IV. Environmental Impact Analysis

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

1. Introduction

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

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on the Water Supply Assessment (WSA) prepared for the Project and adopted by the LADWP Board of Commissioners in February 2024, provided in Appendix Q of this Draft EIR, which includes a copy of Resolution No. 024123 approving the WSA. Additional technical information used in the analysis is based on the *Radford Studio Center Project Utility Infrastructure Technical Report: Water, Wastewater, and Energy* (Utility Report) prepared for the Project and included in Appendix M of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding water supply and infrastructure at the state, regional, and local levels 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)
- Sustainable Groundwater Management Act of 2014

- California Code of Regulations
  - Appliance Efficiency Regulations (Title 20)
  - California Green Building Standards Code
  - 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 Angeles General Plan, including:
  - Framework Element
  - Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass 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 Planning 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 on January 1, 2002. SB 610, codified in Water Code Sections 10910–10915, specifies the requirements for WSAs and their role in the California Environmental Quality Act (CEQA) process and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs, where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;

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

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

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

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

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

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

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.[2] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[3] Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.[4] As provided in LADWP's 2020 Urban Water Management Plan, in accordance with SB X7-7, LADWP developed a final reported 2020 target of 142 gallons per capita per day. LADWP's actual gallons per capita per day in 2020 was 106 gallons per capita per day, less than the 2020 target.[5]

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

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the

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

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

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

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

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

[6] *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.*

sustainable management of groundwater supplies by local authorities.[7] The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The SGMA provides 20 years for groundwater sustainability agencies to implement plans, achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically overdrafted, 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, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable state efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures, such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi), and for lavatory faucets manufactured after July 1, 2016, is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.[8]

(ii) California Green Building Standards Code

Part 11 of Title 24 of the CCR, 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

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[7] *California Department of Water Resources, SGMA Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed September 3, 2024.*

[8] *California Code of Regulations, Title 20, Sections 1605.3(h) and 1605.3(j).*

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 went into effect on January 1, 2023.

(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.

(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. The Order also directs State agencies, led by the Department of Water Resources (DWR) 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. Furthermore, Executive Order N-10-21 directs DWR to monitor hydrologic conditions such as cumulative precipitation, reservoir storage levels, soil moisture and other metrics, and the SWRCB 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 Executive Order B-40-17 ban on wasteful water uses, such as watering ornamental grass on commercial properties.

(2) Regional

(a) Metropolitan Water District

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

(i) 2020 Urban Water Management Plan

MWD's 2020 Urban Water Management Plan (2020 MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.[9] Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions (i.e., under the most challenging

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

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

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. In addition, MWD is working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Sacramento–San Joaquin 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.[13]

(ii) 2015 Integrated Resources Plan

MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply, such as water quality, climate change, and regulatory and operational changes. The most current IRP (2015 IRP) was adopted in January 2016.[14] It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP

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

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

[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. ES-7.*

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

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 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.[15]

The 2020 IRP planning process was organized into a Regional Needs Assessment (Phase 1) and an implementation Phase (Phase 2).[16] The 2020 IRP Regional Needs Assessment identifies the uncertain factors that can affect future water supply, such as climate change, economics and demographics, legislations and regulations, federal and state support, technological advances in water, and aging infrastructure. In collaboration with its 26 member agencies, other interested parties, and its Board of Directors, MWD has broadened its perspectives with scenario planning and thoroughly analyzing four potential future scenarios. In the future scenarios, demands on MWD's imported supplies vary due to different weather and demographic patterns, among other factors. Supplies vary as well, due to reasons such as climate change severity and regulatory impacts. Based on these scenarios, the 2020 IRP Regional Needs Assessment identifies significant threats facing Southern California's water supply reliability through successive qualitative and quantitative analysis steps. The assessment sizes up the scope of reliability challenges and the

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

[16] *Metropolitan Water District of Southern California, www.mwdh2o.com/media/nqtlioid/working-memo-3-irp-needs-assessment-summary-august-22-2023.pdf, accessed December 2, 2024..*

management solutions that could be in store for the region by the year 2045 under a wide range of conditions.[17]

Building upon the foundation of the IRP Regional Needs Assessment, the implementation phase of the IRP will be coordinated through the Climate Adaptation Master Plan for Water (CAMP4W) process. This phase will involve the continuation of extensive collaboration among Metropolitan's Board, Member Agencies, and other interested parties to develop an adaptive management strategy and decision-making framework. CAMP4W will also establish a process for monitoring key reliability indicators and find joint approaches to the regional problems and resource needs identified in the assessment.[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 Plan 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]

(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.

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[17] *Metropolitan Water District of Southern California, Integrated Water Resources Plan – Regional Needs Assessment, 2020, page 5.*

[18] *Metropolitan Water District of Southern California, www.mwdh2o.com/media/nqtlioid/working-memo-3-irp-needs-assessment-summary-august-22-2023.pdf, accessed December 2, 2024.*

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

(v) Water Supply Allocation Plan

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

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.[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 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 2050. Long-range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020–2045 Regional Transportation Plan/Sustainable Communities

[20] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 1-30.*

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 as L.A.'s Green New Deal, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.[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 One Water LA Plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive No. 5 to reduce the City's purchase of imported water by 50 percent by 2024.[24] Major challenges addressed in the

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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, April 2018, Volume 1, Summary Report.*

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

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, of the Framework Element identifies goals, objectives, and policies for City utilities, including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[26] The goals, objectives, and policies are addressed by the City in its ordinances and preparation of its UWMP. Table IV.O.1-1 on page IV.O.1-15 lists the General Plan goals, objectives, and policies related to water supply.

(ii) Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan does not include objectives or policies related to water supply and infrastructure.

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

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

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

(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 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

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

Water is supplied to the City from four primary sources: the Los Angeles Aqueducts (LAA), local groundwater, purchased water from MWD, and recycled water.[27] As shown in Table IV.O.1-2 on page IV.O.1-18, LADWP had an available water supply of 500,743 acre-feet (AF) in 2022 (the latest full year for which data are available), with approximately 87 percent of this supply from imported sources including the LAA and MWD.[28] LADWP's water sources are described in further detail below.

(a) Los Angeles Aqueducts

As provided in the approved WSA for the Project included in Appendix Q of this Draft EIR, the City receives surface water and groundwater from the Eastern Sierra Nevada Mountains through the Los Angeles Aqueduct (LAA). LADWP constructed the first LAA in 1913 to convey water from the Eastern Sierra to the City. In 1940, the LAA was extended 40 miles north from the Owens River to the Mono Basin. To meet additional water demands from the City, a second barrel of the LAA was constructed and completed in 1970. The second LAA increased the City's capacity to deliver water from the Mono Basin and the Owens Valley from 485 cubic feet per second (cfs) to 775 cfs. The value of the City's historical investment in the LAA system is substantial because the City has benefited from the LAA's delivery of high-quality, cost-effective water supplies from the Eastern Sierra for over a century.

The City's water rights in the Eastern Sierra Nevada are comprised of riparian rights, pre-1914 appropriations, and post-1914 appropriation licenses held on various streams in the Mono Basin and Owens Valley. The most significant basis for export of surface water from the Eastern Sierra Nevada is an appropriation claim in 1905 to divert up to 50,000 miner's inches (1,250 cfs) from the Owens River. Up to 16,000 AFY can be supplied from Mono Basin, which is permitted by the 1994 Mono Lake Basin Water Right Decision 1631. Decision 1631 set a limit on LADWP water exports from the Mono Basin, which were set to a range of 0 to 16,000 AFY based on Mono Lake's water elevation. Aside from the primary

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[27] *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, approved February 13, 2024.*

[28] *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, approved February 13, 2024.*

Table IV.O.1-2
LADWP Water Supply

Fiscal Year Ending	Los Angeles Aqueducts (AF)	Local Groundwater (AF)	MWD (AF)	Recycled Water (AF)	Transfer, Spread, Spills, and Storage (AF)[a]	Total (AF)[b]
2018	307,671	21,760	182,706	9,778	200	522,116
2019	312,456	32,233	137,775	7,512	-1,710	488,266
2020	292,095	34,363	152,647	9,641	-1,155	487,591
2021	128,268	51,070	316,627	11,455	938	508,359
2022	69,183	53,057	366,690	12,022	-208	500,743

AF = acre-feet

[a] *Table III of the WSA inverts negative and positive numbers in this column.*

[b] *Numbers may not sum due to rounding.*

Source: LADWP, Water Supply Assessment for the Radford Studio Center Project, Table III, approved February 13, 2024.

surface water rights, the groundwater right in the Owens Valley is managed under the 1991 Long Term Water Agreement (LTWA) and uses vegetation water demand and available soil moisture to determine whether groundwater wells can be pumped. Since 1991, the average annual pumping from Owens Valley wellfields has been less than 75,000 AF compared to 107,000 AF from 1974 to 1990.

Annual water deliveries from the LAA to the City are impacted by hydrologic variability in the Eastern Sierra Nevada and water set aside for environmental projects. At its peak in fiscal year ending (FYE) 1984, the LAA delivered 531,729 AF to the City. Concerns over environmental impacts have required the City to reallocate approximately one-half of the LAA water supply to other uses within the Owens Valley and Mono Basin. Between 1992 and 2020, LADWP reduced deliveries to the City by approximately 177,000 AF to supply water for a variety of environmental projects throughout the Eastern Sierra. Environmental enhancement and mitigation projects in the Mono Basin and Owens Valley that utilize water from the Eastern Sierra include Mono Basin releases, Lower Owens River Project, Owens Lake Dust Mitigation Program, as well as other environmental enhancement and mitigation projects and uses. The expected annual long term LAA delivery from 2020 to 2045 will range from approximately 184,200 AFY to 192,000 AFY for average years.

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, LADWP has implemented, and continues to increase, stormwater capture, local groundwater, water conservation, water use efficiency, and water recycling programs to

mitigate the reduction of LAA supplies. Additionally, LADWP can purchase supplemental imported water from MWD to meet the City's remaining water demands.

(b) Groundwater

As discussed in the approved WSA for the Project included in Appendix Q of this Draft EIR, local groundwater provided approximately 8 percent of the City's total water supply from FYE 2018 to FYE 2022. This amount significantly differs from fifty years ago when local groundwater provided up to 23 percent of total supply during extended dry periods. In recent years, contamination issues have impacted LADWP's ability to fully utilize its local groundwater entitlements and provide groundwater supplies to support annual water demands. In response to this issue and to address the hydrologic variability impacts to imported water supplies, LADWP has focused on 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 this large groundwater basin within the City to store wet year LAA flows to supply water during dry periods.

The City's total adjudicated water rights are approximately 109,809 AFY, which are located within the San Fernando, Sylmar, Central, and West Coast Groundwater Basins. There are additional groundwater basins near and within the Los Angeles area, such as the unadjudicated Hollywood, Santa Monica, and northern Central Basins that may provide additional groundwater supplies for the City.

The San Fernando Groundwater Basin is the primary source of local groundwater for the City. It is located in the Upper Los Angeles River Area (ULARA) and spans 112,000 acres. The ULARA encompasses the San Fernando and Sylmar Basins. It is managed by a court-appointed Watermaster and administrative committee that oversees the operation of groundwater system and reports the groundwater elevations and water quality. The average San Fernando Groundwater Basin groundwater rights is approximately 87,000 AFY. LADWP is implementing its San Fernando Groundwater Basin Groundwater Remediation Program to help restore the capacity of the San Fernando Groundwater Basin as a drinking water source and groundwater storage. LADWP is implementing the following groundwater remediation projects which are expected to be operational in 2025:[29]

LADWP receives additional San Fernando Groundwater Basin 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-

[29] *Los Angeles Department of Water and Power, Theresa Kim, December 20, 2024.*

Burbank Interim Interconnection and began delivery of a minimum of 500 AF of blended water in August 2019. The blended water consists of San Fernando Groundwater Basin groundwater treated at the Burbank Operable Unit and MWD imported water supply. This connection began service in August 2019 and was intended to operate for five years. Construction of a permanent connection is now underway.[30]

The Central Basin is another source of groundwater supply for the City. The Central Basin Watermaster oversees this Basin that is located in the southeastern part of the Los Angeles Coastal Plan in Los Angeles County. The City has approximately 17,236 AFY of groundwater rights in the Central Basin. With additional carryover and storage of unused water rights, the City has accrued a total of 22,943 AF of stored water as of FYE 2020.

Besides the San Fernando and Central Groundwater Basins, the City holds water rights in the following local groundwater basins:

1. The Sylmar and Eagle Rock basins are adjudicated basins, managed by the ULARA, that provides 3,570 AF and 500 AF, respectively. The majority of the Sylmar Basin's groundwater production facilities are inoperable due to high levels of contamination and deteriorated facilities. The Mission Wellfield facility underwent continued improvements since the early 2000s to replace the existing deteriorated facilities and restore Sylmar Basin groundwater production capacity. The facility has been in operation since early 2022. Lastly, although the City has the right to produce groundwater from Eagle Rock Basin, there are no current plans to establish groundwater production facilities here.

2. The West Coast Basin is managed by the West Coast Basin Watermaster and is located in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. LADWP has the right to pump 1,503 AF. In 2014, the West Coast Basin Judgment was amended to increase certain parties', like LADWP's, pumping capacity to 5,000 AFY of unused West Coast Basin rights out of the Central Basin. This basin has groundwater quality problems related to total dissolved solids, chloride, and hydrocarbon pollutants; therefore, LADWP has discontinued use of West Coast Basin facilities in 1980 until further studies are completed to restore groundwater pumping.

Groundwater produced by the City from the San Fernando, Sylmar, and Central Groundwater Basins for the last available five years is shown in Table IV.O.1-3 on page IV.O.1-21. LADWP also has groundwater rights outside the of City. There are

[30] *City of Burbank, Construction for the New Burbank-Los Angeles Potable Water Project Starts October 17, 2022, www.burbankca.gov/newsroom/-/newsdetail/20124/construction-for-the-new-burbank-los-angeles-potable-water-project-starts-october-17-2022, accessed December 30, 2024.*

Table IV.O.1-3
LADWP Groundwater Supply

Fiscal Year (July-June)	San Fernando (AF)	Sylmar (AF)	Central (AF)
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
2021–2022	48,408	3,018	4,562

AF = 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 for the Radford Studio Center Project, Table IV, December 7, 2023, approved February 13, 2024.

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

The Central and West Los Angeles areas of the City overlie the unadjudicated groundwater basins from Hollywood Basin, Santa Monica Basin, and the northerly area of Central Basin located outside of the adjudicated Central Basin boundary. LADWP is exploring opportunities to develop groundwater resources in these manners that is locally sustainable and in cooperation with its regional partners to increase the City's use of local resources. Since the SGMA took effect on January 1, 2015, LADWP had been working with regional partners towards implementing a SGMA Groundwater Sustainability Plan (GSP) for the Santa Monica Basin. In September 2017, Department of Water Resources (DWR) approved the formation of the Santa Monica Basin Groundwater Sustainability Agency (SMGSA), which consisted of LADWP and four other local agencies. The SMGSA submitted the final GSP to DWR in January 2022.

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for supplemental domestic and municipal water uses in California. As one of the twenty-six member agencies of MWD, the City, through LADWP, purchases water from MWD to supplement its water supplies from the LAA, local groundwater, and recycled water. Between FYE 2018 to FYE 2022, LADWP purchased an

average of 231,289 AFY from MWD or approximately 46 percent of the City's total water supply.

MWD imports water from two principal sources: northern California via the California Aqueduct and the Colorado River via the Colorado River Aqueduct. 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. As of FYE 2022, LADWP has a preferential right to purchase 17.69 percent of MWD's total water supply.

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

MWD owns and operates the Colorado River Aqueduct which has delivered water from the Colorado River to Southern California since 1942. The Colorado River supplies come from watersheds of the Upper Colorado River Basin in the states of Colorado, Utah, and Wyoming. Under a permanent service contract with the U.S. Secretary of the Interior, MWD is entitled to receive water from the Colorado River and its tributaries. California is apportioned 4.4 MAF, annually, plus one-half of any surplus that may be available for use, collectively, in Arizona, California, and Nevada. Of the California apportionment, MWD holds the fourth priority right to 550,000 AFY under the 1931 priority system governing allotments to California. Beyond the basic apportionment, MWD holds a fifth priority right to 662,000 AF of water.

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

(d) Water Conservation

Water conservation and water use efficiency have significant effects on the City's water use patterns and their benefit to reducing water demands and pressure on other water

supplies have become a permanent part of LADWP's water management philosophy. The City's water usage today is the same as over fifty years ago despite an increase in population of over one million people, reflecting the success and importance of the City's water conservation strategies. In the future, conservation will continue to be an important part of maintaining long term supply reliability and is a key component of LADWP's goals to reduce potable water use per capita by 22.5 percent and 25 percent by 2025 and 2035, respectively.

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

The state and local conservation ordinances and plumbing codes help LADWP to achieve water conservation throughout its service area and customer classes. Since 1988, the City has utilized ordinances as a tool to reduce water waste, beginning with the adoption of its first version of a plumbing retrofit ordinance. The latest applicable ordinances are: 2009 City's "High Efficiency Plumbing Fixture", 2016 Citywide Water Efficiency Standards Ordinance, 2015 Model Water Efficient Landscape Ordinance (MWELO), and the 2016 Emergency Water Conservation Plan (Conservation Ordinance). The Conservation Ordinance was developed for the City to implement water demand management measures in case of a water supply shortage and to respond to ongoing dry conditions.

LADWP also achieves and maintains water use reductions through the application of tiered volumetric water rates. Since 1993, LADWP has used an ascending tier rate structure that is entirely volumetric based pricing. LADWP's tiered volume water rates, which were last amended by the City's Water Rate Ordinance (Ordinance No. 184,130) with the effective date of April 15, 2016, incorporate and further reinforce foundational water conservation, water use efficiency, and financial principles. A lower first tier rate is applied to water within a specified allocation, and higher successive tier rate is applied to every billing unit exceeding the first tier allocation.

LADWP offers rebates and incentives to promote the installation of water-efficient fixtures and appliances. In 2008, MWD's region-wide "SoCal Water$mart Program" for residential and commercial water use efficiency rebates replaced previous LADWP rebate programs. This program administers uniform rebate amounts across the MWD service area to all MWD member agencies like LADWP. LADWP takes full advantage of regional programs for many product rebates offered through MWD for the residential and Commercial, Industrial, and Institutional (CII) sector, and adds supplemental funding to increase the rebate amount provided for LADWP customers for many qualifying products. Also, since 1992, LADWP has continued the Technical Assistance Program to promote innovative solutions to

saving water. The program provides customized incentives for retrofitting water-intensive equipment in the CII or multi-family customer sector. LADWP plans its future water conservation programs, focusing on obtaining additional active and passive water savings in the water end uses that have the most non-conserving devices still remaining for each of the customer sectors.

(e) Stormwater Capture

Stormwater runoff from urban areas is an underutilized local water resource. Within the City, the majority of stormwater runoff is directed to storm drains and ultimately channeled into the ocean. This unused stormwater carries many pollutants that are harmful to marine life and public health. In addition, local groundwater aquifers that could be replenished by stormwater are receiving less recharge than in past historical times due to increased urbanization. Urbanization has increased the City's hardscape, which has resulted in less infiltration of stormwater and a decline in groundwater elevations. In response, 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 onsite capture and reuse of stormwater for landscape irrigation (i.e., direct use). The total baseline amount of stormwater captured is 64,000 AF. Through the implementation of additional centralized and distributed stormwater capture projects and programs, in development and in construction, it will provide for increased groundwater recharge in the amount of 66,000 AFY and increased direct use in the amount of 2,000 AFY. Under LADWP's current implementation strategy, the total estimated stormwater capture capacity is projected to be 155,000 AFY by 2035. This amount is between the conservative estimate of 132,000 AFY and aggressive scenario of up to 178,000 AFY by 2035.

LADWP utilizes various strategies to respond to hydrologic variability to maintain supply reliability. One of the strategies, known as conjunctive use, is storing supplies when available to help minimize the impacts of water shortages during future dry periods. Since the 1930s, LADWP has recognized the greater operational flexibility provided by a storage program. LADWP has operated its groundwater resources conjunctively by reducing groundwater pumping and diverting water from the LAA into the Tujunga and Pacoima Spreading Grounds. Another strategy is to capture a large portion of stormwater flows, especially during wet years, through the centralized stormwater capture projects. The captured stormwater is a major source for replenishing groundwater supplies through spreading basins where it is infiltrated into underlying groundwater aquifers. Groundwater recharge will address the overall long-term decline in groundwater basin elevations, protect the safe yield of the groundwater basin, and ensure the long-term water supply reliability of the San Fernando Groundwater Basin. The 2020 UWMP projects that by 2045 there will be a minimum of 15,000 AFY of increased groundwater pumping in the San Fernando Groundwater Basin due to increased groundwater recharge through centralized stormwater

infiltration. Anticipating that stored groundwater will rebound in response to enhanced groundwater recharge, LADWP will work with the ULARA Watermaster to continue observing actual basin elevations and re-evaluate basin safe yield to allow additional increases in groundwater production over time as San Fernando Groundwater Basin elevations rebound.

Flood control facilities are the primary means to divert native runoff into the spreading basin facilities. LADWP coordinates stormwater capture related activities, such as collection and delivery of large stormwater runoff to spreading basins, with Los Angeles County Flood Control District to effectively recharge the San Fernando Groundwater Basin. Completed in November 2021, the Tujunga Spreading Grounds Upgrade Project increased stormwater capture capacity by 8,000 AFY to a total of 16,000 AFY.

LADWP's Stormwater Capture Parks Program (Parks Program) has identified nine City-owned parks suitable for stormwater capture projects. The primary objective of the Parks Program is to recharge the San Fernando Valley Groundwater Basin by capturing urban runoff and diverting stormwater from the Tujunga Wash Central Branch storm drain. The anticipated Parks Program capture capacity is 3,088 AFY. The Parks Program provides multiple benefits, such as improvements to the Los Angeles River water quality, reducing localized flooding, raising public awareness, and providing open space enhancements through active and passive recreation space.

The other method to capture stormwater is through distributed stormwater capture facilities. Distributed stormwater/runoff capture refers to capturing localized dry and wet weather runoff. While centralized stormwater capture plays a key role in groundwater recharge in the City, space constraints limit opportunities for new large centralized facilities, and the City has changed the focus towards distributed stormwater capture. Distributed stormwater capture includes stormwater best management practices that utilize vegetation, soils, and natural processes to manage stormwater runoff close to the source. Distributed facilities also aim to conserve water by capturing stormwater for uses that reduce potable water demand.

(f) Water Recycling

As early as 1960, the City recognized the potential for water recycling and invested in infrastructure that produced water of tertiary quality, a high treatment standard for wastewater. In 1979, LADWP began delivering tertiary quality recycled water to the Department of Recreation and Parks for irrigation of various areas in Griffith Park. Today LADWP serves approximately 179 sites in the City with recycled water for irrigation, industrial, and beneficial environmental uses. There are approximately 200 individual customer service accounts, with several projects containing multiple customer accounts at a single location. Recycled water produced for FYE 2021 was 37,060 AFY, inclusive of municipal and industrial, and environmental reuse.

LADWP is committed to maximizing use of recycled water in the City's water supply portfolio. Expansion of recycled water use to offset potable demands has been recognized as one method that will help LADWP achieve its goal of improving the local sustainability of its water supply. LADWP is working in conjunction with LASAN to develop non-potable reuse projects for irrigation and industrial uses. In addition, the City is pursuing a groundwater replenishment project to replenish the San Fernando Groundwater Basin with highly treated recycled water. LADWP's recycled water use is projected to reach 50,900 AFY by FYE 2025 by adding 8,000 AFY of planned municipal/industrial use and 7,000 AFY of indirect potable reuse (groundwater replenishment), and further increase to 67,600 AFY through FYE 2045. Environmental reuse is expected to remain relatively constant at approximately 26,600 AFY.

(g) Precipitation Conditions

The Project Site is located in the San Fernando Valley, which receives an average of 12.44 inches of rain per year.[31] During the 2023–2024 rain season (July 1 to June 30), this area of the City received 29.76 inches of rain.[32]

(h) Global Warming and Climate Change

As discussed in LADWP's 2020 UWMP, any water supplies that are dependent on natural hydrology are vulnerable to climate change, especially if the water source originates from mountain snowpack.

MWD and DWR also continue to study climate change and address the implications of climate change on water supplies. MWD has established a technical process to identify key vulnerabilities from various sources, including climate change, in order to provide comprehensive analyses within its Integrated Water Resources Plans. In addition, DWR addresses climate change impacts on water supply in its California Water Plan Updates, which are updated every five years and serve as the State's strategic plan for sustainably and equitably managing, developing, and stewarding water resources.[33] The most recent *California Water Plan Update 2023* focuses on three intersecting themes of addressing climate urgency, strengthening watershed resilience, and achieving equity in water management.[34]

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[31] *Los Angeles Almanac, Total Seasonal Rainfall (Precipitation) vs Historical Seasonal Average, Van Nuys, Los Angeles, California (Van Nuys Airport) 1998–2024, www.laalmanac.com/weather/we136a.php, accessed August 30, 2024.*

[32] *Los Angeles Almanac, Total Seasonal Rainfall (Precipitation) vs Historical Seasonal Average, Van Nuys, Los Angeles, California (Van Nuys Airport) 1998–2024, www.laalmanac.com/weather/we136a.php, accessed August 30, 2024*

[33] *California Department of Water Resources, California Water Plan Update 2023, December 2023.*

[34] *California Department of Water Resources, California Water Plan Update 2023, December 2023.*

DWR has also been in the process of completing its Climate Action Plan since 2012. Phases I and II of the Climate Action Plan include the guidance of DWR in reducing greenhouse gas emission and the expertise of a climate change technical advisory group formed in 2012, respectively. Phase III of the plan was completed in 2017 with a vulnerability assessment and adaptation plan related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.[35] As such, climate change and its impacts on water supplies are key factors of new water supply regulations and UWMPs.

(2) Water Demand

(a) Regional Water Demand

LADWP's 2020 UWMP provides water demand and supply projections in five-year increments to 2045, based on projected population estimates provided by the SCAG in its 2020–2045 RTP/SCS. Table IV.O.1-4 on page IV.O.1-28 shows LADWP's water demand and supply projections from 2025 through 2045. As shown in Table IV.O.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.[36] LADWP's 2020 UWMP, therefore, concludes that adequate water supplies would be available to meet the projected demands within the LADWP service area under average, single-dry, and multi-dry- year conditions through 2045.[37] 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.[38]

(b) Existing Water Demand

As discussed in Section II, Project Description, of this Draft EIR, the approximately 55-acre Project Site is currently developed with approximately 1,179,110 square feet of studio-related uses, including approximately 359,730 square feet of sound stage uses; 255,510 square feet of production support uses; 450,060 square feet of production office uses; and 113,810 square feet of general office uses. Based on LADWP billing data, the existing water demand associated with the 646,120 square feet of existing studio-related

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[35] *California Department of Water Resources, DWR Climate Action Plan, https://water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed September 4, 2024.*

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

[37] *Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. ES-28.*

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

Table IV.O.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]	655,700	673,600	692,600	712,000	724,900
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]	655,700	673,600	692,600	712,000	724,900

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 five of multi-dry year.*

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

uses to be removed under the Project is estimated at 18,284 gallons per day (gpd) (20.48 AFY).[39]

(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, as of 2024, includes 117 tanks and reservoirs, 86 pump stations, nine ammonization stations, 19 chlorination stations, 354 regulator and relief stations, 7,341 miles of distribution mains and trunk lines, and 61,122 fire hydrants within the City, with a total storage capacity of 323,546 AF.[40]

Domestic water service is available in the vicinity of the Project Site via LADWP water lines within the adjacent streets. According to the Utility Report, there is a distribution water main located in the west side of Radford Avenue, which is an 8 inch diameter pipe north of

[39] *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, approved February 13, 2024.*

[40] *Los Angeles Department of Water and Power, 2023–2024 Briefing Book, 2024.*

Woodbridge Street and a 12 inch diameter pipe south of that point. Additionally, a 26-inch transmission main is located in the east side of Radford Avenue.[41]

In addition to providing domestic water service, LADWP provides water to the Project Site for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). According to the Utility Report, there are currently five existing hydrants on Radford Avenue, north of Valleyheart Drive (three on the east side and two on the west), and three existing hydrants on the west side of Radford Avenue, south of Valleyheart Drive.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.[42]

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

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

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;

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[41] *KPFF Consulting Engineers, Radford Studio Center Project Utility Technical Report: Water, Wastewater, and Energy, January 2025.*

[42] *Refer to Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR, for a discussion of wastewater impacts; Section IV.O.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of this Draft EIR, for a discussion of electric power and natural gas infrastructure impacts; and Section VI, Other CEQA Considerations, of this Draft EIR, and the Initial Study included as Appendix A of this Draft EIR, for a discussion of telecommunications facility impacts and a discussion of stormwater impacts.*

- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of project completion; and

- The degree to which scheduled water infrastructure or project design features would reduce or offset service impacts.

b. Methodology

The analysis of the Project's impacts to water supply is based on the WSA prepared and adopted by the LADWP Commissioners for the Project pursuant to SB 610, included as Appendix Q of this Draft EIR. The WSA includes a conservative calculation of the Project's anticipated water demand by applying the City Department of Public Works, Bureau of Sanitation's (LASAN) wastewater generation rates to the proposed land uses associated with the Project. Additionally, per the WSA, existing water demand for the uses to be removed was estimated by applying a ratio of square footage to be removed to the average of LADWP's five-year billing records from October 2018 to September 2023. The WSA accounts for certain reductions in Project water demand associated with the implementation of water conservation features and regulatory compliance. In accordance with SB 610, the resulting net demand for water associated with the Project was then analyzed relative to LADWP's existing and planned future water supplies to determine if LADWP would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry years.

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

c. Project Design Features

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

Project Design Feature WAT-PDF-1: In addition to applicable regulatory requirements, the Project will incorporate the following water conservation features as set for in the Water Conservation Commitment Letter for the Project included as Appendix B of the WSA:

- ENERGY STAR–Certified Residential Dishwashers—standard with 3.0 gallons/cycle or less

- High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less
- Showerheads with a flow rate of 1.5 gallons per minute, or less
- Drip/Subsurface Irrigation (Micro-Irrigation)
- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

As discussed in the Utility Report included as Appendix M of this Draft EIR, water demand during construction of the Project would include, but not be limited to, dust control, cleaning of equipment, excavation/export, removal, and grading/recompaction activities. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd per acre of ground disturbance. Based on construction means and methods, water use during construction may be greater than the existing water consumption to be removed at the Project Site. Nevertheless, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project as this demand is anticipated to be substantially less than the operational demands discussed below (i.e., 312,890 gpd). Therefore, impacts on water infrastructure due to construction activity would be less than significant.

As also discussed in the Utility Report included as Appendix M of this Draft EIR, the Project would involve the construction of new, on-site water distribution lines to serve the proposed new buildings. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below ground and would be limited to on-site water distribution and off-site work associated with connections to the public main lines. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of any proposed ground disturbance activities to avoid water lines and disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). The off-site

construction activities could also temporarily affect access in adjacent rights-of-way. However, as discussed Section IV.M, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure that emergency access to the Project Site and traffic flow are maintained on adjacent rights-of-way.

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

(b) Operation

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

Fire flow for the Project would comply with LAMC Section 57.507.3.1, which establishes fire flow standards by development type. Based on the fire flow standards set forth therein, and as identified by the LAFD in their written correspondence provided as Exhibit 1 of the Utility Report, the required fire water flow for the Project Site has been set at 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously. As discussed above, there are currently five existing hydrants on Radford Avenue, north of Valleyheart Drive (three on the east side and two on the west), and three existing hydrants on the west side of Radford Avenue, south of Valleyheart Drive. Based on correspondence with LADWP, which is also included in Exhibit 1 of the Utility Report, the following upgrades may be required to meet the top end range of 9,000 gpm:

- Upgrade approximately 900 linear feet of water main on Radford Avenue, north of Valleyheart Drive North, from an 8-inch to 12-inch pipe.
- Upgrade approximately 1,300 linear feet of water main on Valleyheart Drive South, between Radford Avenue and Laurel Canyon Boulevard, from a 6-inch to 8-inch pipe.

- Install four new hydrants. Specifically, install one new hydrant on Radford Avenue, north of Valleyheart Drive, for a total of six, and up to three new hydrants on Radford Avenue, south of Valleyheart Drive, for a total of six.

The above improvements are analyzed herein as the most conservative scenario. Other less impactful options may be considered to demonstrate compliance with LAFD requirements. Furthermore, as provided in Section IV.L.1, Public Services—Fire Protection, of this Draft EIR, in accordance with LAMC Section 57.507.3.3, the Project would incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting phase of the Project and would reduce public hydrant demands. Based on LAMC Section 94.2020.0 that adopts by reference the National Fire Protection Association (NFPA) 14-2013, including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm.

With regard to the domestic water infrastructure, new domestic services would be connected to the existing water mains in Radford Avenue. No expanded main water facilities would be required by the Project beyond those described above to meet fire flow requirements.

Additionally, a Service Advisory Request (SAR) was submitted to LADWP to determine if the existing public water infrastructure could meet the demands of the Project. Refer to Exhibit 2 of the Utility Report included as Appendix M of this Draft EIR. The approved SAR, which is inclusive of the Project's anticipated domestic water demands, shows that the existing infrastructure is sufficient to meet the estimated maximum water demand of the Project. Refer to the analysis under Threshold (b) below for details regarding the water demand associated with the Project.

Based on the above, the Project would not exceed the available capacity of the existing water distribution infrastructure that would serve the Project Site. Accordingly, the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project's operational impacts on water supply and infrastructure would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

As discussed under Threshold (a), the anticipated water demand associated with construction activities would be less than the net new water consumption of the Project at buildout set forth in Table IV.O.1-5 on page IV.O.1-35 in the operational analysis below. As stated in the WSA and summarized below, LADWP concluded that the projected water supplies for average, single-dry, and multiple-dry years reported in LADWP's 2020 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2045. Therefore, the Project's temporary and intermittent demand for water during construction could be similarly met by the City's available supplies during each year of Project construction.

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 establish the Radford Studio Center Specific Plan (Specific Plan) to establish standards to regulate land use, massing, design, and development, and permit up to 2,200,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout. The Specific Plan would provide limited development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, floor area from any permitted land use category may be exchanged for additional sound stage and production support uses as long as the limitations set forth in the Specific Plan are met. In particular, the maximum sound stage or production support floor area cannot exceed 575,000 square feet each, and the total

Table IV.O.1-5
Estimated Project Water Consumption

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit)[a]	Demand (gpd)
Existing Uses to be Removed			
Sound Stage	136,310 sf		
Production Support	170,370 sf		
Production Office	297,110 sf		
General Office	42,330 sf		
Total Existing Demand to be Removed[b]	***646,120 sf***		***18,284***
Proposed Uses			
Sound Stage	226,580 sf	0.05	11,329
Production Support	214,860 sf	0.05	10,743
Production Office	572,050 sf	0.12	68,646
General Office	628,520 sf	0.12	75,422
Retail/Restaurant[c]	833 seats	30.00	25,000
Mobility Hubs[d]	54,200 sf	0.05	2,710
Base Demand Adjustment[e]			1,062
Landscaping[f]	219,811 sf	—	21,577
Covered Parking[g]	1,736,730 sf	0.02	1,142
Cooling Tower	4,750 ton	35.64	169,290
Subtotal Water Demand	—	—	***386,921***
Less Required Ordinances Water Savings[h]	—	—	(54,957)
Project Water Demand	—	—	***331,965***
Less Existing to be Removed[b]	—	—	(18,284)
Less Additional Conservation[i]	—	—	(791)
Net Project Water Demand (Proposed – Existing – Additional Conservation)	—	—	**312,890**

sf = square feet

gpd = gallons per day

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

[b] *Total Existing Use is 1,179,110 sf. Existing uses to be removed total 646,120 sf, and existing uses to remain total 532,990 sf. Approximately 57 percent of the existing water demand is estimated to be removed based on the square footage and uses associated with the existing uses to be removed. The existing water demand to be removed is estimated by applying 57 percent to the LADWP billing data from October 2018 to September 2023.*

[c] *Conservatively assumes 1 seat per 30 sf, or 833 seats per 25,000 sf. Retail/Restaurant is assumed to be 100 percent Restaurant for a conservative water demand estimate.*

[d] *Mobility Hub areas are not included in the total floor area.*

[e] *Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.*

Table IV.O.1-5 (Continued)
Estimated Project Water Consumption

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit)[a]	Demand (gpd)
[f] *Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.*			
[g] *Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.*			
[h] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 186,488, 184,248, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.*			
[i] *The Applicant has agreed to additional water conservation, with a combination of some or all of the measures listed in the water conservation commitment letter included as Appendix B of the WSA.*			
Source: Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, approved February 13, 2024, Table IA.			

permitted floor area cannot exceed 2,200,000 square feet. For more information about the land use exchange component of the Specific Plan, see Section II, Project Description and Section IV.J, Land Use and Planning, of this Draft EIR.

Development of the Project would result in an increase in long-term water demand for consumption due to the new uses and other activities proposed on the Project Site. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is generally based on a calculation of the Project's water demand by applying the sewage generation rates established by LASAN, which also serve to estimate water demand, to the proposed uses. As previously discussed, based on the proposed land uses and the Project's estimated water demand, the Project is subject to the requirements of SB 610 (i.e., preparation of a WSA, as described above in Subsection 2.a.(1)(c)). Specifically, the Project meets Criterion 2 (a business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space) and Criterion 3 (a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space) and thus also meets Criterion 6 (projects that include one or more of the identified categories). Therefore, a WSA was prepared for the Project and is provided in Appendix Q of the Draft EIR.

Table IV.O.1-5 on page IV.O.1-35 provides estimates of the Project's average operational water demand assuming constant water use throughout the year. As shown therein, Project operation would result in a net increase in average daily water demand of an estimated 312,890 gpd (351 AFY) after implementation of Code-required and voluntary water

conservation measures.[43] As stated in the WSA, LADWP has concluded that projected LADWP water supplies during normal, single-dry, and multiple-dry years would be sufficient to meet the Project's estimated water demand in addition to the existing and projected future water demands within LADWP's service area through the year 2040.[44]

With regard to the permitted limited land use exchange for additional sound stage and production support uses, such potential exchanges would result in a reduction in water demand. Specifically, sound stage and production support uses have a lower rate of water demand per square foot than the other permitted uses (i.e., general office, production office, and retail uses). As such, the proposed development program that is evaluated in Table IV.O.1-5 on page IV.O.1-35 results in the greatest water demand.

Based on the projected water demand estimates for LADWP's service area from the 2020 UWMP identified previously in Table IV.O.1-4 on page IV.O.1-28, the Project's estimated net operational domestic water demand of 312,890 gpd (351 AFY) would represent approximately 0.055 percent, 0.052 percent, and 0.054 percent of LADWP's projected 2025 average, single-dry, and multi-dry year water demand and supply, respectively.[45] Because the Project's domestic operational water demand would represent a very small percentage of LADWP's projected water demand and supply in 2025, LADWP concluded in the WSA that the projected water supplies for average, single-dry, and multiple-dry years reported in LADWP's 2020 UWMP would be sufficient to meet the Project's estimated water demand in addition to the existing and anticipated future water demands within LADWP's service area through the year 2045.[46] In addition, as outlined in its 2020 UWMP and discussed above, LADWP is committed to providing a reliable water supply for the City. LADWP's 2020 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 by expanding local water supply programs and reducing demands on purchased imported water. LADWP's 2020 UWMP also furthers the goals of L.A.'s Green New Deal (also discussed above), addresses the current and future SWP supply shortages, and concludes that MWD's actions in response to the threats to the SWP will ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term

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[43] *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, approved February 13, 2024.*

[44] *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, approved February 13, 2024.*

[45] *The Project is compared to LADWP's projected 2025 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2028. However, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045, as discussed further below.*

[46] *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, approved February 13, 2024, p. 5.*

dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, as reaffirmed in L.A.'s Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.[47,48]

Lastly, the Project would not conflict with the applicable goals, objectives, and policies with regard to utilities set forth in Chapter 9, Infrastructure and Public Services, of the General Plan Framework Element. In particular, the Project would support Goal 9C to ensure an adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses, as well as Objective 9.9 to manage and expand the City's water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses. Additionally, the Project would support Objective 9.10 to ensure that water supply, storage, and delivery systems are adequate to support planned development. The approved SAR included in Exhibit 2 of the Utility Report and WSA included as Appendix Q of this Draft EIR demonstrate consistency with these goals and objectives, as analyzed above. Therefore, the Project would not conflict with these goals and objectives.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Development Agreement would confer a vested right to develop the Project in

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

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

accordance with the Specific Plan and Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, as previously discussed, LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Additionally, in the WSA for the Project, LADWP determined that the demand associated with the Project is included in its 2020 UWMP, which shows that there is an adequate 20-year water supply. Therefore, a long-term buildout scenario for the Project is already accounted for in the analysis herein. LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for the water supplies required to serve existing and projected demands within its service area. The main purpose of the UWMP is to forecast future water demands and water supplies under average and dry hydrologic conditions; identify future water supply projects; provide a reliability assessment for average, single dry year, and multi-dry years; and assess near-term drought risk. As such, should hydrologic conditions change under a long-term buildout scenario, LADWP has policies and procedures in place to address such changes and ensure an adequate water supply. Furthermore, with regard to water infrastructure capacity, the results of the conservative analyses of both fire suppression and domestic water flows completed for the Project would remain unchanged as a long-term buildout scenario would not affect the maximum flow conditions evaluated above. While future years could generate greater service area demands, which could begin to strain the existing water distribution system in the surrounding area, LADWP continues to evaluate the need for infrastructure upgrades and expansion based on long-term growth and demand projections. As such, a later buildout date would not affect the impacts or significance conclusions presented above. In addition, no changes to the proposed Project design feature would be necessary in the event of an extended buildout, except as needed to comply with future new or updated regulatory standards.

f. Cumulative Impacts

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. There are 13 related projects in the Project Site vicinity, as listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, all of which are located within the LADWP service area. The projected growth associated with these 13 related projects is a conservative assumption regarding future development as some of the related projects may not be built out by 2028, may never be built, or may be approved and built at reduced densities. To provide a conservative analysis, the future baseline forecast assumes that these 13 related projects would be fully built out by 2028.

(1) Impact Analysis

(a) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and the related projects within this geographic area would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of a SAR and Information on Fire Flow Availability Report, where applicable) to ensure that the existing water infrastructure is adequate to meet the domestic and fire water demands of each related project and would be required to provide water infrastructure improvements if existing infrastructure is determined to be inadequate. In addition, to ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement and update its Water Infrastructure Plan, with the current/latest (2023–2024) plan, which describes infrastructure accomplishments and goals that are a part of LADWP's $6.3 billion five-year water system capital plan.[49] In addition, in accordance with City requirements, prior to ground disturbance, each related project would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects.

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

Based on the above, the Project, together with the related projects, would not result in significant cumulative water infrastructure impacts related to the construction or expansion water facilities. As such, cumulative water infrastructure impacts would be less than significant.

[49] *Los Angeles Department of Water and Power, 2023–2024 Water Infrastructure Plan.*

(b) Water Supply

The geographic context for the cumulative impact analysis of water supply is the LADWP service area. As discussed previously, LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for the water supplies required to serve existing and projected demands within its service area. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045.[50]

As noted above, there are 13 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.O.1-6 on page IV.O.1-42. As shown therein, the related projects would generate a total average water demand of approximately 237,304 gpd (266 AFY). Together with the approximately 312,890 gpd (351 AFY) from the Project, the total cumulative water demand would be approximately 550,194 gpd (616 AFY). These estimates are conservative because, while the water demand estimates for the Project take into account required and proposed water conservation measures and subtract out the water demand associated with the existing uses to be removed, the estimates for the related projects do not.

Based on the projected water demand and supply estimates for LADWP's service area from its 2020 UWMP identified previously in Table IV.O.1-4 on page IV.O.1-28, the estimated total water demand of the Project and related projects of 616 AFY would represent approximately 0.096 percent, 0.091 percent, and 0.094 percent of the 2025 water demand and supply within LADWP's service area during average, single-dry, and multi-dry years, respectively.[51] Hence, the water demand of the Project, together with the related projects, would represent a very small percentage of the LADWP's total 2025 water demand and supply.

As previously stated, based on water demand projections in its 2020 UWMP, LADWP has determined that it will be able to reliably provide water to meet the existing and forecasted future demand through the year 2045. In addition, the Project and the related projects would comply with the numerous regulatory requirements, as applicable, that promote water conservation described in the Regulatory Framework subsection above, which would reduce water demand on a cumulative basis. For example, certain related projects would be subject to the City's Green Building Code requirement to reduce indoor water use by at least

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

[51] *The Project is compared to LADWP's projected 2025 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2028. However, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045, as discussed earlier.*

Table IV.O.1-6
Cumulative Water Demand

No.	Project Name/Use	Project Location	Description	Size	Demand Factor (gpd)[a]	Water Demand (gpd)
1.	Mixed Use	4021 Radford Ave.	Residential Including 6 affordable	54 du	190/du	10,260
			Commercial	3,474 sf	0.025/sf	87
2.	Mixed Use	11611 Ventura Blvd.	Assisted Living	140 du	190/du	26,600
			Senior Independent Living	62 du	190/du	11,780
3.	Commercial	11601 Ventura Blvd.	Commercial	10,568 sf	0.025/sf	264
4.	Studio City Crossing Market/Retail	11265 Ventura Blvd.	Supermarket	37,079 sf	0.025/sf	927
			Retail	1,581 sf	0.025/sf	40
5.	Condominium	11331 Ventura Blvd.	Condominiums	62 du	190/du	11,780
6.	Mixed-Use	12548 Ventura Blvd.	Residential	28 du	190/du	5,320
			Restaurant	1105 seats	30/seats	33,150
7.	Apartments	11433 Albers St.	Residential	62 du	190/du	11,780
			Retail	10,747 sf	0.025/sf	269
			Commercial	5,100 sf	0.025/sf	48
8.	Mixed-Use	12582 Ventura Blvd.	Residential	34 du	190/du	6,460
			Commercial	5,100 sf	0.025/sf	128
9.	Harvard- Westlake River Park Project	4141 Whitsett Ave.	17.2 acre Recreational and Sports Facility	N/A	N/A	6,993[b]
10.	Mixed-Use	11311 Camarillo St..	Residential Including 6 Affordable	60 du	190/du	11,400
			Retail	2,826 sf	0.025/sf	71
11.	Sportsmen's Lodge	12833 Ventura Blvd.	Residential Including 78 Affordable	520	190/du	98,800
			Commercial	45,945 sf	0.025	1,149

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

No.	Project Name/Use	Project Location	Description	Size	Demand Factor (gpd)[a]	Water Demand (gpd)
12.	BOE Bikeway and Greenway River Improvements	N/A	Pedestrian and Bicycle Improvements and BMPs along LA River/Tujunga Wash	N/A	N/A	N/A
13.	DWP Trunkline South	N/A	Pump Station and Water Pipe	N/A	N/A	N/A
Total Related Projects						**237,304 (266 AFY)[c]**
Total Project						**312,890 (351 AFY)[c]**
Total Related Projects + Project						**550,194 (617 AFY)[c]**

AFY = acre-feet per year

du = dwelling unit

gpd = gallons per day

sf = square feet

[a] *LASAN wastewater generation rates (2012).*

[b] *Total water demand is based on the City of Los Angeles, Harvard-Westlake River Park Project Draft Environmental Impact Report, dated March 2022, and includes removal of the existing uses.*

[c] *Numbers may not sum due to rounding.*

Source: Eyestone Environmental, 2025.

20 percent, and all related projects would be required to use fixtures that conserve water. In addition, certain large, related projects meeting the thresholds under SB 610 would be required to prepare and receive LADWP approval of a WSA that demonstrates how the project's water demand would be met.

Overall, as discussed above, LADWP's 2020 UWMP demonstrates that the City will meet all existing and projected future water demand through 2045 during average, single-dry, and multi-dry years. The 2020 UWMP specifically outlined the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP's 2020 UWMP also incorporates the goals of 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 water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that sufficient water supply continues to be available.

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, cumulative water supply impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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