IV. Environmental Impact Analysis

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

1. Introduction

This section evaluates the Project's potential impacts on water supply and determines whether the Project would require or result in the construction of new water facilities, including conveyance infrastructure and treatment facilities, 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. The Project's 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 the Water Supply Assessment (WSA) prepared for the Project and adopted by LADWP, provided in Appendix N of this Draft EIR, which includes a copy of Resolution No. 022 050 approving the WSA.[1] Additional technical information used in the analysis is based on the TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy (Utility Report) prepared by KPFF, included in Appendix O of this Draft EIR.[2]

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:

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1 LADWP, Water Supply Assessment for the TVC 2050 Project, August 26, 2021, and City Resolution No. 022 050, both adopted October 12, 2021.

2 KPFF Consulting Engineers, TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy, March 2022.

- California Urban Water Management Plan Act
- Senate Bill 610, Senate Bill 221 and Senate Bill 7
- Senate Bill X7-7 (Water Conservation Act of 2009)
- Sustainable Groundwater Management Act of 2014
- California Code of Regulations
  - Title 20
  - CALGreen Code
  - Plumbing Code
- Executive Order B-40-17
- Executive Order N-10-21
- Metropolitan Water District
  - 2020 Urban Water Management Plan
  - 2015 Integrated Resources Plan
  - Water Surplus and Drought Management Plan
  - Long-Term Conservation Plan
  - Water Supply Allocation Plan
- Los Angeles Department of Water and Power's 2020 Urban Water Management Plan
- Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan, including:
  - Framework Element
  - 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 on 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.[3] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

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

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.[4] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[5] 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.[6]

(d) Sustainable Groundwater Management Act of 2014[7]

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.[8] 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

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

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

5 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.

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

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

8 California Department of Water Resources, Sustainable Groundwater Management Act (SGMA). https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed January 18, 2022.

groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

(e) California Code of Regulations

(i) Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable state efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures, such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gallons per minute (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.[9]

(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.

[9] 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 January 17, 2022.

(iii) Plumbing Code

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

(f) Executive Order B-40-17

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

(g) Executive Order N-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, 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 (City).

(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.[10] Evaluations are prepared for average year

[10] Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021

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 MWD UWMP.[11] The analysis in the MWD UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[12] 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.[13]

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.[14] 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.

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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, 2020 Urban Water Management Plan, p. 2-19.

13 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, p. 2-19.

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

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

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. IRP Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP shows the supply reliability and conservation targets. As presented in the IRP, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after conservation is estimated to be 4,273,000 af and the total supply reliability target is approximately 4,539,000 af, representing an excess of 266,000 af.[15]

The 2020 IRP planning process is currently in development.[16] 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.[17]

(iii) Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to

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15 Metropolitan Water District of Southern California, Integrated Water Resources Plan—2015 Update, Report 1518. p. VIII.

16 Metropolitan Water District of Southern California, Integrated Water Resources Plan, www.mwdh2o.com/planning-for-tomorrow/how-we-plan/integrated-resource-plan/, accessed March 14, 2022.

17 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.

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

(iv) Long-Term Conservation Plan

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

(v) Water Supply Allocation Plan

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

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.[19] The allocation period covers 12 consecutive months from July of a given year through the following June.

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

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

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

In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAn, which has been renamed as L.A.'s Green New Deal l Sustainability Plan 2019 (Green New Deal), which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.[21] The Green New Deal augments, expands, and elaborates in more detail the City's vision for a sustainable future and includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability.

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

[21] 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.[22] The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[23] Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

(d) City of Los Angeles General Plan

(i) General Plan Framework Element

The General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[24] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for City utilities, including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[25] The goals, objectives, and policies are addressed by the City in its ordinances and preparation of its UWMP.

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

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

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

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

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

Table IV.M.1-1
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.
Policy 9.9.1	Pursue all economically efficient water conservation measures at the local and statewide level.
Policy 9.9.7	Incorporate water conservation practices in the design of new projects so as not to impede the City's ability to supply water to its other users or overdraft its groundwater basins.
Objective 9.10	Ensure that water supply, storage, and delivery systems are adequate to support planned development.
Policy 9.10.1	Evaluate the water system's capability to meet water demand resulting from the Framework Element's land use patterns.
Policy 9.10.2	Solicit public involvement, when appropriate, in evaluating options for the construction of new and/or expansion of existing water facilities.
Objective 9.11	Ensure, to the maximum extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.
Policy 9.11.1	Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.

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

(ii) 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 include 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 Wilshire Community Plan area. The Community Plan does not include water supply and infrastructure objectives that are applicable to commercial projects, such as the Project.

(e) Los Angeles Municipal Code

The City has adopted several ordinances, later codified in the Los Angeles Municipal Code (LAMC), in an effort to reduce water consumption. A summary of the City's key regulations regarding water conservation is provided below.

- Ordinance No. 180,822—amended LAMC Chapter XII, Article 5 to establish water efficiency requirements for new development and renovation of existing buildings, and mandate installation of high efficiency plumbing fixtures in residential and commercial buildings.

- Ordinance No. 181,480—amended LAMC Chapter IX by adding Article 9 (Green Building Code) to the LAMC to incorporate various provisions of the CALGreenCode. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by (1) using water saving fixtures or flow restrictions and/or (2) demonstrating a 20-percent reduction in baseline water use.

- Ordinance Nos. 181,899 and 183,833—amended LAMC Chapter VI, Article 4.4, Section 64.72, regarding stormwater and urban runoff to include new requirements, including Low Impact Development (LID) requirements that promote water conservation.

- Ordinance No. 182,849—amended LAMC Chapter IX, Article 9 (Green Building Code) to mandate that for new water service or for additions or alterations requiring upgraded water service for landscaped areas of at least 1,000 square feet, separate sub-meters or metering devices shall be installed for outdoor potable water use. This ordinance also required that for new non-residential construction with at least 1,000 square feet of cumulative landscaped area, weather or soil moisture–based irrigation controllers and sensors be installed.

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

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

The City 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. 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 within the City of Los Angeles limits 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 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.M.1-2 on page IV.M.1-16, in 2020, the most recent year for which data are available, LADWP had an available water supply of 487,591 af. LADWP water sources are described in further detail below.

(a) Los Angeles Aqueducts

As provided in the WSA for the Project included in Appendix N of this Draft EIR, the City receives surface water and groundwater from the Eastern Sierra Nevada Mountains through the LAA. LADWP constructed the first LAA in 1913 to convey water from the Eastern Sierra to the City. In 1940, the LAA was extended 40 miles north from the Owens River to the Mono Basin. To meet additional water demands from the City, a second barrel of the LAA was constructed and completed in 1970. The second LAA increased the City's

[26] LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, p. 11.

Table IV.M.1-2
Los Angeles Department of Water and Power Water Supply for Fiscal Years 2015–2016 through 2019–2020

Fiscal Year (July–June)	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage[a]	Total
2015–2016	57,853	79,056	339,975	9,913	**-3,509**	**490,306**
2016–2017	224,724	50,439	216,299	8,032	**9,350**	**490,144**
2017–2018	307,671	21,760	182,706	9,778	**-200**	**522,116**
2018–2019	312,456	32,233	137,775	7,512	**1,710**	**488,266**
2019–2020	292,095	34,363	152,647	9,641	**1,155**	**487,591**

Units are in acre-feet.

[a] *The figures presented account for the transfer, spread, spill, and storage of the water supply as determined by LADWP. It should be noted that the figures presented as a negative represent a deficit of water.*

Source: LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, Table III.

capacity to deliver water from the Mono Basin and the Owens Valley from 485 cubic feet per second (cfs) to 775 cfs.[27]

The City's water rights in the Eastern Sierra Nevada are comprised of riparian rights, pre-1914 appropriations, and post-1914 appropriation licenses held on various streams in the Mono Basin and Owens Valley. The most significant basis for the export of surface water from the Eastern Sierra Nevada is an appropriation claim in 1905 to divert up to 50,000 miner's inches (1,250 cfs) from the Owens River. Up to 16,000 afy can be supplied from Mono Basin, which is permitted by the 1994 Mono Lake Basin Water Right Decision 1631. Decision 1631 set a limit on LADWP water exports from the Mono Basin, which were set to a range of zero to 16,000 afy based on Mono Lake's water elevation. Aside from the primary surface water rights, the groundwater right in the Owens Valley is managed under the 1991 Long Term Water Agreement (LTWA) and uses vegetation water demand and available soil moisture to determine whether groundwater wells can be pumped. Since 1991, the average annual pumping from Owens Valley wellfields has been less than 75,000 af compared to 107,000 af from 1974 to 1990.[28]

[27] LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, p. 11.

[28] LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, p. 12.

Annual water deliveries from the LAA to the City are impacted by hydrologic variability in the Eastern Sierra Nevada and water set aside for environmental projects. At its peak in the 1983-1984 fiscal year, the LAA delivered 531,729 af to the City. Concerns over environmental impacts have required the City to reallocate approximately one-half of the LAA water supply to other uses within the Owens Valley and Mono Basin. Between 1992 and 2020, LADWP reduced deliveries to the City by approximately 177,000 afy to supply water for a variety of environmental projects throughout the Eastern Sierra. Environmental enhancement and mitigation projects in the Mono Basin and Owens Valley that utilize water from the Eastern Sierra include Mono Basin releases, Lower Owens River Project, Owens Lake Dust Mitigation Program, as well as other environmental enhancement and mitigation projects and uses. When considering water allocations for these projects, the expected annual long-term LAA delivery over the next 25 years is approximately 192,000 af per year for average years. However, annual deliveries for a series of dry years are expected to range from approximately 71,400 af to 143,000 af.[29]

As indicated in Table IV.M.1-2 on page IV.M.1-16, approximately 292,095 af of LADWP's water supplies were from the LAA in 2020. The average deliveries from the LAA from fiscal year 2015–2016 through fiscal year 2019–2020 were approximately 238,960 af of water annually.

The sole reliance on LAA supply with impacts due to natural variability and water set aside for environmental projects is not sufficient to meet the City's annual water demands. Therefore, as summarized below and described in detail in the WSA, LADWP has implemented, and continues to increase, stormwater capture, local groundwater, water conservation, water use efficiency, and water recycling programs to address the reduction of LAA supplies. Additionally, LADWP can purchase supplemental imported water from MWD to meet the City's remaining water demands.[30]

(b) Local Groundwater Supplies

Local groundwater provided approximately eight percent of the total water supply for Los Angeles from fiscal year-end 2016 to fiscal year-end 2020. This amount significantly differs from 50 years ago when local groundwater provided up to 23 percent of total supply during extended dry periods. In recent years, contamination issues have impacted LADWP's ability to fully utilize its local groundwater entitlements and provide groundwater supplies to support annual water demands. In response to this issue and to address the hydrologic variability impacts to imported water supplies, LADWP has focused on the sustainable management of its local groundwater basins. LADWP continues to invest in stormwater recharge projects to restore local groundwater basin levels as well as advanced

[29] LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, p. 12.

[30] LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, p. 12.

treatment systems to produce purified recycled water for groundwater replenishment. Furthermore, LADWP has, and will continue to, conjunctively use the large groundwater basin within the City to store wet year LAA flows to supply water during dry periods.[31]

The City's total adjudicated groundwater rights are approximately 109,809 afy, which are located within the San Fernando Basin (SFB), Central Basin, Sylmar Basin, and West Coast Basin.[32] Of these, LADWP pumps groundwater from the SFB and, to a lesser extent, the Central Basin and Sylmar Basin.

The SFB is the primary source of local groundwater for the City. It is located in the Upper Los Angeles River Area (ULARA) and spans 112,000 acres.[33] The City's average groundwater rights in the SFB is 87,000 afy. A ULARA Judgment allows groundwater to be stored within the SFB when the City pumps less than its annual water right, and stored water credits may be pumped to supplement the City's water supply. The direct spreading of both imported surface water and recycled water by the City increased the water rights by an equal amount. As of October 1, 2018, the City had accrued 591,460 af of stored water credits.[34] LADWP is implementing its SFB Groundwater Remediation Program to help restore the capacity of SFB as a drinking water source and groundwater storage. LADWP also receives additional SFB water through the Los Angeles–Burbank Interim Interconnection Pipeline. In 2015, the City of Los Angeles and the City of Burbank entered into an agreement to construct and operate the Los Angeles–Burbank Interim Interconnection and began delivery of a minimum of 500 af of blended water in August 2019. This connection began service in August 2019 and will operate for five years.[35]

The Central Basin is located in the southeastern part of the Los Angeles Coastal Plain in Los Angeles County. The City has approximately 17,236 afy of groundwater rights in this basin, which was increased from the 15,000 afy originally awarded through the Central Basin Third Amended Judgment dated December 23, 2013, through three purchase transactions completed between 2014 and 2015.[36,37] With additional carryover

31 LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, p. 12.

32 LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, p. 12.

33 LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, p. 13.

34 LADWP, 2020 Urban Water Management Plan, May 2021, p. 5-7.

35 LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, p.13.

36 LADWP, 2020 Urban Water Management Plan, May 2021, p. 5-3.

37 LADWP, 2020 Urban Water Management Plan, May 2021, p. H-56.

and storage of unused water rights, the City has accrued a total of 22,943 af of stored water as of fiscal year-end 2020.[38]

Aside from the SFB and the Central Basin, the City holds water rights in the Sylmar, Eagle Rock, and West Coast Basins. The City's water rights in the Sylmar Basin is 3,570 afy. The majority of the Sylmar Basin's groundwater production facilities are inoperable due to high levels of contamination and deteriorated facilities. The Mission Wellfield facility has been undergoing continued improvements since the early 2000s to replace the existing deteriorated facilities and restore the Sylmar Basin's groundwater production capacity.The City's water rights in the Eagle Rock Basin are 500 afy. Although the City has the right to produce groundwater from the Eagle Rock Basin, there are no current plans to establish groundwater production facilities there. The West Coast Basin is located in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. LADWP has the right to pump 1,503 afy from this basin. In 2014, the West Coast Basin Judgment was amended to increase certain parties', such as LADWP's, pumping capacity to 5,000 afy of unused West Coast Basin rights out of the Central Basin. However, the West Coast Basin has groundwater quality problems related to total dissolved solids (TDS), chloride, and hydrocarbon pollutants; therefore, LADWP discontinued the use of West Coast Basin facilities in 1980 until further studies are completed to restore groundwater pumping.[39]

Table IV.M.1-3 on page IV.M.1-20 provides data regarding the groundwater produced for the City during the fiscal years of 2016–2017 through 2020–2021. As shown therein, during the 2020–2021 fiscal year, 53,623 af were produced from the SFB, 1,363 af were produced from the Sylmar Basin, and 2,247 were produced from the Central Basin.[40]

The City plans to continue to develop production from its groundwater basins in the coming years to offset reductions in imported supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection. 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 ULARA Administrative Committee of representatives from five public water supply agencies overlying the ULARA Committee.[41] These efforts include the 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

[38] LADWP, 2020 Urban Water Management Plan, May 2021, p. 5-16.

[39] LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, p. 13.

[40] LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, p. 14.

[41] LADWP, 2020 Urban Water Management Plan, May 2021, p. 5-4.

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

Fiscal Year (July–June)	San Fernando	Sylmar	Central
2016–2017	55,116	0[a]	3,005
2017–2018	22,259	0[a]	1[a]
2018–2019	36,870	1[a]	5[a]
2019–2020	35,949	2[a]	10[a]
2020–2021	53,623	1,363	2,247

Units are in acre-feet.

[a] *Small quantities pumped from the Sylmar and Central Basins were for water quality testing purposes, not water supply.*

Source: LADWP, Water Supply Assessment—2050 TVC Project, adopted October 12, 2021, Table IV.

replenishment.[42] In addition, there are additional groundwater basins near and within the Los Angeles area where LADWP is considering and exploring opportunities to develop groundwater resources in a manner that is locally sustainable and in cooperation with its regional partners.[43]

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for supplemental domestic and municipal water uses in California. As one of the 26 member agencies of MWD, LADWP purchases water from MWD to supplement LADWP water supplies from the LAA, local groundwater and recycled water.[44]

MWD imports water from two principal sources: northern California via the California Aqueduct and the Colorado River via the Colorado River Aqueduct (CRA). MWD also manages and owns in-basin surface storage facilities, stores groundwater within the basin via contracts, engages in groundwater storage outside the basin, and conducts water transfers to provide additional supplies for its member agencies. All member agencies have preferential rights to purchase water from MWD, pursuant to Section 135 of the

42 LADWP, 2020 Urban Water Management Plan, May 2021, p. 5-4.

43 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, p. 14.

44 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, p. 18.

Metropolitan Water District Act.[45,46] As of June 30, 2020, LADWP has a preferential right to purchase 18.12 percent of MWD's total water supply.[47]

LADWP plans to reduce purchase of MWD water supplies through increased conservation, increased recycled water production, and enhanced groundwater pumping through stormwater capture and groundwater replenishment. As indicated in Table IV.M.1-2 on page IV.M.1-16, LADWP received approximately 137,775 af and 152,647 af of water from MWD in the fiscal years 2018–2019 and 2019–2020, respectively, which was a substantial reduction from previous years.[48] 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 one of MWD's two major sources of water. The SWP is owned by the State and operated by DWR, delivering municipal and industrial water to approximately 27 million of California's residents and 750,000 acres of farmland.[49] The SWP watershed encompasses the mountains and waterways around the Feather River in the Sacramento Valley of Northern California. The SWP facilities include a complex system of dams, reservoirs, powerplants, pumping plants, canals and aqueducts to deliver water. Water from rainfall and snowmelt runoff is captured and stored in SWP conservation facilities and then delivered through SWP transportation facilities to water agencies and districts located throughout the Upper Feather River, Bay Area, Central Valley, Central Coast, and Southern California. MWD receives water from the SWP through the main stem of the aqueduct system, the California Aqueduct, which is 444 miles long.[50]

MWD is the largest of the 29 SWP contractors, holding a contract for 1.912 million af (maf) per year, or 46 percent of the total contracted amount of the 4.173 maf ultimate delivery capacity of the SWP.[51] However, in accordance with the State Water Contract with DWR, the contracted amount varies annually due to a number of factors, including existing supplies in storage, forecasted hydrology, water quality, environmental flow obligations,

45 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, p.18.

46 Metropolitan Water District Act, Chapter 2, Section 135.

47 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, p. 18.

48 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Table III.

49 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, pp. A-12-13.

50 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-13.

51 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, p. 18.

and other operational considerations.[52] 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 have declined. From calendar year 2006 through 2020, the amount of water received by MWD from the SWP varied from a low of 593,000 af in calendar year 2015 to a high of 1,695,000 af in 2006. In calendar year 2020, DWR's allocation to MWD was 382,300 af. In 2021, DWR's allocation to MWD commenced as 10 percent and then was reduced to five percent (95,575 af).[53]

Challenges to State Water Project Supply

Numerous factors have created challenges for the SWP. Based on DWR's 2021 Draft State Water Project Delivery Capability Report, all but five of the 29 SWP contractors receive SWP deliveries by diversions from the Delta. These diversion facilities are regulated by several state and federal agencies that maintain and enhance the Delta's long-term sustainability. Ongoing regulatory restrictions, such as those aimed at protecting the Delta estuary's resident and migratory fish species, are challenges to a reliable and sustainable water delivery capability for the SWP. In particular, a substantial decrease in SWP Delta exports occurred with new regulations that culminated in the federal Biological Opinions that went into effect in 2008–2009. Complications induced by climate change also pose a threat of increased variability in the frequency and magnitude of both floods and droughts in the Delta. In addition, the projected sea level rise caused by the increase in average temperature also complicates efforts to manage salinity levels in the channels affected by tides in the Delta. Furthermore, higher ocean levels could also result in more frequent water quality degradation in the Delta channels, requiring additional Delta outflow to maintain water quality objectives. Other challenges include the continued subsidence of Delta islands, many of which are already below sea level and supported by relatively unstable levee systems.[54] In addition to challenges within the Delta, as discussed in detail in the WSA, various agreements and litigation regarding the State Water Contract have affected water supplies from the SWP.[55]

[52] LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-14.

[53] LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-14.

[54] California Department of Water Resources, The Draft State Water Project Delivery Capability Report 2021, December 31, 2021.

[55] LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, pp. A13-21 and A-31-34.

(ii) The Colorado River

The Colorado River was MWD's original source of water after MWD's establishment in 1928. MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. Water from the Colorado River and its tributaries is also available to other users in California, as well as users in the states of Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming, resulting in both competition and the need for cooperation among these holders of Colorado River entitlements.[56]

Construction of the CRA, which is owned and operated by MWD, was undertaken by MWD to provide for the transportation of its Colorado River water entitlement to its service area. The CRA originates at Lake Havasu on the Colorado River and extends approximately 242 miles through a series of pump stations and reservoirs to its terminus at Lake Mathews in Riverside County.[57] MWD holds the fourth and fifth priority rights to the Colorado River water supplies. Thus, water diverted by MWD is dependent on unused apportionment from other users.[58] Up to 1.25 million af of water per year may be conveyed through the CRA to MWD's member agencies, subject to availability of Colorado River water for delivery to MWD.[59] Since 2003, MWD's net diversions of Colorado River water have ranged from a low of 537,607 af in 2019 to a high of approximately 1,179,000 af in 2015. Preliminary average annual net diversions for 2011 through 2020 were 871,947 af, with annual volumes dependent primarily on programs to augment supplies, including transfers of conserved water from agriculture. In 2020, the preliminary total available Colorado River supply to MWD was just over one million af. A portion of the available supply that was not diverted was stored in Lake Mead for future usage.[60]

As discussed in detail in the WSA, conveyance from the Colorado River has also experienced many challenges including persistent drought conditions, litigation, and the presence of endangered species.

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56 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-21.

57 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-21.

58 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-22.

59 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-21.

60 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-22.

(iii) MWD Actions to Address Supply

As summarized above in Subsection 2.a, Regulatory Framework, above, MWD has been developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. These plans include MWD's IRP, UWMP, WSDM Plan, LTCP Plan and the WSAP. These long-term plans have been developed to meet MWD's member agencies' growing reliability needs through improvements to the SWP, conjunctive management efforts on the Colorado River, water transfer programs, outdoor conservation measures, and development of additional local resources, such as recycling, brackish water desalination, and seawater desalination.

Additionally, MWD has planned and prepared for dry conditions by investing in vital infrastructure to increase its storage capacity. MWD's storage as of January 1, 2021, is estimated to be 3.91 million af. MWD is prepared to meet the water demands in its service area in calendar year 2021 using a combination of CRA deliveries, storage reserves and, if so determined, supplemental water transfers and purchases. MWD has initiated the process to withdraw from its dry-year storage reserves in the SWP banking programs and flexible storage accounts.[61]

(d) Precipitation Conditions

In 2021, California experienced its second consecutive dry year. As of May 9, 2021, northern Sierra precipitation was 48 percent of the 50-year average for that time of year, and the northern Sierra snowpack peaked on March 24, 2021 and measured at 72 percent of the April 1, 2021 average. As of May 1, 2021, the water year runoff forecast for the Sacramento River was 6.7 million af or 38 percent of the average. An extended drought period is also ongoing in the Colorado River Basin, which is another source of water for southern California as described above. The Upper Colorado River Basin snowpack accumulation peaked on March 29, 2021 and measured at 88 percent of the 30-year April 1 median.[62]

The City of Los Angeles receives an average of 14.26 inches of precipitation per year according to the National Weather Service.[63] During the 2020–2021 rain season (extending from July 1, 2020, to June 30, 2021), the nearby UCLA Campus in Westwood,

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61 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-10.

62 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-9.

63 National Weather Service, Monthly Total Precipitation for Los Angeles Downtown Area, CA 1991–2021, www.weather.gov/wrh/Climate?wfo=lox, accessed February 24, 2022.

Los Angeles received 4.75 inches of precipitation, compared with 15.72 inches the year prior.[64]

(e) Global Warming and Climate Change

As discussed in LADWP's 2020 UWMP, water supplies that are dependent on natural hydrology, such as LADWP's imported supplies and local groundwater, are susceptible to climate risks. Imported sources that originate from mountain snowpack are particularly sensitive to changes in temperatures as small increases in temperature can significantly influence the melting of snowpack. In addition to water supply impacts, shifts in weather conditions can influence water demands by approximately five percent when compared to average conditions. LADWP continues to monitor the latest developments to advance the accuracy of hydrologic forecasts and projections to improve resources planning efforts that better respond to natural hydrologic variability and other potential future climate risks.[65]

MWD also continues 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 Plan, described above.[66]

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. California Water Plan Update 2018 provides recommended actions, funding scenarios, and an investment strategy to bolster efforts by water and resource managers, planners, and decision-makers to overcome California's most pressing water resource challenges.[67] Furthermore, California Water Plan Update 2023 will promote climate resilience across regions and water sectors with a statewide vision, clear goals, watershed planning framework and toolkit, and progress-tracking dashboard of indicators.[68] DWR completed its Climate Action Plan in 2020.[69] Phases I and II of the Climate Action Plan

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64 Los Angeles Almanac, Total Seasonal Rainfall (Precipitation) Westwood, Los Angeles—UCLA Campus, www.laalmanac.com/weather/we135a.php, accessed October 19, 2021.

65 Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, p. 12-1, May 2021.

66 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, Appendix F, p. A-9.

67 California Department of Water Resources, Update 2018, https://water.ca.gov/Programs/California-Water-Plan/Update-2018, accessed February 24, 2022.

68 California Department of Water Resources, Update 2023, https://water.ca.gov/Programs/California-Water-Plan/Update-2023, accessed February 24, 2022.

69 California Department of Water Resources, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed February 24, 2022.

include the guidance of DWR in reducing greenhouse gas emissions and the expertise of a climate change technical advisory group formed in 2012, respectively. As part of Phase I, DWR's Greenhouse Gas Emissions Reduction Plan was completed in 2012 and updated in 2020. As part of Phase II, DWR completed a Climate Change Analysis Guidance in 2018. Phase III of the Climate Action Plan was completed in 2020 with a Climate Change Vulnerability Assessment in 2019 and Climate Change Adaption Plan in 2020 regarding DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.[70] As such, climate change and its impacts on water supplies are key factors of new water supply regulations and urban water management plans.

(f) Water Conservation and Recycling

LADWP has developed many progressive water conservation and use efficiency programs in conjunction with state and local conservation ordinances and plumbing codes to achieve water conservation throughout its service area and customer classes (refer to Subsection 2.a, Regulatory Framework, above for a summary of these plans and regulations). Specifically, to meet multiple water conservation goals established in the Sustainable City pLAn 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.[71] Following the target reduction of potable water use per capita by 25 percent by 2035, the Green New Deal adds an additional target for the City to maintain or reduce 2035 per capita water use through 2050.[72] The Green New Deal also has a target to recycle 100 percent of all wastewater for beneficial reuse by 2035.[73] 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.

Since the inception of LADWP's conservation programs, the estimated cumulative annual active savings is over 150,000 afy. In addition, LADWP completed a Stormwater Capture Master Plan in 2015 to comprehensively evaluate stormwater capture potential within the City. Stormwater capture can be achieved by increasing infiltration into groundwater basins and by on-site capture and reuse of stormwater for landscape irrigation (i.e., direct use). The total baseline amount of stormwater captured is 64,000 af. The implementation of additional centralized and distributed stormwater capture projects and programs, in development and in construction, could provide for increased groundwater

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70 California Department of Water Resources, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed October 19, 2021.

71 Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

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

73 Baseline from LASAN: In Fiscal Year 2017–2018, 27 percent of wastewater was recycled.

recharge in the amount of 66,000 afy and increased direct use in the amount of 2,000 afy. Under LADWP's current implementation strategy, the total estimated stormwater capture capacity is projected to be 155,000 afy by 2035. LADWP also has numerous programs and strategies in place to recycle water, including the existing production of recycled water for irrigation totaling 36,392 afy in fiscal year-end 2020, and coordination with LASAN to develop non-potable water reuse projects.[74,75]

(2) Water Demand

(a) Regional Water Demand

LADWP's 2020 UWMP provides water demand and supply projections in five-year increments to 2045, based on projected population estimates provided by the SCAG in its 2020–2045 RTP/SCS. Table IV.M.1-4 on page IV.M.1-28 shows LADWP's water demand and supply projections from 2025 through 2045. As shown in Table IV.M.1-4, LADWP's water supply would be equal to the water demand within LADWP's service area during average, single-dry and multi-dry years from 2025 through at least 2045.[76] LADWP's 2020 UWMP, therefore, concludes that adequate water supplies would be available to meet the projected demands within the LADWP service area under average, single-dry, and multi-dry year conditions through 2045.[77] 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.[78]

(b) On-Site Water Demand

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with approximately 743,680 square feet of studio-related uses, including approximately 95,540 square feet of sound stage uses; 325,450 square feet of production support uses, such as storage and mills; 163,090 square feet of production office space; and 159,600 square feet of general office space. As discussed in the Utility Report, based on LADWP data, the existing water demand associated with the existing

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74 The 36,392 afy of recycled water was used for municipal, industrial and environmental uses.

75 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, p. 17.

76 Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

77 Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. ES-28.

78 Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, pp. 11–19.

Table IV.M.1-4
LADWP Water Demand and Supply Projections

Hydrologic Conditions	Year (af)				
	2025	2030	2035	2040	2045
Demand[a]					
Average Year	642,600	660,200	678,800	697,800	710,500
Single-Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year[b]	657,900	675,800	694,900	714,400	727,400
Supply					
Average Year	642,600	660,200	678,800	697,800	710,500
Single-Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year[b]	657,900	675,800	694,900	714,400	727,400

af = acre-feet

[a] *Note that this total demand number is conservative as it only includes passive conservation prior to fiscal year-end 2014.*

[b] *First year of multi-dry year.*

Source: Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, Exhibits 11E, 11F, and 11G, May 2021.

uses to be removed is approximately 29,745 gpd or 33.32 afy, and the total existing demand at the Project Site is an estimated 44,662 gpd.[79]

(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 extensive distribution system that includes 115 tanks and reservoirs, 84 pump stations, nine ammonization stations, 22 chlorination stations, 329 regulator and relief stations, 7,336 miles of distribution mains and trunk lines, and 60,988 fire hydrants within the City, with a total storage capacity of 323,820 af according to the estimates for fiscal year 2019–2020.[80]

[79] Existing water use is based on the average of LADWP's five-year billing records from January 2015 to December 2019 (at LADWP's discretion, the water billing records from 2020 and 2021 were excluded due to potential effects on operations related to the COVID-19 pandemic). LADWP estimated the existing water usage for the land uses to be removed under the Project by applying the ratio of square footage to be removed to the average of LADWP's billing records. That number was extrapolated to estimate the total existing water usage on-site.

[80] LADWP, 2019–2020 Briefing Book, 2020.

Water service is available to the Project Site via LADWP water lines within the adjacent streets. According to the Utility Report, included as Appendix O of this Draft EIR, there is an eight-inch water line in Fairfax Avenue that heads south and turns at 1st Street. Per record drawings, the Project Site has two points of connection that come from a 12-inch water line in Fairfax Avenue and an eight-inch water line in Beverly Boulevard.[81] According to the Utility Report, there are six existing LADWP fire hydrants surrounding the Project Site. Specifically, there are two existing fire hydrants along the northern property line on Beverly Boulevard, two fire hydrants along the western property line on Fairfax Avenue and two fire hydrant along the eastern property line on The Grove Drive.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, 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.***[82]

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

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

- The total estimated water demand for the project;

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81 KPFF Consulting Engineers, TVC 2050 Project–Utility Infrastructure Technical Report: Water, Wastewater and Energy, March 2022.

82 Refer to Section IV.M.2, Utilities—Wastewater, of this Draft EIR for a discussion of wastewater impacts; Section IV.G, Hydrology and Water Quality of this Draft EIR for a discussion of stormwater impacts; and Section IV.M.3, Utilities—Energy Infrastructure, of this Draft EIR for a discussion of electric power, natural gas, and telecommunication impacts.

- 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

The analysis of the Project's impacts to water supply is based on the WSA prepared by LADWP for the Project pursuant to SB 610, included as Appendix N of this Draft EIR. The WSA includes a conservative calculation of the Project's anticipated water demand by applying the City Department of Public Works, Bureau of Sanitation's (LASAN) wastewater generation rates to the proposed land uses associated with the Project. Additionally, per the WSA, existing water demand for the uses to be removed was estimated by applying a ratio of square footage to be removed to the average of LADWP's five-year billing records from January 2015 to December 2019. The most recent water billing records from 2020 and 2021 were excluded at LADWP's discretion due to potential effects on operations related to the COVID-19 pandemic. The WSA accounts for certain reductions in Project water demand associated with the implementation of water conservation features. In accordance with SB 610, the resulting net demand for water associated with the Project is then analyzed relative to LADWP's existing and planned future water supplies to determine if LADWP would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry years.

The analysis with regard to water infrastructure is based on the Utility Report prepared for the Project by KPFF Consulting Engineers, which is included in Appendix O of this Draft EIR. The Utility Report includes a comparison of the estimated net water demand for the Project to the available capacity of the existing water infrastructure.

c. Project Design Features

The following Project design feature, which is based on the Project's WSA commitment letter, would be implemented as part of the Project with regard to water supply and infrastructure:

Project Design Feature WAT-PDF-1: In addition to any existing applicable regulatory requirements, the Project design will incorporate the following water conservation features to support water conservation:

- High-Efficiency Toilets with a flush volume of 1.1 gallons per flush or less.
- Showerheads with a flow rate of 1.5 gallons per minute or less.
- ENERGY STAR Certified Residential Dishwashers—standard with 3.0 gallons/cycle or less.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).

In addition, per Project Design Feature GHG-PDF-1 set forth in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would incorporate efficiency and conservation features capable of achieving the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold rating or equivalent green building standards. These measures include, but are not limited to, the following: use of Energy Star appliances (e.g., water heaters) consistent with CCR Title 20 (Appliance Efficiency Regulations); reducing indoor water use by at least 20 percent; plumbing fixtures (water closets and urinals) and fittings (faucets) that exceed LAMC performance requirements; and weather-based irrigation system and water-efficient landscaping with use of drought tolerant plants in up to 60 percent of the proposed landscaping.

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?[83]

(1) Impact Analysis

(a) Construction

As discussed in the Utility Report included as Appendix O of this Draft EIR, the Project would include the construction of new, on-site water distribution lines to serve the proposed new buildings. Construction impacts associated with the installation of water

[83] Refer to Section IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of wastewater impacts; Section IV.G, Hydrology and Water Quality, of this Draft EIR for a discussion of stormwater impacts; Section IV.C, Energy, 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.

distribution lines would primarily involve trenching in order to place the water distribution lines below ground and would be limited to on-site water distribution and minor off-site work associated with connections to the public main lines. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of any proposed ground disturbance activities to avoid water lines and disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). The limited off-site construction activities could also temporarily affect access in adjacent rights-of-way. However, as discussed Section IV.K, Transportation, of this Draft EIR, a Construction Traffic Management Plan (Project Design Feature TR-PDF-1) would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure that emergency access to the Project Site and traffic flow are maintained on adjacent rights-of-way.

Water demand during construction of the Project would include, but would not be limited to, dust control, cleaning of equipment, and excavation and grading/recompaction activities. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd). Based on LADWP records for the Project Site, the existing total water use is approximately 44,662 gpd. Therefore, the existing water infrastructure has the capacity to meet the limited and temporary water demand associated with construction of the Project. As such, water needed during construction would not result in the construction of new or expanded water distribution facilities, and the existing on-site LADWP water infrastructure system would be adequate to provide for the water flow necessary to serve the Project during construction.

Overall, construction activities associated with the Project would not require or result in the relocation or construction of new water facilities or expansion of existing facilities that could cause a significant environmental effect. As such, construction-related impacts on water infrastructure would be less than significant.

(b) Operation

Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. As discussed in the Utility Report, while domestic water demand is typically the main contributor to operational water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and, therefore, are the primary means for analyzing infrastructure capacity. Nevertheless, conservative analyses for both fire suppression and domestic water flows have been completed for the

Project. These analyses are summarized below and described in more detail in the Utility Report included as Appendix O of this Draft EIR.

Fire flow for the Project would comply with LAMC Section 57.507.3.1, which establishes fire flow standards by development type. The required fire water flow for the Project Site has been set at 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously with a minimum residual water pressure of 20 psi, which corresponds to the Industrial and Commercial land use category. As discussed above, there are six existing fire hydrants adjacent to the Project Site. As part of the Utility Report included in Appendix O of this Draft EIR, an Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP to determine the available fire hydrant flow from all six of the existing public fire hydrants. Based on the completed IFFAR (see Exhibit 2 of Appendix O of this Draft EIR), all six of the existing public fire hydrants (two on Beverly Boulevard, two on Fairfax Avenue, and two on The Grove Drive) flowing simultaneously can deliver a combined flow of approximately 9,000 gpm, which meets the required flow established for the Project. Therefore, based on the IFFAR, there is adequate fire flow available for the Project to comply with the fire flow requirements identified for the Project in accordance with LAMC Section 57.507.3.1. Furthermore, as provided in Section IV.J.1, Public Services—Fire Protection, of this Draft EIR, in accordance with LAMC Section 57.507.3.3 , the Project would incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting phase of the Project and would reduce public hydrant demands. Based on LAMC Section 94.2020.0 that adopts by reference the National Fire Protection Association (NFPA) 14-2013, including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm.

With regard to the domestic water infrastructure, new domestic services would be connected from the existing 12-inch water line in Fairfax Avenue and the eight-inch water line in Beverly Boulevard. No expanded main water facilities would be required by the Project.

Additionally, a Service Advisory Request (SAR) was submitted to LADWP to determine if the existing public water infrastructure could meet the demands of the Project. The approved SAR, which is inclusive of the Project's anticipated domestic water demands, shows that the existing infrastructure is sufficient to meet the estimated maximum water demand of the Project. Refer to the analysis under Threshold (b) below for details regarding the water demand associated with the Project.

Based on the above, the Project would not exceed the available capacity of the existing water distribution infrastructure that would serve the Project Site. Accordingly, the Project 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, the Project's operational impacts on water infrastructure would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

Water demand during construction of the Project would include, but would not be limited to, dust control, cleaning of equipment, and excavation and grading/recompaction activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd. Based LADWP records for the Project Site, the existing total water use is approximately 44,662 gpd. In addition, the anticipated water demand associated with construction activities would also be less than the net new water consumption of the Project at buildout set forth in Table IV.M.1-5 and Table IV.M.1-6 on pages IV.M.1-35 and IV.M.1-37, respectively, in the analysis below. As stated in the WSA and summarized below, LADWP concluded that the projected water supplies for average, single-dry, and multiple-dry years reported in LADWP's 2020 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2045. Therefore, the Project's temporary and intermittent demand for water during construction could be similarly met by the City's available supplies during each year of Project construction.

Table IV.M.1-5
Estimated Project Water Demand—Proposed Development Program

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit)[a]	Demand (gpd)
Existing Uses to be Removed			
Sound Stages	41,360 sf	—	—
Production Support	302,340 sf	—	—
Production Office	98,490 sf	—	—
General Office	53,670 sf	—	—
Total Existing Demand to be Removed			***29,745***[b]
Proposed Uses[c]			
Sound Stages	295,820 sf	0.050	14,791
Production Support	80,890 sf	0.050	4,045
Production Office	635,400 sf	0.120	76,248
General Office	594,070 sf	0.120	71,288
Retail[d]	15,000 sf	0.025	375
Restaurant[d]	334 seats	30.000	10,020
Basecamp[e]	194,600 sf	0.030	5,838
Mobility Hub[f]	36,000 sf	0.050	1,800
Base Demand Adjustment[g]	—	—	4,065
Landscaping[h]	104,008 sf	—	9,872
Covered Parking[i]	1,503,600 sf	—	989
Cooling Tower	8,050 tons	—	169,533
Subtotal Water Demand	—	—	***368,864***
Less Required Ordinances Water Savings[j]	—	—	(67,071)
Project Water Demand	—	—	***301,793***[k]
Less Existing to be Removed	—	—	(29,745)
Less Additional Conservation[l]	—	—	(3,534)
Net Project Water Demand (Proposed – Existing – Additional Conservation)	—	—	**268,514**

sf = square feet

gpd = gallons per day

[a] *Rate source: LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, available at https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart.*

[b] *Based on LADWP's estimate of water use associated with the existing development to be removed as part of the Project. This estimate was derived by applying a ratio of the demolished area to the average of the five-year water billing record from January 2015 to December 2019 (at LADWP's discretion, the water billing records from 2020 and 2021 were excluded due to potential effects on operations related to the COVID-19 pandemic). Additionally, as discussed in the WSA, up to an estimated 6,608 square feet of existing production office space and 38,068 square feet of existing general office space which would remain may ultimately be converted to basecamp/parking uses, which would result in a lower net*

Table IV.M.1-5 (Continued)
Estimated Project Water Demand—Proposed Development Program

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit)[a]	Demand (gpd)

additional water demand. Also, for a conservative estimate, it is assumed that the plumbing fixtures for the existing uses to remain would not be replaced.

[c] *The proposed uses do not include the existing floor areas that would remain, consistent with the data presented in the WSA.*

[d] *5,000 square feet of the retail uses are assumed to consist of restaurant uses with 334 seats for a conservative estimate. Seat count based on one seat per 15 square feet, as detailed in the WSA.*

[e] *Basecamp areas are dedicated to media production uses, parking, loading, and storage, where mobile facilities related to production are temporarily staged. Basecamp areas are not included in the total floor area.*

[f] *The proposed Mobility Hub area is not included in the total floor area.*

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

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

[i] *Automobile parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, assuming cleaning 12 times per year.*

[j] *The proposed land uses would comply with City of Los Angeles Ordinance No. 186488, Ordinance No. 184,248, the 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.*

[k] *The existing uses on-site generate a total water demand of approximately 44,662 gpd based on billing records obtained by LADWP. When accounting for the existing uses to be removed, the existing uses to remain under the Project result in a water demand of approximately 14,917 gpd. Thus, the total water demand generated by the Project under the proposed development program, including the existing uses to remain less additional conservation, would be 313,176 gpd.*

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

Source: LADWP, Water Supply Assessment for the TVC 2050 Project, Table 1A, adopted October 12, 2021.

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, the Project's construction-related impacts on water supply would be less than significant.

(b) Operation

As described in Section II, Project Description, of this Draft EIR, the Project would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the modernization and expansion of media production facilities within the approximately 25-acre Television City studio. The proposed Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated circulation

Table IV.M.1-6
Estimated Project Water Demand—Maximum Demand Scenario

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit)[a]	Demand (gpd)
Existing Uses to be Removed			
Sound Stages	41,360 sf	—	—
Production Support	302,340 sf	—	—
Production Office	98,490 sf	—	—
General Office	53,670 sf	—	—
Total Existing Demand to be Removed			***29,745***[b]
Proposed Uses[c]			
Sound Stages	295,820 sf	0.050	14,791
Production Support	80,890 sf	0.050	4,045
Additional Sound Stages or Production Support[d]	15,000 sf	0.050	750
Production Office	635,400 sf	0.120	76,248
General Office	594,070 sf	0.120	71,288
Restaurant[e]	334 seats	30.000	10,020
Basecamp[f]	194,600 sf	0.030	5,838
Mobility Hub[g]	36,000 sf	0.050	1,800
Base Demand Adjustment[h]	—	—	4,065
Landscaping[i]	104,008 sf	—	9,872
Covered Parking[j]	1,503,600 sf	—	989
Cooling Tower	8,050 tons	—	169,533
Subtotal Water Demand	—	—	***369,239***
Less Required Ordinances Water Savings[k]	—	—	(66,815)
Project Water Demand	—	—	***302,424***[l]
Less Existing to be Removed	—	—	(29,745)
Less Additional Conservation[m]	—	—	(3,556)
Net Project Water Demand (Proposed – Existing – Additional Conservation)	—	—	**269,123**

sf = square feet

gpd = gallons per day

[a] *Rate source: LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, available at https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart.*

[b] *Based on LADWP's estimate of water use associated with the existing development to be removed as part of the Project. This estimate was derived by applying a ratio of the demolished area to the average of the five-year water billing record from January 2015 to December 2019 (at LADWP's discretion, the water billing records from 2020 and 2021 were excluded due to potential effects on operations related to the COVID-19 pandemic). Additionally, as discussed in the WSA, up to an estimated 6,608 square feet of existing production office space and 38,068 square feet of existing general office space which would remain may ultimately be converted to basecamp/parking uses, which would result in a lower net*

Table IV.M.1-6 (Continued)
Estimated Project Water Demand—Maximum Demand Scenario

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit)[a]	Demand (gpd)

additional water demand. Also, for a conservative estimate, it is assumed that the plumbing fixtures for the existing uses to remain would not be replaced.

[c] *The proposed uses do not include the existing floor areas that would remain, consistent with the data presented in the WSA.*

[d] *Assumes that an additional 15,000 square feet of sound stages and/or production support would be developed in exchange for 15,000 square feet of retail uses in order to yield the maximum water demand under the proposed land use exchange program.*

[e] *5,000 square feet of the retail uses are assumed to consist of restaurant uses with 334 seats for a conservative estimate. Seat count based on one seat per 15 square feet, as detailed in the WSA.*

[f] *Basecamp areas are dedicated to media production uses, parking, loading, and storage, where mobile facilities related to production are temporarily staged. Basecamp areas are not included in the total floor area.*

[g] *The proposed Mobility Hub area is not included in the total floor area.*

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

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

[j] *Automobile parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, assuming cleaning 12 times per year.*

[k] *The proposed land uses would comply with City of Los Angeles Ordinance No. 186488, Ordinance No. 184,248, the 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.*

[l] *The existing uses on-site generate a total water demand of approximately 44,662 gpd based on billing records obtained by LADWP. When accounting for the existing uses to be removed, the existing uses to remain under the Project result in a water demand of approximately 14,917 gpd. Thus, the total water demand generated by the Project under the maximum demand scenario, including the existing uses to remain less additional conservation, would be 313,785 gpd.*

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

Source: LADWP, Water Supply Assessment for the TVC 2050 Project, Table 1A, adopted October 12, 2021.

improvements, parking, landscaping, and open space. The Specific Plan would provide development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, floor area from any permitted land use category may be exchanged for additional sound stage and production support uses as long as the limitations set forth in the Specific Plan are met. In particular, the total permitted floor area on-site must not exceed 1,874,000 square feet, and the sitewide floor area ratio must not exceed 1.75:1. For more information about the land use exchange component of the Specific Plan, see Section IV.H, Land Use and Planning, of this Draft EIR.

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. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is generally based on a calculation of the Project's water demand by applying the sewage generation rates established by LASAN, which also serve to estimate water demand, to the proposed uses.

As previously discussed, based on the proposed land uses and the Project's estimated water demand, the Project is subject to the requirements of SB 610 (preparation of a WSA, as described above in Subsection 2.a.(1)(c)). Specifically, the Project meets Criterion 2 (a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 square feet of floor space) and Criterion 3 (a commercial office building that will employ more than 1,000 persons or have more than 250,000 square feet of floor space) and thus also meets Criterion 6 (projects that include one or more of the above-identified categories). Therefore, a WSA was prepared for the Project and is provided in Appendix N of the Draft EIR.

Table IV.M.1-5 on page IV.M.1-35 shows the estimated water demand associated with the proposed development program detailed in Section II, Project Description, of this Draft EIR, while Table IV.M.1-6 on page IV.M.1-37 demonstrates a land use mix permitted under the land use exchange program that would generate the highest potential water demand for the Project (i.e., the maximum demand scenario). As shown therein, the Project could generate an estimated maximum new domestic water demand of up to approximately 302,424 gpd,[84] for a net increase of approximately 269,123 gpd over existing conditions, or approximately 301 afy, including water savings from compliance with applicable regulatory requirements and additional water saving features as set forth in Project Design Feature WAT-PDF-1, above.

Based on the projected water demand estimates for LADWP's service area from the 2020 UWMP identified previously in Table IV.M.1-4 on page IV.M.1-28, the Project's estimated net operational domestic water demand of 269,123 gpd (301 afy) under the maximum demand scenario would represent approximately 0.047 percent, 0.045 percent, and 0.046 percent of LADWP's projected 2025 average, single-dry, and multi-dry year water demand and supply, respectively.[85] Hence, the Project's domestic operational water demand would represent a miniscule proportion of LADWP's projected water demand and

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84 When accounting for the existing uses to remain, the total water demand generated by the Project under the maximum demand scenario would be approximately 317,341 gpd.

85 The Project is compared to LADWP's projected 2025 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2026. However, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043, as discussed further below.

supply in 2025. Furthermore, as stated in the WSA, LADWP concluded that the projected water supplies for average, single-dry, and multiple-dry years reported in LADWP's 2020 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and anticipated future water demands within LADWP's service area through the year 2045.[86] In addition, as outlined in its 2020 UWMP and discussed above, LADWP is committed to providing a reliable water supply for the City. 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 of Los Angeles will meet all new demand for water due to projected population growth by expanding local water supply programs and reducing demands on purchased imported water. The 2020 UWMP also furthers the goals of the Green New Deal (also discussed above), addresses the current and future SWP supply shortages, and concludes that MWD's actions in response to the threats to the SWP will ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, as reaffirmed in the Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.[87,88]

Lastly, the Project would not conflict with the applicable goals, objectives, and policies with regard to utilities set forth in Chapter 9, Infrastructure and Public Services, of the General Plan Framework Element. In particular, the Project would support Goal 9C to ensure an adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses, as well as Objective 9.9 to 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. Additionally, the Project would support Objective 9.10 to ensure that water supply, storage, and delivery systems are adequate to support planned development. The completed IFFAR and approved SAR demonstrate consistency with these goals and objectives, as analyzed above. Therefore, the Project would not conflict with these goals and objectives.

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 operational impacts on water supply would be less than significant.

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86 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, p. 21.

87 Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

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

(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 or included, and the impact level remains less than significant.

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring and Reporting Program (MMRP) throughout the term of the Development Agreement. The Specific Plan and MMRP would continue to regulate development of the Project site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, as previously discussed, LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Additionally, as stated in the WSA for the Project, a determination was made by LADWP that the demand associated with the Project is included in its 2020 UWMP, which shows that there is an adequate 20-year water supply. Therefore, a long-term buildout scenario for the Project is already accounted for in the analysis herein. LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for the water supplies required to serve existing and projected demands within its service area. The main purpose of the UWMP is to forecast future water demands and water supplies under average and dry hydrologic conditions; identify future water supply projects; provide a reliability assessment for average, single dry year, and multi-dry years; and assess near-term drought risk. As such, should hydrologic conditions change under a long-term buildout scenario, LADWP has policies and procedures in place to address such changes and ensure an adequate water supply. Furthermore, with regard to water infrastructure capacity, the results of the conservative analyses of both fire suppression and domestic water flows completed for the Project would remain unchanged, as a long-term buildout scenario would not affect the maximum flow conditions evaluated above. While future years could generate greater service area demands, which could begin to strain the existing water distribution system in the surrounding area, LADWP continues to evaluate the need for infrastructure upgrades and expansion based on long-term growth and demand projections. As such, a later buildout date would not affect the

impacts or significance conclusions presented above. In addition, no changes to the proposed Project design feature would be necessary in the event of an extended buildout, except as needed to comply with future new or updated regulatory standards.

f. Cumulative Impacts

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. There are 68 related projects in the Project Site vicinity, as listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, 38 of which are located in the City of Los Angeles or the eastern portion of the City of West Hollywood which is within the LADWP service area. The projected growth associated with these 38 related projects is a conservative assumption regarding future development, as some of the related projects may not be built out by 2026, may never be built, or may be approved and built at reduced densities. To provide a conservative analysis, the future baseline forecast assumes that these 38 related projects would be fully built out by 2026, unless otherwise noted.

(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 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 an IFFAR, where applicable) 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 if existing infrastructure is determined to be 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/latest (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.[89] In addition, in accordance with City requirements, prior to ground disturbance, related projects would also coordinate with LADWP to identify the locations and depths of all lines. Furthermore, 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

[89] Los Angeles Department of Water and Power, 2018–2019 Water Infrastructure Plan.

requirements, pipe depths, and connection location(s) associated with the related projects. 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, related projects would also implement a Construction Traffic 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 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 sites and traffic flow is maintained on adjacent right-of-ways.

Lastly, as indicated in the Project-level analysis under Threshold (a) above, the Project would result in less-than-significant water infrastructure impacts. Thus, the Project's contribution to cumulative water infrastructure impacts would not be considerable.

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 or contribute considerably to cumulative water infrastructure impacts. As such, cumulative water infrastructure impacts would be less than significant.

(b) Water Supply

The geographic context for the cumulative impact analysis of water supply is the LADWP service area. As discussed previously, LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for the water supplies required to serve existing and projected demands within its service area. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045.

As identified in Section III, Environmental Setting, of this Draft EIR, there are 68 related projects located in the vicinity of the Project Site, 38 of which are located within the LADWP service area. The estimated water demand of these related projects is shown in Table IV.M.1-7 on page IV.M.1-44. As indicated therein, these related projects would generate a total estimated water demand of 2,889,782 gpd (3,237 afy). Together with the estimated 269,123 gpd (301 afy) of net water demand from the Project under the maximum water demand scenario, the total cumulative water demand would be 3,158,905 gpd (3,538 afy). These estimates are conservative because they do not take into account code-required water conservation measures or any additional water conservation measures proposed by each related project. Additionally, in most cases, the estimates do not account for the removal of existing uses and, thus, represent total water demand rather than the net increase over existing conditions.

Table IV.M.1-7
Cumulative Water Demand of Related Projects in LADWP Service Area

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Water Demand (gpd)
City of Los Angeles					
1	Beverly & Fairfax Mixed-Use 7901 W. Beverly Blvd.	Apartments	71 du	190 gpd/du	13,490
		Retail	11,454 sf	0.05 gpd/sf	573
2	Museum Square Office 5757 W. Wilshire Blvd.	Office	253,962 sf	0.12 gpd/sf	30,475
3	Academy Museum of Motion Pictures 6067 W. Wilshire Blvd.	Retail	5,000 sf	0.05 gpd/sf	250
		Restaurant	4,000 sf	30 gpd/seat[c]	4,000
		Museum	208,000 sf	0.03 gpd/sf	6,240
4	Jewish Family Service 320 N. Fairfax Ave.	Office	28,341 sf	0.12 gpd/sf	3,401
5	Edin Park 8001 W. Beverly Blvd.	Retail	12,685 sf	0.05 gpd/sf	634
		Restaurant	15,245 sf	30 gpd/seat[c]	15,245
6	1556–1564 Hi Point Street 1556 S. Hi Point St.	Apartments	45 du	190 gpd/du	8,550
7	Unified Elder Care Facility/Mixed-Use 8052 W. Beverly Blvd.	Synagogue	5,000 sf	3/gpd/seat[c,d]	143
		Apartments	102 du	190 gpd/du	19,380
		Medical Office	15,000 sf	0.12 gpd/sf	1,800
		Retail	1,000 sf	0.05 gpd/sf	50
8	8000 Beverly Mixed-Use 8000 W. Beverly Blvd.	Apartments	48 du	190 gpd/du	9,120
		Restaurant	7,400 sf	30 gpd/seat[c]	7,400
9	LACMA Renovation 5905 W. Wilshire Blvd.	(Museum)	(392,871 sf)	0.03 gpd/sf	(11,786)
		Museum	387,500 sf	0.03 gpd/sf	11,625
10	Third Street Mixed-Use 8000 W. 3rd St.	Apartments	45 du	190 gpd/du	8,550
		Affordable Housing	5 du	190 gpd/du	950
		Retail	6,252 sf	0.05 gpd/sf	313

Table IV.M.1-7 (Continued)
Cumulative Water Demand of Related Projects in LADWP Service Area

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Water Demand (gpd)
11	7951 Beverly Mixed-Use 7951 W. Beverly Blvd.	Apartments	51 du	190 gpd/du	9,690
		Affordable Housing	6 du	190 gpd/du	1,140
		Restaurant	6,294 sf	30 gpd/seat[c]	6,294
		Retail	1,142 sf	0.05 gpd/sf	57
12	830-840 Fairfax Avenue 800 S. Fairfax Ave.	Apartments	209 du	190 gpd/du	39,710
		Restaurant	1,600 sf	30 gpd/seat[c]	1,600
		Small Restaurant	750 sf	30 gpd/seat[c]	750
13	Third & Fairfax Mixed-Use 6300 W. 3rd St.	Apartments	331 du	190 gpd/du	62,890
		Retail	13,412 sf	0.05 gpd/sf	671
		Restaurant	7,500 sf	30 gpd/seat[c]	7,500
		Supermarket	63,082 sf	0.05 gpd/sf	3,154
14	Wilshire & Crescent Heights Mixed-Use 6245 W. Wilshire Blvd.	Apartments	158 du	190 gpd/du	30,020
		Condominiums	4 du	190 gpd/du	760
		Bank	4,200 sf	0.05 gpd/sf	210
		Coffee Shop	6,850 sf	25/gpd/seat[c]	5,708
15	Apartments 350 N. Hayworth Ave.	Apartments	18 du	190 gpd/du	3,420
		Affordable Housing	2 du	190 gpd/du	380
16	Apartments 400 N. Vista St.	(Apartments)	(6 units)	190 gpd/du	(1,140)
17	DOCS Surgical Hospital 6000 W. San Vicente Blvd.	Office	47,026 sf	0.12 gpd/sf	5,643
18	333 La Cienega Boulevard Project 333 S. La Cienega Blvd.	Apartments	145 du	190 gpd/du	27,550
		Supermarket	27,685 sf	0.05 gpd/sf	1,384
		Restaurant	3,370 sf	30 gpd/seat[c]	3,370
19	627 South La Brea Avenue 623–671 S. La Brea Ave.	Apartments	121 du	190 gpd/du	22,990
		Retail	13,037 sf	0.05 gpd/sf	652
		Hotel	125 rm	120 gpd/rm	15,000

Table IV.M.1-7 (Continued)
Cumulative Water Demand of Related Projects in LADWP Service Area

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Water Demand (gpd)
20	Wilshire & La Jolla Tower 6401–6419 Wilshire Blvd.	Apartments	90 du	190 gpd/du	17,100
		Retail	5,100 sf	0.05 gpd/sf	255
21	Mid-City Vons 1430 S. Fairfax Ave.	Supermarket	55,920 sf	0.05 gpd/sf	2,796
22	La Brea Gateway 915 N. La Brea Ave.	Apartments	179 du	190 gpd/du	34,010
		Supermarket	33,500 sf	0.05 gpd/sf	1,675
23	Mixed-Use 5411 W. Wilshire Blvd.	Apartments	310 du	190 gpd/du	58,900
		Affordable Housing	38 du	190 gpd/du	7,220
		Retail	9,288 sf	0.05 gpd/sf	464
		Restaurant	4,346 sf	30 gpd/seat[c]	4,346
		Café	1,000 sf	25/gpd/seat[c,e]	833
24	904–932 North La Brea Mixed-Use 904 N. La Brea Ave.	Apartments	169 du	190 gpd/du	32,110
		Retail	37,057 sf	0.05 gpd/sf	1,853
25	656 S. San Vicente Medical Office 656 S. San Vicente Blvd.	Medical Office	140,305 sf	0.12 gpd/sf	16,837
		Drugstore	1,000 sf	0.05 gpd/sf[f]	50
		Restaurant	4,000 sf	30 gpd/seat[c]	4,000
City of West Hollywood					
26	900 Fairfax Avenue 900 Fairfax Ave.	Residential	6 du	190 gpd/du	1,140
		Retail	930 sf	0.05 gpd/sf	47
		Restaurant	2,318 sf	30 gpd/seat[c]	2,318
27	Mixed-Use 7965–7985 Santa Monica Blvd.	Restaurant	8,600 sf	30 gpd/seat[c]	8,600
		Entertainment	3,200 sf	0.72 gpd/sf[g]	2,304
		Retail	4,400 sf	0.05 gpd/sf	220
		Office	62,800 sf	0.12 gpd/sf	7,536
31	Faith Plating 7143 Santa Monica Blvd.	Residential	166 du	190 gpd/du	31,540
		Retail/Restaurant	9,300 sf	30 gpd/seat[c,k]	9,300

Table IV.M.1-7 (Continued)
Cumulative Water Demand of Related Projects in LADWP Service Area

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Water Demand (gpd)
32	7811 Santa Monica Boulevard 7811 Santa Monica Blvd.	Hotel	74 rm	120 gpd/rm	8,880
		Apartment	74 du	190 gpd/du	14,060
		Commercial	3,446 sf	0.05 gpd/sf	172
33	Mixed-Use 8555 Santa Monica Blvd.	Apartment	97 du	190 gpd/du	18,430
		Live/Work	12 du	190 gpd/du	2,280
		Restaurant	282,000 sf	30 gpd/seat[c]	282,000
		Retail	15,680 sf	0.05 gpd/sf	784
		Office	6,080 sf	0.12 gpd/sf	730
34	Retail 605 West Knoll Dr.	Retail	7,270 sf	0.05 gpd/sf	364
37	1040 North La Brea 1040 N. La Brea	Restaurant	5,240 sf	30 gpd/seat[c]	5,240
		Residential	8 du	190 gpd/du	1,520
		Hotel	91 rm	120 gpd/rm	10,920
38	7617 Santa Monica Boulevard 7617 Santa Monica Blvd.	Residential	71 du	190 gpd/du	13,490
		Retail	4,821 sf	0.05 gpd/sf	241
		Restaurant	4,419 sf	30 gpd/seat[c]	4,419
39	1001 Fairfax Avenue 1001 Fairfax Ave.	Condominium	35 du	190 gpd/du	6,650
		Retail	900 sf	0.05 gpd/sf	45
		Restaurant	900 sf	30 gpd/seat[c]	900
43	8497 Sunset Boulevard 8497 Sunset Blvd.	Apartments	9,775 du	190 gpd/du	1,857,250
		Commercial Space	11,520 sf	0.05 gpd/sf	576
44	8430 Sunset Boulevard 8430 Sunset Blvd.	Condominium	125 du	190 gpd/du	23,750
		Commercial	35,000 sf	0.05 gpd/sf	1,750
47	1250 Fairfax Avenue 1250 Fairfax Ave.	Apartments	53 du	190 gpd/du	10,070

Table IV.M.1-7 (Continued)
Cumulative Water Demand of Related Projects in LADWP Service Area

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Water Demand (gpd)
Infrastructure Projects					
68	Metro D (Purple) Line Extension	Provide extended rail service with seven new transit stations from Metro Wilshire/Western Station to Metro Westwood/Veterans Administration Hospital Station by year 2027. Construction of the first phase (Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega Stations) is anticipated to be completed and in operation by Year 2024. The Metro D Line Wilshire/Fairfax Station will be located south of the Project Site.		N/A. No comparable generation factor.	N/A
Related Projects Water Demand					**2,889,782 gpd [3,237 afy]**
Project Net Water Demand (Maximum Demand Scenario)					**269,123 gpd [301 afy]**
Total Cumulative Water Demand (Project + Related Projects)					**3,158,905 gpd [3,538 afy]**

( ) = to be removed/demolished
ac = acres
afy = acre-feet per year
du = dwelling units
gpd = gallons per day
mem = members
rm = rooms
sf = square feet
stu = student

[a] *Rate source (except where otherwise noted): LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, available at https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart.*

Table IV.M.1-7 (Continued)
Cumulative Water Demand of Related Projects in LADWP Service Area

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Water Demand (gpd)

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

[c] *Assumes 30 sf per seat or student.*

[d] *Two seatings assumed per week (Friday night and Saturday morning services).*

[e] *Sewage generation rates provided by LASAN do not include a rate for "Cafe" uses. Therefore, the most comparable land use rate of 25 gallons per seat per day for "Coffee House: Serves Prepared Food" is applied.*

[f] *Sewage generation rates provided by LASAN do not include a rate for "Drugstore" uses. Therefore, the most comparable land use rate of 50 gallons per day per 1,000 square feet for "Store: Retail" is applied.*

[g] *Sewage generation rates provided by LASAN do not include a rate for "Entertainment" uses. Therefore, the most comparable land use rate of 720 gallons per day per 1,000 square feet for "Bar: Cocktail, Public Table Area" is applied.*

[h] *Sewage generation rates provided by LASAN do not include a rate for "Research and Development" uses. Therefore, the most comparable land use rate of 250 gallons per day per 1,000 square feet for "Medical: Lab in Hospital" is applied.*

[i] *Sewage generation rates provided by LASAN do not include a rate for "Design Showroom" uses. Therefore, the most comparable land use rate of 120 gallons per day per 1,000 square feet for "Conference Room of Office Bldg." is applied.*

[j] *Sewage generation rates provided by LASAN do not include a rate for "Nightclub" uses. Therefore, the most comparable land use rate of 720 gallons per day per 1,000 square feet for "Bar: Cocktail, Public Table Area" is applied.*

[k] *Where uses are categorized as retail/restaurant, the generation factor for restaurant is used to provide a conservative analysis.*

[l] *Sewage generation rates provided by LASAN do not include a rate for "Arts Club" uses. Therefore, the most comparable land use rate of 11 gallons per day per student for "School: Arts/Dancing/Music" is applied to each member.*

[m] *Sewage generation rates provided by LASAN do not include a rate for "Screening Room" uses. Therefore, the most comparable land use rate of three gallons per day per seat for "Studio: Film/TV—Audience Viewing Room" is applied.*

Source: Eyestone Environmental, 2022.

Based on the projected water demand and supply estimates for LADWP's service area from the 2020 UWMP identified previously in Table IV.M.1-4 on page IV.M.1-28, the estimated total water demand of the Project and related projects of 3,538 afy would represent approximately 0.55 percent, 0.52 percent, and 0.54 percent of the 2025 water demand and supply within LADWP's service area during average, single-dry, and multi-dry years, respectively.[90] Hence, the water demand of the Project, together with the related projects, would represent a very small proportion of the LADWP's total 2025 water demand and supply, with the Project's share representing an even smaller proportion.

As previously stated, based on water demand projections in its 2020 UWMP, LADWP has determined that it will be able to reliably provide water to meet the existing and forecasted future demand through the year 2045. In addition, the Project and the related projects would comply with the numerous regulatory requirements that promote water conservation described in the Regulatory Framework subsection above, which would 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 related projects would be required to use fixtures that conserve water. In addition, certain large, related projects meeting the thresholds under SB 610 would be required to prepare and receive LADWP approval of a WSA that demonstrates how the project's water demand would be met.

Overall, as discussed above, LADWP's 2020 UWMP demonstrates that the City will meet all existing and projected future water demand through 2045 during average, single-dry, and multi-dry years. The 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 the City's Sustainability pLAn. 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. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that sufficient water supply continues to be available.

Lastly, as indicated in the Project-level analysis under Threshold (b) above, the Project would result in less-than-significant water supply impacts. Thus, the Project's contribution to cumulative water supply impacts would not be considerable.

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[90] The Project is compared to LADWP's projected 2025 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2026. However, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043, as discussed earlier.

Based on the above, it is anticipated that LADWP would be able to meet its existing water demands and the water demand associated with the Project and projected future growth within its service area through at least 2045. Therefore, the Project, together with the related projects, would not result in significant cumulative impacts related to water supply or contribute considerably to cumulative water demand. 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 or included, and the impact level remains less than significant.