IV. Environmental Impact Analysis

M.1 Utilities and Service Systems—Water Infrastructure

1. Introduction

This section evaluates the Project's potential impacts on water infrastructure and assesses 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 municipal water infrastructure serving the Project site and the adequacy of the existing water infrastructure to meet Project demand. This analysis is based in part on the *Utility Technical Report for New Beatrice West* (Utility Report) prepared for the Project, dated September 22, 2022, and included in Appendix M of this Draft EIR.

The Project's potential impacts on water supply were fully evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR and determined to be less than significant. The analysis regarding water supply included in the Initial Study is summarized below.

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

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

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

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

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

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use projects that include one or more of the projects specified 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] *California State Water Resources Control Board, 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 March 17, 2023.*

over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

(e) California Code of Regulations

(i) Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures, such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gpm at 80 psi and 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 CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2019 California Plumbing Code, which is based on the 2018 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2019.

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[7] *California Code of Regulations, Title 20, Section 1605.3(h).*

(f) Executive Order B-40-17

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

(g) Executive Order N-10-21

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

(2) Regional

(a) Metropolitan Water District

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

(i) 2020 Urban Water Management Plan

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 the 2020 MWD UWMP.[9] The analysis in the 2020 MWD UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[10] In the

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

[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.*

2020 RUWMP, the projected 2045 demand water during multiple-dry year conditions is 1,564,000 afy, whereas the expected and projected 2045 supply is 2,239,000 afy based on current programs, for a potential surplus in 2045 of 675,000 afy.[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 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 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

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[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, 2016.*

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 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

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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, The Integrated Water Resources Plan, www.mwdh2o.com/how-we-plan/integrated-resource-plan/, accessed March 17, 2023.*

[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.*

deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[16]

(iv) Long-Term Conservation Plan

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

(v) Water Supply Allocation Plan

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

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

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

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

(3) Local

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

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 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).

(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.[18] The Sustainable City pLAn was intended to be updated every four years.

In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAn, which has been renamed as L.A.'s Green New Deal, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity, objectives.[19] 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.

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

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

(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.[20] 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.[21] 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.[22] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for City utilities, including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[23] The goals, objectives, and policies are addressed by the City in its ordinances and preparation of its UWMP.

Table IV.N.1-1 on page IV.M.1-13 shows General Plan goals, objectives and policies relate to water supply.

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

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

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

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

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

Goal/Objective/Policy	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.
Objective 9.10	Ensure that water supply, storage, and delivery systems are adequate to support planned development.
Policy 9.10.1	Evaluate the water system's capability to meet water demand resulting from the Framework Element's land use patterns.
Policy 9.10.2	Solicit public involvement, when appropriate, in evaluating options for the construction of new and/or expansion of existing water facilities.
Objective 9.11	Ensure, to the maximum extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.
Policy 9.11.1	Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.

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

(ii) 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 Palms–Mar Vista–Del Rey Community Plan area.[24] The Palms–Mar Vista–Del Rey Community Plan does not include objectives or policies related to water infrastructure.

(e) Los Angeles Municipal Code

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

b. Existing Conditions

Water infrastructure in the vicinity of the Project site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 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 acre-feet according to the estimates for Fiscal Year 2018–2019.[25] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant in Sylmar, which is owned and operated by LADWP. Water entering the Los Angeles Aqueduct Filtration Plant undergoes treatment and disinfection before being distributed throughout the LADWP's water service area.[26]

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[24] *The Los Angeles Department of City Planning is currently in the process of updating the Palms–Mar Vista–Del Rey Community Plan.*

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

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

Domestic water service is available in the vicinity of the Project site via LADWP water lines within the adjacent streets. Based on the Utility Report included in Appendix M of this Draft EIR, the Project site and vicinity are currently served by an existing 8-inch water main in Jandy Place and an 8-inch water main in Beatrice Street.[27]

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). As provided in the Utility Report, there are four fire hydrants near the Project Site, including one hydrant at the southwest corner of Beatrice Street and Jandy Place, one hydrant at the north end of the cul-de-sac on Jandy Place, one hydrant at the southeast corner of Beatrice Street and Westlawn Avenue, and one hydrant at the northwest corner of Grosvenor Boulevard and Beatrice Street.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.[28]***

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. As previously noted, the Project's potential impacts on water supply (Threshold b) were fully evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft

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[27] *Barbara L. Hall, P.E., Inc., Utility Technical Report for New Beatrice West, September 2022.*

[28] *Refer to Sections IV.D, Energy and Section IV.M.2, 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 and Section XIX, Utilities and Service Systems, for a discussion of wastewater impacts.*

EIR, and determined to be less than significant. The analysis regarding water supply included in the Initial Study is summarized below.

In addition to the Appendix G Thresholds listed above, the analysis 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:

- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; and
- The degree to which scheduled water infrastructure or project design features would reduce or offset service impacts.

b. Methodology

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 a hydraulic analysis performed by LADWP 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 Appendix A of the Utility Report for the results of the Information of Fire Flow Availability Requests (IFFAR) for the four fire hydrants evaluated.

c. Project Design Features

The following project design feature is proposed with regard to water infrastructure.

Project Design Feature WAT-PDF-1: The Project will replace the existing 8-inch diameter water mains in Beatrice Street and Jandy Place and add fire hydrants in the area to increase fire flow protection based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow as determined necessary by LADWP. The specific improvements based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow are as follows:

- **12,000 gpm fire flow:** Approximately 865 linear feet of 16-inch diameter ductile iron pipe, 600 linear feet of 12-inch ductile iron pipe and 4 new fire hydrants would be installed (8 total fire

hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Jandy Place to Grosvenor Boulevard. The new 12-inch pipe will be constructed in Jandy Place from the cul-de-sac end to Beatrice Street, and extend westerly on Beatrice Street approximately 200 linear feet, replacing the existing 8-inch water main in those streets.

- **9,000 gpm fire flow:** Approximately 550 linear feet of 16-inch diameter ductile iron pipe, 325 linear feet of 12-inch ductile iron pipe and 2 new fire hydrants would be installed (8 total fire hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Westlawn Avenue to Grosvenor Boulevard, replacing the existing 8-inch water main. The new 12-inch pipe will be constructed in Beatrice Street from Jandy Place to Westlawn Avenue, replacing the existing 8-inch water main.

Additionally, implementation of a Construction Traffic Management Plan (Project Design Feature TR-PDF-1 set forth in Section IV.K, Transportation, of this Draft EIR) 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, including during installation of the necessary infrastructure improvements.

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? [29]

[29] *Refer to: Sections IV.D, Energy, and IV.M.2, 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 and Section XIX, Utilities and Service Systems, for a discussion of wastewater impacts.*

(1) Impact Analysis

(a) Construction

Project construction activities would require water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. 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 existing fire hydrants in the immediate vicinity of the Project site. As the Project would include the removal of the existing 30,260 square feet of office uses (estimated to consume approximately 6,052 gpd per the Initial Study included in Appendix A of this Draft EIR), the water demand associated with Project construction activities would be partially offset. Additionally, based on the temporary nature of construction activities, as well as the limited construction phases requiring the use of water, Project construction water demand would be anticipated to be less than the operational water demand of the existing building. Construction-related water use would be less than that for operation of the Project and would be offset by removal of the existing on-site uses. Therefore, the existing water infrastructure would have adequate capacity to meet Project construction-related water demand, and new water mains or upgrades to the existing water mains would not be required for construction-related water use.

As described above in Project Design Feature WAT-PDF-1, the Project would require construction of new on-site and off-site water distribution lines to serve the Project. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the lines below surface. The installation of new water infrastructure would involve off-site work associated with upgrading the public main as described above in Project Design Feature WAT-PDF-1 and installing connections from the Project site to the upgraded public main and on-site work associated with installing water distribution lines. The environmental effects associated with the off-site trenching/improvements would be temporary and would be anticipated to be less than significant both due to the scope of the primarily trenching activities and the location of these activities within already developed area. In addition, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines, LADWP would be notified in advance of proposed ground disturbance activities, to avoid water lines and disruption of water service, and LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). Lastly, while trenching and installation activities could temporarily affect traffic flow and access on the adjacent streets and sidewalks, a Construction Traffic Management Plan (Project Design Feature TR-PDF-1) would be implemented (discussed in Section IV.K, Transportation, of this Draft EIR), which would ensure the safe and efficient flow of vehicular and pedestrian traffic, and that emergency access to the Project site and adjacent properties would be maintained during the construction period.

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

(b) Operation

When analyzing the capacity of the water infrastructure system to serve a project, the estimated operational demands of the project for both fire suppression and domestic water are considered. Although domestic water demand would be the Project's main contributor to water demand in the long term, the Project's fire flow demands have a much greater instantaneous impact on infrastructure and therefore are the primary means for analyzing infrastructure capacity. Conservative analysis for fire suppression 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, refer to Appendix A of the Utility Report for the results of the IFFARs.[30]

(i) Fire Flow

Fire flow to the Project would be required to meet City fire flow requirements. LAMC Section 57.507.3.1 establishes fire flow standards by development type. Based on LAMC Section 57.507.3.1 and Table 57.507.3.1, as well as the Project site's zoning of M2-1, the LAFD identified a required fire flow for the Project of 12,000 gallons. However, it is noted that this fire flow is based strictly on the Project site's zoning, which is not representative of the scope of the Project. As such, as described in the Utility Report, when evaluating whether the existing infrastructure would have sufficient capacity to meet fire flow demands, the LADWP evaluated both a fire flow of 12,000 gpm, as well as a fire flow of 9,000 gpm from eight and six fire hydrants, respectively, flowing simultaneously at 1,500 gpm with a residual pressure of 20 psi, which would be more compatible with the proposed density and use of the Project site for commercial and office uses.

As discussed in the Utility Report, included as Appendix M of this Draft EIR, the IFFARs submitted to LADWP show there would be insufficient capacity in the existing water infrastructure system under either a 12,000 gpm fire flow or a 9,000 gpm fire flow, and system upgrades would be necessary to meet the fire flow demand for the Project.[31] The Project would incorporate a fire sprinkler suppression system in the proposed building

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[30] *Barbara L. Hall, P.E., Inc., Utility Technical Report for New Beatrice West, September 22, 2022.*

[31] *Barbara L. Hall, P.E., Inc., Utility Technical Report for New Beatrice West, September 2022. Refer to Appendix M of this Draft EIR.*

to reduce or eliminate the public hydrant demands. In addition, as part of the Project, required water service upgrades necessary to achieve the adequate fire flow would be implemented. As detailed above in Project Design Feature WAT-PDF-1, such upgrades are anticipated to involve replacing the existing 8-inch diameter water mains in Beatrice Street and Jandy Place and adding fire hydrants in the area to increase fire flow protection. With the implementation of Project Design Feature WAT-PDF-1, public water infrastructure would provide adequate water pressure to serve the Project site's anticipated water demand.

(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. As previously stated, while domestic water demand is the main contributor to water consumption, fire demands have been shown to have the greatest instantaneous impact on infrastructure; therefore, the results of the IFFAR can be utilized as indication that the existing water infrastructure is sufficient. As discussed above, with implementation of Project Design Feature WAT-PDF-1, sufficient capacity would be available to serve the Project site. 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.[32]

(c) Conclusion

Based on the above, while the Project would require the construction of expanded water facilities, the construction activities associated with these improvements would not cause significant environmental effects. Additionally, upon completion of the proposed improvements prior to Project build-out, sufficient water infrastructure would be available to serve the Project for operation of the Project; thus, operational impacts related to water infrastructure would be less than significant.

(2) Mitigation Measures

Impacts related to water infrastructure would be less than significant. Therefore, no mitigation measures are required.

[32] *Barbara L. Hall, P.E., Inc., Utility Technical Report for New Beatrice West, September 2022.*

(3) Level of Significance After Mitigation

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?

As evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, and as summarized in Section VI, Other CEQA Considerations, of this Draft EIR, the 2015 Urban Water Management Plan forecasts adequate water supplies to meet all projected water demands in the City for normal, single-dry, and multiple-dry years through the year 2040. Furthermore, as outlined in the 2015 Urban Water Management Plan, LADWP is committed to providing a reliable water supply for the City. The 2015 Urban Water Management Plan also notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. As determined in the Initial Study, sufficient water supplies would be available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts with respect to Threshold (b) would be less than significant. No further analysis is required.

e. Cumulative Impacts

(1) Impact Analysis

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 related project within this geographic area would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related project would be subject to LADWP review (e.g., preparation of an IFFAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire water demands of each project and would be required to provide water infrastructure improvements to serve the project if the existing infrastructure is inadequate. In addition, to ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement and update its Water Infrastructure Plan (WIP), with the current (2018–2019) WIP containing a five-year water system capital improvement plan that includes $6.3 billion for needed water system infrastructure improvements and

maintenance.[33] Furthermore, in accordance with City requirements, prior to ground disturbance, the related project 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 project.

As with the Project, off-site connection activities and infrastructure improvements associated with the related project could temporarily affect access in adjacent rights-of-way. However, as with the Project, the related project would be required to implement a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the related project site during construction activities. As part of the Construction Traffic 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 site and traffic flow is maintained on adjacent rights-of-way.

Based on the above, the Project, together with the related projects, would not result in significant cumulative water infrastructure impacts related to the construction or expansion water facilities. The Project's contribution would not be cumulatively considerable, and, as such, cumulative water infrastructure impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative 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.

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