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.[25] The goals, objectives and policies are addressed by the City in its ordinances and preparation of its UWMP.

The General Plan goals, objectives, and policies listed in **Table IV.M.1-1**, *Relevant General Plan Utilities and Service Systems Goals, Objectives, and Policies*, relate to water supply.

22 City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

23 City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response – Creating a Water Wise City, October 14, 2014.

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

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

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

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.

(ii) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express

goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan) area. The Community Plan was adopted in 1998 and addresses growth and the arrangement of land uses within its boundaries through the year 2010.[26] The Community Plan does not provide specific policies for provision of water supply. However, it does provide general guidance to ensure the availability of utilities and facilities to support development within hillside areas and to install utilities underground when feasible.

(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 CALGreen Code. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by (1) using water saving fixtures or flow restrictions and/or (2) demonstrating a 20-percent reduction in baseline water use.
- Ordinance Nos. 181,899 and 183,833-amended LAMC Chapter VI, Article 4.4, Section 64.72, regarding stormwater and urban runoff to include new requirements, including Low Impact Development (LID) requirements that promote water conservation.
- Ordinance No. 182,849-amended LAMC Chapter IX, Article 9 (Green Building Code) to mandate that for new water service or for additions or alterations requiring upgraded water service for landscaped areas of at least 1,000 square feet, separate sub-meters or metering devices shall be installed for outdoor potable water use. This ordinance also required that for new non-residential construction with at least 1,000 square feet of cumulative landscaped area, weather or soil moisture-based irrigation controllers and sensors be installed.

[26] City of Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, adopted May 13, 1998.

- Ordinance No. 184,692-amended LAMC Chapter IX, Article 4 (Plumbing Code) by adopting by reference various sections of the California Plumbing Code. This ordinance also added requirements for plumbing fixtures and fixture fitting.
- Ordinance No. 184,248-amended LAMC Chapter IX, Article 4 (Plumbing Code) and Article 9 (Green Building Code) to establish Citywide water efficiency standards and mandate a number of new fixture requirements and methods of construction for plumbing and irrigation systems.

The City of Los Angeles also has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gpm in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 psi is to remain in the water system with the required gpm flowing. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

b) Existing Conditions

(1) Water Supply

LADWP is responsible for providing water for the City and various parts of Culver City, South Pasadena, and West Hollywood. As the Project Site is located within the City, LADWP is the urban water provider for the Project Site.

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.M.1-2**, *LADWP Water Supply*, summarizes LADWP water supplies from these sources over the last 10 years. As indicated therein, in 2019, LADWP had an available water supply of 480,539 AFY, including 72 percent from the Los Angeles Aqueducts; six percent from groundwater; 21 percent from the MWD; and two percent from recycled water.[27]

[27] The total percentages do not add up to 100 percent of the total LADWP water supply because the amounts from the respective sources do not take into account the transfer, spread, spills, and storage reductions that affect the total LADWP water supply availability.

TABLE IV.M.1-2
LADWP WATER SUPPLY (IN ACRE-FEET PER YEAR)

Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage	Total
2015	33,244	80,155	378,539	9,829	430	501,337
2016	95,573	72,503	314,336	9,095	-981	492,487
2017	380,329	14,695	113,033	8,509	5,730	510,835
2018	245,942	42,458	212,938	8,832	-858	511,027
2019[a]	344,622	26,433	101,722	8,807	1,045	480,539

[a] 2019 supply data are preliminary as of the date of the approved WSA.

SOURCE: LADWP, WSA, p. 22. Provided in Appendix M-2 of this Draft EIR.

Based on Table VI in the approved WSA, included in Appendix M-2 of this Draft EIR, LADWP determined that there would be adequate water supply for the demands within the MWD service area from 2020 to 2040 based on an average weather year.[28] 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. As specified within LADWP's UWMP, should a significant shortage (up to 30 percent) or worse shortage occur, under the Water Shortage Contingency Plan, withdrawal from available emergency storage along the Los Angeles Aqueduct System and local groundwater basins would occur. These water sources are described in further detail below.

(a) Los Angeles Aqueducts (LAA)

As discussed in the WSA for the Project, included in Appendix M-2 of this Draft EIR, 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[29]; therefore, the LAA's supply to the City in recent years has been at less than historical averages.[30]

28 LADWP, WSA, page 36.

29 LADWP, WSA, page 23.

30 LADWP, WSA, page 24.

On November 14, 2014, the City and the GBUAPCD announced an 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.[31]

Average deliveries of water from the LAA system have totaled approximately 192,084 AFY from between fiscal year (FY) 2014/15 to 2018/19.[32] The average delivery includes the 5 years that began in FY 2012/2013 and ended in FY 2016/2017 with the highest levels of snowpack at 203 percent of normal.[33] During this period, the record level of snowpack for the LAA watershed was recorded for FY 2016/2017. LAA supplies have provided between 10 percent and 85 percent of the City's total water supplies from FY 1969/1970 to FY 2018/2019. Since LAA supplies vary substantially from year to year depending on the hydrology, LADWP plans to increase resiliency to address climate change and natural disasters by developing sustainable local water supplies.[34]

(b) Groundwater

As discussed in the WSA for the Project, included in Appendix M-2 of this Draft EIR, LADWP extracts groundwater from the San Fernando, Sylmar, and Central groundwater basins.[35] 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*,[36] which requires that pumping be reported to the court-appointed Upper Los Angeles River Area 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 San Fernando Basin underlies approximately 112,000 acres of land in the Upper Los Angeles River Area (ULARA). The majority of LADWP's groundwater is extracted from the San Fernando Basin. The City has an annual pumping right of 87,000 af in the San Fernando Basin and has accumulated 643,105 af of stored water credits in the San Fernando Basin as of October 1, 2019.[37] The Sylmar Basin, located in the northern part of the ULARA, overlies 5,600 acres of land. LADWP's current annual entitlement per the

31 LADWP, WSA, page 24.

32 LADWP, WSA, page 25.

33 LADWP, WSA, p. 25.

34 LADWP, WSA, p. 25.

35 Currently, LADWP does not exercise its pumping rights at the West Coast Basin due to localized water quality issues.

36 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.

37 LADWP, WSA, page 25.

latest Sylmar Safe Yield is 3,570 AFY. The Sylmar Basin production is anticipated to increase to 4,170 AFY from fiscal-year ending (FYE) 2021 to 2036 to utilize groundwater the City has accumulated into storage, and then return to the entitlement of 3,570 AFY in FYE 2037.[38] The City also holds a right to 17,236 AFY from the Central Basin and holds additional storage rights in that basin.[39]

The supplies of groundwater in recent years, as well as projections through 2040, are shown in **Table IV.M.1-3**, *Local Groundwater Basin Supply*.[40] LADWP plans to continue production from its groundwater basins in the coming years to offset reductions in imported supplies. However, extraction from the basins may be limited by water quality, sustainable pumping practices, and groundwater elevation. Future projections for groundwater supply at five-year intervals are also shown in Table IV.M.1-3. As indicated, the expected supply available for extraction for the San Fernando, Sylmar, and Central Basins in 2040 is 92,000 AFY, 3,570 AFY, and 18,500 AFY, respectively.

TABLE IV.M.1-3
LOCAL GROUNDWATER BASIN SUPPLY (IN ACRE-FEET)

Fiscal Year (July–June)	San Fernando	Sylmar	Central
Recent Years			
2014–2015	80,097	1	6,948
2015–2016	75,958	683	8,395
2016–2017	55,116	0	3,005
2017–2018	22,259	0	0.77
2018-2019	36,871	1	5
Future Projections[a]			
2019–2020	90,000	4,170	18,500
2024–2025	88,000	4,170	18,500
2029–2030	84,000	4,170	18,500
2034–2035	92,000	4,170	18,500
2039–2040	92,000	3,570	18,500

[a] Future projections are based on LADWP, 2015 UWMP, 2016, Exhibit 6I.
SOURCE: LADWP, WSA, page 26.

(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

38 LADWP, WSA, pages 25-26.

39 LADWP, WSA, page 26.

40 LADWP, 2015 UWMP, page 6-24.

California. MWD's primary water supply resources are the Colorado River and the SWP. As of June 30, 2019, LADWP has a preferential right to purchase 18.25 percent of MWD's total annual water supply.[41] MWD assesses future supply and demand in reports titled RUWMPs, which by statute, are prepared every five years.

The most recent report is the 2020 RUWMP.[42] The 2020 RUWMP 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., drought lasting five consecutive water years) is presented in Table 2-5 of the 2020 RUWMP.[43] In the 2020 RUWMP, 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 surplus in 2045 of 675,000 AFY under multiple dry-year conditions.[44]

LADWP plans to reduce purchase of MWD water supplies through increase conservation, increase recycle water production, and enhance groundwater pumping through stormwater capture and groundwater replenishment. This would allow LADWP to reach the Green New Deal's goals to reduce imported water supplies by 50 percent by 2025 from FY 2013/2014 levels.[45]

(d) Water Conservation and Recycling

LADWP's 2020 UWMP details the City's efforts to promote the efficient use and management of its water resources and provides the basic policy principles that guide LADWP's decision-making process to secure a sustainable water supply for the City in the next 25 years. To meet multiple water conservation goals established in the Sustainable City pLAn and the Water Conservation Act of 2009, LADWP's goal is to reduce potable water use per capita by 22.5 percent and 25 percent by 2025 and 2035, respectively, compared to FY 2013/14 average per capita consumption.[46] Following the target reduction of potable water use per capita by 25 percent by 2035, the Green New Deal adds an additional target for the City to maintain or reduce 2035 per capita water use through 2050.[47]

Based on LADWP's 2020 UWMP, LADWP's recycled water use is projected to reach 50,900 AFY by FYE 2025 by adding 8,000 AFY of planned municipal/industrial use and 7,000 AFY of indirect potable reuse (groundwater replenishment), and further increase to 67,600 AFY through FYE 2045. Environmental reuse is expected to remain relatively

41 LADWP, WSA for the Hilton Universal City Project, October 1, 2020, p. 28.

42 MWD, RUWMP, June 2021.

43 MWD, RUWMP, June 2021, page 2-19.

44 MWD, RUWMP, June 2021, page 2-19.

45 LADWP, WSA for the Hilton Universal City Project, October 1, 2020, p. 29.

46 LADWP, 2020 Urban Water Management Plan, page 11-4, 2021.

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

constant at approximately 26,600 AFY.[48] Environmental uses include water delivery to the Japanese Garden and Lake Balboa in the Sepulveda Dam Recreation Area, and the Wildlife Lake in the Sepulveda Basin Wildlife Reserve.

LADWP has developed many progressive water conservation and use efficiency programs in conjunction with State and local conservation ordinances and plumbing codes to achieve water conservation throughout its service area and customer classes. LADWP's conservation program has achieved an estimated cumulative water savings of over 150,000 AFY as for FY 2020.[49]

For additional information and discussion of LADWP's water conservation programs, refer to the WSA provided Appendix M-2 of this Draft EIR.

(e) Stormwater Capture

Stormwater capture is another water supply resource for LADWP. Stormwater capture is achieved by infiltration into groundwater basins and by onsite capture and reuse of stormwater for landscape irrigation (i.e., direct use). The stormwater capture baseline capacity in 2015 was 64,000 AFY.[50] Through the implementation of additional centralized and distributed stormwater capture projects and programs per LADWP's current implementation strategy in its Stormwater Capture Master Plan (2015), the total estimated stormwater capture capacity is projected to be 155,000 AFY by 2035. This amount is between the conservative estimate of 132,000 AFY and aggressive scenario of up to 178,000 AFY by 2035.[51] For additional information and discussion of stormwater capture facilities and systems, refer to the WSA provided Appendix M-2 of this Draft EIR.

(2) Water Demand

(a) Regional Water Demand

LADWP's 2020 UWMP provides water supply and demand projections in five-year increments until the year 2045, based on projected population estimates provided in SCAG's 2020–2045 RTP/SCS. **Table IV.M.1-4** shows the projected water demand from the year 2025 through 2045 for the City of Los Angeles. As shown in Table IV.M.1-4, in 2045 under the multiple dry year scenario, the City's water demand forecast is approximately 724,900 AFY. Based on this forecast, the 2020 UWMP concludes that adequate water supplies would be available to meet the projected demands of the service area under normal, single-dry year, and multiple dry year conditions through 2045.[52] Therefore, the City's water supply projections in the 2020 UWMP are considered

48 LADWP, 2020 Urban Water Management Plan, page 7-26, 2021.

49 LADWP, WSA for the Hilton Universal City Project, October 1, 2020, p. 13.

50 LADWP, WSA for the Hilton Universal City Project, October 1, 2020, p. 17.

51 LADWP, 2020 Urban Water Management Plan, page 6-27, 2021.

52 LADWP, 2020 Urban Water Management Plan, page 11-8, 2021.

adequate to meet the demand of projects considered to be consistent with the growth projections of the adopted 2020–2045 RTP/SCS.

TABLE IV.M.1-4
LADWP WATER DEMAND PROJECTIONS (IN THOUSAND ACRE-FEET PER YEAR)

	Years				
Hydrological Conditions	**2025**	**2030**	**2035**	**2040**	**2045**
Average Year	642.6	660.2	678.8	697.8	710.5
Single Dry Year	674.7	693.2	712.7	732.7	746.0
Multiple Dry Year (Year 5)	655.7	673.6	692.6	712.0	724.9

SOURCE: LADWP, 2020 UWMP, Exhibits 11E, 11F, and 11G.

(b) Project Site Existing Water Demand

The Project Site is currently developed with a 24-story hotel building with 495 guestrooms, an attached ancillary hotel building providing meeting/banquet rooms and ancillary hotel uses, a three-level parking garage, an outdoor pool area, and a cooling tower for the hotel building. The Project Site also currently includes a pool and attached bar area and various landscaping features across the Project Site. Existing water consuming activities across the Project Site currently include guest-related water use in hotel rooms (sinks, showers and toilets), housekeeping, cleaning and laundry-services, communal bathrooms, outdoor swimming pool and associated showers, the on-site restaurant, kitchen and bar, cooling tower, and landscape irrigation. Most of the existing improvements on the Project Site would remain in place throughout development of the Project, except for the Existing Outdoor Pool Area and attached bar/grill area, which would be removed. As shown in Table I of the approved WSA for the Hilton Universal City Project (Appendix M-2), the pool/spa and attached pool bar/grill area that would be removed currently generate a combined water demand of 1,145 gpd or 1.28 AFY.

(3) Water Infrastructure

(a) LADWP Service Area

Water infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 115 storage tanks and reservoirs, 84 pump stations, 7,326 miles of distribution mains and trunk lines within the City, and a total storage capacity of 323,820.[53] Much of the water flows north to south, entering Los Angeles at the LAA Filtration Plant in Sylmar, which is owned and operated by LADWP.

[53] LADWP website. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=f06dh5pvk_21&_afrLoop=16215047628097, Accessed May 23, 2023.

Water entering the LAA Filtration Plant undergoes treatment and disinfection before being distributed throughout the LADWP's water service area.[54]

(b) Project Site Water Infrastructure

LADWP maintains the water infrastructure that provides service connections to the Project Site. According to water service maps obtained from LADWP, there is a 12-inch water main that increases to 16 inches as it travels south in Universal Hollywood Drive, west of the Project Site's boundary. Two existing water service laterals, a 10-inch and a 12-inch, serve the Project Site, both of which connect to the Project Site underneath the Hotel's existing access driveways located adjacent to Universal Hollywood Drive.[55]

In addition to providing domestic water service, LADWP provides water for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). As discussed in the Utility Infrastructure Technical Report, there are six existing fire hydrants around the Project Site within a 1,000-foot radius.[56]

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:

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;[57] or

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as

54 LADWP, 2021–2022 Briefing Book, 2022.

55 KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water (Infrastructure Report), June 2023, page 3.

56 KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water (Infrastructure Report), June 2023, page 16.

57 Electrical and natural gas are addressed in Section IV.D, *Energy*, of this Draft EIR. Stormwater drainage is addressed in more detail in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR. Telecommunications is addressed in more detail in Chapter VI, *Other CEQA Considerations*, of this Draft EIR.

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 Supply

The Project was determined by the City's Planning Department to generate a water demand equal to or greater than the amount required by a 500-dwelling unit project. Therefore, a WSA was prepared for the Project in compliance with Section 10912 of the Water Code. The Project, as described in the WSA request letter submitted to LADWP in 2020 included the development of a 20-story Hotel Expansion Building with 395 guest rooms and a spa, a 1-story addition to the Ancillary Hotel Building consisting of a Junior Ballroom/Meeting Room Addition, the expansion of the existing below grade parking garage, a revised surface parking program, a new Gate Entryway structure, and landscape and hardscape improvements. In total, the Project, as described in the WSA request letter to LADWP, would develop 300,000 square feet of additional floor area to the Project Site.

Since the original WSA was prepared, refinements to the Project's development program have occurred, including removal of the Junior Ballroom, and revisions to the square footages of the Meeting Room Addition and amenities within the Hotel Expansion Building (i.e., restaurants, spa, pool areas).

Overall, with these refinements, the Project would add approximately 299,088 square feet of additional floor area to the Project Site, resulting in approximately 912 square feet less floor area than was analyzed in the WSA. As such, and using the Project Description provided in Chapter II of this Draft EIR, LADWP[58] recalculated the Project's water demand and determined per Water Code Section 10910(h), no additional WSA is required for the Project. Accordingly, the analysis below is based on the 2020 WSA, which still applies to the Project.

As required by Water Code Section 10912, the Project's water demand was calculated to determine if the Project's water demand is within the projections of the 2015 UWMP and

[58] LADWP, J. Hwang, Personal Communication - Request for a Water Supply Assessment, 09 May 2023. See Appendix M-3.

whether sufficient water supply is available to meet the Project's demand. LADWP calculated the base water demand for the Project's indoor water uses by multiplying the proposed land uses by the appropriate LASAN Sewer Generation Factors (SGF), which estimates the amount of wastewater generated by use. LASAN publishes a list of SGFs for approximately 176 different building use types in the City and updates factors to make adjustments necessary due to water conservation efforts and increased efficiencies in new appliances and plumbing fixtures. Outdoor landscape water demand is estimated per the CCR Title 23 Division 2 Chapter 2.7 Model Water Efficient Landscape Ordinance. Historical billing records were used to establish existing baseline water demand on the Project Site.[59] The total increase in water demand was then calculated by subtracting the water savings to be achieved through compliance with water conservation requirements (e.g., City Ordinance No. 184,248, Los Angeles Plumbing Code, and Los Angeles Green Building Code) in addition to the Project's conservation measures (reflected in Project Design Feature WS-PDF-1 below).[60] The resulting total demand for water associated with the Project was then analyzed relative to LADWP's existing and planned future water supplies to determine if LADWP can accommodate the Project's water demands during average, single-dry, and multiple-dry years hydrologic conditions.

(2) Water Infrastructure

The analysis of impacts to water infrastructure is based on the analysis in the Utility Technical Report (included as Appendix M-1 of this Draft EIR). The analysis (1) identifies the domestic water mains that would serve the Project; (2) identifies the capacity and water pressures in these mains based on flow tests (e.g., Service Advisory Requests [SARs]) performed by LADWP (included as Exhibit 1 of the Utility Technical Report); and (3) determines whether the subject water mains have the capacity to serve the Project based on the capacity in these mains allotted to the Project by LADWP in the SARs. LADWP performed a flow test to determine if available water conveyance infrastructure (e.g., pipes, hydrants, and mains) exists to support future development. LADWP's approach consists of data ranging from available static pressure, which is the amount of pressure available at the source before applying the Project's demand; residual pressure, which is the amount of pressure exerted on the pipe when water is flowing through it; and the flow rate (in gpm) through the hydrants at 20 psi.

Project impacts regarding the adequacy of water infrastructure for fire-fighting purposes via fire hydrant flow are addressed in Section IV.J.1, *Public Services – Fire Protection*, of this Draft EIR.

59 LADWP, WSA, page 7.

60 LADWP, WSA, page 3.

c) Project Design Features

Based on the commitments by the Applicant to the LADWP (included as Appendix B of the approved WSA) regarding specific design features to conserve water and reduce Project water demand, the following Project Design Feature related to water supply will be implemented as part of the Project:[61]

WS-PDF-1: Water Conservation Features. The Project will provide the following specific water efficiency features:

- Fixtures for the entire Project
  - High Efficiency Toilets with a flush volume of 1.0 gallons per flush, or less
  - High-efficiency Energy Star–rated commercial dishwashers
  - Showerheads with a flow rate of 1.5 gallons per minute, or less
  - Waterless Urinals
- Landscape and irrigation
  - 80 percent California Friendly® plants
  - Artificial Turf on all turf areas
  - Drip/Subsurface Irrigation (Micro-Irrigation)
  - Landscaping contouring to minimize precipitation runoff
  - Micro-Spray
  - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
  - Rotating Sprinkler Nozzles for Landscape Irrigation – 0.5 gallon per minute
- Pool
  - Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
  - Leak Detection System for swimming pools and Jacuzzi
  - Water-Saving Pool Filter

In addition, refer to Project Design Feature TRAF-PDF-2 (Construction Management Plan) in Section IV.K, *Transportation*, of this Draft EIR, which would maintain lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access during wherever construction of new water lines would impede such access.

61 LADWP, WSA, pages 3–4.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction Impacts

Project 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.[62] Prior to connection to the existing water system for Project operations, construction water would be provided by one more of the six existing fire hydrants in the immediate vicinity of the Project Site, and per the IFFAR prepared for the Project (see Exhibit 2 of the Infrastructure Report), six of these hydrants would have the capacity to provide a combined 9,000 gpm. In addition, during construction, the Existing Outdoor Pool Area would be demolished, removing approximately 1,145 gpd of existing on-site water demand (see Table I of the approved WSA for the Hilton Universal City Project [Appendix M-2]), which would account for either part of or all of the construction water demand.

Construction of the Project would also include construction and installation of a new on-site water distribution system. The new water system would obtain water from a metered connection and would then distribute the water for Project needs. Prior to buildout of the new water system, during Project construction and with approval from LADWP and the City, temporary water supply may be obtained from metered connections from existing metered water connections or fire hydrants. At the time when the new on-site water distribution lines are constructed, the potential construction impacts would be trenching for the placement of pipe and connection into the existing water main or existing meter lateral location.[63] Construction impacts associated with the water distribution would primarily involve trenching in order to place the water distribution lines below the surface and would be limited to on-site water distribution and minor off-site work associated with connections from the Project buildings to the public mains. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.[64] As discussed in Section IV.K,

62 KPFF Consulting Engineers, Infrastructure Report, page 26.

63 KPFF Consulting Engineers, Utility Technical Report, pages 6-7.

64 KPFF Consulting Engineers, Utility Technical Report, p. 7.

Transportation, of this Draft EIR, in accordance with Project Design Feature TRAF-PDF-2, the Project will 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.

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, and impacts would be less than significant.

(b) Operational Impacts

Water service to the Project Site would continue to be provided by LADWP, as under existing conditions, during Project operations. When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and potable water usage are considered. Although indoor plumbing devices and outdoor irrigation water demand are 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. Nonetheless, both fire suppression and typical daily water flow analyses have been completed by LADWP for the Project.

In regard to fire hydrant flow, the Project would meet the required fire flow of 9,000 gpm from the existing six hydrants flowing simultaneously with a residual water pressure of 20 psi.[65] Furthermore, the Project would incorporate a fire sprinkler suppression system which can provide 1,250 gpm for all buildings on the Project Site. As shown in the approved SAR in Exhibit 3 of the Infrastructure Report, the maximum allowable fire sprinkler demand can be supplied to the Project Site.[66] Therefore, there is adequate fire flow available to meet the flow required for the Project.

New water services would be connected from the 12-inch main on Universal Hollywood Drive. Based on proposed uses listed in the approved WSA, which includes interior uses associated with the Hotel Expansion Building, Meeting Room Addition, restaurants (including bars), spa, outdoor pools, landscaping, and covered parking, the net additional water demand for the Project Site was 112,868 gpd (refer to Table I of the approved WSA [Appendix M-2]). However, with implementation of WS-PDF-1, the Project's total water demand increase is approximately 77,619 gpd (refer to Table 5 in Appendix M-1), which would be a decrease as compared to the domestic water demand estimated in the approved WSA. LADWP reviewed the Project Description as provided in Chapter II of this Draft EIR and responded that the approved WSA did not require updating based on the refinements to the Project's development program since 2020 because the Project would not result in a substantial increase to the water demand estimated in the approved WSA (refer to Appendix M-3 for a record of this correspondence). The approved WSA for the

65 KPFF Consulting Engineers, Infrastructure Report, p. 27.

66 KPFF Consulting Engineers, Infrastructure Report, p. 27.

Project demonstrates that the existing public water distribution infrastructure on Universal Hollywood Drive has sufficient capacity to serve the Project. While the Project would require new service connections, such work would be subject to LADWP's review and approval of final design and the recommendations of the Project's civil engineers. All infrastructure improvements would be undertaken with the approval and oversight of LADWP and other applicable parties as required. Therefore, the Project would not have a significant impact on existing water infrastructure.

Based on the above, while Project operation would require the construction of new on-site water distribution lines and connections to existing off-site water lines, the Project would not exceed the available capacity of the existing water infrastructure that would serve the Project Site. Accordingly, Project operation would not require construction of new or expanded water facilities. Operational impacts on water infrastructure would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Impacts would 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 Impacts

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 Infrastructure 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 over the duration of construction.[67] Using the upper range of 2,000 gpd to facilitate a more conservative analysis, construction water use would be substantially less than the Project's approved water consumption during long-term operation (estimated to be approximately 112,868 gpd for the Project according to the approved WSA). Considering temporary construction water use would be substantially less than the approved water consumption at the Project Site, there would

[67] KPFF Consulting Engineers, Utility Technical Report, p. 27.

be sufficient water supplies available to serve the Project Site during construction. Furthermore, Project construction includes demolition of the Existing Outdoor Pool Area which would also reduce existing water demand on the Project Site.

Furthermore, as described further below, the approved WSA determined that adequate water supplies exist to meet the Project's projected water demand between 2015 and 2040, in addition to the existing and planned future demands for normal, single-dry, and multiple-dry years on LADWP.[68] As Project construction would require a nominal amount of water compared to Project operation, and construction would be completed by 2025, the Project's intermittent construction-related water demand can be met by LADWP's available water supplies during each year of construction through 2040. 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) Operational Impacts

Estimated water demand for Project operation was determined to be approximately 112,868 gpd in the approved WSA (as shown in Table I of the WSA, *Calculated Total Additional Water Demand)*. LADWP determined that no additional WSA was required considering the refinements to the Project's development program, and the operational information contained within the WSA still applies to the Project regardless of the components having changed.[69]

According to the estimates provided in the WSA, the Project would result in a net additional domestic water demand of 112,868 gpd or 126.44 AFY. This estimate considered the removal of existing uses (i.e., Existing Outdoor Pool Area), regulatory required water conservation features, and the additional Project-specific water conservation features (Project Design Feature WS-PDF-1).

LADWP determined in the approved WSA that there are adequate water supplies available from existing LADWP entitlements and supplies to meet the projected water demand of 112,868 gpd, when considering the existing and planned future demand on LADWP, annually during normal, single-dry, and multiple-dry water years over the next 20 years, as required by SB 610, as well as through at least 2040 (the planning horizon of the LADWP's 2015 UWMP). In addition, as stated in the approved WSA, the projected water demand falls within the LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions during the planning

68 LADWP, WSA, p. 4.

69 LADWP, J. Hwang, Personal Communication - Request for a Water Supply Assessment, 09 May 2023. See Appendix M-3.

period.[70] As described above and in Table 5 of the Infrastructure Report, the Project, as described in Chapter II, *Project Description*, of this Draft EIR, would result in a proposed water demand increase of 77,619 gpd. As this water demand is less than the demand projected in the approved WSA, the conclusion that there is adequate water supplies available from existing entitlements to the meet the demand through 2040 remains applicable.

The approved WSA found that: (1) the Project would be consistent with the demographic projections for the City in both of the SCAG 2012-2035 and 2016–2040 Regional Transportation Plans/Sustainable Communities Strategy (RTP/SCS); (2) the Project's water demand falls within LADWP's 2015 UWMP's projected water supplies for normal, single-dry, and multiple-dry years through the year 2040; and (3) the Project's water demand is within LADWP's 2015 UWMP's 25-year water demand growth projections.[71]

Furthermore, as described above in Subsection IV.M.1.2.b)(2)(a), LADWP determined there would be sufficient capacity for normal, single-dry year, and multiple-dry year conditions through 2045 in the current 2020 UWMP for all projects consistent with the population projects in the 2020–2045 RTP/SCS. Refer to Section IV.H, *Land Use and Planning,* of this Draft EIR for a detailed discussion of the Project's consistency with the 2020–2045 RTP/SCS.

LADWP determined that it could provide a highly reliable water supply to its customers through 2040, which would include the Project's buildout year, including during each interim year. Therefore, as determined by the approved WSA, the 2015 UWMP's projections for water demand and supply would include the water demand required for the Project. **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 operation would be less than significant.**

(2) Mitigation Measures

Impacts with regard to water supply would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

70 LADWP, WSA, page 5.

71 LADWP, WSA, page 5.

e) 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 and the LADWP service area, respectively. Chapter III, *Environmental Setting*, of this Draft EIR, identifies 15 related projects, 14 of which are in the City and one of which is in the County of Los Angeles. All 15 related projects are served by LADWP.

(a) Water Supply

As discussed above in Subsection IV.M.1.2.b)(2)(a), 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 15 related projects would contribute, in conjunction with the Project, to overall water demand from LADWP. Water demand for related projects is calculated the same was as for the Project, and as detailed in the 2020 UWMP, using sewer generation factors published by the City of Los Angeles Department of Public Works, Bureau of Sanitation and Environment.

As indicated in **Table IV.M.1-5**, *Estimated Cumulative Water Demand*, the estimated water demand generated by the related projects would be 404,089 gpd or 452.6 AFY. With inclusion of the Project's net added water demand (using the Project's demand as of the approved WSA), the cumulative water demand would be 516,957 gpd or 579.1 AFY. These estimates are likely conservative since they do not quantify code-required conservation or applicant conservation commitments that would reduce demand by the related projects nor deduct for existing uses and assumes all the related projects would be fully built out.

As discussed with respect to Project impacts above and according to the 2020 UWMP, LADWP expects to have a reliable supply of up to 724,900 AFY of water in 2045 to service an estimated demand of 724,900 AFY based on anticipated growth (565,700 AFY with implementation of all existing and planned future water conservation measures), which would include projects that are accounted for within SCAG's 2020-2045 RTP/SCS.[72]

[72] LADWP, 2020 UWMP, page ES-24.

TABLE IV.M.1-5
ESTIMATED CUMULATIVE WATER DEMAND

Land Uses	Quantity	Water Factor	Estimated Water Demand (gpd)[a]	Estimated Water Demand (AFY)
Multi-Family Residential	796 du	150 gpd/du[b]	119,400	133.7
Single-Family Residential	(9 du)	185 gpd/du[c]	(1,665)	(1.9)
Affordable Housing	23 du	150 gpd/du[d]	3,450	3.9
Assisted Living[e]	(58 beds)	70 gpd/bed	(4,060)	4.5
Other Commercial/Retail	60.77 ksf	50 gpd/ksf	3,039	3.4
Car Wash	1.10 ksf	Actual[f]	3,500	3.9
Office[g]	1,088.37 ksf	170 gpd/ksf	185,023	207.3
Restaurant[h]	6.37 ksf/25 seats[i]	30/seat	750	0.8
Hotel	665 rooms	120 gpd/room	79,800	89.4
Studio[j]	307.95 ksf	50 gpd/ksf	15,398	17.2
Entertainment[k]	166.07 ksf	50 gpd/ksf	8,304	9.3
Supermarket[l]	53.26 ksf	50 gpd/ksf	2,663	3.0
Convenience Store[m]	2.56 ksf	25 gpd/ksf	64	0.1
Health/Fitness Club	(17.81 ksf)	650 gpd/ksf	(11,577)	13.0
Subtotal Related Projects			404,089	452.6
Project Subtotal			112,868	126.4
Related Projects + Project Water Demand Total			516,957	579.1

gpd = gallons per day; AFY = acre-feet per year; ksf = thousand square feet; du = dwelling units.

NOTES:

1 AFY = 892.75 gpd.

Parentheses indicate removal of a use and subtraction of the water demand.

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

[b] All multi-family residential units assume an average of 2 bedrooms per unit and, as such, uses the consumption factor for a 2-bedroom unit.

[c] Single family residential units assume an average of 3 bedrooms per unit.

[d] LASAN does not include a separate generation factor for affordable housing, as such, the same generation factor applied to multi-family residential is applied.

[e] Assisted Living uses Rest Home factor.

[f] Car Wash assumes 35 gallons of water used per vehicle and approximately 100 cars per day.

[g] Office uses the Office Building with Cooling Tower factor.

[h] Assumes full service indoor seating restaurant factor.

[i] Restaurant area assumes 60% of the area is used for patron seating, and 15sf per seat, for a total of approximately 25 seats.

[j] Assumes regular use indoor filing areas factor.

[k] Entertainment uses the Commercial Use factor.

[l] Supermarket uses the Retail (greater than 100,000 sf) factor.

[m] Convenience Store uses the Retail (less than 100,000 sf) factor.

SOURCE: ESA, 2023; LASAN, 2012.

LADWP expects to accommodate future demand in part by increasing the proportion of water supply being purchased from the MWD. The MWD's 2020 RUWMP 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. As previously indicated, both the 2020 RUWMP and 2020 IRP anticipate a surplus of available water to meet projected demand.[73]

Compliance by the Project and the related projects with regulatory requirements that promote water conservation, such as the CALGreen Code, City's Green Building Code, and the LAMC, would also ensure that cumulative water demands are reduced compared to what could occur without such measures. Moreover, the approved WSA for the Project provides a more detailed accounting of the reliable water supply sources for the Project and cumulative growth in the future than is presented in this impact analysis. For example, the approved WSA identifies long-term water conservation strategies, including conservation rebates and incentives to reduce indoor and outdoor water use, retrofitting facilities with water-efficient hardware, promoting water efficiency in new developments, water recycling, enhanced stormwater capture, and accelerating clean-up of the San Fernando Basin to increase its contribution to the water supply.

In addition, similar to the Project, for each related project, LADWP would be required to determine whether or not it could provide a highly reliable water supply to its customers. The related projects that would trigger SB 610 would require an approved WSA, which would require for (1) the project to be consistent with the demographic projections for the City of the current adopted RTP/SCSs, as applicable, whereas other projects that would not trigger SB 610 would be required to coordinate with the service provider, LADWP, to ensure that the respective project would have available supply and capacity to serve the project; (2) the project's water demand has been accounted for in the City's overall total demand projections in the LADWP current UWMP; and (3) LADWP water supplies would be adequate during normal, single-dry and multi-year dry years to meet the project, existing, and projected future demand. As LADWP's UWMPs would use the SCAG projections, the related projects that are consistent with the City's General Plan are included in the planned growth of the City's water demand. Further, related projects would be required to comply with SB 610 as needed and would be evaluated on a case-by-case basis. Additionally, as previously stated, LADWP expects to have a reliable supply of up to 675,700 AFY of water in 2040 and to 724,900 AFY of water in 2045, which would service the water demand generated by the Project and related projects. **Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on water supply would be less than significant.**

[73] MWD, 2020 RUWMP, page 2-24.

(b) Water Infrastructure

Development of the Project, in conjunction with the related projects, would cumulatively increase service demand on the existing water infrastructure system. Related Project 1, the NBC Universal Evolution Plan, is the most proximate of the related projects to the Project Site. While the NBCU Universal Evolution Plan is the only related project in close enough proximity to have cumulative impacts that might affect the Project Site, all of the identified related projects have the potential to cumulatively impact the capacity of water infrastructure throughout the City and County of Los Angeles. However, each related project would be subject to City review to assure 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 and a WSA if the Project's water demand is enough to warrant one. 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. As such, cumulative impacts on water infrastructure would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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