IV. Environmental Impact Analysis

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

1. Introduction

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

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on the *Utility Technical Report: Water and Energy* (Utility Report), prepared for the Project by KPFF Consulting Engineers, dated October 2023, included as Appendix K of this Draft EIR.[1]

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding water supply and infrastructure at the state, regional, and local levels that apply to the Project. Described below, these include:

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

[1] *KPFF Consulting Engineers, The Bloc Residential Tower*—Utility Technical Report: Water and Energy*, October 2023.*

- Sustainable Groundwater Management Act of 2014
- California Code of Regulations
  - Appliance Efficiency Regulations (Title 20)
  - California Green Building Standards Code
  - California Plumbing Code
- Executive Order B-40-17
- Executive Order N-10-21
- Executive Order N-7-22
- Executive Order N-5-23
- 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
- L.A.'s Green New Deal
- One Water LA 2040 Plan
- City of Los Angles General Plan, including
  - Framework Element; and
  - Central City Community Plan
- Los Angeles Municipal Code (Ordinance Nos. 180,822, 181,480, 181,899, 183,833, 182,849, 184,692, and 184,248)

(1) State

(a) California Urban Water Management Plan Act

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

Recent changes to the California Urban Water Management Planning Act further enhance state policies which promote resilience of the State's water supplies. For example, Senate Bill (SB) 664 requires urban water suppliers to include in their UWMPs a seismic risk assessment and mitigation plan to assess the vulnerability of each of the various facilities of a water system and mitigate those vulnerabilities. SB 606 requires UWMPs to include contingency plans addressing the possibility of prolonged water shortage conditions and further requires consideration of climate change impacts on water supplies. Additionally, SB 606 and Assembly Bill (AB) 1414 require drought risk assessment for a five-year historic drought sequence.

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

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

- Residential developments of more than 500 dwelling units;

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

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

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

SB 221 also addresses water supply in the land use approval process for large residential subdivision projects. However, unlike SB 610 WSAs, which are prepared at the beginning of a planning process, a Water Supply Verification (WSV) required by SB 221 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.[2] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

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

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.[3] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[4] Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.[5] 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.[6]

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[2] *California State Water Resources Control Board, Final 20 x 2020 Water Conservation Plan, February 2010.*

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

[4] *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.*

[5] *State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, updated October 3, 2017.*

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

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

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.[8] The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The SGMA provides 20 years for groundwater sustainability agencies to implement plans and 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) Appliance Efficiency Regulations (Title 20)

Title 20, Section 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures such as showerheads, lavatory faucets and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018 is 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi); and lavatory faucets manufactured after July 1, 2016 is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.[9]

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[7] *Sustainable Groundwater Management Act [And Related Statutory Provisions from SB 1168 (Pavley), AB 1739 (Dickinson), and SB 1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2016.*

[8] *California Department of Water Resources. SGMA Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed January 4, 2024.*

[9] *California Code of Regulations, Title 20, Section 1605.3(h), https://energycodeace.com/site/custom/public/reference-ace-t20/index.html#!Documents/section16053statestandardsfornonfederallyregulatedappliances.htm, accessed January 4, 2024.*

(ii) California Green Building Standards Code

Part 11 of CCR 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) California Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2022 California Plumbing Code, which is based on the 2021 Uniform Plumbing Code, has been published by the California Building Standards Commission and became effective January 1, 2023.[10]

(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 State Water Resources Control Board (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.

[10] *California Plumbing Code (CCR, Title 24, Part 5).*

(g) Executive Order N-10-21

On July 8, 2021, Executive Order N-10-21 was issued calling for voluntary cutbacks of water usage by 15 percent from 2020 usage levels. Executive Order N-10-21 lists commonsense measures Californians can undertake to achieve water usage reduction goals and identifies the SWRCB for tracking of monthly reporting on the State's progress. Executive Order N-10-21 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, Executive 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.

(h) Executive Order N-7-22

On March 28, 2022, Executive Order N-7-22 was issued to the SWRCB to consider adopting regulations by May 25, 2022 that require urban water suppliers with water shortage contingency plans to implement, at a minimum, shortage response actions for a shortage level of up to 20 percent (a "Level 2" shortage). On May 24, 2022, in response to the executive order, the SWRCB adopted a new emergency water conservation regulation. The new regulation bans irrigating turf at commercial, industrial, and institutional properties, such as grass in front of or next to large industrial or commercial buildings. The ban does not include watering turf that is used for recreation or other community purposes, water used at residences or water to maintain trees. The regulation also requires all urban water suppliers to implement conservation actions under Level 2 of their water shortage contingency plans.

(i) Executive Order N-5-23

On March 24, 2023, Executive Order N-5-23 was issued ending the voluntary 15-percent water conservation target. The order ended the requirement that the SWRCB consider requiring local water agencies to implement the demand reduction measures identified in Level 2 of their water shortage contingency plans. Lastly, Executive Order N-5-23 continued the ban on wasteful water uses required by Executive Order B-40-17.

(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 (City).

(i) 2020 Urban Water Management Plan

MWD's 2020 Urban Water Management Plan (2020 MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.[11] 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.[12] The analysis in the 2020 MWD UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[13] In the 2020 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.[14]

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

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[11] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021.*

[12] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 2-19.*

[13] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021 p. 2-19.*

[14] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021 p. 2-19.*

Southern California region. In addition, MWD is 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. Furthermore, 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 recent IRP (2015 IRP) was adopted in January 2016.[15] 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 to be

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

4,273,000 acre-feet and the total supply reliability target is approximately 4,539,000 acre-feet, representing an excess of 266,000 acre-feet.[16]

The 2020 IRP planning process is currently in development.[17] 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.[18]

(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.[19]

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

[17] *Metropolitan Water District of Southern California, The Integrated Water Resources Plan, www.mwdh2o.com/how-we-plan/integrated-resource-plan/, accessed October 13, 2023.*

[18] *Metropolitan Water District of Southern California, Preliminary Gap Analysis of the 2020 Integrated Resources Plan (Presentation), 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.

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

(iv) Long-Term Conservation Plan

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

(v) Water Supply Allocation Plan

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

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.[20] 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 2020 UWMP details LADWP's efforts to promote the efficient use and

[20] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016, p. 2-21.*

management of its water resources. LADWP's 2020 UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2045. Long range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). LADWP's water use efficiency goals include reducing per capita water use to 100 gallons per capita per day by 2035 and to maintain this usage through 2050.

(b) L.A.'s Green New Deal

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAn, which includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[21] 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, renamed 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.[22] L.A.'s 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.[23] 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

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

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

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

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.[24] 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.[25] 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 (Infrastructure and Public Services Chapter), of the City's Framework Element identifies goals, objectives, and policies for City utilities including water service. Goal 9C of the Infrastructure and Public Services Chapter is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[26] The goals, objectives and policies are addressed by the City in its ordinances and preparation of its UWMP.

The General Plan goals, objectives and policies related to water supply are shown in Table IV.J.1-1 on page IV.J.1-15.

(ii) 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 City's General Plan Framework at the local level and consist of both text and an

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

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

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

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

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

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

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. As discussed in Section IV.E, Land Use and Planning, of this Draft EIR, the Project is located within the Central City Community Plan area. The Central City Community Plan, last updated in 2003, does not include objectives or policies related to water supply and infrastructure.

(e) Los Angeles Municipal Code

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

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

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

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

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

- 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 also has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard

level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gpm in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 psi is to remain in the water system with the required gpm flowing. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5 inch by 4 inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

b. Existing Conditions

(1) Water Supply[27]

LADWP is responsible for providing water within the City's limits and ensuring that the water quality meets applicable California health standards for drinking water. As the Project Site is located within the City, LADWP is the water provider for the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts (LAA), local groundwater, purchased water from MWD, and recycled water.[28]

As shown in Table IV.J.1-2 on page IV.J.1-18, in 2021, the most recent year for which data is available, LADWP had an available water supply of 508,359 AFY. LADWP water sources are described in further detail below.

(a) Los Angeles Aqueducts

The City receives surface water and groundwater from the Eastern Sierra Nevada Mountains through the LAA. LADWP constructed the first LAA in 1913 to convey water from the Eastern Sierra to the City. In 1940, the LAA was extended 40 miles north from the Owens River to the Mono Basin. To meet additional water demands from the City, a second barrel of the LAA was constructed and completed in 1970. The second LAA

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[27] *The MWD maintains a website that may include information on programs or projects described in Appendix A of the WSA prepared for the West LA Commons Project (dated November 16, 2022); however, none of the information on MWD's website is part of the Official Statement. Therefore, this discussion of existing water supply conditions relies upon the WSA prepared for the West LA Commons Project.*

[28] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 11.*

Table IV.J.1-2
LADWP Water Supply

Calendar Year	Los Angeles Aqueducts (AF)	Local Groundwater (AF)	MWD (AF)	Recycled Water (AF)	Transfer, Spread, Spills, and Storage (AF)	Total (AF)
2016–2017	57,853	50,439	216,299	8,032	9,350	490,144
2017–2018	224,724	21,760	182,706	9,778	-200	522,116
2018–2019	307,671	32,233	137,775	7,512	1,710	488,266
2019–2020	312,456	34,363	152,647	9,641	1,155	487,591
2020–2021	292,095	51,070	316,627	11,455	-938	508,359

Units are in acre-feet.

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

Source: LADWP, Water Supply Assessment—West LA Commons Project, adopted November 16, 2022, Table III.

increased the City's capacity to deliver water from the Mono Basin and the Owens Valley from 485 cubic feet per second (cfs) to 775 cfs.[29]

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. Concerns over environmental impacts have required the City to reallocate approximately one-half of the LAA water supply to other uses within the Owens Valley and Mono Basin. Between 1992 and 2020, LADWP reduced deliveries to the City by approximately 177,000 AFY to supply water for a variety of environmental projects throughout the Eastern Sierra. Environmental enhancement and mitigation projects in the Mono Basin and Owens Valley that utilize water from the Eastern Sierra include Mono Basin releases, Lower Owens River Project, Owens Lake Dust Mitigation Program, as well as other environmental enhancement and mitigation projects and uses. When considering water allocations for these projects, the expected annual long-term Los Angeles Aqueduct delivery over the next 25 years could range from approximately 184,200 AFY to 192,000 AFY for average years.[30]

[29] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 11.*

[30] *LADWP, Water Supply Assessment—West LA Commons Project, adopted November 16, 2022, p. 12.*

As indicated in Table IV.J.1-2 on page IV.J.1-18, approximately 292,095 acre-feet (AF) of LADWP's water supplies were from the LAA in 2021. The average deliveries from the LAA from fiscal year 2016–2017 through fiscal year 2020–2021 were approximately 128,268 AF of water annually.

The sole reliance on LAA supply with impacts due to natural variability and water set aside for environmental projects is not sufficient to meet the City's annual water demands. Therefore, as summarized below, LADWP has implemented, and continues to increase, stormwater capture, local groundwater, water conservation, water use efficiency, and water recycling programs to address the reduction of LAA supplies. Additionally, LADWP can purchase supplemental imported water from MWD to meet the City's remaining water demands.[31]

(b) Local Groundwater Supplies

LADWP pumps groundwater from three adjudicated basins, including the San Fernando, Sylmar, and Central Basins. The City's total adjudicated groundwater rights are approximately 109,809 AFY.[32]

The San Fernando Basin (SFB) is the primary source of local groundwater for the City. The City's average groundwater rights in the SFB is 87,000 AFY. As of October 1, 2018, the City had accrued 591,460 AF of stored water credits.[33] LADWP is implementing its SFB Groundwater Remediation Program to help restore the capacity of SFB as a drinking water source and groundwater storage. LADWP also receives additional SFB water through the Los Angeles–Burbank Interim Interconnection Pipeline. In 2015, the City of Los Angeles and the City of Burbank entered into an agreement to construct and operate the Los Angeles–Burbank Interim Interconnection and began delivery of a minimum of 500 AF of blended water in August 2019. This connection began service in August 2019 and will operate for five years.[34]

The Central Basin is located in the southeastern part of the Los Angeles Coastal Plain in Los Angeles County. The City has approximately 17,236 AFY of groundwater rights in this basin, which was increased from the 15,000 AFY originally awarded.[35,36] With

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[31] *LADWP, Water Supply Assessment—West LA Commons Project, adopted November 16, 2022, p. 12.*

[32] *LADWP, Water Supply Assessment—West LA Commons Project, adopted November 16, 2022, p. 12.*

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

[34] *LADWP, Water Supply Assessment—West LA Commons Project, adopted November 16, 2022, p. 13.*

[35] *LADWP, 2020 Urban Water Management Plan, May 2021, p. 5-3.*

[36] *LADWP, 2020 Urban Water Management Plan, May 2021, p. H-56.*

additional carryover and storage of unused water rights, the City has accrued a total of 22,943 AF of stored water as of fiscal year-end 2020.[37]

The City holds water rights in the Sylmar, Eagle Rock, and West Coast Basins. The City's water rights in the Sylmar Basin is 3,570 AFY. The majority of the Sylmar Basin's groundwater production facilities are inoperable due to high levels of contamination and deteriorated facilities. The Mission Wellfield facility has been undergoing continued improvements since the early 2000s to replace the existing deteriorated facilities and restore the Sylmar Basin's groundwater production capacity. The City's water rights in the Eagle Rock Basin are 500 AFY. Although the City has the right to produce groundwater from the Eagle Rock Basin, there are no current plans to establish groundwater production facilities there. The West Coast Basin is located in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. LADWP has the right to pump 1,503 AFY from this basin. However, the West Coast Basin has groundwater quality problems related to total dissolved solids (TDS), chloride, and hydrocarbon pollutants; therefore, LADWP discontinued the use of West Coast Basin facilities in 1980 until further studies are completed to restore groundwater pumping.[38]

Table IV.J.1-3 on page IV.J.1-21, provides data regarding the groundwater produced for the City during the fiscal years of 2016–2017 through 2020–2021. As shown therein, during the 2020–2021 fiscal year, 53,625 AF were produced from the SFB, 1,368 AF were produced from the Sylmar Basin, and 2,247 AF were produced from the Central Basin.[39]

Local groundwater provided approximately 8 percent of the total water supply for Los Angeles from fiscal year-end 2017 to fiscal year-end 2021. In recent years, contamination issues have impacted LADWP's ability to fully utilize its local groundwater entitlements and provide groundwater supplies to support annual water demands. In response to this issue and to address the hydrologic variability impacts to imported water supplies, LADWP has focused on the sustainable management of its local groundwater basins. LADWP continues to invest in stormwater recharge projects to restore local groundwater basin levels as well as advanced treatment systems to produce purified recycled water for groundwater replenishment. Furthermore, LADWP has, and will continue to, conjunctively use the large groundwater basin within the City to store wet year LAA flows to supply water during dry periods.[40]

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

[38] *LADWP, Water Supply Assessment—West LA Commons Project, adopted November 16, 2022, p. 13.*

[39] *LADWP, Water Supply Assessment—West LA Commons Project, adopted November 16, 2022, p. 14.*

[40] *LADWP, Water Supply Assessment—West LA Commons Project, adopted November 16, 2022, p. 12.*

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

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

Units are in acre-feet.

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

Source: LADWP, , Water Supply Assessment—West LA Commons Project, adopted November 16, 2022, Table IV.

The City plans to continue to develop production from its groundwater basins in the coming years to offset reductions in imported supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection. There are additional groundwater basins near and within the Los Angeles area where LADWP is considering and exploring opportunities to develop groundwater resources in a manner that is locally sustainable and in cooperation with its regional partners.[41]

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for supplemental domestic and municipal uses in California. As one of the 26 member agencies of MWD, LADWP purchases water from MWD to supplement LADWP water supplies from the LAA, local groundwater, and recycled water.[42]

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

[41] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 14.*

[42] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 19.*

Metropolitan Water District Act.[43,44] As of June 30, 2021, LADWP has a preferential right to purchase 17.93 percent of MWD's total water supply.[45]

LADWP plans to reduce purchase of MWD water supplies through increased conservation, increased recycled water production, and enhanced groundwater pumping through stormwater capture and groundwater replenishment. As indicated in Table IV.J.1-2 on page IV.J.1-18, LADWP received approximately 152,647 AF and 316,627 AF of water from MWD in the fiscal years 2019–2020 and 2020–2021, respectively.[46] Summaries of MWD's individual supplies, along with each supply's challenges and specific responsive actions taken by MWD, are presented below.

(i) State Water Project

The SWP is one of MWD's two major sources of water. The SWP is owned by the State and operated by the Department of Water Resources (DWR) delivering municipal and industrial water to approximately 27 million of California's residents and 750,000 acres of farmland.[47] The SWP watershed encompasses the mountains and waterways around the Feather River in the Sacramento Valley of Northern California. The SWP facilities include a complex system of dams, reservoirs, powerplants, pumping plants, canals and aqueducts to deliver water. Water from rainfall and snowmelt runoff is captured and stored in SWP conservation facilities and then delivered through SWP transportation facilities to water agencies and districts located throughout the Upper Feather River, Bay Area, Central Valley, Central Coast, and Southern California. MWD receives water from the SWP through the main stem of the aqueduct system, the California Aqueduct, which is 444 miles long.[48]

MWD is the largest of the 29 SWP contractors, holding a contract for 1.912 million acre feet (MAF) per year, or 46 percent of the total contracted amount of the 4.173 MAF ultimate delivery capacity of the SWP.[49] However, in accordance with the State Water Contract with DWR, the contracted amount varies annually due to a number of

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[43] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 19.*

[44] *Metropolitan Water District Act, Chapter 2, Section 135.*

[45] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 19.*

[46] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Table III.*

[47] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-16.*

[48] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-16.*

[49] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 19.*

factors, including existing supplies in storage, forecasted hydrology, water quality, environmental flow obligations, and other operational considerations.[50] Due to water quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, SWP deliveries in the most critically dry years have declined. From calendar year 2012 through 2021, the amount of water received by MWD from the SWP varied from a low of 593,000 AF in calendar year 2015 to a high of 1,473,000 AF in 2017. In calendar year 2020, DWR's allocation to MWD was 382,300 AF. In 2021, DWR's allocation to MWD commenced as 10 percent and then was reduced to 5 percent (95,575 AF).[51]

Challenges to State Water Project Supply

Numerous factors have created challenges for the SWP. Based on DWR's 2021 Draft State Water Project Delivery Capability Report, all but five of the 29 SWP contractors receive SWP deliveries by diversions from the Delta. These diversion facilities are regulated by several state and federal agencies that maintain and enhance the Delta's long-term sustainability. Ongoing regulatory restrictions, such as those aimed at protecting the Delta estuary's resident and migratory fish species, are challenges to a reliable and sustainable water delivery capability for the SWP. In particular, a substantial decrease in SWP Delta exports occurred with new regulations that culminated in the federal Biological Opinions that went into effect in 2008–2009. Complications induced by climate change also pose a threat of increased variability in the frequency and magnitude of both floods and droughts in the Delta. In addition, the projected sea level rise caused by the increase in average temperature also complicates efforts to manage salinity levels in the channels affected by tides in the Delta. Furthermore, higher ocean levels could also result in more frequent water quality degradation in the Delta channels, requiring additional Delta outflow to maintain water quality objectives. Other challenges include the continued subsidence of Delta islands, many of which are already below sea level and supported by relatively unstable levee systems.[52] In addition to challenges within the Delta, various agreements and litigation regarding the State Water Contract have affected water supplies from the SWP.[53]

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[50] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-14.*

[51] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-16.*

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

[53] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, pp. A-17-19 and A-33-37.*

(ii) The Colorado River

The Colorado River was MWD's original source of water after MWD's establishment in 1928. MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. Water from the Colorado River and its tributaries is also available to other users in California, as well as users in the states of Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming, resulting in both competition and the need for cooperation among these holders of Colorado River entitlements.[54]

Construction of the CRA, which is owned and operated by MWD, was undertaken by MWD to provide for the transportation of its Colorado River water entitlement to its service area. The CRA originates at Lake Havasu on the Colorado River and extends approximately 242 miles through a series of pump stations and reservoirs to its terminus at Lake Mathews in Riverside County.[55] MWD holds the fourth and fifth priority rights to the Colorado River water supplies. Thus, water diverted by MWD is dependent on unused apportionment from other users.[56] Up to 1.25 million AF of water per year may be conveyed through the CRA to MWD's member agencies, subject to availability of Colorado River water for delivery to MWD.[57] Since 2003, MWD's net diversions of Colorado River water have ranged from a low of 537,607 AF in 2019 to a high of approximately 1,179,000 AF in 2015. Preliminary average annual net diversions for 2012 through 2021 were 909,585 AF, with annual volumes dependent primarily on programs to augment supplies, including transfers of conserved water from agriculture. In 2021, the preliminary total available Colorado River supply to MWD was just over one million AF. A portion of the available supply that was not diverted was stored in Lake Mead for future usage.[58]

Conveyance from the Colorado River has also experienced many challenges including persistent drought conditions, litigation, and the presence of endangered species.

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[54] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-24.*

[55] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-24.*

[56] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-24.*

[57] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-24.*

[58] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-25.*

(iii) MWD Actions to Address Supply

As summarized above in Subsection 2.a., Regulatory Framework, above, MWD has been developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. These plans include MWD's 2015 IRP, the 2020 MWD UWMP, the WSDM Plan, the LTCP and the WSAP. These long-term plans have been developed to meet MWD's member agencies' growing reliability needs through improvements to the SWP, conjunctive management efforts on the Colorado River, water transfer programs, outdoor conservation measures, and development of additional local resources, such as recycling, brackish water desalination, and seawater desalination.

Additionally, MWD has planned and prepared for dry conditions by investing in vital infrastructure to increase its storage capacity. MWD's storage as of January 1, 2022, is estimated to be 3.38 million AF. MWD is prepared to meet the water demands in its service area in calendar year 2022 using a combination of CRA deliveries, storage reserves and, if so determined, supplemental water transfers and purchases. MWD has initiated the process to withdraw from its dry-year storage reserves in the SWP banking programs and flexible storage accounts.[59]

(d) Precipitation Conditions

In 2021, California experienced its second consecutive dry year. As of May 9, 2021, northern Sierra precipitation was 48 percent of the 50-year average for that time of year, and the northern Sierra snowpack peaked on March 24, 2021 and measured at 72 percent of the April 1, 2021, average. As of May 1, 2021, the water year runoff forecast for the Sacramento River was 6.7 million acre footage or 38 percent of the average. An extended drought period is also ongoing in the Colorado River Basin, which is another source of water for southern California, as described above. The Upper Colorado River Basin snowpack accumulation peaked on March 29, 2021, and measured at 88 percent of the 30-year April 1 median.[60]

The City receives an average of 14.75 inches of precipitation per year according to the National Weather Service.[61] During the 2021–2022 rain season (extending from July 1, 2022, to June 30, 2023), Downtown Los Angeles received 28.40 inches of precipitation.[62]

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[59] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-11-12.*

[60] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-11.*

[61] *Los Angeles Almanac, Total Seasonal Rainfall (Precipitation) Downtown Los Angeles—USC Campus, www.laalmanac.com/weather/we13.php, accessed January 4, 2024.*

(e) Global Warning and Climate Change

As discussed in LADWP's 2020 UWMP, water supplies that are dependent on natural hydrology, such as LADWP's imported supplies and local groundwater, are susceptible to climate risks. Imported sources that originate from mountain snowpack are particularly sensitive to changes in temperatures as small increases in temperature can significantly influence the melting of snowpack. In addition to water supply impacts, shifts in weather conditions can influence water demands by approximately five percent when compared to average conditions. LADWP continues to monitor the latest developments to advance the accuracy of hydrologic forecasts and projections to improve resources planning efforts that better respond to natural hydrologic variability and other potential future climate risks.[63]

MWD also continues to study climate change and address the implications of climate change on water supplies. MWD has established a technical process to identify key vulnerabilities from various sources, including climate change, in order to provide comprehensive analyses within its IRP, described above.[64]

In addition, DWR addresses climate change impacts on water supply in its California Water Plan Updates, which also account for uncertainty, risk, and sustainability in planning for the future. California Water Plan Update 2018 provides recommended actions, funding scenarios, and an investment strategy to bolster efforts by water and resource managers, planners, and decision-makers to overcome California's most pressing water resource challenges.[65] Furthermore, California Water Plan Update 2023 will promote climate resilience across regions and water sectors with a statewide vision, clear goals, watershed planning framework and toolkit, and progress-tracking dashboard of indicators.[66] DWR completed its Climate Action Plan in 2020.[67] Phases I and II of the Climate Action Plan include the guidance of DWR in reducing greenhouse gas emissions and the expertise of a climate change technical advisory group formed in 2012, respectively. As part of Phase I, DWR's Greenhouse Gas Emissions Reduction Plan was completed in 2012 and updated in

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62 *Los Angeles Almanac, Total Seasonal Rainfall (Precipitation) Downtown Los Angeles—USC Campus, www.laalmanac.com/weather/we13.php, accessed January 4, 2024.*

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

64 *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, Appendix F, p. A-9.*

65 *California Department of Water Resources, Update 2018, https://water.ca.gov/Programs/California-Water-Plan/Update-2018, accessed January 4, 2024.*

66 *California Department of Water Resources, Update 2023, https://water.ca.gov/Programs/California-Water-Plan/Update-2023, accessed January 4, 2024.*

67 *California Department of Water Resources, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed January 4, 2024.*

2020. As part of Phase II, DWR completed a Climate Change Analysis Guidance in 2018. Phase III of the Climate Action Plan was completed in 2020 with a Climate Change Vulnerability Assessment in 2019 and Climate Change Adaption Plan in 2020 regarding DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.[68] As such, climate change and its impacts on water supplies are key factors of new water supply regulations and urban water management plans.

(f) Water Conservation and Recycling

LADWP has developed many progressive water conservation and use efficiency programs in conjunction with state and local conservation ordinances and plumbing codes to achieve water conservation throughout its service area and customer classes (refer to Subsection 2.a., Regulatory Framework, above for a summary of these plans and regulations). Specifically, to meet multiple water conservation goals established in the Sustainable City pLAn, and the Water Conservation Act of 2009, LADWP's 2020 UWMP aims to reduce per capita potable water use by 22.5 percent by 2025 and by 25 percent by 2035.[69] 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.[70] The Green New Deal also has a target to recycle 100 percent of all wastewater for beneficial reuse by 2035. [71] Beneficial reuse includes, but is not limited to, non-potable reuse, groundwater recharge, and supporting environmental and recreational uses such as those in the Los Angeles River.

Since the inception of LADWP's conservation programs, the estimated cumulative annual active savings is over 150,000 AFY.[72] In addition, LADWP completed a Stormwater Capture Master Plan in 2015 to comprehensively evaluate stormwater capture potential within the City. Stormwater capture can be achieved by increasing infiltration into groundwater basins and by on-site capture and reuse of stormwater for landscape irrigation (i.e., direct use). The total baseline amount of stormwater captured is 64,000 AF.[73] The implementation of additional centralized and distributed stormwater capture projects and programs, in development and in construction, could provide for increased groundwater

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[68] *California Department of Water Resources, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed January 4, 2024.*

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

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

[71] *City of Los Angeles, L.A.'s Green New Deal, Targets, https://plan.lamayor.org/targets/targets_plan.html, accessed December 21, 2023.*

[72] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 16.*

[73] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 17.*

recharge in the amount of 66,000 AFY and increased direct use in the amount of 2,000 AFY.[74] Under LADWP's current implementation strategy, the total estimated stormwater capture capacity is projected to be 155,000 AFY by 2035.[75] LADWP also has numerous programs and strategies in place to recycle water, including the existing production of recycled water for irrigation totaling 37,060 AFY in fiscal year-end 2021, and coordination with LASAN to develop non-potable water reuse projects. [76,77]

(2) Water Demand

(a) Regional Water Demand

LADWP's 2020 UWMP provides water supply and demand projections in five-year increments to 2045, based on projected population estimates provided by SCAG in its 2020–2045 RTP/SCS. Table IV.J.1-4 on page IV.J.1-15 shows the projected water demand from the year 2025 through 2045 for the City. As shown in Table IV.J.1-4, LADWP's water supply would be equal to the water demand within LADWP's service area during average, single-dry and multi-dry years from 2025 through at least 2045.[78] LADWP's 2020 UWMP concludes that adequate water supplies would be available to meet the projected demands of the service areas under normal, single-dry, and multi-dry year conditions through 2045.[79] Therefore, the City's water supply projections in LADWP's 2020 UWMP are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the 2020–2045 RTP/SCS adopted by SCAG.[80]

(b) On-Site Water Demand

As discussed in Section II, Project Description, of this Draft EIR, the Project Site comprises an entire city block that is currently occupied by The Bloc, a mixed-use development that includes an office tower, a high-rise hotel, commercial/retail uses, an expansive plaza that includes a portal to the Metro 7th Street/Metro Center Station, and approximately 1,971 parking spaces. The southern portion of the Project Site (the Development Area) is currently developed with an existing 9-story podium building, which includes five stories of enclosed parking, four stories of existing commercial/retail floor

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[74] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 17.*

[75] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 17.*

[76] *The 37,060 AFY of recycled water was used for municipal, industrial and environmental uses.*

[77] *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 19.*

[78] *Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.*

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

[80] *Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, pp. 11–19.*

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

Hydrologic Conditions	Year (AF)				
	2025	2030	2035	2040	2045
Demand[a]					
Average Year	642,600	660,200	678,800	697,800	710,500
Single-Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year[b]	657,900 661,700	675,800 679,700	694,900 698,900	714,400 718,500	727,400 731,500
Supply					
Average Year	642,600	660,200	678,800	697,800	710,500
Single-Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year[b]	657,900 661,700	675,800 679,700	694,900 698,900	714,400 718,500	727,400 731,500

AF = acre-feet

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

[b] *Year one and two of multi-dry year.*

Source: LADWP, 2020 Urban Water Management Plan, Exhibits 11E, 11F, and 11G, May 2021.

area, and one level of rooftop parking. The Project proposes to add a new residential tower, which includes the replacement of approximately 24,342 square feet of existing commercial uses with residential uses. As detailed in Table 1 of the Utility Report, included as Appendix K of this Draft EIR, based on the 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN) sewer generation rates, the existing water demand associated with the existing uses to be removed is approximately 597 gpd or 0.67 AFY.[81,82]

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 115 storage tanks and reservoirs, 85 pump

[81] *KPFF Consulting Engineers, The Bloc Residential Tower*—Utility Technical Report: Water and Energy, *October 2023, pg. 7.*

[82] *This analysis is based on the water generation of 23,888 square feet of commercial retail uses to be removed, and does not include the approximately 454 square feet of theater space to be removed because the removal of this space will not affect the existing water demand.*

stations, nine ammonization stations, 22 chlorination stations, 329 regulator and relief stations, 7,340 miles of distribution mains and trunk lines, and 61,077 fire hydrants within the City, with a total storage capacity of 323,820 AF according to the estimates for fiscal year 2021–2022.[83]

Domestic water service is available to the Project Site via LADWP water lines within the adjacent streets. According to the Utility Report included in Appendix K of this Draft EIR, the Project Site and vicinity are currently served by an 8-inch public water main located approximately 20 feet northwest from Hope Street centerline.[84]

In addition to providing domestic water service, LADWP provides water for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). As described in the Utility Report, there are eight existing public hydrants surrounding the Project Site. Specifically, public fire hydrants are located on the northwestern and northeastern corners of the 8th Street and Hope Street intersection and on the northeastern and northwestern corners of the 8th Street and Flower Street intersection (total of four hydrants). There are also two hydrants located at the midpoint between 7th Street and 8th Street along Hope Street and Flower Street, respectively. Two additional public fire hydrants are located at the southeastern corner of the 7th Street and Flower Street intersection and the southwest corner of the 7th Street and Hope Street intersection. Furthermore, the existing buildings within the Project Site are also equipped with fire sprinkler systems.

3. Project Impacts

a. Thresholds of Significance

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

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

[83] *LADWP, 2021–2022 Briefing Book, 2022.*

[84] *KPFF Consulting Engineers, The Bloc Residential Tower*—Utility Technical Report: Water and Energy, *October 2023.*

construction or relocation of which could cause significant environmental effects.[85]

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 provided above are relied upon. The analysis utilizes factors and considerations identified in the *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following factors to evaluate water supply and infrastructure:

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

b. Methodology

(1) Water Supply

The analysis of the Project's impact relative to water supply is based on a calculation of the Project's anticipated net water demand. Consistent with LADWP's methodology, the estimated net water demand for the Project is calculated by applying the LASAN's sewer generation factors to the Project's proposed uses. The water demand of the existing uses to be removed is then subtracted from the Project's total water demand to determine the Project's net water demand. The resulting net demand for water associated with the Project is then analyzed relative to LADWP's existing and future water supplies to determine if LADWP would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry years hydrologic conditions.

[85] *Refer to Section IV.C, Energy, of this Draft EIR for a discussion of electric power and natural gas impacts. Refer to the Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater, wastewater, and telecommunications facility impacts.*

(2) Water Infrastructure

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

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 Utility Report for the results of the Information of Fire Flow Availability Request (IFFAR) for the fire hydrants evaluated.

2. Flow tests to determine if sufficient water conveyance is available for the Project. LADWP's approach provides data ranging from available static pressure (meaning how much pressure is available at the source before applying the Project's demand) to the available pressure at the maximum demand needed for the Project. Based on the results, LADWP determined whether the existing infrastructure is sufficient to meet the Project needs. See Exhibit 2 of the Utility Report for the results of the Service Advisory Request (SAR).

c. Project Design Features

The following project design features are proposed with regard to water supply:

Project Design Feature WAT-PDF-1: As part of the construction of the new building, a portion of the existing 8-inch water main on Hope Street will be upgraded to a 12-inch main. The upgrade will include approximately 710 feet of 12-inch ductile iron (DI) water main from the intersection of Hope Street and 8th Street to a point 710 feet northeast of 8th Street. Due to the mainline upgrade, the existing 8-inch water main will be cut and plugged in two locations and three existing fire hydrants will be re-tapped. System upgrades will require repaving, which will be paid for by the Project Applicant via the City of LA Bureau of Engineering Street Damage Restoration Fee.

Project Design Feature WAT-PDF-2: The design of the new building will incorporate the following additional water conservation features:

- High-efficiency Energy Star–rated residential clothes washers.

- High-efficiency Energy Star–rated residential dishwashers, should dishwashers be provided.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- Drought-Tolerant Plants.

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?[86]

(1) Impact Analysis

(a) Construction

Project construction activities would require water for dust control, cleaning of equipment, and preparation during the early construction phases. The latter phases of construction normally require less water usage. As the Project would require the removal of approximately 23,888 square feet of existing commercial uses in the podium building, estimated to consume approximately 597 gpd[87], the water demand associate with Project construction activities would be partially offset. Additionally, based on the temporary nature of construction activities, Project construction water demand would be anticipated to be less than the operational water demand, which can be met following necessary infrastructure upgrades, as described below. As such, water needs during construction would not result in the construction of new or expanded water distribution facilities, and the existing off-site LADWP water infrastructure system would be adequate to provide for the water flow necessary to serve the Project during construction.

The Project would require new on-site and off-site water distribution infrastructure to serve the Project. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below

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[86] *Refer to Section IV.C, Energy, of this Draft EIR for a discussion of electric power and natural gas impacts. Refer to the Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater, wastewater, and telecommunications facility impacts.*

[87] *This analysis is based on the water generation of 23,888 square feet of commercial retail uses to be removed, and does not include the approximately 454 square feet of theater space to be removed because the removal of this space will not affect the existing water demand.*

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

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

(b) Operation

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

(i) Fire Flow

Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As identified by the LAFD in their written correspondence provided in Appendix H.1 of this Draft EIR, the required fire flow for the Project Site has been set at 12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, additional 2,000 to 8,000 gpm. will be required). A

minimum residual water pressure of 20 psi is to remain in the water system. As discussed in the Utility Report, an IFFAR was submitted to LADWP to determine if the existing public water system would have adequate water pressure to serve the Project's anticipated fire water needs. Based on the completed IFFAR, attached as Exhibit 1 of the Utility Report, the Project Site (under existing conditions) has inadequate fire flow available to demonstrate compliance with LAMC Section 57.507; therefore, system upgrades would be necessary to meet the fire flow demand for the Project. As detailed above in Project Design Feature WAT-PDF-1, the Project would upgrade a portion of the existing 8-inch water main on Hope Street to a 12-inch main. The upgrade would include approximately 710 feet of 12-inch ductile iron (DI) water main from the intersection of Hope Street and 8th Street to a point 710 feet northeast of 8th Street. Due to the mainline upgrade, the existing 8-inch water main would be cut and plugged in two locations and three existing fire hydrants would be re-tapped. As discussed above, system upgrades would require repaving, which would be paid for by the Project Applicant via the City of LA Bureau of Engineering Street Damage Restoration Fee. As shown in the completed IFFAR, with the implementation of Project Design Features WAT-PDF-1, public water infrastructure would provide adequate water pressure to serve the Project Site's anticipated fire flow demands.

In addition, the Project would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands. Per LAMC 94.2020.0 which adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. Because the SAR submitted to LADWP (see Exhibit 2 of Appendix K of this Draft EIR), confirms there is sufficient pressure to serve the Project Site, adequate water pressure is available to operate the proposed fire sprinkler suppression system.

(ii) Domestic Water Demand

As previously stated, while domestic water demand is the main contributor to water consumption, fire demands have been shown to have the greatest instantaneous impact on infrastructure; therefore, the results of the IFFAR can be utilized as indication that the existing water infrastructure is sufficient. As discussed above, with implementation of Project Design Feature WAT-PDF-1, sufficient capacity would be available to serve the Project Site. In addition, the proposed service laterals would be adequately sized to accommodate fire demand and domestic demand and would include backflows and be metered separately per City requirements.

(c) Conclusion

Based on the above, while the Project would require the construction of expanded water facilities, the construction activities associated with these improvements would not cause significant environmental effects. Additionally, upon completion of the proposed improvements prior to Project build-out, sufficient water

infrastructure would be available to serve the Project for operation of the Project; thus, operational impacts related to water infrastructure would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

As discussed above, Project construction activities would require water for dust control, cleaning of equipment, and preparation during the early construction phases. These activities would occur incrementally throughout construction of the Project (from the start of construction to project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. As discussed above, water use during construction would be partially offset by the estimated 597 gpd of water currently consumed by the existing on-site uses to be removed. Additionally, based on the temporary nature of construction activities, Project construction water demand would be anticipated to be less than the operational water demand, which can be met following necessary infrastructure upgrades, as described in Subsection 3.c., above. Furthermore, as concluded in LADWP's 2020 UWMP, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year in each year from 2020 through 2045. Project construction is anticipated to be completed by 2031. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction.

Based on the above, LADWP would have sufficient water supplies available to serve the Project's construction activities and reasonably foreseeable future

development during normal, dry, and multiple dry years. Therefore, Project construction-related water supply impacts would be less than significant.

(b) Operation

As described in Section II, Project Description, of this Draft EIR, the Project would remove approximately 24,342 square feet of existing commercial uses in the podium building and construct 466 new residential units. Based on the size of the land uses and the Project's resulting estimated water demand, the Project is not subject to the requirements of SB 610 regarding preparation of a WSA.

Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation factors established by LASAN, which also serve to estimate water demand for the proposed uses.

As shown in Table IV.J.1-5 on page IV.J.1-38, when accounting for the existing uses to be removed, the Project would result in a net average daily water demand of 55,530 gpd, or approximately 62.20 AFY. This is a conservative calculation as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code or the implementation of Project Design Feature WAT-PDF-2.

The 2020 UWMP utilized SCAG's 2020-2045 RTP/SCS data to provide more reliable water demand forecasts by taking into account changes in population, housing units and employment. As discussed in Section II, Project Description, of this Draft EIR, the Project would construct 466 new residential units. Based on generation factors from the LADOT's Vehicle Miles Traveled Calculator, the Project would generate approximately 1,049 residents.[88] As discussed in Response to Checklist Question No. XIV.a., of the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project would be consistent with growth projections anticipated by the SCAG and the demographic projection for the City of Los Angeles Subregion.

Additionally, the Project's water demand has been accounted for in the City's overall total demand projections set forth in LADWP's 2020 UWMP. Specifically, based on the projected water demand estimates for LADWP's service area from the 2020 UWMP

[88] *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

Table IV.J.1-5
Estimated Project Water Demand

Propose Land Use	Size	Water Demand Rate[a]	Water Demand (gpd)
Existing to Be Removed			
Retail[b]	23,888 sf	25 gpd/1,000 sf	597
To Be Removed			***597***
Proposed			
Residential			
Studio	83 du	75 gpd/du	6,225
One Bedroom	203 du	100 gpd/du	22,330
One Bedroom +	68 du	110 gdp/du	7,480
Two Bedroom	100 du	150 gdp/du	15,000
Three Bedroom	12 du	190 gdp/du	2,280
Lounge	56,236 sf	50 gdp/1,000 sf	2,812
Proposed Water Demand			56,127
Net Project Water Demand			**55,530**

sf = square feet

gpd = gallons per day

[a] *Based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates*.

[b] *Water generated by the theater space is not included since the removal of this space will not affect the existing water demand*.

Source: KPFF Consulting Engineers, The Bloc Residential Tower—Utility Technical Report: Water and Energy, October 2023.

identified previously in Table IV.J.1-4 on page IV.J.1-15, the Project's estimated net average daily water demand of 55,530 gpd, or approximately 62.20 AFY, would represent approximately 0.009 percent of LADWP's projected 2031 (the Project's buildout year) average (663,920 AF), single-dry (697,100 AF), and multi-dry years (679,620 AF and 683,540 AF) water demand and supply, respectively.[89,90] Hence, the Project's domestic operational water demand would represent a miniscule proportion of LADWP's projected water demand and supply in 2031. Furthermore, LADWP concluded that the projected water supplies for average, single-dry, and multiple-dry years reported in LADWP's 2020 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the

[89] *2031 water demand and supply values were calculated using a linear forecast between 2030 and 2035 values available in Table IV.J.1-4 on page IV.J.1-15.*

[90] *(62.20 AFY ÷ 663,920 AFY) * 100 = 0.009%, (62.20 AFY ÷ 67,100 AFY) * 100 = 0.009%, (62.20 AFY ÷ 679,620 AFY) * 100 = 0.009%, and (62.20 AFY ÷ 683,540 AFY) * 100 = 0.009%.*

existing and anticipated future water demands within LADWP's service area through the year 2045.[91] In addition, as outlined in its 2020 UWMP, LADWP is committed to providing a reliable water supply for the City.[92] The 2020 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling.[93] The 2020 LADWP UWMP also furthers the goals of the City's Executive Directive 5, which set a 20 percent water reduction target by 2017, and L.A.'s Green New Deal, addresses the current and future SWP supply shortages, and concludes that MWD's actions in response to the threats to the SWP will ensure continued reliability of its water deliveries.[94] By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages.[95] Additionally, as reaffirmed by L.A.'s Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.[96]

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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91 *LADWP, Water Supply Assessment for the West LA Commons Project, adopted November 16, 2022, p. 21.*

92 *LADWP, 2020 Urban Water Management Plan, May 2021.*

93 *LADWP, 2020 Urban Water Management Plan, May 2021.*

94 *LADWP, 2020 Urban Water Management Plan, May 2021.*

95 *LADWP, 2020 Urban Water Management Plan, May 2021.*

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

e. Cumulative Impacts

(1) Impact Analysis

The Project, in conjunction with growth forecasted in the City and greater LADWP service area through 2031 (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 2031 includes specific known development projects as well as general ambient growth projected to occur. As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 44 is a conservative assumption, as some of the related projects may not be built out by 2031, may never be built, or may be approved and/or built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 44 are fully built out by 2031, unless otherwise noted.

(a) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and the cumulative or related projects within this geographic area would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of a SAR and IFFAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire water demands of each project and would be required to provide water infrastructure improvements to serve the project if the existing infrastructure is inadequate. In addition, to ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement and update its Water Infrastructure Plan (WIP), with the current (2022–23) WIP containing a five-year water system capital improvement plan that includes $5.6 billion for needed water system infrastructure improvements and maintenance.[97] Furthermore, in accordance with City requirements, prior to ground disturbance, the related projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects.

[97] *LADWP, 2022-23 Water Infrastructure Plan.*

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

Based on the above, the Project's contribution to water infrastructure impacts would not be cumulatively considerable. As such, cumulative water infrastructure impacts would be less than significant.

(b) Water Supply

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City and portions of the cities of West Hollywood, Culver City, South Pasadena, and the Owens Valley). As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for the water supplies required to serve existing and projected demands within its service area. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045.[98]

As identified in Section III, Environmental Setting, of this Draft EIR, there are 44 related projects located in the vicinity of the Project Site, all of which are located within the LADWP service area. The estimated water demand of these related projects is shown in Table IV.J.1-6 on page IV.J.1-42. As indicated therein, the related projects would generate a total average water demand of approximately 3,546,527 gpd (3975,25 AFY). Together with the approximately 55,530 gpd (62.20 AFY) net new demand from the Project, total cumulative water demand would be approximately 3,602,057 gpd (4,037.5 AFY). These estimates are conservative as they do not account for existing uses to be removed as well as required and proposed water conservation measures.

Based on the projected water demand and supply estimates for LADWP's service area from the 2020 UWMP, identified previously in Table IV.J.1-4, total water demand of the Project and related projects of approximately 3,569,187 gpd (4037.5 AFY) would represent approximately 0.6 percent of LADWP's 2031 water demand and supply during

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

Table IV.J.1-6
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Factor[a,b,c]	Total Water Demand (gpd)
1	Mitsui Fudosan (Eighth and Figueroa Tower) 744 S. Figueroa St.	Apartments	438 du	190 gpd/du	83,220
		Restaurant	250 seats (3,750 sf)	30 gpd/seat	7,500
		Retail	3750 sf	0.025 gpd/sf	94
2	945 West 8th Street 945 W. 8th St.	Apartments	781 du	190 gpd/du	148,390
		Commercial	6700 sf	0.05 gpd/sf	168
3	8th, Grand and Hope Project 754 S. Hope St.	Condominium	580 du	190 gpd/du	110,200
		Retail	7329 sf	0.025 gpd/sf	183
4	Embassy Tower 6630 W. Sunset Blvd.	Condominium	420 du	190 gpd/du	79,800
4	Embassy Tower 6630 W. Sunset Blvd.	Retail	38,500 sf	0.025 gpd/sf	963
5	Mixed-Use 840 S. Olive St.	Condominium	303 du	190 gpd/du	57,570
		Restaurant	646 seats (9,680 sf)	30 gpd/seat	19,380
6	845 Olive & 842 Grand Mixed-Use 845 S. Olive St.	Apartments	208 du	190 gpd/du	39,520
		Retail	2,430 sf	0.025 gpd/sf	61
7	1018 West Ingraham Street 1018 W. Ingraham St.	Apartments	43 du	190 gpd/du	8,170
		Retail	7,400 sf	0.025 gpd/sf	185
8	949 South Hope Street Mixed Use Development 949 S. Hope St.	Apartments	236 du	190 gpd/du	44,840
		Retail	5,954 sf	0.025 gpd/sf	149
9	Metropolis Mixed-Use 899 S. Francisco St.	Office	988,225 sf	0.12 gpd/sf	118,587
		Retail	46,000 sf	0.025 gpd/sf	1,150
		Condominium	836 du	190 gpd/du	158,840
		Hotel	480 rm	120 gpd/rm	57,600

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

No.	Project	Land Use	Size	Generation Factor[a,b,c]	Total Water Demand (gpd)
10	Hotel & Apartments 675 S. Bixel St.	Apartments	422 du	190 gpd/du	80,180
		Retail	4,874 sf	0.025 gpd/sf	122
		Hotel	126 rm	120 gpd/rm	15,120
11	Alexan South Broadway 850 S. Hill St.	Apartments	305 du	190 gpd/du	57,950
		Retail	3,500 sf	0.025 gpd/sf	88
		Restaurant	234 seats (3,500 sf)	30 gpd/seat	7,020
12	Olympic Towers 813 W. Olympic Blvd.	Condominium	374 du	190 gpd/du	71,060
		Hotel	373 rm	120 gpd/rm	44,760
		Office	33,498 sf	0.12 gpd/sf	4,020
		Retail	65,074 sf	0.025 gpd/sf	1,627
		Conference Center	10,801 sf	0.12 gpd/sf	1,296
13	Downtown LA 926 James M. Wood Blvd	Hotel	247 rm	120 gpd/rm	29,640
14	Hill Street Mixed-Use 920 S. Hill St.	Retail	5,400 sf	0.025 gpd/sf	135
		Apartments	239 du	190 gpd/du	45,410
15	5th & Hill 323 W. 5th St.	Hotel	190 rm	120 gpd/rm	22,800
		Meeting Room	6,100 sf	0.12 gpd/sf	732
		Apartments	31 du	190 gpd/du	5,890
		Restaurant	1,947 seats (29,200 sf)	30 gpd/seat	58,410
16	Mixed-Use 1150 W. Wilshire Blvd.	Condominium	140 du	190 gpd/du	26,600
		Commercial	9,115 sf	0.05 gpd/sf	456

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

No.	Project	Land Use	Size	Generation Factor[a,b,c]	Total Water Demand (gpd)
17	Spring St Hotel 633 S. Spring St.	Hotel	176 rm	120 gpd/rm	21,120
		Bar	353 seats	30 gpd/seat	5,295
		Restaurant	562 seats (8,430 sf)	30 gpd/rm	16,860
18	Mixed-Use 1145 W. 7th St.	Condominium	241 du	190 gpd/du	45,790
		Retail	7,291 sf	0.025 gpd/sf	182
19	Sapphire Mixed-Use (Revised) 1111 W. 6th St.	Apartments	362 du	190 gpd/du	68,780
		Retail	25,805 sf	0.025 gpd/sf	645
20	940 South Hill Mixed-Use 940 S. Hill St.	Apartments	232 du	190 gpd/du	44,080
		Retail	14,000 sf	0.025 gpd/sf	350
21	Restaurant 1036 S. Grand Ave.	Restaurant	477 seats (7,149 sf)	30 gpd/seat	14,310
22	Broadway Mixed-Use 955 S. Broadway	Apartments	163 du	190 gpd/du	30,970
		Retail	6,406 sf	0.025 gpd/sf	160
23	Apartments 1218 W. Ingraham St.	Apartments	80 du	190 gpd/du	15,200
24	Fig Central 1101 S. Flower St.	Condominium	504 du	190 gpd/du	95,760
		Hotel	183 rm	120 gpd/rm	21,960
		Retail	166,000 sf	0.05 gpd/sf	8,300
25	Olympia Mixed-Use 1001 Olympic Blvd.	Apartments	879 du	190 du gpd/du	167,010
		Retail	20,000 sf	0.025 gpd/sf	500
		Restaurant	1,334 seats (20,000 sf)	30 gpd/seat	40,020
		Hotel	1,000 rm	120 gpd/rm	120,000

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

No.	Project	Land Use	Size	Generation Factor[a,b,c]	Total Water Demand (gpd)
26	Angels Landing Mixed-Use 332 S. Olive St.	Residential	432 du	190 gpd/du	82,080
		Hotel	515 rm	120 gpd/rm	61,800
		Commercial	72,090 sf	0.025 gpd/sf	1,802
27	Mixed-Use 601 S. Main St.	Apartments	452 du	190 gpd/du	85,880
		Retail	25,000 sf	0.025 gpd/sf	625
28	1045 South Olive Street 1045 S. Olive St.	Condominium	800 du	190 gpd/du	152,000
		Retail	15,000 sf	0.025 gpd/sf	375
29	Olympic & Hill Mixed Use 1030 S. Hill St.	Apartments	700 du	190 gpd/du	133,000
		Retail	7,000 sf	0.025 gpd/sf	175
		Restaurant	467 seats (7,000 sf)	30 gpd/seat	14,010
30	Equity Residential Mixed-Use 340 S. Hill St.	Apartments	406 du	190 gpd/du	77,140
		Affordable Housing	22 du	190 gpd/du	4,180
		Office	2,980 sf	0.12 gpd/sf	358
		Retail	2,630 sf	0.025 gpd/sf	66
31	Mixed-Use (Lifan Tower) 1235 W. 7th St.	Apartments	303 du	190 gpd/du	57,570
		Retail	5,960 sf	0.025 gpd/sf	149
32	Mixed-Use 400 S. Broadway	Apartments	450 du	190 gpd/du	85,500
		Retail	6,904 sf	0.025 gpd/sf	173
		Bar	334 seats	30 gpd/seat	10,020
33	Residential 1322 W. Maryland St.	Apartments	62 du	190 gpd/du	11,780
34	Amacon Project 1133 S. Hope St.	Condominium	208 du	190 gpd/du	39,520
		Retail	5,029 sf	0.025 gpd/sf	126
35	Condominiums 742 S. Hartford Ave.	Condominium	42 du	190 gpd/du	7,980

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

No.	Project	Land Use	Size	Generation Factor[a,b,c]	Total Water Demand (gpd)
36	Apartments 740 S. Hartford Ave.	Apartments	80 du	190 gpd/du	15,200
37	Mixed-Use 755 S. Los Angeles St.	Office	60,243 sf	0.12 gpd/sf	7,229
		Retail	16,694 sf	0.025 gpd/sf	417
		Restaurant	1,798 seats (26,959 sf)	30 gpd/seat	53,940
38	11th & Hill Project 1115 S. Hill St.	Condominium	172 du	190 gpd/du	32,680
		Restaurant	457 seats (6,850 sf)	30 gpd/seat	13,710
39	Hotel/Restaurant 1099 S. Grand Ave.	Hotel	160 rm	120 gpd/rm	19,200
		Restaurant	205 seats (3,063 sf)	30 gpd/seat	6,150
40	Hotel/Retail 1130 S. Hope St.	Hotel	144 rm	120 gpd/rm	17,280
		Retail	378 sf	0.025 gpd/sf	9
41	Ethos Societe 806 S. Garland Ave.	Apartments	120 du	190 gpd/du	22,800
		Day Care Center	10,056 sf (168 children)[d]	9 gpd/child	1,512
		Retail	6,906 sf	0.025 gpd/sf	173
		Office	33,703 sf	0.12 gpd/sf	4,044
42	Variety Arts (Mixed-Use) 940 S. Figueroa St.	Restaurant	671 seats (10,056 sf)	30 gpd/seat	20,130
		Office	3,295 sf	0.12 gpd/sf	395
		Bar	342 seats	30 gpd/seat	10,260
43	Residential 350 S. Figueroa St.	Apartments	570 du	190 gpd/du	108,300

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

No.	Project	Land Use	Size	Generation Factor[a,b,c]	Total Water Demand (gpd)
44	Mack Urban (Site 2 & 3) 1105 S. Olive St.	Site 2: Apartment	537 du	190 gpd/du	102,030
		Site 2: Restaurant	254 seats (3,800 sf)	30 gpd/seat	7,620
		Site 2: Retail	3,800 sf	0.025 gpd/sf	95
		Site 3: Apartment	713 du	190 gpd/du	135,470
		Site 3: Restaurant	474 seats (7,100 sf)	30 gpd/seat	14,220
		Site 2: Retail	7,100 sf	0.025 gpd/sf	178
Total Related Projects					**3,546,527**
Project					**55,530**
Total Related Project + Project					**3,602,057**

du = dwelling units

gpd = gallons per day

rm = rooms

sf = square feet

Numbers may not sum precisely due to rounding.

[a] *This analysis is based on 100 percent of sewage generation rates provided by LASAN (effective April 6, 2012).*

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

[c] *Consistent with assumptions applied by KPFF Consulting Engineers, a standard factor of 15 square feet per seat was assumed to calculate the number of seats for restaurant uses.*

[d] *Per California Code of Regulations Section 1859.124.1, Square Footage Facility Chart, a standard factor of 60 square feet per child was assumed to calculate the number of children for daycare uses.*

Source: Eyestone Environmental, 2023.

average, single-dry, and multi-dry years, respectively.[99,100] Hence the water demand of the Project, together with the related projects would represent a very small proportion of the LADWP's total 2031 water demand and supply, with the Project's share representing an even smaller proportion.

As previously stated, based on water demand projections through 2045 in its 2020 UWMP, LADWP determined that it will be able to reliably provide water to its customers through the year 2045, as well as the intervening years (i.e., 2031, the Project buildout year) based on demographic growth projections in SCAG's 2020–2045 RTP/SCS, which includes the Project and related projects. In addition, compliance of the Project and other future development projects with the numerous regulatory requirements that promote water conservation described above would also reduce water demand on a cumulative basis. For example, certain related projects would be subject to the City's Green Building Code requirement to reduce indoor water use by at least 20 percent and all projects would be required to use fixtures that conserve water. In addition, certain large related projects meeting the thresholds under SB 610 would be required to prepare and receive LADWP approval of a WSA that demonstrates how the project's water demand would be met.

Overall, as discussed above, the 2020 LADWP UWMP demonstrates that the City will meet all new water demands from projected population growth, through a combination of water conservation and water recycling. LADWP's 2020 UWMP specifically outlined the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP's 2020 UWMP also incorporates the goals of the City's Sustainability pLAn (superseded in 2019 by L.A.'s Green New Deal). LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high-efficiency appliances, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that sufficient water supply continues to be available.

Based on the above, it is anticipated that LADWP would be able to meet the water demands of the Project and future growth within its service area through at least 2045. Therefore, the Project together with the related projects would not result in significant cumulative impacts related to water supply, nor would the Project's

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[99] *2031 water demand and supply values were calculated using a linear forecast between 2030 and 2035 values available in Table IV.J.1-4 on page IV.J.1-15.*

[100] *(4,037.5 AFY ÷ 663,920 AFY) * 100 = 0.6%, (4,037.5 AFY ÷ 697,100 AFY) * 100 = 0.6%, (4,037.5 AFY ÷ 679,620 AFY) * 100 = 0.6%, and (4,037.5 AFY ÷ 683,540 AFY) * 100 = 0.6%.*

contribution to water demand be cumulatively considerable. As such, cumulative water supply impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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