IV. Environmental Impact Analysis

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

1. Introduction

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

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on a Water Supply Assessment (WSA) prepared for the Project and adopted by LADWP and included in Appendix L of this Draft EIR, along with a copy of Resolution No. 022016 approving the WSA. Additional technical information used in the analysis is based on the *Sunset + Wilcox Utility Infrastructure Technical Report: Water and Energy* (Utility Report) prepared for the Project dated September 2021 and included in Appendix M of this Draft EIR.

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. 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
- City of Los Angeles Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan, including:
  - Framework Element
  - Community Plan
- Los Angeles Municipal Code (Ordinance Nos. 180,822, 181,480, 181,899, 183,833, 182,849, 184,692, and 184,248)

(1) State

(a) California Urban Water Management Plan Act

The California Urban Water Management Planning Act (Water Code Section 10610, et seq.) addresses several State policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water

Suppliers to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000 acre feet per year (afy) of water to customers.

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

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

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet for 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 above; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a)).

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

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

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

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 Statewide, as described in the "20 x 2020" State Water Conservation Plan.[1] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

[1] *State Water Resources Control Board, Final 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]

(d) Sustainable Groundwater Management Act of 2014[5]

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.[6] 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 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

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

[6] *California Department of Water Resources, SGMA Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed September 10, 2021.*

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, Section 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures, such as showerheads, lavatory faucets and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018 is 1.8 gpm at 80 psi and 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.[7]

(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 California Code of Regulations establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2019 California Plumbing Code, which is based on

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[7] *California Code of Regulations, Title 20, Section 1605.3(h), https://energycodeace.com/site/custom/public/reference-ace-t20/index.html#!Documents/section16053statestandardsfornonfederallyregulatedappliances.htm, accessed September 10, 2021.*

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 bans wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

(g) Executive Order N-10-21

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth On July 8, 2021 Executive Order N-10-21 was issued calling for voluntary cutbacks of water usage by 15 percent from 2020 usage levels. This executive order lists common-sense measures Californians can undertake to achieve water usage reduction goals and identifies the State Water Resources Control 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 further below, in response to recent developments in the Sacramento Delta, MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, including the City of Los Angeles.

(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.[8] 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

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

the MWD UWMP.[9] The analysis in the MWD UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[10] 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.[11]

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 Sacramento-San Joaquin River 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.[12] It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

The 2015 IRP reliability targets identify developments in imported and local water supply and in water conservation that, if successful, would provide a future without water

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

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

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

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

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 af and the total supply reliability target is approximately 4,539,000 af, representing an excess of 266,000 af.[13]

The 2020 IRP planning process is currently in development.[14] 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.[15]

(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

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

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

[15] *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.*

laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[16]

(iv) Long-Term Conservation Plan

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

(v) Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan (WSAP), which has since been implemented three times, most recently in April 2015 (under the new name Drought Rationing Plan). The WSAP includes a formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance 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

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

conservation savings programs.[17] The allocation period covers 12 consecutive months from July of a given year through the following June.

(3) Local

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

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. LADWP adopted the 2020 UWMP on May 25, 2021. The 2020 UWMP complies with the Urban Water Management Planning Act, builds upon the goals and progress made in the 2015 UWMP, and currently serves as the City's master plan for reliable water supply and resource management consistent with the City goals and objectives. The UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2045. Long range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). As provided in LADWP's UWMP, 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 capital per day, less than the 2020 target.[18]

(b) City of Los Angeles 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.[19] The Sustainable City pLAn was intended to be updated every four years.

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

[18] *City of Los Angeles, Los Angeles Department of Water and Power. 2020 Urban Water Management Plan for the Los Angeles Department of Water & Power, p. 1-8.*

[19] *City of Los Angeles, Sustainable City pLAn, April 2015.*

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.[20] 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 stormwater management.[21] 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.[22] 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.[23] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals,

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

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

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

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

objectives, and policies for City utilities including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[24] The goals, objectives and policies are addressed by the City in its ordinances and preparation of its UWMP.

The General Plan goals, objectives and policies related to water supply are shown in Table IV.J.1-1 on page IV.J.1-14.

(ii) Community Plan

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

The Project Site is located within the Hollywood Community Plan area.[25] Objective 5 of the Hollywood Community Plan addresses the need to provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development.

(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

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

[25] *The Los Angeles Department of City Planning is currently in the process of updating the Hollywood Community Plan. The most recent draft can be accessed at https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan.*

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

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

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

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.

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

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

The City of Los Angeles also has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing. As set forth in LAMC Section 57.507.3.1, Industrial and Commercial land uses (which the LAFD has classified the Project as) have a minimum required fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 psi unless otherwise determined by LAFD. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

b. Existing Conditions

(1) Water Supply

LADWP is responsible for providing water in the City and ensuring that the water quality meets applicable California health standards for drinking water. As the Project Site is located within the City, LADWP is the urban water provider for the Project Site.

Water is supplied to the City from four primary sources: the Los Angeles Aqueducts (LAA), local groundwater, purchased water from MWD, and recycled water.[26] As shown in Table IV.J.1-2 on page IV.J.1-17, LADWP had an available water supply of 487,591 acre-feet (AF) in 2020 (the latest full year for which data is available), with approximately 91 percent of this supply from imported sources, including the LAA and MWD.[27] LADWP's water sources are described in further detail below.

(a) Los Angeles Aqueducts

As provided in the WSA prepared for the Project included in Appendix L of this Draft EIR, snowmelt runoff from the Eastern Sierra Nevada Mountains is collected and conveyed to the City via the LAA. The LAA supplies come primarily from snowmelt and secondarily from groundwater pumping, and can fluctuate yearly due to the varying hydrological conditions. [28]In recent years, LAA supplies have been less than the historical average because of environmental restoration obligations in Mono and Inyo Counties.

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

Average deliveries from LAA system have been approximately 238,960 AF annually from Fiscal Year (FY) 2015/16 to 2019/20. This average delivery includes 2 of the 5 dry years that began in FY 2012/2013 and ended in FY 2016/2017. On April 1, 2021, the

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[26] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[27] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[28] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, p. 11, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

Table IV.J.1-2
LADWP Water Supply

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

AF = acre-feet

Source: LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Appendix L of this Draft EIR.

Eastern Sierra snowpack was 100 percent of an average year.[29] Since LAA supplies vary substantially from year to year, LADWP plans to increase resiliency to address climate change and natural disasters by developing sustainable local water supplies.[30]

Various lawsuits and injunctions, and resulting agreements, affect water supplies from the Los Angeles Aqueduct. These include an agreement with the County of Inyo regarding groundwater levels and enhancement and mitigation projects in the Owens Valley, and the imposition of new regulatory requirements by the SWRCB regarding export from Mono Lake and restoration and monitoring programs for the Mono Basin. In addition, in November 2014, an agreement between the City and the Great Basin Unified Air Pollution Control District (GBUAPCD) was reached wherein LADWP will continue to implement measures to address dust emissions at Owens Lake and implement additional water conservation through increasing use of water efficient and waterless dust measures.[31] Upon completion of the Phase 9/10 Project on December 31, 2017, LADWP had mitigated dust emissions from 48.6 square-miles of Owens Lake.[32] Based on the

[29] *LADWP, Eastern Sierra Snow Survey Results, https://wsoweb.ladwp.com/Aqueduct/snow/snowpillow data.htm, accessed August 24, 2019.*

[30] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, page 11, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

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

[32] *LADWP, LADWP News, The Los Angeles Department of Water and Power Continues its Commitment to the Preservation and Restoration of the Owens Valley, www.ladwpnews.com/the-los-angeles-department-of-water-and-power-continues-its-commitment-to-the-preservation-and-restoration-of-the-owens-valley/, accessed September 10, 2021.*

agreement, the GBUAPCD's potential future dust mitigation orders to LADWP cannot exceed an additional 4.8 square miles.[33] As a result, LADWP expects to reduce total lake-wide water use by at least 50 percent, through the strategic use of waterless or water efficient control measures and groundwater under Owens Lake for dust control.[34]

LADWP projects that the average annual long-term LAA delivery between 2020 and 2045 will be approximately 192,000 AFY due, in part, to implementation of environmental projects throughout the Eastern Sierra and environmental enhancement and mitigation projects in the Mono Basin and Owens Valley that includes water allocations from the LAA.[35]

(b) Groundwater

As discussed in the WSA prepared for the Project included in Appendix L of this Draft EIR, LADWP pumps groundwater from three adjudicated basins, including the San Fernando, Sylmar, and Central Basins. The San Fernando Basin (SFB) is the largest of the three basins. LADWP has accumulated 591,460 AF of stored groundwater in the SFB as of October 1, 2018 (the latest year for which data is available).[36] A portion of this water is available for the City to withdraw during normal and dry years, or in an emergency, in addition to the City's approximate 87,000 AF annual entitlement.[37] With regards to the Sylmar and Central Basins, the City's current annual entitlements are 3,570 AF and 17,236 AF, respectively. The City has also accumulated 9,014 AF of stored water credits in the Sylmar Basin[38] and 22,943 AF of stored water credits in the Central Basin.[39]

As shown in Table IV.J.1-3 on page IV.J.1-19, the City extracted 42,913 AF, 11 AF, and 3 acre-foot of groundwater from the San Fernando, Central, and Sylmar Basins, respectively, during FY 2019–2020. The City plans to continue to develop production from its groundwater basins in the coming years to offset reductions in imported supplies.[40]

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

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

[35] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[36] *LADWP, 2020 Urban Water Management Plan, May 2021, p. 5-7.*

[37] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[38] *LADWP, 2020 Urban Water Management Plan, May 2021, p. 5-14.*

[39] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[40] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

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

Fiscal Year (July–June)	San Fernando (AF)	Sylmar (AF)	Central (AF)
2015–2016	75,958	682	8,395
2016–2017	55,116	0	3,005
2017–2018	22,259	0	1
2018–2019	36,870	1	5
2019-2020	42,913	3	11

AF = acre-feet

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

Source: LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Appendix L of this Draft EIR.

Both LADWP and DWR have programs in place to monitor wells to prevent overdrafting. LADWP's groundwater pumping practice is based on a "safe yield" operation. Furthermore, basin management is achieved by collective efforts of a court appointed Watermaster and the Upper Los Angeles River Area (ULARA) Administrative Committee of representatives from five public water supply agencies overlying the ULARA Committee. These efforts include operation of groundwater remediation systems, use of an extensive network of groundwater monitoring wells, routine reporting on groundwater elevation and water quality, management and mitigation of urban runoff water quality, and development of enhanced stormwater recharge and groundwater replenishment.[41]

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for domestic and municipal uses in Southern California. MWD imports a portion of its water supplies from Northern California through the SWP California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct (CRA). As one of the 26 member agencies of MWD, LADWP purchases water from MWD to supplement LADWP water supplies from the LAA and local groundwater. As of fiscal year end 2020, LADWP has a preferential right to purchase 18.12 percent of MWD's total water supply.[42]

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

[42] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

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

As indicated in Table IV.J.1-2 on page IV.J.1-17, LADWP received approximately 152,647 AF of water from MWD in 2020, which was a substantial reduction from water received in 2016, 2017, and 2018. Summaries of MWD's individual supplies, along with each supply's challenges and specific responsive actions taken by MWD, are presented below.

(i) State Water Project

The SWP is owned by the State of California and operated by DWR, delivering water to two-thirds of the population of California and 750,000 acres of farmland. The SWP facilities include 36 storage facilities, 30 pumping and generating plants, and approximately 700 miles of aqueducts and pipelines.[43] SWP facilities originate in Northern California at Lake Oroville on the Feather River and is pumped from the Bay-Delta region to contractors in areas north and south of the San Francisco Bay and south of the Bay-Delta.[44]

MWD began receiving water from the SWP in 1972. MWD is the largest of the 29 SWP contractors, holding a contract for 1.912 million acre-feet (MAF) per year, or 46 percent of the total contracted amount of the 4.173 MAF ultimate delivery capacity of the project. Variable hydrology, environmental issues, and regulatory restrictions in the San Francisco Bay/Sacramento-San Joaquin River Delta (Bay-Delta) have periodically reduced the quantity of water that the SWP delivers to MWD.[45]

The SWP, under the original contracted amount at 100 percent allocation, provides MWD with 1,911,500 AF of water each calendar year.[46] However, due to water quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, SWP deliveries in the most critically dry years

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[43] *California Department of Water Resources, State Water Project Facilities, https://water.ca.gov/Programs/State-Water-Project/SWP-Facilities, accessed February 3, 2022.*

[44] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, page A-12, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[45] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[46] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

vary. For 2019, DWR estimated an initial allocation of 10 percent[47] but increased this to 15 percent[48] in January due to changes in precipitation and available water supplies.

Challenges to State Water Project Supply

Litigation and various regulations have created challenges for the SWP.[49] In particular, the listing of several fish species in the Delta as threatened or endangered under the federal and/or California Endangered Species Acts (ESA/CESA) has constrained SWP operations and created more uncertainty in SWP supply reliability. Based on DWR's 2015 *SWP Delivery Capability Report*, future SWP deliveries will continue to be impacted by restrictions on SWP and Central Valley Project Delta pumping, and climate change, which is altering the hydrologic conditions in the State.[50]

On October 22, 2019, the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service released new biological opinions. The Bureau of Reclamation completed its environmental review of the proposed action covered by the new biological opinions on February 18, 2020. The new opinions replace the existing federal permits for the Central Valley Project.[51]

On March 31, 2020, the California Department of Fish and Wildlife (CDFW) issued an Incidental Take Permit to DWR for long-term operations of the SWP.[52] In April 2020, MWD, with the MWD Board approval, joined the State Water Contractors in their litigation against DWR and CDFW over the Incidental Take Permit.[53] The impacts to MWD from the ongoing negotiation of Voluntary Agreements on the new biological opinions and Incidental Take Permit, as well as litigation challenging them, remain unknown.[54]

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

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

[49] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

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

[51] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[52] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, page A-28, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[53] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, page A-28, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[54] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, page A-29, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

(ii) The Colorado River

MWD owns and operates the Colorado River Aqueduct, which has delivered water from the Colorado River to Southern California since 1942. The Colorado River currently supplies approximately 25 percent of Southern California's water needs.[55] MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. California is apportioned the use of 4.4 million AF of water from the Colorado River each year plus one-half of any surplus that may be available for use collectively in Arizona, California, and Nevada.[56] In addition, California has historically been allowed to use Colorado River water apportioned to, but not used by, Arizona or Nevada.[57]

Since 2003, due to increased consumption, there has been no such unused, apportioned water available to California. Of the California apportionment, MWD holds the fourth priority right to 550,000 AFY under a 1931 priority system governing allotments to California. This is the last priority within California's basic apportionment of 4.4 million AF. Beyond the basic apportionment, MWD holds the fifth priority right to 662,000 AF of water. Historically, MWD has been able to claim most of its legal entitlement of Colorado River water and could divert over 1.2 million AF in any year, but persistent drought conditions since 1999 have contributed to a decrease in these claims.[58] The recent 16-year drought has been so severe that it has resulted in major reductions in water deliveries from the Colorado River.

(iii) Additional MWD Actions to Address Supply

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

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[55] *The Metropolitan Water District of Southern California, Metropolitan Declares Water Supply Alert In Response To Severe Drought, August 17, 2021, www.mwdh2o.com/newsroom-press-releases/metropolitan-declares-water-supply-alert-in-response-to-severe-drought/, accessed September 10, 2021.*

[56] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[57] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[58] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, page A-24, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

conservation measures; and (4) development of additional local resources, such as recycling, brackish water desalination, and seawater desalination.[59]

Additionally, MWD has approximately 6.0 million AF of storage capacity available in reservoirs and banking/transfer programs. MWD was estimated to have 3.95 million AF of water in Water Surplus Drought Management storage and additional 750,000 AF in emergency storage as of January 1, 2021. Continued efficiency in the region kept demands low in 2020, resulting in available water supplies far exceeding demands. With implementation of new and modified existing storage programs to manage the available surplus supplies, MWD was able to add to storage in 2020.[60]

MWD's 2015 IRP builds upon the strong foundation of diversification and adaptation developed in previous IRPs. The 2015 IRP reinforces MWD commitment to meeting the region's water supply needs through an evolving long-term strategy that calls for maintaining and stabilizing existing resources along with developing more conservation and new local supplies.[61]

MWD's 2020 UWMP reports on water reliability and identifies projected supplies to meet the long-term demand within MWD's service area. Table V in the WSA summarizes MWD's water reliability (e.g., water demand, supply, etc.) in five-year increments extending to 2045 and is based on information contained in LADWP's 2020 UWMP. As indicated in Table V for the average year, and in Exhibits 11E through 11G in LADWP's 2020 UWMP for the average, single dry-year and multiple dry-year, respectively, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2045 under average, single dry-, and multiple dry-year hydrologic conditions.[62,63]

(d) Precipitation Conditions

According to the WSA, as of January 11, 2021, northern Sierra precipitation was 41 percent of the 50-year average for the time of year, and northern Sierra snowpack

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[59] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, various programs described in detail from page A-30 to page A-45, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[60] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[61] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[62] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

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

measured 60 percent of average for such time of year. On December 1, 2020, DWR notified State Water Contractors that its calendar year 2021 allocation estimate of SWP water would be 10 percent of contracted amounts, or 191,150 AF for MWD.[64] The current 2022 allocation of SWP water is 15 percent.[65] Changes to this allocation may occur and are dependent on the developing hydrologic conditions.[66]

Based on the WSA, as of January 11, 2021, the Upper Colorado River Basin snowpack accumulation measured 70 percent of the 30-year average as of this date and the total system storage in the Colorado River Basin was 46 percent of capacity, a decrease of 6 percent or 3.8 million AF at the same time the prior year. Because of the current storage level, no shortage will be declared in Colorado River water supply availability conditions for calendar year 2021, resulting in projected available supply of Colorado River water in calendar year 2021 of 1,007,700 AF for MWD.[67]

Downtown Los Angeles receives an annual average of 14.67 inches of precipitation according to the National Weather Service.[68] From July 1, 2020 to June 30, 2021, Downtown Los Angeles received 5.82 inches of precipitation, equating to 8.85 inches below the annual average.[69]

(e) Global Warming and Climate Change

As discussed in the LADWP's 2020 UWMP, generally speaking, any water supplies that are dependent on natural hydrology are vulnerable to climate change, especially if the water source originates from mountain snowpack. For LADWP, the most vulnerable water sources subject to climate change impacts are imported water supplies from MWD and the LAA, though local sources can also expect to see some changes in the future. In addition to water supply impacts, changes in local temperature and precipitation are expected to alter water demand patterns. However, there is still general uncertainty within the scientific

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64 *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, page A-9, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

65 *California Department of Water Resources, State Water Project Contractors, SWP Allocation, https:// water.ca.gov/programs/state-water-project/management/swp-water-contractors, accessed February 3. 2022.*

66 *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, page A-9, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

67 *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, Appendix F, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

68 *Los Angeles Almanac, Total Seasonal Rainfall (Precipitation) Downtown Los Angeles—USC Campus, www.laalmanac.com/weather/we13.php, accessed September 10, 2021.*

69 *Los Angeles Almanac, Total Seasonal Rainfall (Precipitation) Downtown Los Angeles—USC Campus, www.laalmanac.com/weather/we13.php, accessed September 10, 2021.*

community regarding the potential impacts of climate change within the City. LADWP continues to monitor the latest developments in scientific knowledge and will continue to assess future research for the potential impacts of climate change on its water resources.[70]

MWD and DWR also continue to study climate change and address the implications of climate change on water supplies. MWD has established a technical process to identify key vulnerabilities from various sources, including climate change, in order to provide comprehensive analyses within its Integrated Water Resources Plans. In addition, DWR addresses climate change impacts on water supply in its California Water Plan Updates, which also account for uncertainty, risk, and sustainability in planning for the future.[71] With updates published every five years, the latest *California Water Plan Update 2018* built on its predecessor by identifying specific performance tracking metrics, recommending financing methods with stable revenues, and incorporating principles of sustainability.[72]

DWR has also been in the process of completing its Climate Action Plan since 2012. Phases I and II of the Climate Action Plan include the guidance of DWR in reducing greenhouse gas emission and the expertise of a climate change technical advisory group formed in 2012, respectively. Phase III of the plan was completed in 2017 with a vulnerability assessment and adaptation plan DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.[73] As such, climate change and its impacts on water supplies are key factors of new water supply regulations and UWMPs.

(f) Water Conservation and Recycling

LADWP's 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 ED 5, the Green New Deal, and the Water Conservation Act of 2009, LADWP's 2020 UWMP aims to reduce per capita potable water use by 22.5 percent by 2025 and by 25 percent by 2035.[74] 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

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[70] *LADWP, 2020 Urban Water Management Plan, May 2021, p. 12-1.*

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

[72] *DWR, California Water Plan Update 2018.*

[73] *DWR, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed September 10, 2021.*

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

capita water use through 2050.[75] The City also intends to build upon the success of Save the Drop and develop additional water conservation campaigns; continue benchmarking customer use and recognizing innovative water reduction initiatives; improve data gathering to identify program effectiveness; expand top performing conservation incentive programs for landscape transformation, washing machines, etc.; and expand sub-metering and evaluate smart water meter technologies.[76]

Further, based on LADWP's 2020 UWMP, recycled water use is projected to reach 24,300 AFY by 2025 and further increase to 41,000 AFY by 2045.[77] Overall, the 2020 LADWP UWMP reports a 28-percent lower recycled water trend for municipal and industrial uses along with environmental uses than what was projected in the previous 2015 UWMP.[78] In addition, based on programs and improvements contemplated in the 2020 LADWP UWMP, locally developed water supplies (including groundwater replenishment and stormwater capture) will increase from the current 11 percent to 48 percent in dry years, or to 43 percent in average years by 2045.[79] The Green New Deal also has a target to recycle 100 percent of all wastewater for beneficial reuse by 2035.[80] Beneficial reuse includes, but is not limited to, non-potable reuse, groundwater recharge, and supporting environmental and recreational uses, such as those in the Los Angeles River.

(2) Water Demand

(a) Regional Water Demand

LADWP's 2020 UWMP provides water supply and demand projections in five-year increments to 2045, based on projected population estimates provided by SCAG in its 2020–2045 RTP/SCS. Table IV.J.1-4 on page IV.J.1-27 shows the projected water demand from the year 2025 through 2045 for the City of Los Angeles. As shown in Table IV.J.1-4, in 2045 during average year hydrological conditions, the City's water demand is forecasted to be approximately 710,500 AFY (with passive water conservation).[81,82] LADWP's 2020 UWMP concludes that adequate water supplies would

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

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

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

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

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

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

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

[82] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

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

Hydrological Conditions	Years				
	2025	2030	2035	2040	2045
Average Year	642.6	660.2	678.8	697.8	710.5
Single Dry Year (FY 2014–2015)	674.7	693.2	712.7	732.7	746
Multi-Dry Year (2011–2015)	662.3	680.4	699.6	719.2	732.3

AFY = acre-feet per year

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

be available to meet the projected demands of the service areas under normal, single-dry, and multi-dry year conditions through 2045.[83] Therefore, the City's water supply projections in LADWP's 2020 UWMP are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the 2020–2045 RTP/SCS adopted by SCAG.[84]

(b) Existing Water Demand

The Project Site is currently developed with three buildings and surface parking. The existing buildings on the Project Site comprise approximately 26,261 square feet of floor area consisting of a one-story, 16,932-square-foot commercial building along Sunset Boulevard and Wilcox Street/Cole Place, a one-story, 4,446-square-foot commercial office building along Wilcox Street, and a two-story, 4,883-square-foot commercial office building along Cole Place and De Longpre Avenue. Based on LADWP billing data, the existing water demand associated with the existing development is estimated at 804 gpd (0.90 AFY).[85]

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an

[83] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[84] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021. Refer to Appendix L of this Draft EIR.*

[85] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021, Appendix L of this Draft EIR.*

extensive distribution system that includes 117 storage tanks and reservoirs, 84 pump stations, 7,326 miles of distribution mains and trunk lines within the City, and a total storage capacity of 311,000 AF according to the estimates for Fiscal Year 2018–2019.[86] Much of the water flows north to south, entering Los Angeles at the LAA Filtration Plant in Sylmar, which is owned and operated by LADWP. Water entering the LAA Filtration Plant undergoes treatment and disinfection before being distributed throughout the LADWP's water service area.[87]

Domestic water service in the vicinity of the Project Site is available via LADWP water lines within the adjacent streets. According to the Utility Report included in Appendix M of this Draft EIR, there are five water mains in the vicinity of the Project Site, including two water lines in Sunset Boulevard between Wilcox Avenue and Cole Place (the northerly line is 30-inches and the southerly line is 8-inches), an 8-inch line between Sunset Boulevard and De Longpre Avenue, a 4-inch line between Sunset Boulevard and De Longpre Avenue, and a 12-inch line between Wilcox Avenue and Cole Place.[88]

In addition to providing domestic water service, LADWP provides water to the Project Site for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). According to the Utility Report, there are six fire hydrants: four hydrants are located along Sunset Boulevard (two at the intersection of Sunset Boulevard and Wilcox Avenue, one at the intersection of Sunset Boulevard and Cole Place, and one at the corner of Sunset Boulevard and Cahuenga Boulevard) and two hydrants located along De Longpre Avenue (one at the intersection of De Longpre Avenue and Cahuenga Boulevard and one at the intersection of De Longpre Avenue and Wilcox Avenue).

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

[88] *KPFF Consulting Engineers, Sunset + Wilcox Utility Technical Report: Water and Energy, September 2021, Appendix M of this Draft EIR.*

construction or relocation of which could cause significant environmental effects.[89]

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

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

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

b. Methodology

(1) Water Supply

The analysis of the Project's impacts to water supply is based on the WSA for the Project prepared by LADWP pursuant to SB 610 and included as Appendix L of this Draft EIR. The WSA includes a conservative calculation of the Project's anticipated net water demand by applying 100 percent of City Department of Public Works, Bureau of Sanitation (LASAN) wastewater generation rates to proposed land uses under the Project, and the existing water demand is based on the LADWP water billing data. The WSA accounts for the reduction in Project water demand associated with the implementation of required and proposed water conservation features. In accordance with SB 610, the resulting net increase in demand for water associated with the Project is then analyzed relative to

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

LADWP's existing and planned future water supplies over the next 20 year period as set forth in LADWP's 2020 UWMP to determine if LADWP would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry year hydrologic conditions in combination with LADWP's existing and projected future water commitments.

(2) Water Infrastructure

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

1. A hydraulic analysis of the water system to determine if adequate fire flow (which requires more water volume and pressure than domestic flow) is available from the existing fire hydrants surrounding the Project Site. LADWP's approach consisted of modeling the portion of their water system in the vicinity of the Project Site. Based on the results, LADWP determined whether their existing water infrastructure can meet the Project's fire hydrant flow needs. See Exhibit 2 of the Utility Report for the results of the Information of Fire Flow Availability Request (IFFAR) for the fire hydrants evaluated.

2. Flow tests to determine if sufficient water conveyance is available for the Project. LADWP's approach provides data ranging from available static pressure (meaning how much pressure is available at the source before applying the Project's demand) to the available pressure at the maximum demand needed for the Project. Based on the results, LADWP determines whether they can meet the Project needs based on existing infrastructure. See Exhibit 3 of the Utility Report for the results of the Service Advisory Requests (SARs) for the 8-inch Sunset Boulevard and 8-inch Wilcox Avenue mains.

c. Project Design Features

The following project design feature is proposed with regard to water supply:

Project Design Feature WAT-PDF-1: The Project design will incorporate the following design features to support water conservation in excess of LAMC requirements.

- Heating, ventilation, and air conditioning make up water systems will be supplied by the Project's capture and reuse system, which will be provided by storm water from the Project's storm water management plan.

- Install a meter on the make-up so water use can be monitored, and leaks can be identified and repaired.
- High Efficiency Toilets with a flush volume of 1.1 gallons per flush.
- Showerheads with a flow rate of 1.5 gallons per minute.
- Domestic Water Heating System located in close proximity to point(s) of use.
- Individual metering and billing for water use for every commercial unit.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? [90]

(1) Impact Analysis

(a) Construction

As discussed in the Utility Report included as Appendix M of this Draft EIR, Project construction activities would require water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects of similar size and duration, a conservative estimate of Project water use during construction ranges from 1,000 to 2,000 gpd.[91] In addition, prior to connection to the existing water system for Project operations, construction water needs would most likely be provided by one or more of the six existing fire hydrants in the immediate vicinity of the Project Site, and per the IFFAR for the Project included as Exhibit 2 of the Utility Report, six

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

[91] *KPFF Consulting Engineers, Sunset + Wilcox Utility Technical Report: Water and Energy, September 2021, Appendix M of this Draft EIR.*

of these hydrants flowing simultaneously have the capacity to provide a combined 9,000 gpm, which would substantially exceed the anticipated construction demand. Furthermore, the Project would include the demolition of 26,261 square feet of existing on-site office and retail uses (estimated to consume 804 gpd), which would partially offset the water demand associated with Project construction activities. Lastly, Project construction water demand would be substantially less than Project operational water demand and, as discussed further below, the existing water infrastructure would be adequate to meet Project operational demand. Hence, the existing water infrastructure would also have adequate capacity to meet Project construction-related water demand, and new water mains or upgrades to the existing water mains would not be required.[92]

As there are existing buildings onsite that currently connect to the existing water mains available in the vicinity of the Project Site, it is anticipated that Project-related construction activities associated with water infrastructure would be limited to the installation of connections to the existing water mains and/or rerouting of existing onsite connections to other water mains. In any case, such activities would be limited to trenching within the Project Site and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines and LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s). Lastly, while trenching and installation activities could temporarily affect traffic flow and access on the adjacent streets and sidewalks, a Construction Traffic Management Plan (Project Design Feature TR-PDF-2 included in Section IV.H, Transportation of this Draft EIR) would be implemented, which would ensure the safe and efficient flow of vehicular and pedestrian traffic, and that emergency access to the Project Site and adjacent properties would be maintained during the construction period.

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

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92 *KPFF Consulting Engineers, Sunset + Wilcox Utility Technical Report: Water and Energy, September 2021, Appendix M of this Draft EIR.*

(b) Operation

When analyzing the capacity of the water infrastructure system to serve a project, the estimated operational demands of the project for both fire suppression and domestic water are considered. Although domestic water demand would be the Project's main contributor to water demand in the long term, the Project's fire flow demands have a much greater instantaneous impact on infrastructure and therefore are the primary means for analyzing infrastructure capacity. Conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project as summarized in the Utility Report included as Appendix M of this Draft EIR. Specifically, see Exhibits 2 and 3 of the Utility Report for the results of the Information of Fire Flow Availability Request (IFFAR) and Service Advisory Request (SAR), respectively, which demonstrate that adequate water infrastructure capacity exists to serve the Project.[93]

(i) Fire Flow

Fire demands have the greatest instantaneous impact on water infrastructure; therefore, the results of the IFFAR can be utilized as indication that the existing water infrastructure is sufficient. The results of the IFFAR, included as Exhibit 2 of the Utility Report, show that hydrants have an existing static pressure of greater than 20 psi, and, thus, the water infrastructure can meet the needs of the Project.

LAFD set the required fire flow for the Project at 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously based on fire flow standards set forth in Section 57.507.3 of the LAMC. An IFFAR was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The completed IFFAR, included as Exhibit 2 of the Utility Report, shows six nearby hydrants flowing simultaneously for a combined 9,000 gpm. As shown by the IFFAR, the Project would have adequate fire flow available to demonstrate compliance with LAMC Section 57.507.3.[94]

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

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[93] *KPFF Consulting Engineers, Sunset + Wilcox Utility Technical Report: Water and Energy, September 2021, Appendix M of this Draft EIR.*

[94] *KPFF Consulting Engineers, Sunset + Wilcox Utility Technical Report: Water and Energy, September 2021, Appendix M of this Draft EIR.*

[95] *KPFF Consulting Engineers, Sunset + Wilcox Utility Technical Report: Water and Energy, September 2021, Appendix M of this Draft EIR.*

Project, adequate water pressure is available to operate the proposed fire sprinkler suppression system.

(ii) Domestic Water Demand

The Project would install new on-site domestic water infrastructure to meet the proposed plumbing demands in compliance with Los Angeles Department of Building and Safety (LADBS) and LADWP requirements. In addition, the proposed service laterals would be adequately sized to accommodate fire demand and domestic demand and would include backflows and be metered separately per City requirements.[96]

As discussed further under Threshold (b) below, LADWP estimates that the Project would generate a net increase in water demand of 87,521 gpd after implementation of Code-required measures and Project Design Feature WAT-PDF-1. The approved SAR, included as Exhibit 3 of the Utility Report, confirms that sufficient capacity exists in the Sunset Boulevard and Wilcox Avenue mains to serve the Project.[97]

(c) Conclusion

Based on the above, the Project would not exceed the available capacity of the existing water infrastructure that would serve the Project Site, and new or expanded water facilities would not be required. Accordingly, Project operation would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects, and impacts to water infrastructure during Project operation 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.

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[96] *KPFF Consulting Engineers, Sunset + Wilcox Utility Technical Report: Water and Energy, September 2021, Appendix M of this Draft EIR.*

[97] *KPFF Consulting Engineers, Sunset + Wilcox Utility Technical Report: Water and Energy, September 2021, Appendix M of this Draft EIR.*

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

As discussed in the Utility Report included as Appendix M of this Draft EIR, Project construction activities would require water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects of similar size and duration, a conservative estimate of Project water use during construction ranges from 1,000 to 2,000 gpd.[98] Also, the Project would include the demolition of 26,261 square feet of existing on-site office and retail uses (estimated to consumed 804 gpd),[99] which would partially offset the water demand associated with Project construction activities. In addition, Project construction-related water use would be minimal and temporary. Furthermore, as discussed further below, the WSA for the Project concludes that LADWP water supplies during normal, single-dry, and multiple-dry years would be adequate to meet the Project's operational water demand, and Project construction-related water demand would represent only a small fraction (e.g., 2.29 percent) of the Project's post-conservation measure operational demand.[100] Therefore, LADWP water supplies would be adequate to meet Project construction-related water demand during normal, single-dry, and multiple dry years.

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

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[98] *KPFF Consulting Engineers, Sunset + Wilcox Utility Technical Report: Water and Energy, September 2021, Appendix M of this Draft EIR.*

[99] *Based on LADWP billing data. Source: LADWP, Water Supply Assessment for the Sunset and Wilcox Project, June 30, 2021, Appendix L of this Draft EIR.*

[100] *The 2.29 percent estimate was derived using the following formula: (2,000 gpd / 87,521 gpd) x 100 = 2.29%. 87,521 gpd is the post-conservation measure operational water demand estimate for the Project.*

(b) Operation

Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. In accordance with SB 610, LADWP prepared a WSA for the Project, included as Appendix L of this Draft EIR. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on estimates of the Project's operational water demand as compared to LADWP's existing and forecasted future water supplies and demand over the next 25 year period during normal, single-dry and multiple dry years as set forth in LADWP's 2020 UWMP. As indicated in the WSA, the estimates of Project operational water demand in the WSA are based on 100 percent of LASAN sewage generation rates.

Table IV.J.1-5 on page IV.J.1-37 provides estimates of the Project's average operational water demand assuming constant water use throughout the year. As indicated therein, Project operation would result in a net increase in average daily water demand of 87,521 gpd (98 AFY) after implementation of Code-required (approximately 12,611 gpd savings) and voluntary (Project Design Feature WAT-PDF-1, approximately 445 gpd savings) water conservation measures.[101] As stated in the WSA, LADWP has concluded that projected LADWP water supplies during normal, single-dry, and multiple-dry years would be sufficient to meet the Project's estimated water demand in addition to the existing and projected future water demands within LADWP's service area through the year 2045.[102]

As outlined in its 2020 UWMP, LADWP is committed to providing a reliable water supply for the City.[103] The 2020 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling.[104] The 2020 LADWP UWMP also furthers the goals of the City's ED 5 and the Green New Deal, addresses the current and future State Water Project supply shortages, and concludes that MWD's actions in response to the threats to the State Water Project will ensure continued reliability of its water deliveries.[105] By focusing on demand reduction and alternative sources of water supplies, LADWP will

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[101] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021, Appendix L of this Draft EIR.*

[102] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, adopted August 24, 2021, Appendix L of this Draft EIR.*

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

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

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

Table IV.J.1-5
Project Water Demand

Proposed Use	Quantity	Water Use Factor[a] (gpd/unit)	Proposed Water Demand
Total Existing (to be Removed)[b]	**26,261 sf**		**804 gpd**
Proposed Uses			
Restaurant	530 seats	30 gpd/seat	15,900 gpd
Office	431,032 sf	0.12 gpd/sf	51,724 gpd
Base Demand Adjustment[c]			1,057 gpd
Total Proposed Uses			***68,681 gpd***
Cooling Tower Total[d]	**1,500 tons**	**21.06**	**31,590 gpd**
Landscaping[e]	**8,693 sf**		**860 gpd**
Covered Parking[f]	**379,602 sf**	**0.02**	**250 gpd**
Project Total			**101,381 gpd**
Less Existing to Be Removed			-804 gpd
Less Required Ordinances Savings[g]			-12,611 gpd
Less Additional Conservation[h]			-445 gpd
Net Additional Water Demand			**87,521 gpd**

afy = acre feet per year

gpd = gallons per day

sf = square feet

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

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

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

[d] *Assumed to operate 12 hours/day, 7 days/week and 55 percent of chiller capacity.*

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

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

[g] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 186488, 184248, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.*

[h] *Water conservation due to additional conservation commitments agreed by the Applicant. See Table II of the Water Supply Assessment in Appendix L.*

Source: LADWP, Water Supply Assessment for the Sunset and Wilcox Project, June 30, 2021. Refer to Appendix L of this Draft EIR.

further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages.[106] Additionally, as reaffirmed by the Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.[107]

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

(a) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and the cumulative or related projects within this geographic area would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of a SAR and IFFAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire water demands of each project and would be required to provide water infrastructure improvements to serve the project if the existing infrastructure is inadequate. In addition, to ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement and update its Water Infrastructure Plan, with the current (2018–2019) Water Infrastructure Plan containing a

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

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

five-year water system capital improvement plan that includes $6.3 billion for needed water system infrastructure improvements and maintenance.[108] Furthermore, in accordance with City requirements, prior to ground disturbance, the related projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects.

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

Based on the above, the Project's contribution to water infrastructure impacts would not be cumulatively considerable. As such, cumulative water infrastructure impacts 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 Urban Water Management Plan to plan and provide for the water supplies required to serve existing and projected demands within its service area. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045.[109]

As identified in Section III, Environmental Setting, of this Draft EIR, there are 55 related projects located in the vicinity of the Project Site, all of which are located within the LADWP service area. The estimated water demand of these related projects is shown in Table IV.J.1-6 on page IV.J.1-40. As indicated therein, the related projects would generate a total average water demand of approximately 2,075,883 gpd (2,327 AFY). Together with the approximately 87,521 gpd (98 AFY) from the Project, total cumulative

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

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

Table IV.J.1-6
Cumulative Water Demand

No.	Project	Land Use	Size	Demand Factor [a,b]	Water Demand (gpd)
1	6225 W. Hollywood Blvd.	Office	214,000 sf	0.12 gpd/sf	25,680
2	6360 W. Hollywood Blvd.	Other[g]	90 rm	120 gpd/rm	10,800
		Other	11,000 sf		—
3	6523 W. Hollywood Blvd.	Office	4,074 sf	0.12 gpd/sf	489
		Other	10,402 sf		—
4	1313 N. Vine St.	Other	44,000 sf		—
		Other	35,231 sf		—
5	1610 N. Highland Ave.	Apartments	248 du	190 gpd/du	47,120
		Retail	12,785 sf	0.025 gpd/sf	320
6	6201 W. Sunset Blvd.	Apartments	731 du	190 gpd/du	138,890
		Other	5,000 sf		—
		Retail	8,000 sf	0.025 gpd/sf	200
		Other	1,000 sf		—
		Retail	13,000 sf	0.025 gpd/sf	325
		Other	1,000 sf		—
7	6230 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Office	13,510 sf	0.12 gpd/sf	1,621
		Other	13,471 sf		—
		Other	N/A		
		Retail	4,700 sf	0.025 gpd/sf	118
8	1525 N. Cahuenga Blvd.	Other[g]	64 rm	120 gpd/rm	7,680
		Office	1,500 sf	0.12 gpd/sf	180
		Other	700 sf		—
9	1718 N. Las Palmas Ave.	Apartments	195 du	190 gpd/du	37,050
		Condominiums	29 du	190 gpd/du	5,510
		Retail	985 sf	0.025 gpd/sf	25

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

No.	Project	Land Use	Size	Demand Factor [a,b]	Water Demand (gpd)
10	1310 N. Cole Ave.	Apartments	375 du	190 gpd/du	71,250
		Other[e]	2,500 sf	0.05 gpd/sf	125
11	6611 W. Hollywood Blvd.	Other[g]	167 rm	120 gpd/rm	20,040
		Other[e]	10,545 sf	0.05 gpd/sf	527
		Other[e]	5,375 sf	0.05 gpd/sf	269
		Other[e]	3,980 sf	0.05 gpd/sf	199
		Other[f]	1,634 sf	0.03 gpd/sf	49
12	6445 W. Sunset Blvd.	Hotel	175 rm	120 gpd/rm	21,000
		Restaurant (11,400 sf)[c]	380 seats	30 gpd/seat	11,400
13	6409 W. Sunset Blvd.	Other[g]	275 rm	120 gpd/rm	33,000
		Retail	1,900 sf	0.025 gpd/sf	48
14	1717 N. Wilcox Ave.	Other[g]	140 rm	120 gpd/rm	16,800
		Retail	3,500 sf	0.025 gpd/sf	88
15	6831 W. Hawthorn Ave.	Apartments	140 du	190 gpd/du	26,600
		Other[e]	1,207 sf	0.05 gpd/sf	60
16	1749 N. Las Palmas Ave.	Apartments	71 du	190 gpd/du	13,490
17	6701 W. Sunset Blvd.	Mixed Use	N/A		
18	6200 W. Sunset Blvd.	Apartments	270 du	190 gpd/du	51,300
		Other[g]	2,500 sf	0.025 gpd/sf	63
		Other	N/A		
		Other (2,500 sf)[h]	58 seats	30 gpd/seat	1,740
19	6332 W. De Longpre Ave.	Apartments	200 du	190 gpd/du	38,000
		Office	298,171 sf	0.12 gpd/sf	35,781
		Restaurant (11,935 sf)[c]	398 seats	30 gpd/seat	11,940
		Restaurant (4,200 sf)[c]	140 seats	30 gpd/seat	4,200

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

No.	Project	Land Use	Size	Demand Factor [a,b]	Water Demand (gpd)
20	6516 W. Selma Ave.	Other[k]	212 du	190 gpd/du	40,280
		Other	2,308 sf		—
		Other	5,305 sf		—
		Other	5,843 sf		—
21	1600 N. Schrader Blvd.	Other[g]	198 rm	120 gpd/rm	23,760
		Other	2,379 sf		—
		Other	3,600 sf		—
22	6421 W. Selma Ave.	Other[k]	114 du	190 gpd/du	21,660
		Other[l]	5,041 sf	0.05 gpd/sf	252
		Other (1,809 sf)[c,h]	60 seats	30 gpd/seat	1,800
23	1601 N. Las Palmas Ave.	Apartments	202 du	190 gpd/du	38,380
		Commercial	14,200 sf	0.05 gpd/sf	710
24	1360 N. Vine St.	Office	463,521 sf	0.12 gpd/sf	55,623
		Restaurant (20,902 sf)[c]	697 seats	30 gpd/seat	20,910
25	1541 N. Wilcox Ave.	Other[g]	190 rm	120 gpd/rm	22,800
		Other	8,500 sf		—
		Other	1,382 sf		—
26	1400 N. Cahuenga Blvd.	Other[g]	220 rm	120 gpd/rm	26,400
		Other	2,723 sf		—
		Other	1,440 sf		—
27	6436 W. Hollywood Blvd.	Apartments	260 du	190 gpd/du	49,400
		Retail	14,220 sf	0.025 gpd/sf	356
		Office	3,580 sf	0.12 gpd/sf	430
28	6400 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Other[e]	4,037 sf	0.05 gpd/sf	202
		Other[e]	3,000 sf	0.05 gpd/sf	150

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

No.	Project	Land Use	Size	Demand Factor [a,b]	Water Demand (gpd)
29	1546 N. Argyle Ave.	Apartments	276 du	190 gpd/du	52,440
		Retail	9,000 sf	0.025 gpd/sf	225
		Other (15,000 sf)[c,h]	500 seats	30 gpd/seat	15,000
		Other[g]	27,000 sf	0.025 gpd/sf	675
30	1533 N. Schrader Blvd.	Other[k]	70 du	190 gpd/du	13,300
31	1545 N. Wilcox Ave.	Retail	14,800 sf	0.025 gpd/sf	370
		Office	16,100 sf	0.12 gpd/sf	1,932
32	1637 N. Wilcox Ave.	Apartments	154 du	190 gpd/du	29,260
		Other[g]	6,586 sf	0.025 gpd/sf	165
33	6753 W. Selma Ave.	Apartments	51 du	190 gpd/du	9,690
		Retail	438 sf	0.025 gpd/sf	11
34	1524 N. Cassil Pl.	Apartments	138 du	190 gpd/du	26,220
		Other[g]	62 rm	120 gpd/rm	7,440
		Other[e]	1,400 sf	0.05 gpd/sf	70
35	1720 N. Vine St.	Apartments	872 du	190 gpd/du	165,680
		Other[k]	133 du	190 gpd/du	25,270
		Other[g]	4,530 sf	0.025 gpd/sf	113
		Other (25,650 sf)[c,h]	855 seats	30 gpd/seat	25,650
		Other	350 per		—
36	1723 N. Wilcox Av.	Other[g]	81 rm	120 gpd/rm	9,720
		Other	N/A		
37	1400 N. Vine St.	Apartments	179 du	190 gpd/du	34,010
		Apartments	19 du	190 gpd/du	3,610
		Retail	16,000 sf	0.025 gpd/sf	400
38	1818 N. Cherokee Ave.	Apartments	65 du	190 gpd/du	12,350
		Apartments	21 du	190 gpd/du	3,990
39	1235 Vine St.	Office	117,000 sf	0.12 gpd/sf	14,040
		Retail	7,800 sf	0.025 gpd/sf	195

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

No.	Project	Land Use	Size	Demand Factor [a,b]	Water Demand (gpd)
40	1708–1732 N. Cahuenga Blvd.	Office	210,500 sf	0.12 gpd/sf	25,260
		Restaurant (6,500 sf)[c]	217 seats	30 gpd/seat	6,510
41	1612 N. McCadden Pl.	Retail	37,000 sf	0.025 gpd/sf	925
		Micro-Units	69 du	75 gpd/du	5,175
42	6517–6533 Lexington Ave.	Single-Family Homes	18 du	230 gpd/du	4,140
43	1400 N. Highland Ave.	Apartments	49 du	190 gpd/du	9,310
		Retail	800 sf	0.025 gpd/sf	20
44	6100 W. Hollywood Blvd.	Apartments	209 du	190 gpd/du	39,710
		Apartments	11 du	190 gpd/du	2,090
		Other[g]	3,270 sf	0.05 gpd/sf	164
45	6630 W. Sunset Blvd.	Apartments	40 du	190 gpd/du	7,600
		Retail	3,474 sf	0.025 gpd/sf	87
46	6350 Selma Ave.	Apartments	290 du	190 gpd/du	55,100
		Commercial	6,576 sf	0.05 gpd/sf	329
47	6140 Hollywood Blvd.	Hotel	102 rm	120 gpd/rm	12,240
		Condominiums	27 du	190 gpd/du	5,130
		Restaurant (11,500 sf)[c]	383 seats	30 gpd/seat	11,490
48	1718 Vine St.	Hotel	216 rm	120 gpd/rm	25,920
49	1719 N. Whitley Ave.	Hotel	156 rm	120 gpd/rm	18,720
50	6677 Santa Monica Blvd.	Apartments	695 du	190 gpd/du	132,050
		Other[e]	4,000 sf	0.05 gpd/sf	200
		Other[e]	5,500 sf	0.05 gpd/sf	275
		Retail	15,400 sf	0.025 gpd/sf	385
51	1118 N. McCadden	Office	17,040 sf	0.12 gpd/sf	2,045
		Other[j]	29,650 sf	0.12 gpd/sf	3,558
		Other[k]	100 du	190 gpd/du	19,000
		Other[k]	92 du	190 gpd/du	17,480

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

No.	Project	Land Use	Size	Demand Factor [a,b]	Water Demand (gpd)
52	6050 W. Sunset Blvd.	Office	859,350 sf	0.12 gpd/sf	103,122
		Other	52,800 sf		—
		Other	169,400 sf		—
53	6220 W. Yucca St.	Apartments	210 du	190 gpd/du	39,900
		Other[g]	136 rm	120 gpd/rm	16,320
		Retail	12,570 sf	0.025 gpd/sf	314
54	1149 N. Gower St.	Apartments	169 du	190 gpd/du	32,110
55	1233 N. Highland Ave.	Apartments	72 du	190 gpd/du	13,680
		Commercial	12,160 sf	0.05 gpd/sf	608
Related Projects Wastewater Generation					**2,075,883 (2,327 afy)**
Project Net Wastewater Generation					**87,521 (98 afy)**
Total Wastewater Generation for Related Projects and Project					**2,163,404 (2,425 afy)**

afy = acre-feet per year

du = dwelling units

per = persons

rm = rooms

sf = square feet

[a] *This analysis is based on sewage generation rates provided by LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

[b] *This analysis conservatively assumes that all dwelling units are 3-bedroom units.*

[c] *Restaurant space is assumed to be all full-service restaurant and assumed to be equivalent to 30 square feet per seat for a conservative estimate.*

[d] *Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the most comparable land use rate of 120 gallons per day per room for "Hotel" is applied.*

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

No.	Project	Land Use	Size	Demand Factor [a,b]	Water Demand (gpd)
[e]	*Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 50 gallons per 1,000 square feet for "Commercial" is applied.*				
[f]	*Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 30 gallons per 1,000 square feet for "Museum" is applied.*				
[g]	*Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 25 gallons per 1,000 square feet for "Retail" is applied for land use size less than 100,000 square feet).*				
[h]	*Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 30 gallons per seat for "Restaurant" is applied.*				
[i]	*Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 50 gallons per 1,000 square feet for "Lobby" is applied.*				
[j]	*Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 120 gallons per 1,000 square feet for "Office" is applied.*				
[k]	*Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 190 gallons per dwelling unit for "Residential" is applied.*				
Source:	*Fehr and Peers, 2020, based on data provided by City of Los Angeles Department of Transportation and the City of Los Angeles Department of City Planning; Eyestone Environmental, 2021.*				

water demand would be approximately 2,163,404 gpd (2,425 AFY). These estimates are conservative because, while the water demand estimates for the Project account for required and proposed water conservation measures and subtract the water demand associated with the existing uses to be removed, the estimates for the related projects do not.

The total water demand of the Project and related projects of approximately 2,425 AFY would represent approximately 0.5 percent of LADWP's 2020 water supply of 487,591 AF, with the Project's share of 98 AFY representing approximately 0.02 percent of LADWP's 2020 water supply.

As previously stated, the WSA prepared for the Project and included as Appendix L of this Draft EIR concludes that LADWP would be able to meet the water demand of the Project together with the existing and forecasted growth in the City through 2045.[110] Additionally, based on water demand projections through 2045 in its 2020 UWMP, LADWP has determined that it would be able to reliably provide water to its customers through the year 2045, based on demographic growth projections in SCAG's 2020–2045 RTP/SCS, which includes the Project and likely most of the related projects.[111] In addition, compliance of the Project and other future development projects with the numerous regulatory requirements that promote water conservation described above would also reduce water demand on a cumulative basis. For example, certain related projects would be subject to the City's Green Building Code requirement to reduce indoor water use by at least 20 percent, and all projects would be required to use fixtures that conserve water. In addition, as with the Project, any related projects meeting the size criteria under SB 610 would be required to prepare and receive LADWP approval of a WSA that demonstrates how the water demand associated with these projects would be met.

Overall, as discussed above, the 2020 LADWP UWMP demonstrates that the City will meet all new water demands from projected population growth, through a combination of water conservation and water recycling. LADWP's 2020 UWMP specifically outlined the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP's 2020 UWMP also incorporates the goals of ED 5 and the City's Green New Deal. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high-efficiency water fixtures, providing incentives, and expanding the City's outdoor water conservation program.[112] To increase

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[110] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, June 30, 2021. Refer to Appendix L of this Draft EIR.*

[111] *LADWP, Water Supply Assessment for the Sunset and Wilcox Project, June 30, 2021. Refer to Appendix L of this Draft EIR.*

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

recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that sufficient water supply continues to be available.

Based on the above, LADWP would be able to meet the water demands of the Project and future growth within its service area through at least 2045. Therefore, the Project's contribution to impacts related to water supply would not be cumulatively considerable. As such, cumulative water supply impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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