IV. Environmental Impact Analysis

L.1 Utilities and Service Systems – Water Supply

1. Introduction

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

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on a Water Supply Assessment (WSA) prepared for the Project and adopted by LADWP and included in Appendix L-2 of this Draft EIR, along with a copy of Resolution No. 023051 approving the WSA. Additional technical information used in the analysis is based on the *Fourth & Central Utility Infrastructure Technical Report: Water, Wastewater, and Energy (*Infrastructure Report*)*, prepared for the Project by KPFF Consulting Engineers, dated February 2023, which is included in Appendix L-1 of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

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

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

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

(1) State

(a) California Urban Water Management Plan Act

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

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

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

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

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

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

if any; (3) a description and analysis of groundwater use in the past five years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

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

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

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

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.[2] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[3] Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to

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

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

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

August 2013 potable water production.[4] As provided in LADWP's 2020 Urban Water Management Plan, in accordance with SB X7-7, LADWP developed a final reported 2020 target of 142 gallons per capita per day. LADWP's actual gallons per capita per day in 2020 was 106 gallons per capita per day, less than the 2020 target.[5]

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

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

(e) California Code of Regulations

(i) Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures, such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018 is 1.8 gpm (gallons per minute) at 80 psi and for

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

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

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

7 California Department of Water Resources. SGMA Groundwater Management. https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management. Accessed January 2023.

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

(ii) CAL Green Code

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

(iii) Plumbing Code

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

(f) Executive Order B-40-17

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

8 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 2023.

(g) Executive Order N-10-21

On July 8, 2021 Executive Order N-10-21 (Order) was issued calling for voluntary cutbacks of water usage by 15% from 2020 usage levels. The Order lists commonsense measures Californians can undertake to achieve water usage reduction goals and identifies the State Water Resources Control Board (Water Board) for tracking of monthly reporting on the State's progress. The Order also directs State agencies, led by the Department of Water Resources and in coordination with local agencies, to encourage actions by all Californians, in their residential, industrial, commercial, agricultural, or institutional use, to reduce water usage, including through the statewide Save Our Water conservation campaign. Thirdly, the Order directs the Department of Water Resources to monitor hydrologic conditions such as cumulative precipitation, reservoir storage levels, soil moisture and other metrics, and the Water Board to monitor progress on voluntary conservation as ongoing indicators of water supply risk that may inform future drought response actions.

(2) Regional

(a) Metropolitan Water District

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

(i) 2020 Urban Water Management Plan

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

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

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

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

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

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

(ii) 2015 Integrated Resources Plan

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

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

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

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

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.[14]

The 2020 IRP planning process is currently in development.[15] The 2020 IRP analyzes multiple scenarios that could plausibly unfold in the future due to climate change, economic growth, legislation and regulations affecting water sources and demands, and other variables. With the variability of these impacts in mind, MWD is developing four scenarios to help understand the challenges of the future and effectively plan to ensure water reliability in the face of those challenges. These four scenarios include (A) low demand, stable imports; (B) high demand, stable imports; (C) low demand, reduced imports; and (D) high demand, reduced imports.[16,17]

(iii) Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[18]

(iv) Long-Term Conservation Plan

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

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

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

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

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

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

(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.

(3) Local

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

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. LADWP adopted the 2020 UWMP on May 25, 2021.The 2020 UWMP complies with the Urban Water Management Planning Act, builds upon the goals and progress made in the 2015 UWMP, and currently serves as the City's master plan for reliable water supply and resource management consistent with the City goals and objectives. The UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2050. Long range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

(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,

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

waste and landfills, housing and development, mobility and transit, and air quality, among others.[20] The Sustainable City pLAn was intended to be updated every four years.

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

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and 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

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

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

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

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

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

for City utilities, including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[25] The goals, objectives and policies are addressed by the City in its ordinances and preparation of its UWMP.

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

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

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

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

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

(i) Central City Community Plan

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

The Central City Community Plan includes within its purpose statement the promotion of "… an arrangement of land use, streets, and services which will encourage and contribute to health, safety, welfare and convenience of the people who live and work in the community."[26] The Community Plan identifies aging infrastructure as an issue, but does not provide specific policies regarding the provision of infrastructure facilities for individual development projects, which are routinely evaluated on a project-by-project basis.

(e) Los Angeles Municipal Code

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

- Ordinance No. 180,822-amended LAMC Chapter XII, Article 5 to establish water efficiency requirements for new development and renovation of existing buildings, and mandate installation of high efficiency plumbing fixtures in residential and commercial buildings.
- Ordinance No. 181,480-amended LAMC Chapter IX by adding Article 9 (Green Building Code) to the LAMC to incorporate various provisions of the CALGreen Code. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by (1) using water saving fixtures or flow restrictions and/or (2) demonstrating a 20-percent reduction in baseline water use.
- Ordinance Nos. 181,899 and 183,833-amended LAMC Chapter VI, Article 4.4, Section 64.72, regarding stormwater and urban runoff to include new requirements, including Low Impact Development (LID) requirements that promote water conservation.
- Ordinance No. 182,849-amended LAMC Chapter IX, Article 9 (Green Building Code) to mandate that for new water service or for additions or alterations requiring upgraded water service for landscaped areas of at least 1,000 square feet,

[26] City of Los Angeles Department of City Planning, *Central City North Community Plan*, 2003.

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 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 four-inch double fire hydrants or four-inch by four-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 Sources

LADWP is responsible for providing water for the City and various parts of Culver City, South Pasadena, and West Hollywood. LADWP ensures that the delivered water quality meets applicable California health standards for drinking water. Water is supplied to the City from the following sources: Los Angeles Aqueducts (LAA), local groundwater, imported water from the MWD and recycled water. **Table IV.L.1-2**, *LADWP Water Supply*, summarizes LADWP water supplies drawn from these sources over the last 10 years. As indicated therein, in 2021, LADWP had an available water supply of 508,359 AFY,

including 25 percent from the Los Angeles Aqueducts; ten percent from groundwater; 62 percent from the MWD; and two percent from recycled water.[27]

TABLE IV.L.1-2
LADWP WATER SUPPLY (IN ACRE-FEET)

Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage	Total
2017	224,724	50,439	216,299	8,032	9,350	**490,144**
2018	307,671	21,760	182,706	9,778	-200	**522,116**
2019	312,456	32,233	137,775	7,512	1,710	**488,266**
2020	292,095	34,363	152,647	9,641	1,155	**487,591**
2021	128,268	51,070	316,627	11,455	-938	**508,359**

SOURCE: Water Supply Assessment, Fourth and Central Project, Table 3 – LADWP Water Supply, August 2022

Less than one percent was drawn from LADWP's reservoir system or provided via transfer. LADWP's available water supply is generally equivalent to the demand from year to year, as LADWP purchases additional water from MWD only on an as-needed basis. These water sources are described in further detail below.

(a) Los Angeles Aqueducts

As discussed in the WSA for the Project, the City receives surface water and groundwater from the Eastern Sierra Nevada Mountains through the Los Angeles Aqueduct (LAA). LADWP constructed the first LAA in 1913 to convey water from the Eastern Sierra to the City. 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. Between 1992 and 2020, LADWP reduced deliveries to the City by approximately 177,000 AF 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 AFY 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. Please refer to the WSA in Appendix L-2 of this Draft EIR for additional discussion of the LAA.

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

(b) Local Groundwater Supplies

As discussed in the WSA for the Project, local groundwater provided approximately eight percent of the City's total water supply from FYE 2017 to FYE 2021.

The City's total adjudicated water rights are approximately 109,809 AFY, which are mostly located within the San Fernando Basin (SFB), Sylmar Basin, Central Basin, and West Coast Basin. Groundwater produced by the City from the San Fernando, Sylmar, and Central Basins for the last available five years are shown in **Table IV.L.1-3**, *Local Groundwater Basin Supply*.

TABLE IV.L.1-3
HISTORICAL LOCAL GROUNDWATER BASIN SUPPLY

Fiscal Year (July – June)	San Fernando	Sylmar	Central
Recent Years			
2016–2017	55,116	0*	3,005
2017–2018	22,259	0*	1*
2018–2019	36,870	1*	5*
2019–2020	35,949	2*	10*
2020–2021	53,625	1,368	2,247

* Small quantities pumped from Sylmar and Central Basin were for water quality testing purposes, not water supply

SOURCE(S): LADWP, Water Supply Assessment, Fourth and Central Project, Table IV, Historical Local Groundwater Basin Supply, August 2022.

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. The ULARA encompasses the San Fernando and Sylmar Basin. The Central Basin is a smaller source of groundwater supply for the City. The City has approximately 17,236 AFY of groundwater rights in this basin. The City also holds water rights in the Sylmar and Eagle Rock basins, which provide 3,570 AF and 500 AF, respectively. The majority of the Sylmar Basin's groundwater production facilities are inoperable due to high levels of contamination and deteriorated facilities. Although the City has the right to produce groundwater from Eagle Rock Basin, there are no current plans to establish groundwater production facilities here.

Also, LADWP holds the right to pump 1,503 AF from the West Coast Basin located in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. This basin has groundwater quality problems related to total dissolved solids (TDS), chloride, and hydrocarbon pollutants; therefore, LADWP has discontinued use of West Coast Basin facilities in 1980 until further studies are completed to restore groundwater pumping.

LADWP also has groundwater rights outside the of City. There are 3,975 AF of groundwater rights in the Antelope Valley Groundwater Basin. This basin only allows the native water rights to be used locally; however, LADWP would have the ability to store water it imports into the basin for future export. LADWP would be able to recover imported and stored water for export to the City at times when it is necessary to manage seasonal peak demand or augment supplies during dry periods, emergencies, or natural disasters.

For additional information and discussion of the basins referenced above, refer to WSA provided Appendix L-2 of this Draft EIR.

(c) Water Conservation and Recycling

LADWP's 2020 UWMP details the City's efforts to promote the efficient use and management of its water resources and provides the basic policy principles that guide LADWP's decision-making process to secure a sustainable water supply for the City in the next 25 years. To meet multiple water conservation goals established in the Sustainable City pLAn and the Water Conservation Act of 2009, LADWP's goal is to reduce potable water use per capita by 22.5 percent and 25 percent by 2025 and 2035, respectively, compared to FY 2013/14 average per capita consumption.[28] 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.[29]

Based on LADWP's 2020 UWMP, LADWP's recycled water use is projected to reach 50,900 AFY by FYE 2025 by adding 8,000 AFY of planned municipal/industrial use and 7,000 AFY of indirect potable reuse (groundwater replenishment), and further increase to 67,600 AFY through FYE 2045. Environmental reuse is expected to remain relatively constant at approximately 26,600 AFY.[30] Environmental uses include water delivery to the Japanese Garden and Lake Balboa in the Sepulveda Dam Recreation Area, and the Wildlife Lake in the Sepulveda Basin Wildlife Reserve.

LADWP has developed many progressive water conservation and use efficiency programs in conjunction with state and local conservation ordinances and plumbing codes to achieve water conservation throughout its service area and customer classes. Since inception of LADWP's conservation program, the estimated cumulative annual active savings is over 150,000 AFY. Additional savings are passive savings, achieved from codes, ordinances, and changes in customer behavior due to outreach and educational programs.[31]

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

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

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

31 LADWP, Fourth and Central Project Water Supply Assessment, page 15, September 2022.

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

(d) Stormwater Capture

Stormwater capture is another water supply resource for LADWP. Stormwater capture is achieved by infiltration into groundwater basins and by onsite capture and reuse of stormwater for landscape irrigation (i.e., direct use). In 2020, the stormwater capture capacity was 84,200 AFY. Through the implementation of additional centralized and distributed stormwater capture projects and programs per LADWP's current implementation strategy in its Stormwater Capture Master Plan (2015), the total estimated stormwater capture capacity is projected to be 155,000 AFY by 2035. This amount is between the conservative estimate of 132,000 AFY and aggressive scenario of up to 178,000 AFY by 2035.[32] For additional information and discussion of stormwater capture facilities and systems, refer to the WSA provided in Appendix L-2 of this Draft EIR.

(e) 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 twenty-six member agencies of MWD, the City through LADWP purchases water from MWD to supplement its water supplies from the LAA, local groundwater, and recycled water. Between FYE 2017 to FYE 2021, LADWP purchased an average of 201,211 AFY from MWD or approximately 40 percent of the City's total water supply.[33]

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 MWD Act. As of FYE 2021, LADWP has a preferential right to purchase 17.93 percent of MWD's total water supply.

MWD is a contractor for water from Northern California through the State Water Project's (SWP) California Aqueduct. MWD holds a contract for 1.912 million acre-feet (MAF) per year, or 46 percent of the total contracted amount of the 4.173 MAF ultimate delivery capacity of the SWP. However, this amount varies annually due to many factors. DWR annually approves the amount of contract allocations SWP receives.

MWD owns and operates the CRA. Since 1942, the CRA has delivered water from the Colorado River to Southern California. The Colorado River supplies come from watersheds of the Upper Colorado River Basin in the states of Colorado, Utah, and

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

33 LADWP, Fourth and Central Project Water Supply Assessment, page 18, September 2022.

Wyoming. Under a permanent service contract with the U.S. Secretary of the Interior, MWD is entitled to receive water from the Colorado River and its tributaries. California is apportioned 4.4 million AF, annually, plus one-half of any surplus that may be available for use, collectively, in Arizona, California, and Nevada. Of the California apportionment, MWD holds the fourth priority right to 550,000 AFY under the 1931 priority system governing allotments to California. Beyond the basic apportionment, MWD holds a fifth priority right to 662,000 AF of water. See Appendix F of the Project's WSA (see Appendix L-2 of this Draft EIR) for more details.

MWD has been developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of these water resource development plans. MWD's actions have been focused on the following: continuing water conservation, developing water supply management programs outside of the region, developing storage programs related to the SWP and the Colorado River, developing storage and groundwater management programs within the Southern California region, increasing water recycling, groundwater recovery, stormwater, and seawater desalination and pursuing long-term solutions for the ecosystem, regulatory and water supply issues in the California Bay-Delta.

(2) Water Demand

(a) Regional Demand - LADWP Water Reliability

LADWP's 2020 UWMP provides water supply and demand projections in five-year increments to 2045, based on projected population estimates provided by the Southern California Association of Governments (SCAG) in its Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).[34] LADWP's 2020 UWMP water supply and demand projections in five-year increments to 2045 for average year, single dry year, and multiple dry years are shown in: **Table IV.L.1-4**, *Service Area Reliability Assessment for Average Weather Year*, **Table IV.L.1-5**, *Service Area Reliability Assessment for Single Dry Year*, and **Table IV.L.1-6**, *Service Area Reliability Assessment for Multiple Dry Years (Year 5 of 5).* The analysis in Table IV.L.1-6 regarding multiple years is based on historic conditions that occurred between 1988 to 1992, with Year 5 (1992) presenting the worst-case conditions when supplies would be at their lowest. These tables show that LADWP can provide reliable water supplies under all three hydrologic scenarios through the 25-year planning period. 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 RTP/SCS adopted by SCAG.

[34] SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) Project Site Water Demand

The Project Site is currently developed with existing cold storage facilities, warehouses, and associated office spaces, and surface parking lots. According to the WSA prepared for the Project, the estimated existing water demand for the Project Site is approximately 12,700 gallons per day (gpd) or 14 AFY.[35] The existing water demand is based on LADWP's existing billing data.

[35] LADWP, Water Supply Assessment, Fourth and Central Project, Table 1 – Fourth and Central Project Calculated Total Additional Water Demand, September 2022.

(3) Water Infrastructure

(a) LADWP Service Area

Water infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 115 storage tanks and reservoirs, 84 pump stations, 7,326 miles of distribution mains and trunk lines within the City, and a total storage capacity of 323,820.[36] Much of the water flows north to south, entering Los Angeles at the LAA Filtration Plant in Sylmar, which is owned and operated by LADWP. Water entering the LAA Filtration Plant undergoes treatment and disinfection before being distributed throughout the LADWP's water service area.[37]

(b) Project Site

Domestic water service is available in the vicinity of the Project Site via LADWP water lines within the adjacent streets. According to the Infrastructure Report, five (5) water lines are located within the vicinity of the Project Site.[38] The first water main is a six-inch water line in 4th Street between Central Avenue and Alameda Street. There are two water lines within Central Avenue, one 30-inch main and one 16-inch main. A four-inch water line is located within Glady's Avenue, and the last water main is a 12-inch water line in Alameda Street.

In addition to providing domestic water service, LADWP provides water to the Project Site for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). According to the Infrastructure Report, there are eight (8) fire hydrants that could serve the Project Site. These fire hydrants are listed below and their locations are identified graphically in the IFFAR, Exhibit 1, Fire Hydrant Exhibit, of the Infrastructure Report.

- Fire Hydrant 1 (FH1), No. 3867, located along eastern side of Central Avenue near southern portion of South Site.
- Fire Hydrant 2 (FH2), No. 9031, located at intersection of Central Avenue and Gladys Avenue.
- Fire Hydrant 3 (FH3), No. 9377, located at southeastern corner of 4th Street and Central Avenue.
- Fire Hydrant 4 (FH4), No. 6418, located at northeastern corner of 4th Street and Central Avenue.
- Fire Hydrant 5 (FH5), No. 39445, located on east side Central Avenue near intersection with 4th Street.

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36 LADWP website. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=f06dh5pvk_21&_afrLoop=16215047628097, Accessed May 10, 2023.

37 LADWP, 2021–2022 Briefing Book, 2022.

38 KPFF Consulting Engineers, Infrastructure *Report*, page 6, May 2023.

- Fire Hydrant 6 (FH6), No. 3891, located along western side of Alameda Street near southern portion of South Site.
- Fire Hydrant 7 (FH7), No. 39063, located along eastern side of Alameda Street just south of South Site.
- Fire Hydrant 8 (FH8), No. 9381, located at southwestern corner of 4th Street and Central Avenue.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to water supply if it would:

Threshold (a): ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction of which would cause significant environmental effects;[39] or***

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

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

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

39 Electricity and natural gas are addressed in Section IV.C, *Energy*, and Section IV.L.4, *Electric Power, and Natural Gas Infrastructure*, of this Draft EIR; see also the Initial Study provided in Appendix A of this Draft EIR for a discussion of hydrology and water quality stormwater and telecommunications facilities.

b) Methodology

(1) Water Infrastructure

The analysis of impacts to water infrastructure is based on the analysis in the Infrastructure Report prepared for the Project (see Appendix L-1 of this Draft EIR). The Infrastructure Report includes a comparison of the estimated net domestic and fire flow water demand for the Project to the available capacity of the existing water infrastructure. Specifically, the Infrastructure Report summarizes the results of the following analyses performed by LADWP:

1. A hydraulic analysis of the water system to determine if adequate fire flow (which requires more water volume and pressure than domestic flow) is available from the existing fire hydrants surrounding the Project Site. LADWP's approach consisted of modeling the portion of their water system in the vicinity of the Project Site. Based on the results, LADWP determined whether their existing water infrastructure can meet the Project's fire hydrant flow needs. See Exhibit 1 of the Infrastructure Report for the results of the Information of Fire Flow Availability Request (IFFAR) for the fire hydrants evaluated.
2. Flow tests to determine if sufficient water conveyance is available for the Project. LADWP's approach provides data ranging from available static pressure (meaning how much pressure is available at the source before applying the Project's demand) to the available pressure at the maximum demand needed for the Project. Based on the results, LADWP determines whether they can meet the Project needs based on the existing infrastructure. See Exhibit 3 of the Infrastructure Report for the results of the Service Advisory Requests (SARs) for the eight-inch Central Avenue main, eight-inch 4th Street main and the eight-inch Alameda Street main.

(2) Water Supply

Per Section 10912 of the CWC, a WSA is required for the Project. As the Project was determined by the City of Los Angeles Planning Department to generate a water demand equal to or greater than the amount required by a 500-dwelling unit project, a WSA was prepared for the Project and approved by LADWP. The Project proposes a mixed-use development with ten buildings over three sites totaling up to 2,318,534 square feet. The findings of the WSA prepared by LADWP for the Project are summarized in this section, and the complete WSA is provided in Appendix L-2 of this Draft EIR. The analysis of Project demand for and availability of domestic water supplies is based on the findings of the WSA. The WSA determines the Project's net domestic operational water demand based on LASAN Sewer Generation Factors (SFG) as applied to the proposed Project uses, less water consumption by existing uses on the Project Site, code-required water conservation measures, and any additional conservation commitments made by the Applicant. The WSA then determines the availability of existing and future water supplies for the Project according to the projections contained within the LADWP's 2020 UWMP, in accordance with SB 610.

c) Project Design Features

Based on the commitments made by the Applicant to the LADWP (included as Appendix B to the WSA, itself provided in Appendix L-2 of this Draft EIR), the following Project Design Feature (PDF) to conserve water and reduce Project water demand will be implemented as part of the Project:[40]

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

- Fixtures for the entire Project
  - ENERGY STAR Certified Commercial Clothes Washers – utilizing less than a Water Factor of "4" and a max capacity of "6" cubic feet
  - ENERGY STAR Certified Residential Clothes Washers – Front-loading or Top-loading with Integrated Water Factor and capacity as follows:
    - Front-loading with capacity greater than "2.5" cubic feet: Integrated Water Factor of less than "3.2"
    - Top-loading with capacity greater than "2.5" cubic feet: Integrated Water Factor of less than "4.3" or less
    - Either front- or top-loading with capacity of less than or equal to "2.5" cubic feet: Integrated Water Factor of "4.0" or less
  - ENERGY STAR Certified Residential Dishwashers – standard with 3.2 gallons/cycle or less or compact with less than "3.1" gallons/cycle
  - Hybrid Waterless Urinals with a flush volume of 1 gallon per 72 hours, (WaterSense labels are not available for hybrid or waterless urinals)
  - WaterSense-labeled High Efficiency Toilets with a flush volume of "1.1" gallons per flush, or less
  - WaterSense-labeled Showerheads with a flow rate of 1.5 gallons per minute, or less in all residential units
- Landscape and irrigation
  - California Friendly® plants or native plants
  - Drip/Subsurface Irrigation (Micro-Irrigation)
  - Irrigation Controls programmed to real-time weather conditions
  - Leak Detection System for irrigation
  - Micro-Spray
  - Design and use where feasible water-efficient flowing/recirculating water features such as fountains in ways to reduce evaporation and makeup water

40 LADWP, WSA Appendix B, pages 2 and 3.

  - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
  - Rainwater Harvesting and Grey Water Use/Storage where and when feasible and if space is available for the system (e.g., tanks, pumps, and filtration systems). Greywater sources may include bathroom faucets, showers, clothes washers, and mechanical cooling condensate, among other allowable sources.
  - Xeriscaping (landscaping that reduces or eliminates the need for irrigation), while still ensuring that heat island effects are mitigated

- Pool
  - Install a meter on the pool make-up line so water use can be monitored, and leaks can be identified and repaired
  - Pool splash troughs around the perimeter that drain back into the pool
  - Pool/Spa recirculating filtration equipment
  - Reuse pool backwash water for irrigation
  - Water-Saving Pool Filter

- Utilities
  - Individual metering and billing for water use for every commercial unit
  - Individual meters for water supply and water subsystems to analyze water demand and identify additional water savings by tracking water consumption
  - Allocate space and clearance to support non-potable water (purple pipe) infrastructure with a connecting port for future connection to a municipal recycled water system when made available.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Construction would result in an intermittent demand for water during demolition, excavation, grading, and construction activities on-site, including but not limited to use in dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other related activities. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 5,000 to 10,000

gpd.[41] Furthermore, because construction activities within the North, South and West Sites would be phased to meet market demand and/or to maximize construction efficiency, daily water use during construction would not be expected to be on higher range of this estimate. Because there is capacity in the existing water infrastructure for the existing site conditions (estimated to be 12,700 gpd), the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project. Therefore, impacts on the water infrastructure due to construction activity would be less than significant.

In order to accommodate the Project's operational water use, the Project would require the construction of new, on-site water distribution lines to serve the new buildings. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the lines below surface. Installation of new water infrastructure will be limited to on-site water distribution, and minor off-site work associated with connections to the public water main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.[42] Further, as discussed in Section IV.J, *Transportation,* of this Draft EIR, in accordance with Project Design Feature TRAF-PDF-1, the Project would implement a Construction Management Plan to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of new water lines or connections to existing water lines would impede such access.

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

(b) Operation

When analyzing the capacity of the water infrastructure system to serve a project, the estimated operational demands for both fire suppression and domestic water are considered. Although domestic water demand would be the Project's main contributor to water demand in the long term, the Project's fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project as summarized in the Infrastructure Report included as Appendix L-1 of this Draft EIR. Specifically, see Exhibits 1 and 3 of the Infrastructure Report for the results of the IFFAR and SAR, respectively.

41 KPFF Consulting Engineers, Infrastructure Report, p. 12, February 2023.

42 KPFF Consulting Engineers, Infrastructure Report, p. 12, February 2023.

(i) Water Supply Infrastructure

(a) Fire Sprinkler Service Flows

The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which will be subject to LAFD review and approval during the design and permitting of the Project. Fire service flows to serve sprinkler systems in the new buildings has been estimated as the maximum allowable fire flow through new LADWP fire services. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm.

In addition, several LADWP SARs (see Exhibit 3 of the Infrastructure Report) were submitted in order to determine if the existing public infrastructure could meet the private water demands of the Project. The SARs for the water mains adjacent to the Project Site show a static pressure of 61-64 pounds per square inch with a flow of 2,500 gpm can be delivered to the Project Site on Central Avenue with a residual pressure of 54-59 pounds per square inch. The SARs for the 12-inch water main along Alameda Street show a static pressure of 62-64 pounds per square inch and that a flow of 2,500 gpm can be delivered to the Project Site with a residual pressure of 52-55 pounds per square inch. Thus, the fire service flows shown in the SARs are compliant with the Fire Code. Fire service flows are different from fire hydrant flows, which are discussed below.

(b) Fire Hydrant Flows

Fire demands have the greatest instantaneous impact on water infrastructure; therefore, the results of the IFFAR can be utilized as indication that the existing water infrastructure is sufficient. As stated in the Infrastructure Report, based on fire flow standards set forth in Section 57.507.3 of the LAMC, the Project falls within the High Density Industrial and Commercial category, which has a required fire flow of 12,000 gallons per minute (gpm) available to any block from hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch. This demand translates to a required hydrant flow of approximately 1,500 gpm each from the eight existing fire hydrants. An IFFAR was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The completed IFFAR, attached as Exhibit 1 of the Infrastructure Report, indicates that the closest eight hydrants can provide 11,750 gpm. Thus, as shown by the IFFAR, the Project Site currently does not have adequate fire hydrant flow available to demonstrate compliance with Section 57.507.3 of the LAMC. Accordingly, the existing shortage of fire hydrant flow required for the Project is considered to be a potentially significant impact.

(ii) Conclusion

Based on the above, while adequate domestic water pressure and flows are available to serve the Project (i.e., sprinkler system), because of the existing shortage in total fire hydrant flow to serve the Project, impacts regarding water infrastructure are considered to be potentially significant.

(2) Mitigation Measures

Refer to Mitigation Measure PS-MM-1 in Section IV.I.1, *Public Services – Fire Protection*, of this Draft EIR. Mitigation Measure PS-MM-1 is shown below. Mitigation Measure PS-MM-1 is required to address the potential impacts on water supply infrastructure due to a shortage in the existing fire hydrant flow.

> **PS-MM-1:** Prior to building occupancy, the Project shall implement the following improvements as shown in Exhibit 2 of the Infrastructure Report prepared for the Project by KPFF Consulting Engineers, dated May 2023: 1) upgrade approximately 110 linear feet of the existing six-inch line in 4th Street to an eight-inch line; 2) Relocate the hydrant (FH 16418) to the north due to the proposed 4th Street dedication and reconnect it to the upsized eight-inch line; and 3) Reconnect the hydrant (FH 9377) on the south to the upsized eight-inch line.

(3) Level of Significance After Mitigation

Mitigation Measure PS-MM-1 would increase the capacity in the existing six-inch line in 4th Street to allow for adequate fire hydrant flow to the Project Site. Potentially significant impacts related to water infrastructure (fire hydrant flows) would be reduced to a less than significant level with implementation of Mitigation Measure PS-MM-1. Upgrades to the water line in 4th Street and relocated fire hydrants as required by Mitigation Measure PS-MM-1 would ensure the combined fire hydrant flow to the Project Site meets the 12,000-gpm minimum requirement required by Section 57.507.3 of the LAMC.

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

(1) Impact Analysis

(a) Construction

As stated under Threshold (a), water would be required for Project construction activities, such as dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other related activities. Construction activities would be intermittent, with demand for water consumption variable but generally short-term and temporary in nature. As stated above and in the Infrastructure Report, based on a review of construction projects of similar size and duration, a conservative estimate of construction water demand would be approximately 5,000 to 10,000 gpd over the duration of construction. Using the upper range of 10,000 gpd to facilitate a more conservative analysis, water use of approximately 10,000 gpd would be substantially less than the Project's approved water consumption during long-term operation (as further detailed below) and below the existing site water demand. Considering temporary construction water use would be less than the existing site conditions and the approved water consumption at the Project Site, there would be sufficient water supplies available to serve the Project Site during construction.

Furthermore, the approved LADWP WSA determined that adequate water supplies exist to meet the Project's projected water demand between through 2045, in addition to the existing and planned future demands on LADWP.[43] As Project construction would require a nominal amount of water compared to Project operation, and construction is anticipated to commence as early as 2025 and is estimated to be completed within approximately five years, the Project's intermittent construction-related water demand can be met by LADWP's available water supplies during each year of construction through 2045. For these reasons, adequate water supplies would be available from existing entitlements and resources for Project construction activities. **Therefore, LADWP has sufficient water supplies to serve the Project and reasonably foreseeable future development during normal, dry, and multiple-dry years, and impacts on water supply during construction would be less than significant.**

(b) Operation

Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance and other activities on the Project Site. In accordance with SB 610, LADWP prepared a WSA for the Project, included as Appendix L-2 of this Draft EIR. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on estimates of the Project's operational water demand as compared to LADWP's existing and forecasted future water supplies and demand over the next 25-year period during normal, single-dry and multiple dry years as set forth in LADWP's 2020 UWMP. As indicated in the WSA, the estimates of Project operational water demand in the WSA are based on LASAN's sewage generation rates.

Estimated domestic water demand for the Project, as determined in the WSA based on LASAN's sewer generation rates, are shown in **Table IV.L.1-7**, *Estimated Project Water Demand*.

As indicated in Table IV.L.1-7, the Project would result in a net increase in domestic water demand of an estimated 392,197 gpd or 439 AFY. This estimate takes into account required water conservation features and the additional water conservation features committed to by the Project Applicant in the WSA (e.g., Project Design Feature WS-PDF-1).

43 LADWP, *WSA*, pp. 5.

TABLE IV.L.1-7
ESTIMATED PROJECT WATER DEMAND

Proposed Uses	Quantity	Water Use Factor (gpd/unit)[a]	Base Demand (gpd)	Required Ordinances Water Savings (gpd)[b]	Net Proposed Water Demand (gpd)	Net Proposed Water Demand (AFY)
Residential						
Residential Studio – Building 2,5,7,9,10	428 du	75/du	32,100			
Residential 1 Bedroom – Building 2,5,6,7,9,10	720 du	110/du	79,200			
Residential 2 Bedroom – Building 2,5,6,7,9,10	323 du	150/du	48,450			
Residential 3 Bedroom – Building 2	42 du	190/du	7,980			
Residential Live/Work – Building 7,9	8 du	185/du	1,480			
Total Residential Units Base Demand Adjustment[c]	1,521		18,639			
Residential Units Total			*187,849*	*46,080*	*141,769*	*158.8*
Hotel – Building 6	68 rooms	120.00	8,160			
Base Demand Adjustment			739			
Hotel Rooms Total			*8,899*	*971*	*7,928*	*8.88*
Gymnasium (Building 1,2,5,6,7,9,10)	11,000 sf	0.20/sf	2,200			
Health Club (Building 1,2,5,6,7,9,10)	8,000 sf	0.65/sf	5,200			
Community room/Conference Rooms (Building 1,2,5,6,9,10)	41,360 sf	0.12/sf	4,963			
Pet Grooming (Building 1,2,5,6,7,9,10)	3,500 sf	0.43/sf	1,488			
Rooftop Terrace/Lounge Area with pool (Building 2,5,6,7,9)[d]	54,608 sf	0.05/sf	2,730			
Residential Amenities						

TABLE IV.L.1-7
ESTIMATED PROJECT WATER DEMAND

Proposed Uses	Quantity	Water Use Factor (gpd/unit)[a]	Base Demand (gpd)	Required Ordinances Water Savings (gpd)[b]	Net Proposed Water Demand (gpd)	Net Proposed Water Demand (AFY)
Retail (Building 1,2,5,6,7,9,10)	45,266 sf	0.025/sf	1,132			
Office (Building 3,4,8)	411,113 sf	0.12/sf	49,334			
Restaurant (Building 1,2,3,4,5,6,6,7,8,9 – seating area[e])	4,553 seats	30.00	136,598			
Hotel Bar (Building 6)[f]	36 seats	30.00	1,094			
Car Wash (Building 1,5,6,7,8,9,10)[g]	42 cars	40.00	1,680			
Base Demand Adjustment			269			
Residential Amenities and Commercial Total			*206,687*	*6,427*	*200,260*	*224.34*
Landscaping and Pools [h]	*60,189 sf*		*5,995*	*2,864*	*3,131*	*3.51*
Covered Parking [i]	*1,014,982 sf*	*0.02/sf*	*667*	*0*	*667*	*0.75*
Cooling Tower [j]	*4,000 ton*	*19.31*	*77,220*	*15,444*	*61,776*	*69.20*
		Proposed Total	**487,317**	**71,786**	**415,531**	**465.49**
				Less Existing Uses to Be Removed	-12,700	-14
				Less Additional Conservation [k]	-10,634	-12
				Net Additional Water Demand	**392,197**	**439**

TABLE IV.L.1-7
ESTIMATED PROJECT WATER DEMAND

Proposed Uses	Quantity	Water Use Factor (gpd/unit)[a]	Base Demand (gpd)	Required Ordinances Water Savings (gpd)[b]	Net Proposed Water Demand (gpd)	Net Proposed Water Demand (AFY)

NOTE(S):

[a] Water Use Factor is based on City's Department of Public Works, Bureau of Sanitation sewer generation rates.

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

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

[d] Rooftop Terrace/Lounge Area with pool is a residential amenity that contains an outdoor kitchen.

[e] Restaurant Space. Total indoor and Outdoor Restaurant Floor Area is 68,299 sf. Indoor Restaurant Area is 55,822 sf and Outdoor Restaurant Area is 12,477 sf.

[f] Hotel Bar Floor Area is 547 sf.

[g] Car Wash Actual Water Use is 100 gallons/day as provided in the WSA Request Letter by the Applicant. AB 2230 (2012) requires 40 percent of the amount of water to be potable. Each Car Wash area is 600 sf; therefore total floor area of car wash is 4,200 sf.

[h] Landscaping & pool/spa water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance. Residential pool areas is 5,261 sf. Total landscaping is 54,928.

[i] Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption. Covered parking includes Bicycle Parking/Repair area, and excludes car wash area of 4,200 sf.

[j] The proposed project would use cooling towers for eight of the 10 buildings. The cooling tower's total load is 4,000 ton.

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

SOURCE: LADWP, Water Supply Assessment, Fourth and Central Project, Table I, Fourth and Central Project Calculated Total Additional Water Demand, August 2022.

LADWP determined in the approved WSA that there are adequate water supplies available from existing LADWP entitlements and supplies to meet the Project's projected water demand, in addition to existing and planned future demand on LADWP, annually during normal, single-dry, and multiple-dry water years over the next 20 years, as required by SB 610, as well as through at least 2045 (the planning horizon of the LADWP's 2020 UWMP). In addition, as stated in the WSA, the Project's water demand falls within the LADWP's 2020 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions during the planning period.[44] Further, the WSA found that the Project would be consistent with the demographic projections for the City in the 2020-2045 SCAG RTP/SCS.

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

(2) Mitigation Measures

Impacts related to sufficient water supply to serve the Project and reasonably foreseeable future development during normal, dry, and multiple-dry years would be less than significant; therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts would be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The Project, in conjunction with growth forecasted in the City through 2030 (i.e., the Project's buildout year), would increase the demand for water, thus potentially resulting in cumulative impacts on water supplies and water infrastructure. Cumulative growth in the Project Site vicinity through 2030 includes specific known development projects as well as general ambient growth projected to occur. As discussed in Chapter III, *Environmental Setting*, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 39 is a conservative assumption, as some of the related projects may not be built out by 2030, may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 39 are fully built out by 2030.

44 LADWP, *WSA*, September 2022, p. 20.

(1) Impact Analysis

(a) Water Infrastructure

Development of the Project, in conjunction with the related projects, would cumulatively increase service demand on the existing water infrastructure system. However, each related project would be subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. All projects are required to obtain a SAR, based on flow testing of facilities, to verify that there is available service. Individual projects are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval. Furthermore, LADWP, together with the City's Department of Public Works, conducts ongoing evaluations to ensure facilities are adequate and requires infrastructure system improvements as needed. **As discussed above, potentially significant Project-level impacts related to water infrastructure would be less than significant with implementation of Mitigation Measure PS-MM-1. Based on these facts and the above analysis relating to the Project's construction and operational impacts on the City's water infrastructure system, the Project's incremental effects with mitigation on the water infrastructure system would not be cumulatively considerable. Cumulative impacts on water infrastructure would be less than significant with mitigation.**

(b) Water Supply

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

The 39 related projects would contribute, in conjunction with the Project, to overall water demand from LADWP. As shown in Table IV.L.2-2, *Operational Cumulative Wastewater Generation*, in Section IV.L.2*, Utilities and Service Systems – Wastewater*, of this Draft EIR the estimated cumulative wastewater generation for the 39 related projects is 2,359,709 gpd. This is conservative, as the related projects' wastewater estimates represents gross generation, rather than net generation after removal of any existing uses. This estimate also does not account for water conservation measures associated with each related project, and therefore likely overstates wastewater generation. Because not all of the water used for the related projects enters into the sewer system, such as water used in parking areas, landscaping and other miscellaneous site maintenance activities, a factor of 110 percent is used to calculate the water demand of the related projects. Using this factor, the related

projects would have a cumulative water demand of 2,595,680 gpd or 2,910 AFY. Thus, the Project (439 net AFY) and the related projects would have a cumulative demand of 3,349 AFY, which would be well within the City's total increase of 51,300 AFY in water demand from 2030 to 2045.[45] These estimates are likely conservative (i.e., high) since they do not quantify code-required conservation or applicant conservation commitments that would reduce demand by the related projects or deduct for existing uses and assumes all the related projects would be fully built out.

As reported in the 2020 UWMP, the population within LADWP's service area increased from 2.97 million in 1980 to approximately 4.04 million in 2020, representing an average annual growth rate of approximately 0.8 percent.[46] Per the UWMP, it is anticipated that the LADWP service area would continue to grow over the next 25 years at a rate of 0.64 percent annually. This rate is similar to the historical 0.7 percent annual growth rate from 1980 to 2020 and will lead to approximately 765,112 new residents over the period from 2020 to 2045 per the 2020 UWMP, with a service population of 4,806,396 persons in 2045. In the near-term, the service population would be 4,374,240 in 2030, an increase of 334,240 persons from 2020. The total number of housing units increased from 1.10 million in 1980 to approximately 1.44 million in 2020, representing an average annual growth rate of approximately 0.8 percent. The total number of housing units estimated by the UWMP in 2045 is estimated to be 1,924,864, thus representing an increase of 484,864 units between 2020 and 2045. In the near-term, the number of housing units would be 1,608,479 in 2030, an increase of 168,479 units from 2020.The LADWP service area includes all of the City of Los Angeles and portions of the City of West Hollywood. The cumulative increase in population and housing growth of the Project and the related projects combined within the City of Los Angeles would be well within the LADWP's growth projections between 2020 and 2030.

As discussed in the water reliability section of the 2020 UWMP, LADWP expects to have a reliable supply of up to 724,900 af of water in 2045 under a multiple dry years scenario (See Table IV.L.1-6). In comparison, the cumulative demand of the related projects and the Project would be 3,349 AFY of water, which is within the water supply available in the LADWP service area.

Furthermore, in terms of the City's overall water supply, the water demand for projects that are consistent with the allowable land uses, building area, and density contained in the City's General Plan have been taken into account in the planned growth of the water distribution system. Development of each related project would be evaluated on a case-by case basis to determine if they are consistent with the allowable land uses and densities pursuant to the applicable zoning and land use designations. As previously stated, based on water demand projections through 2045 in LADWP's 2020 UWMP,

45 The increase in water demand for the City is derived from Table IV.L.1-6 above for Multi-Dry Years: 2045 total water demand (724,900 afy) – 2030 total water demand (673,600 afy) = 51,300 AFY.

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

LADWP determined that it will be able to reliably provide water to its customers through the year 2045, as well as the intervening years (including the Project's buildout year), based on the growth projections in SCAG's 2020-2045 RTP/SCS.

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

(2) Mitigation Measures

Cumulative impacts regarding water infrastructure were determined to be less than significant with mitigation (refer to Mitigation Measure PS-MM-1). Therefore, no additional mitigation measures regarding water infrastructure are required.

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

(3) Level of Significance After Mitigation

Cumulative impacts with regard to water infrastructure were determined to be less than significant with mitigation. Therefore, no additional mitigation measures were required or included, and the impact level remains less than significant with mitigation.

Cumulative impacts regarding water supply were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.