IV. Environmental Impact Analysis

L.2 Utilities and Service Systems—Water Supply and Infrastructure

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts to water supply and the water infrastructure system serving the Project Site. This section includes a description of the regional water supplies and existing water infrastructure serving the Project Site, estimates the water demand associated with the Project, and assesses whether there is sufficient water supply and infrastructure capacity to meet that demand. The analysis is based, in part, on the *1718 Vine Street Project Utility Infrastructure Technical Report: Water* (Utility Report), May 2018, prepared by KPFF Consulting Engineers, Inc., and included in Appendix J to this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

(a) California Urban Water Management Planning Act (California Water Code Sections 10610–10656)

The California Urban Water Management Planning Act of 1983 (California Water Code, Sections 10610–10656) addresses several state policies regarding water conservation and development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires water suppliers to develop urban water management plans every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, single-dry, and multiple-dry years. Specifically, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water must adopt an urban water management plan.

A number of recent requirements regarding preparation of water management plans have been added to the Urban Water Management Planning Act. These additional requirements include: (i) a narrative description of water demand measures implemented

over the past five years and future measures planned to meet 20 percent demand reduction targets by 2020; (ii) a standard methodology for calculating system water loss; (iii) a voluntary reporting of passive conservation savings, energy intensity, and climate change; and (iv) an analysis of water features that are artificially supplied with water.[1]

(b) Senate Bill X7-7 (California Water Code Section 10608)

Senate Bill (SB) X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608 et seq., requires all water suppliers to increase water use efficiency. 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 was required to make incremental progress towards this goal by reducing per capita urban water use by at least 10 percent on or before December 31, 2015.

(c) Senate Bill 610 (Water Code Sections 10910 et seq.)

SB 610, codified in California Water Code Sections 10910 et seq., became effective January 1, 2002. Senate Bill 610 requires counties and cities to consider the availability of adequate water supplies for certain new large development projects as part of the California Environmental Quality Act (CEQA) process. Specifically, SB 610 requires that for certain projects subject to CEQA, the urban water supplier must prepare a water supply assessment that determines whether the projected water demand associated with a project is included as part of the most recently adopted urban water management plan. The water supply assessment shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. In addition, the water supply assessment must address water supplies over a 20-year future period and consider average, single-dry, and multiple-dry years. In accordance with Water Code Section 10912, projects subject to CEQA requiring submittal of a water supply assessment include the following:

- Residential developments of more than 500 dwelling units;
- Shopping center or business establishment 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;

[1] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018..*

- Industrial, manufacturing, or processing plant, or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;

- Mixed-use projects that include one or more of the above-identified categories; or

- A project that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

The water supply assessment must be approved by the public water system 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 water supply assessment.

As discussed in Section II, Project Description, of this Draft EIR, the Project would develop a hotel with 240 guest rooms, approximately 2,742 square feet of guest amenities,[2] and approximately 5,373 square feet of shared guest and public spaces.[3] Upon completion, the Project would result in approximately 73,440 square feet of new floor area. Based on the proposed land use mix, the Project would not meet the criteria set forth above for requiring a water supply assessment. In particular, as discussed below, the Project would generate a net new demand for approximately 24,621 gallons per day (gpd) of water. This demand would be well below the approximately 55,000 gpd of water that would be generated by a 500 residential unit project.[4] Therefore, a water supply assessment is not required for the Project.

(d) California Plumbing Code

Title 24, Part 5 of the California Code of Regulations (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 current 2016 California Plumbing Code, which is based on the 2015 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2017. In addition, the

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[2] *Guest amenities would consist of a ground-floor lobby, and gym and restrooms on Level 12.*

[3] *Shared guest and public spaces would include the coffee bar and outdoor seating on the ground floor and the "living room" and covered terrace on Level 13.*

[4] *Based on the City of Los Angeles Bureau of Sanitation's factors, a one-bedroom apartment or condominium would consume approximately 110 gpd. Thus, a 500 dwelling-unit project would generate a demand for approximately 55,000 gpd of water.*

California Building Standards Commission approved a Supplement to the 2016 California Plumbing Code in 2017 that goes into effect on July 1, 2018.[5]

(e) Sustainable Groundwater Management Act of 2014[6,7]

The Sustainable Groundwater Management Act of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities. The Sustainable Groundwater Management Act 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. Under Water Code Section 10720.7, groundwater sustainability agencies responsible for high- and medium-priority basins that are subject to critical conditions of overdraft must adopt groundwater sustainability plans by January 31, 2020, while plans for high- and medium-priority basins that are not in critical overdraft must be adopted by January 31, 2022. The Sustainable Groundwater Management Act provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The Sustainable Groundwater Management Act also 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. As required by the Sustainable Groundwater Management Act, in December 2016, the California Department of Water Resources (DWR) published on its website the best management practices (BMPs): BMP 1. Monitoring Protocols, Standards, and Sites; BMP 2. Monitoring Networks and Identification of Data Gaps; BMP 3. Hydrogeologic Conceptual Model; BMP 4. Water Budget; and BMP 5. Modeling.[8] On November 8, 2017, BMP 6 for Sustainable Management Criteria was released for a public comment period, which closed on January 8, 2018. BMP 6 is still considered in draft form and has not yet been adopted.[9] Furthermore, under Section 10720.7 of the Sustainable

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[5] *California Building Standards Commission, Revision Record for the State of California, Supplement, 2016 Title 24, Part 5 California Plumbing Code.*

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

[7] *California Department of Water Resources, SGM Sustainable Groundwater Management, www.water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed December 28, 2018.*

[8] *California Department of Water Resources, Best Management Practices, www.water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents, accessed December 26, 2018.*

[9] *California Department of Water Resources, Best Management Practices and Guidance Documents, www.water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents, accessed December 28, 2018.*

Groundwater Management Act, groundwater sustainability agencies responsible for high- and medium-priority basins must adopt groundwater sustainability plans by January 31, 2020, or January 31, 2022, depending on whether the basin is in critical overdraft.

(f) California Code of Regulations Title 23, Article 22.5, Drought Emergency Water Conservation (Emergency Declaration and Executive Orders)

In response to California's drought conditions, Governor Edmund G. "Jerry" Brown, Jr. (Governor Brown) issued numerous Executive Orders regarding water conservation. Executive Order B-37-16, which was issued in May 2016, extends the mandatory water reduction measures outlined in previous Executive Order B-29-15 and further directs DWR and the State Water Resources Control Board (SWRCB) to develop long-term efficiency targets that go beyond the 20-percent reductions mandated by SB X7-7, discussed above. The Executive Order also establishes longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks, eliminating wasteful practices, strengthening urban drought contingency plans, and improving agricultural water management and drought plans.

On November 30, 2016, several state agencies including the SWRCB released a public draft of *Making Water Conservation A California Way of Life*, which addresses elements of Executive Order B-37-16 that requires state agencies to develop a framework for using water more wisely, eliminating water waste, strengthening local drought resilience, and improving agricultural water use efficiency and drought planning.[10]

Due to improved hydrologic conditions statewide, on April 7, 2017, Governor Brown issued Executive Order B-40-17 lifting the drought emergency in all but four California counties.[11] Additionally, Executive Order B-40-17 rescinds the Drought Emergency Proclamations issued in January and April 2014, as well as four drought-related Executive Orders issued in 2014 and 2015. However, Executive Order B-40-17 also directs the SWRCB to maintain urban water use reporting requirements and prohibitions on wasteful practices. Water agencies will continue to strengthen drought readiness and water use efficiency.[12] The regulatory requirements resulting from the existing Executive Orders

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[10] *California State Water Resources Control Board, Water Conservation Portal—Emergency Conservation Regulation, State Plan Seeks to Make Water Conservation A Way of Life, November 30, 2016.*

[11] *The Counties of Fresno, Kings, Tulare, and Tuolumne remain under a drought state of emergency, per Executive Order B-40-17.*

[12] *Governor Brown Lifts Drought Emergency, Retains Prohibition on Wasteful Practices, Executive Order B-40-17.*

have been codified in Title 23, Article 22.5, Drought Emergency Water Conservation, of the CCR.[13]

(g) California Water Plan[14]

Required by the Water Code Section 10005(a), the California Water Plan is the State government's strategic plan for managing and developing water resources statewide for current and future generations. It provides a collaborative planning framework for elected officials, agencies, tribes, water and resource managers, businesses, academia, stakeholders, and the public to develop findings and recommendations and make informed decisions for California's water future.

Updated every five years, the California Water Plan presents the status and trends of California's water-dependent natural resources, water supplies, and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The Water Plan also evaluates coordinated efforts of regional and statewide resource management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. The evaluations and assessments thus help identify effective plan actions and policies for meeting California's resource management objectives in both the short term and long term of future decades. While the California Water Plan cannot mandate actions or authorize itemized spending, policy-makers and lawmakers have the ability to authorize specific actions and appropriate necessary funding. In addition, while the California Water Plan Update 2013 represents the latest complete update, the California Water Plan Update 2018 is in development and will work in tandem with Governor Brown's California Water Action Plan, as discussed further below.

(h) California Water Action Plan

The first California Water Action Plan (Action Plan) was first released by Governor Brown's administration in January 2014 ,and most recently updated in January 2016, to provide a roadmap for the State's path towards sustainable water management.[15] The Action Plan discusses the challenges for managing the state's water resources supply, scarcity, and quality, and also considers the effects of ecosystems, flooding, population

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[13] *California Department of Water Resources, State Water Resources Control Board, California Public Utilities Commission, California Department of Food and Agriculture, and California Energy Commission, Making Water Conservation a California Way of Life Final Report, April 2017.*

[14] *California Department of Water Resources, About the Water Plan, water.ca.gov/Programs/California-Water-Plan, accessed December 28, 2018.*

[15] *California Department of Natural Resources, California Water Action Plan, 2014.*

growth, and climate change and floods.[16] Ten actions were presented: (1) Make conservation a California way of life; (2) Increase regional self-reliance and integrated water management across all levels of government; (3) Achieve the co-equal goals for the Delta; (4) Protect and restore important ecosystems; (5) Manage and prepare for dry periods; (6) Expand water storage capacity and improve groundwater management; (7) Provide safe water for all communities; (8) Increase flood protection; (9) Increase operational and regulatory efficiency; (10) Identify sustainable and integrated financing opportunities. In complementing local efforts, the Action Plan emphasizes collaboration between different levels of government, water agencies, conservationists, tribes, farmers, and other stakeholders. Since the Action Plan Update for 2016 has been released, its implementation progress has also been documented with focuses on policy, funding, and coordinated projects.[17] The Action Plan will continue to be implemented simultaneously with the California Water Plan Update 2018 as it is completed.

(2) Regional

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.

(a) MWD's Integrated Water Resources Plan

MWD first adopted its Integrated Water Resources Plan (IRP) in 1996. The IRP is updated every five years. The goal of the IRP is for Southern California to have a reliable water system that extends to the future. The 2015 IRP Update, adopted in January 2016, provides MWD's strategy for water resource reliability through the year 2040. The 2015 IRP Update calls for stabilizing and maintaining imported water supplies; meeting future growth through increased water conservation and sustaining and developing new local supplies; pursuing a comprehensive transfers and exchanges strategy; building storage in wet and normal years to manage risks and drought; and preparing for uncertainty with Future Supply Actions. Overall, the strategies presented in the 2015 IRP Update include investments to maintain the reliability of imported water supplies, expansion of local water

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[16] *California Department of Natural Resources, California Water Action Plan 2014.*

[17] *California Department of Natural Resources, California Water Action Plan Implementation Report 2016 Summary of Accomplishments, January 9, 2017.*

supplies and reduction in water demand through a variety of conservation and water use efficiency initiatives.[18]

(b) MWD's 2015 Urban Water Management Plan

MWD's 2015 Urban Water Management Plan (UWMP) addresses the future of MWD's water supplies and demand through the year 2040.[19] Based on its 2015 UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under single dry-year and multiple dry-year hydrologic conditions, as well as average year hydrologic conditions. MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs. As set forth in their 2015 UWMP, MWD will also continue investments in water use efficiency measures to help the region achieve the 20 percent per person potable water use reduction by 2020.

(c) MWD's Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water shortage contingency analysis that is required as part of any urban water management plan into a separate, more detailed plan, called the Water Surplus and Drought Management Plan. The overall objective of the Water Surplus and Drought Management Plan is to ensure that shortage allocation of MWD's imported water supplies is not required.[20] The Water Surplus and Drought Management Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The Water Surplus and Drought Management Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The Water

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[18] *Metropolitan Water District of Southern California, Integrated Water Resources Plan Draft 2015 Update, January 12, 2016.*

[19] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

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

Surplus and Drought Management 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 and then outside of the region. The Shortage Actions of the Water Surplus and Drought Management Plan are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as a part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.

(d) MWD's Water Supply Allocation Plan

While the Water Surplus and Drought Management Plan includes a set of general actions and considerations for MWD staff to address during shortage conditions, it does not include a detailed water supply allocation plan or implementation approach. Therefore, MWD adopted the Water Supply Allocation Plan (WSAP) in February 2008 to encourage proactive steps to reduce the region's water demand to mitigate the need for more severe actions, up to and including the implementation of the plan to allocate water supply shortages to member agencies.[21] The WSAP includes a formula for determining reductions of water deliveries to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen cuts in water supplies). The formula allocates shortages of MWD supplies and seeks to balance the impacts of a shortage at the retail level while maintaining equity on the wholesale level, and takes 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. The allocation period covers 12 consecutive months from July of a given year through the following June.

The WSAP identifies four conditions, each calling for an increasingly heightened level of conservation response: [22]

- Baseline Water Use Efficiency;
- Condition 1: Water Supply Watch;
- Condition 2: Water Supply Alert;
- Condition 3: Water Supply Allocation.

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

[22] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

The record dry and hot conditions of 2014 significantly impacted the water resources of both the State and MWD. The WSAP has been implemented three times, most recently in April 2015. DWR limited supplies from the SWP to only five percent of the contractors' allocated amounts in 2014. This allocation was the lowest ever in the history of the SWP. The MWD was able to meet demands in 2014 by relying heavily on storage reserves to make up for the historically low allocation. MWD's dry-year storage reserves ended 2014 at approximately 1.2 million acre-feet. In April 2015, to support Governor Brown's Executive Order B-29-15 and to reduce withdrawals from MWD's dry-year storage reserves, the MWD implemented the WSAP at a Level 3 Regional Shortage Level though June 2016. The MWD dry-year storage reserves ended 2015 at approximately 0.87 million acre-feet. Following improved water supply conditions and reduced water use due to conservation, in May 2016, the MWD voted to end the current WSAP allocation, rescind WSAP Regional Shortage Level 3, and declare a Condition 2 Water Supply Alert for allocation year 2016–2017. Nonetheless, the MWD called for member agencies to continue with conservation efforts to safeguard against future dry years. On May 9, 2017, in response to continued and significantly improved statewide hydrologic conditions, MWD moved from the Water Supply Alert implemented in the previous fiscal year to a Water Supply Watch.[23]

(3) Local

(a) Los Angeles Department of Water and Power's 2015 Urban Water Management Plan

LADWP's 2015 UWMP, adopted in June 2016, serves two purposes: (i) achieve full compliance with the requirements of California's Urban Water Management Planning Act (described above); and (ii) serve as a master plan for water supply and resource management consistent with the City's goals and objectives.[24]

A number of important changes have occurred since the LADWP prepared its 2010 UWMP. The year 2012 marked the start of the current multi-year drought in California, in response to which Governor Brown proclaimed a drought State of Emergency in January 2014. In addition, as discussed above, in 2014, the SWRCB implemented its Drought Emergency Water Conservation Regulation, which mandated 25-percent reductions in water use statewide. In October 2014, City of Los Angeles Mayor Eric Garcetti issued Executive Directive No. 5 (ED 5), which set goals to reduce per capita water use, to reduce purchases of imported potable water by 50 percent by 2024, and to create an integrated

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[23] *Metropolitan Water District of Southern California, News Release, "Metropolitan Takes Region Off Water Alert, But Maintains Call for Voluntary Water Saving," May 9, 2017.*

[24] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

water strategy to increase local supplies and improve water security considering climate change and seismic vulnerability. In addition, in April 2015, Mayor Garcetti's Sustainable City pLAn (discussed below) was released establishing targets for the City over the next 20 years to strengthen and promote sustainability. LADWP's 2015 UWMP incorporates the objectives of these recent initiatives. Overall, LADWP's 2015 UWMP projects a 7-percent lower water demand trend than what was projected in the 2010 UWMP.[25]

(b) Sustainable City pLAn[26]

In April 2015, the City's first Sustainable City pLAn (pLAn) was released. The pLAn 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. The pLAn builds on ED 5's goals and incorporates water savings goals of reduction in per capita potable water by 20 percent by 2017, by 22.5 percent by 2025, and by 25 percent by 2035, using a 2014 baseline of 131 gallons per day. The pLAn also includes a reduction in imported water purchases from MWD by 50 percent of the total supply by 2025 and a goal to expand local sources of water to 50 percent of the total water supply by 2035. Specific strategies and desired outcomes for conservation, recycled water, and stormwater capture are included in the pLAn. These include investments in state-of-the art technology, rebates and incentives promoting water-efficient appliances, tiered water pricing, a technical assistance program for business and industry, and large landscaped irrigation and water efficiency programs.

In April 2016, the Sustainable City pLAn's First Annual Report for 2015–2016 was released. It was reported that the City had reduced water use by 19 percent to nearly achieve the 20 percent water reduction goal, and that rebates for water efficient appliances have contributed to conservation.[27] As discussed above, as of February 2017, the City has met its 20 percent water reduction target, which also meets the Sustainable City pLAn's goal. Since the Sustainable City pLAn's Second Annual Report for 2016–2017 was released in March 2017, the City is working toward its next goal of reducing municipal water use by 22.5 percent by 2025.

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[25] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[26] *Mayor's Office of Sustainability, Sustainable City pLAn, April 2015.*

[27] *Mayor's Office of Sustainability, Sustainable City pLAn, First Annual Report for 2015–2016, April 2016.*

The Sustainable City pLAn's 3rd Annual Report, which was released on April 20, 2018, reported that the following 2017 (or 2025 where noted) outcomes have been achieved:[28,29]

- Secure additional funding for San Fernando Groundwater Basin clean up;
- Reduce average per capita potable water use by 20 percent;
- Establish Water Cabinet to implement key aspects of local water policy;
- Expand recycled water production by at least 6 million gallons per day;
- Replace 95 miles of water pipe infrastructure;
- Reduce number of annual sewer spills to less than 125;
- Identify funding mechanism(s) to implement the Enhanced Watershed Management Plan necessary for Municipal Separate Storm Sewer System permit compliance; and
- Reduce number of annual sewer spills to less than 100 (a 2025 goal).

In addition, on January 17, 2018, the City broke ground on the North Hollywood West Wellhead Remediation Project (NHWWRP), a project to clean up and restore the use of groundwater for safe, high-quality drinking water in the San Fernando Valley and the City at large. The LADWP was awarded a $44.5 million Proposition 1 grant from the SWRCB in January 2018 to help fund this $92 million project, which is anticipated to be complete by 2020. The NHWWRP, in combination with three other planned remediation projects in the San Fernando Valley, advances two key pLAn goals—reducing the purchase of imported water by 50 percent by 2025 and producing 50 percent of the City's water locally by 2035. By facilitating the use of additional groundwater from the San Fernando Basin, this project also furthers the goals of increasing recycled water use and stormwater capture.[30]

(c) One Water LA

The One Water LA 2040 (One Water LA) plan is an initiative that builds on the progress of the IRP. One Water LA extends the IRP planning period to year 2040 and

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[28] *City of Los Angeles, Mayor Eric Garcetti, Press Release, Los Angeles Achieves Mayor Garcetti Releases Third Annual Sustainable City pLAn Progress Report, released April 20, 2018, www.lamayor.org/los-angeles-achieves-mayor-garcetti%E2%80%99s-goal-20-percent-water-savings, accessed February 21, 2019.*

[29] *Mayor's Office of Sustainability, Sustainable City pLAn, 3rd Annual Report for 2017–2018, April 2018.*

[30] *Mayor's Office of Sustainability, Sustainable City pLAn, 3rd Annual Report for 2017–2018, April 2018.*

takes into consideration an additional emphasis on environmental, social, and sustainability factors.[31] One Water LA is a collaborative approach to develop an integrated framework for managing the City's watersheds, water resources, and water facilities in an environmentally, economically, and socially beneficial manner. One Water LA objectives include the following:[32]

1. Integrate management of water resources and policies by increasing coordination and cooperation between all City departments, partners and stakeholders.

2. Balance environmental, economic and societal goals by implementing affordable and equitable projects and programs that provide multiple benefits to all communities.

3. Improve health of local watersheds by reducing impervious cover, restoring ecosystems, decreasing pollutants in our waterways and mitigating local flood impacts.

4. Improve local water supply reliability by increasing capture of stormwater, conserving potable water and expanding water reuse.

5. Implement, monitor and maintain a reliable wastewater system that safely conveys, treats and reuses wastewater while also reducing sewer overflows and odors.

6. Increase climate resilience by planning for climate change mitigation and adaptation strategies in all City actions.

7. Increase community awareness and advocacy for sustainable water by active engagement, public outreach and education.

The final draft of One Water LA has been completed, and work on its Programmatic Environmental Impact Report (PEIR) will begin soon.[33]

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[31] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[32] *LASAN, About One Water LA, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-owla-au?_adf.ctrl-state=76au6qg25_5&_afrLoop=2125734313890589#!, accessed February 21, 2019.*

[33] *One Water LA, Plan Documents, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-owla-r?_adf.ctrl-state=rnwk2mfka_5&_afrLoop=3595575820503671#!, accessed February 20, 2019.*

(d) Los Angeles Municipal Code

The City has adopted several ordinances to amend 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 Nos. 166,080, 181,288, 183,608, and 184,250—amending LAMC Chapter XII, Article 1 to clarify prohibited uses of water and modify certain water conservation requirements of the City's Emergency Water Conservation Plan. The City's Emergency Water Conservation Plan sets forth six different phases of water conservation, which shall be implemented based on water conditions. As part of these requirements, watering is limited to specific days and hours. In determining which phase of water conservation shall be implemented, LADWP monitors and evaluates the projected water supply and demand. In addition, the Emergency Water Conservation Plan includes penalties for those that violate its requirements.

- City 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.

- City Ordinance No. 181,480—amended LAMC Chapter IX by adding Article 9 (Green Building Code) to the LAMC to incorporate various provisions of the California Green Building Standards 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.

- City 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. 184,248—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.

- City 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.

The City of Los Angeles also has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (Chapter V, Article 7 of the LAMC). Section 57.507.3.1 of the Fire Code 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 Section 57.507.3.1 of the LAMC, fire water flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing. As set forth in Section 57.507.3.1 of the LAMC, Industrial and Commercial land uses such as those of the Project have a minimum required fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 psi unless otherwise determined by LAFD. Section 57.507.3.2 of the LAMC 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.

(e) Los Angeles Water Rate Ordinance

The City's Water Rate Ordinance was adopted in June 1995 and last amended by the City's Board of Water and Power Commissioners pursuant to Ordinance No. 184,130. Effective since April 15, 2016, this City Water Rate Ordinance restructured water rates to help further promote conservation. Specifically, the goal of the ordinance is to incentivize water conservation while recovering the higher costs of providing water to high volume users and accelerating development of sustainable local water supply. Tiered water rate schedules were established for: single-dwelling unit customers; multi-dwelling unit customers; commercial, industrial, and governmental customers and temporary construction; recycled water service; private water service; publicly-sponsored irrigation, recreational, agricultural, horticultural, and floricultural uses, community gardens and youth sports. The new water rate structure increases the number of tiers from two to four for single-dwelling unit customers. In addition, this ordinance intends to maintain cost-of-service principles, incremental tier pricing based on the cost of water supply, and added pumping and storage costs.

b. Existing Conditions

(1) Water Supply

LADWP is responsible for providing water within the City of Los Angeles limits and ensuring that the water quality meets applicable California health standards for drinking water. As the Project Site is located within the City, LADWP is the water provider for the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, purchased water from MWD, and recycled water.[34] As shown in Table IV.L.2-1 on page IV.L.2-17, in 2016, the LADWP had an available water supply of 492,447 acre-feet. LADWP water sources are described in further detail below.

(a) Los Angeles Aqueducts

Snowmelt runoff from the Eastern Sierra Nevada Mountains is collected and conveyed to the City via the Los Angeles Aqueducts (LAA). The LAA's supplies come primarily from snowmelt and secondarily from groundwater pumping, and can fluctuate yearly due to the varying hydrological conditions.

The City holds water rights in the Eastern Sierra Nevada where the LAA's water supplies originate. These supplies originate from both streams and groundwater. As indicated in Table IV.L.2-1, approximately 95,566 acre-feet of LADWP's water supplies were from the LAA in 2016. Average deliveries from the LAA system from Fiscal Year 2011–2012 through Fiscal Year 2015–2016 were approximately 111,293 acre-feet of water annually.[35] In recent years, LAA supplies have been less than the historical average due to environmental restoration obligations in Mono and Inyo Counties. Various lawsuits and injunctions, and resulting agreements affect water supplies from the LAA. These include an agreement with the County of Inyo regarding groundwater levels and enhancement and mitigation projects in the Owens Valley, and the imposition of new regulatory requirements by the SWRCB regarding export from Mono Lake and restoration and monitoring programs for the Mono Basin. In addition, in November 2014, an agreement between the City and the Great Basin Unified Air Pollution Control District was reached wherein LADWP will continue to implement measures to address dust emissions at Owens Lake and implement additional water conservation through increasing use of water efficient and waterless dust measures.[36]

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[34] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[35] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[36] *Los Angeles Department of Water and Power, LADWP Newsroom, 2014 Archive, City of Los Angeles and Great Basin Unified Air Pollution Control District Reach Historic Comprehensive Agreement on Owens Lake Dust Mitigation, released November 14, 2014, www.ladwpnews.com/city-of-los-angeles-*

(Footnote continued on next page)

Table IV.L.2-1
Los Angeles Department of Water and Power 2007–2016 Water Supply

Calendar Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Total[a]
2007	127,392	88,041	439,353	3,595	**658,438**
2008	148,407	64,604	427,422	7,048	**645,817**
2009	137,261	66,998	351,959	7,570	**563,234**
2010	251,126	68,346	205,240	6,900	**532,550**
2011	357,752	49,915	119,481	7,708	**535,009**
2012	166,858	59,109	326,122	5,965	**556,872**
2013	64,690	66,272	438,534	9,253	**581,153**
2014	63,960	96,394	391,325	11,307	**561,515**
2015	33,236	80,155	378,439	9,829	**500,432**
2016	95,566	72,503	314,301	9,095	**492,447**

Units are in acre-feet.

[a] *The figures presented account for the transfer, spread, spill, and storage of the water supply as determined by LADWP.*

Source: Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.

LADWP projects that the average annual long-term LAA delivery between 2015 and 2040, using the 50-year average hydrology from Fiscal Year 1961-1962 to Fiscal Year 2010-2011, is expected to be approximately 278,000 AFY and gradually decline to 267,000 AFY due to projected climate change impacts.[37] However, with the anticipated completion of the Owens Lake improvements by 2024, the projected LAA delivery may increase to 286,000 AFY due to water conserved at Owens Lake, which would off-set most of the anticipated long-term losses.[38]

and-great-basin-unified-air-pollution-control-district-reach-historic-comprehensive-agreement-on-owens-lake-dust-mitigation/, accessed December 28, 2018.

[37] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[38] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

(b) Groundwater

LADWP owns water rights in the San Fernando, Sylmar, Eagle Rock, Central and West Coast Basins.[39] All of these basins are adjudicated by judicial decisions of the Superior Court of the State of California.

LADWP currently has combined water rights of approximately 109,809 AFY, of which approximately 87,000 AFY are located in the San Fernando Basin, 500 AFY in the Eagle Rock Basin, 1,503 AFY in the West Coast Basin, 17,236 AFY in the Central Basin and 3,570 AFY in Sylmar Basin.[40] LADWP has accumulated nearly 537,622 acre-feet of stored groundwater in the San Fernando Basin as of October 1, 2014.[41] This water can be withdrawn from the basin by the City during normal and dry years or in an emergency, in addition to LADWP's approximately 87,000 AFY entitlement in the basin.

As shown in Table IV.L.2-2 on page IV.L.2-19, during the period of July 2014 to June 2015, the City extracted 80,097 acre-feet from the San Fernando Basin and 6,948 acre-feet from the Central Basin.[42] The City plans to continue production from its groundwater basins in the coming years to offset reductions in imported water supplies. However, extraction from the basins may be limited by water quality, sustainable pumping practices, and groundwater elevation. Both LADWP and DWR have programs in place to monitor wells to prevent overdrafting. LADWP's groundwater pumping practice is based on a "safe yield" operation. Furthermore, basin management is achieved by collective efforts of a court-appointed Watermaster and the Upper Los Angeles River Area (ULARA) Administrative Committee of representatives from five public water supply agencies overlying the ULARA Basins.[43] These efforts include operation of groundwater remediation systems, use of an extensive network of groundwater monitoring wells, routine reporting on groundwater elevation and water quality, management and mitigation of urban runoff water quality, and development of enhanced stormwater recharge and groundwater replenishment.

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[39] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

[40] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

[41] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[42] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[43] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

Table IV.L.2-2
Local Groundwater Basin Supply

Fiscal Year (July–June)	San Fernando	Sylmar	Central
2010–2011	44,029	225	5,099
2011–2012	50,244	1,330	9,486
2012–2013	50,550	1,952	6,310
2013-2014	68,784	891	9,727
2014–2015	80,097	0	6,948
2019–2020[a]	90,000	4,170	18,500
2024–2025[a]	88,000	4,170	18,500
2029–2030[a]	84,000	4,170	18,500
2034–2035[a]	92,000	4,170	18,500
2039–2040[a]	92,000	3,570	18,500

Units are in acre-feet.

[a] *Projected groundwater production.*

Source: Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for domestic and municipal uses is Southern California. MWD imports a portion of its water supplies from Northern California through the SWP's California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct. As one of the 26 member agencies of MWD, LADWP purchases water from MWD to supplement LADWP water supplies from the Los Angeles Aqueducts and local groundwater. As of June 30, 2016, LADWP has a preferential right to purchase 18.51 percent of MWD's total water supply.[44]

Purchases from MWD have averaged 64 percent of the City's water supply over a five-year period from Fiscal Year 2011–2012 to 2015–2016.[45] The Sustainable City pLAn calls for a reduction in purchased imported water by 50 percent by 2025 from the Fiscal Year 2013–2014, which was approximately 441,870 acre-feet.[46] To meet these targets,

[44] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[45] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[46] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

LADWP plans to reduce water demand through increased conservation as well as increase local supply development. Local supply development includes enhancing the ability of groundwater pumping through increased stormwater capture projects and groundwater replenishment with highly treated recycled water as well as remediation of contaminated groundwater supplies in the San Fernando Basin. LADWP also plans to increase recycled water use for non-potable purposes. With these initiatives and under average hydrologic conditions, LADWP's 2015 UWMP projects MWD purchases to be approximately 65,930 AFY in 2025.[47]

As indicated in Table IV.L.2-1 on page IV.L.2-17, in 2016, LADWP received approximately 314,301 acre-feet of water from MWD. LADWP will continue to rely on MWD to meet its current and future supplemental water needs. Summaries of MWD's individual supplies, along with the challenges facing each supply and specific actions that MWD is taking to meet each of the challenges facing its water supplies, are presented below.

(i) State Water Project

MWD imports water from the SWP, which is owned by the State of California and operated by DWR. The SWP is the largest state-built, multi-purpose, user-financed water project in the country. The SWP is a water storage and delivery system of pump stations, reservoirs, aqueducts, tunnels, and power plants. The main purpose of the SWP is to divert and store surplus water during wet periods and distribute it to areas throughout the State. Other purposes of the SWP include flood control, power generation, recreation, fish and wildlife protection, and water quality management in the Sacramento–San Joaquin River Delta. The SWP transports Feather River water stored in and released from Oroville Dam and conveyed through the Bay-Delta, as well as unregulated flows diverted directly from the Bay-Delta south via the California Aqueduct to four delivery points near the northern and eastern boundaries of MWD's service area.

MWD is one of the 29 agencies that have long-term contracts for water service from DWR, and is the largest agency in terms of the number of people it serves (approximately 18.8 million), the share of the SWP water that it has contracted to receive (approximately 46 percent), and the percentage of total annual payments made to DWR by agencies with State water contracts (approximately 52 percent in 2016).[48]

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[47] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[48] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

The SWP, under the original contract with 100 percent allocation, provides MWD with 1,911,500 acre-feet of water.[49] However due to water quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, SWP deliveries in the most recent critically dry years were 5 percent of contractual amounts in 2014 and 20 percent of contractual amounts in 2015.[50] For 2016, DWR had estimated an initial allocation of 10 percent but increased the allocation to 60 percent by April 2016, primarily due to changes in hydrologic conditions.[51,52] In November 2016, DWR had estimated an initial allocation of 20 percent for 2017, due to factors including, but not limited to: existing storage in SWP conservation reservoirs, conservation constraints for the delta smelt, and contractor demands.[53,54] Due to the observed changes in hydrologic conditions, DWR subsequently increased 2017 allocation levels to 45 percent in December 2016,[55] 60 percent in January 2017,[56] and 85 percent on April 14, 2017.[57]

On November 29, 2017, DWR set an initial SWP allocation of 15 percent for most SWP contractors for the 2018 calendar year.[58] This allocation increased to 20 percent on January 29, 2018 and 30 percent on April 24, 2018.[59,60] The approval by DWR considered several factors, including existing storage in SWP conservation reservoirs, SWP

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[49] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[50] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

[51] *California Department of Water Resources, Notice to State Water Project Contractors, Number 15-07, 2016 State Water Project Initial Allocation—10 Percent.*

[52] *California Department of Water Resources, Notice to State Water Project Contractors, Number 16-06, 2016 State Water Project Allocation—60 Percent.*

[53] *California Department of Water Resources, Notice to State Water Project Contractors, Number 16-09, 2017 State Water Project Initial Allocation—20 Percent.*

[54] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[55] *California Department of Water Resources. Notice to State Water Project Contractors, Number 16-10, 2017 State Water Project Allocation—45 Percent.*

[56] *California Department of Water Resources, Notice to State Water Project Contractors, Number 17-01, 2017 State Water Project Allocation—60 Percent.*

[57] *California Department of Water Resources, Notice to State Water Project Contractors, Number 17-05, 2017 State Water Project Allocation—85 Percent.*

[58] *California Department of Water Resources, Notice to State Water Project Contractors, Number 17-10, 2018 State Water Project Initial Allocation—15 Percent.*

[59] *California Department of Water Resources, Notice to State Water Project Contractors, Number 18-02, 2018 State Water Project Allocation—20 Percent.*

[60] *California Department of Water Resources, Notice to State Water Project Contractors, Number 18-03, 2018 State Water Project Allocation Increase—30 Percent.*

operational regulatory constraints, and the 2018 contractor demands. DWR may revise the allocation and subsequent allocations if warranted by the year's developing hydrologic and water supply conditions.[61]

Recent Events at Oroville Dam

In early 2017, due to continued precipitation, DWR increased releases to manage higher in-flows in the Feather River Basin. On February 7, 2017, the Oroville Dam main flood-control spillway experienced significant damage during the releases. In response, DWR, for the first time in its history, stopped releases on the main spillway and diverted water to the emergency spillway. However, the emergency spillway quickly eroded, causing officials to order the temporary evacuation of downstream residents while ramping up water releases over the main spillway to control lake levels.[62]

Following a multi-agency investigation and recovery design, demolition and repairs began in May 2017. According to DWR, the spillways were functional by November 2017, while the upper section of the main spillway will be completed in 2019.[63] Despite the damage to the main spillway, water supplies are not expected to be adversely affected, as future water supplies are primarily dependent on hydrology.[64]

Challenges to State Water Project Supply

Litigation and various regulations have created challenges for the SWP.[65] In particular, the listing of several fish species in the Delta as threatened or endangered under the federal Endangered Species Act (ESA) and/or California Endangered Species Acts (CESA) has constrained SWP operations and created more uncertainty in SWP supply reliability. Based on the DWR's 2015 SWP Delivery Capability Report, future SWP deliveries will continue to be impacted by restrictions on SWP and Central Valley Project Delta pumping, and climate change, which is altering the hydrologic conditions in the State.

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[61] *California Department of Water Resources, Notice to State Water Project Contractors, Number 18-03, 2018 State Water Project Allocation Increase—30 Percent.*

[62] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[63] *California Department of Water Resources, Reconstruction Plans, www.water.ca.gov/What-We-Do/Emergency-Response/Oroville-Spillways/Reconstruction-Plans, accessed May 1, 2018.*

[64] *Los Angeles Department of Water and Power, Water Supply Assessment for the 222 West 2nd Project, January 9, 2018.*

[65] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

Programs Addressing Challenges within the Delta

In November 2009, the State Legislature and then Governor Arnold Schwarzenegger passed the 2009 Comprehensive Water Package, which set a statewide conservation target for urban per capita water use of 20 percent reductions by 2020 and consisted of four policy bills and an $11.14 billion bond proposal designed to ensure a reliable future water supply for the State and to restore the Delta and other ecologically sensitive areas.[66] Specifically, SB X7-1 of the 2009 Comprehensive Water Package established the coequal goals for the Delta: to provide a more reliable water supply for the State, and to protect, restore, and enhance the Delta ecosystem. SB X7-1 also created a new Delta governance structure and established a process for determining the consistency of the Bay Delta Conservation Plan (BDCP) with the coequal goals. Implementation of the four policy bills in the 2009 Comprehensive Water Package achieved major milestones, one of which included the May 16, 2013, adoption of the Delta Plan, a comprehensive and long-term management plan for the Delta. The goal of the BDCP was to provide the basis for the issuance of endangered species permits for the operation of the SWP, Central Valley Project, and for Delta conveyance improvements.[67]

The draft BDCP and associated EIR/EIS were made available for public review and comment in December 2013. In April 2015, state agencies announced a modified preferred alternative referred to as California WaterFix, which includes design changes and refinements to address impacts to Delta communities and various environmental commitments. A separate ecosystem effort referred to as California EcoRestore was also announced that includes restoration of at least 30,000 acres of Delta habitat. A recirculated draft EIR/supplemental draft EIS evaluating California WaterFix was prepared and released for public review in July 2015. In that document, the cumulative impacts of California EcoRestore are evaluated. Together, California WaterFix and California EcoRestore are expected to make significant contributions toward achieving the coequal goals of providing a more reliable water supply in California and protecting, restoring and enhancing the Delta ecosystem established in the Sacramento-San Joaquin Delta Reform Act of 2009.

On December 22, 2016, DWR and the U.S. Bureau of Reclamation completed the Bay Delta Conservation Plan/California WaterFix Final EIR/EIS, which has been submitted

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[66] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[67] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

to state and federal regulatory agencies for approval and permit authorization.[68] On January 18, 2017, the EPA recommended that the lead agencies for WaterFix carefully consider reasonably foreseeable operational constraints to ensure appropriate design and operation.[69] On July 21, 2017, the California Department of Water Resources certified the Final EIR and approved the California WaterFix (Alternative 4a).[70] In addition, on the same day, DWR filed a validation action with the Sacramento County Superior Court to affirm the department's authority to, among other things, issue revenue bonds to finance the planning, design, construction, and other capital costs of California WaterFix. The validation action is intended to provide assurances to the financial community for the sale of the revenue bonds for California WaterFix.[71,72] On April 10, 2018, the MWD Board of Directors voted to provide the additional funding necessary to allow for the construction of the full California WaterFix project. MWD's financing of the full project is expected to cost households on average up to $4.80 per month, though that average cost would be reduced as MWD recoups some of its investments from the agricultural sector. In addition, MWD would sell or lease capacity in the tunnels to allow water deliveries or exchanges for other parties.[73] California WaterFix has entered the design phase, and the first Requests for Qualifications have been released. Construction is anticipated to begin upon the receipt of all required permits.[74]

In addition, a primary consideration in the operation of the SWP is avoiding, minimizing, and/or offsetting adverse impacts to species of concern, species listed as threatened or endangered by a State or federal agency, or species proposed for listing. The SWP is operated pursuant to biological opinions issued under the federal ESA, and consistency determinations or incidental take permits issued under the CESA. As such, in order to avoid and minimize adverse impacts to these species, the SWP is operated with flexibility in operational responses, which can include the Delta Cross Channel gate

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[68] *California Department of Water Resources and the U.S. Bureau of Reclamation, Final Environmental Impact Report/Environmental Impact Statement for the Bay Delta Conservation Plan/California WaterFix, December 2016.*

[69] *U.S. Environmental Protection Agency, Director of Enforcement Division, to Bureau of Reclamation, Mid-Pacific Region, Regional Director, January 18, 2017.*

[70] *Bay Delta Conservation Plan, Notice of Determination (NOD), http://baydeltaconservationplan.com/Notice of Determination.aspx, accessed December 28, 2018.*

[71] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[72] *California Department of Water Resources, News for Immediate Release, California WaterFix Reaches Key Milestone as State Environmental Review is Certified, July 21, 2017.*

[73] *Metropolitan Water District of Southern California, News Release, "Metropolitan Approves Additional Funding for Full-Scale, Two-Tunnel California WaterFix," April 10, 2018.*

[74] *California Natural Resources Agency, California WaterFix, www.californiawaterfix.com/design-construction/, accessed April 18, 2018.*

closure, export curtailments, changes in delivery schedules, increased reservoir releases, preferential use of certain facilities, or a combination of these actions.[75]

(ii) The Colorado River

MWD owns and operates the Colorado River Aqueduct, which since 1942 has delivered water from the Colorado River to Southern California. The Colorado River currently supplies approximately 17 percent of Southern California's water needs, and on average makes up about 15 percent of LADWP's purchases from MWD.[76] MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. California is apportioned the use of 4.4 million acre-feet of water from the Colorado River each year plus one-half of any surplus that may be available for use collectively in Arizona, California, and Nevada.[77] Since 2003, due to increased consumption, no such unused apportioned water has been available to California. Historically, MWD has been able to claim most of its legal entitlement of Colorado River water and could divert over 1.2 million acre-feet in any year, but persistent drought conditions have contributed to a decrease in these claims. MWD's supplies from the Colorado River totaled approximately 985,000 acre-feet in the 2016 calendar year, which included a base supply of 935,000 acre-feet and water management actions resulting in 50,000 acre-feet.[78]

Challenges to Colorado River Supply

The Colorado River Basin has been experiencing a prolonged drought, with runoff in 2012 being among the four driest in history.[79] During these drought conditions, Colorado River system storage decreased to 50 percent of capacity.[80] MWD has developed a number of supply and conservation programs to increase the amount of supply available from the Colorado River. However, other users along the River have rights that will allow their water use to increase as their water demands increase. The Colorado River faces long-term challenges of water demands exceeding available supply with additional uncertainties due to climate change. Because MWD holds the lowest priority rights in

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[75] *California Department of Water Resources, Bulletin 132-16, Management of the California State Water Project, June 2017.*

[76] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[77] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[78] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[79] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

[80] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

California during a normal Lake Mead storage condition, the available future supply could decrease.[81]

Federal and state environmental laws protecting fish species and other wildlife species also have the potential to affect Colorado River operations. A number of species that are either endangered or threatened are present in the Lower Colorado River. However, the Lower Colorado River Multi-Species Conservation Program allows MWD to obtain federal and state permits for any incidental take of protected species resulting from current and future water and power operations of its Colorado River facilities and to minimize any uncertainty from additional listings of endangered species.[82] The Lower Colorado River Multi-Species Conservation Program also covers operations of federal dams and power plants on the river that deliver water and hydroelectric power for use by MWD and other agencies.[83]

Management of Colorado River Supply

There are various agreements and guidelines that affect the management of Colorado River water supplies, and MWD has taken steps to augment its share of Colorado River water supplies by entering into agreements with other agencies that have rights to use such water. Specifically, under a 1988 water conservation agreement between MWD and the Imperial Irrigation District, MWD provided funding for the Imperial Irrigation District to construct and operate a number of conservation projects that are currently conserving up to 109,460 acre-feet of water per year that is provided to MWD.[84] As amended, the agreement's initial term has been extended to at least 2041 or 270 days after the termination of the Quantification Settlement Agreement described below. In 2016, 105,000 acre-feet of conserved water was made available by the Imperial Irrigation District to MWD.[85] In addition, in August 2004, MWD and the Palo Verde Irrigation District signed an agreement for a Land Management, Crop Rotation and Water Supply Program, which provides up to 133,000 acre-feet of water to be available to MWD in certain years.[86] Furthermore, in May 2008, MWD joined the Central Arizona Water Conservation District

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[81] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

[82] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[83] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[84] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[85] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[86] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

and the Southern Nevada Water Authority in funding of the Warren H. Brock Reservoir, which conserves approximately 70,000 AFY of water by capturing and storing water that would otherwise be lost from the system. In return for its funding, MWD received 100,000 acre-feet of water stored in Lake Mead for future use and has the ability to receive up to 25,000 acre-feet of water in any single year. As of January 1, 2016, MWD had taken delivery of 43,992 acre-feet of the water and had 56,008 acre-feet of remaining in storage.[87]

MWD is also participating in numerous pilot programs to augment its water supplies. Other agreements and guidelines that continue to affect the management of water supplies from the Colorado River include the 2003 Quantification Settlement Agreement, which amended the 1998 Water Conservation and Transfer Agreement. The Quantification Settlement Agreement, executed by MWD, Coachella Valley Water District, and Imperial Irrigation District in 2003, establishes Colorado River water use limits for the Coachella and Imperial districts and provides for specific acquisitions of conserved water and water supply arrangements for up to 75 years. With full implementation of the programs identified in the Quantification Settlement Agreement, at times when California is limited to its basic apportionment of 4.4 million acre-feet per year, MWD expects to be able to annually divert to its service area approximately 850,000 acre-feet of Colorado River water plus water from its other developed water augmentation programs. The agreement called for the delivery of flows to the Salton Sea until the end of 2017, while further mitigation measures will continue to be funded by other agencies and the State of California. The Salton Sea Task Force created by Governor Brown released a draft of its Salton Sea Management Program in March 2017 and will continue to convene workshops and public hearings through 2018.[88] The MWD has no obligation to pay any costs associated with the restoration of the Salton Sea.[89]

Additional guidelines and programs that influence management of the Colorado River water supplies include, but are not limited, to the Interim Surplus Guidelines,[90] the Lower Basin Shortage Guidelines and Coordinated Management Strategies for Lake

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[87] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[88] *California Natural Resources Agency, Salton Sea Management Program, http://resources.ca.gov/salton-sea/, accessed February 21, 2019.*

[89] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018*

[90] *The Interim Surplus Guidelines are used to determine the conditions under which certain availability of surplus water can be used within the lower basin states of Arizona, California, and Nevada. Such guidelines were amended in 2007 and extend through 2026.*

Powell and Lake Mead,[91] and Intentionally Created Surplus Program,[92] and the Quagga Mussel Control Program.[93]

(iii) Additional MWD Actions to Address Supply

To improve water supply reliability for the entire Southern California region, MWD has also been pursuing voluntary water transfer and exchange programs with state, federal, public and private water districts, and individuals. Programs include the Arvin-Edison Storage Program; the Semitropic Storage Program; the San Bernardino Storage Program, the San Gabriel Valley MWD Exchange Program; the Antelope Valley-East Kern Water Agency Exchange and Storage Program; the Kern-Delta Water District Storage Program; the Mojave Storage Program; and the Central Valley Transfer Programs.[94]

In addition, MWD continues to develop plans and make efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates with MWD to ensure implementation of these water resource development plans.[95] As discussed above, MWD's long-term plans to meet its member agencies' reliability needs include improvements to the SWP as outlined in the California WaterFix and EcoRestore Plans, conjunctive management efforts on the Colorado River, water transfer programs and outdoor conservation measures, and development of additional local supplies, such as groundwater clean-up, recycled water, and desalination of brackish or high salt content water.[96]

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[91] *The Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead provide federal guidelines that concern the operation of the Colorado River system, particularly during drought and low reservoir conditions, and the delivery of water for Lower Basin states such as Arizona, California, and Nevada. These guidelines include, but are not limited to: water release criteria from Lake Powell; water storage and water release criteria from Lake Mead during shortage and surplus conditions in the Lower Basin; and a mechanism for the storage and delivery of conserved system and non-system water in Lake Mead.*

[92] *The Intentionally Created Surplus (ICS) program allows Lower Basin States to store conserved water in Lake Mead. ICS water is water that has been conserved through a variety of programs using extraordinary conservation measures, such as land fallowing. As of January 1, 2017, MWD had an estimated 71,000 acre-feet of ICS water.*

[93] *The Quagga Mussel Control Program was developed by MWD in 2007 to control the spreading of the invasive quagga mussels in the Colorado River's canals and reservoirs.*

[94] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

[95] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[96] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

Additionally, MWD has more than 5.0 million acre-feet of storage capacity available in reservoirs and banking/transfer programs, with approximately 1.25 acre-feet, inclusive of Intentionally Created Surplus, in that storage, and 626,000 acre-feet in emergency storage as of January 1, 2017.[97] As described in the MWD's 2015 UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under average-year, single dry-year, and multiple dry-year hydrologic conditions.

(d) Precipitation Conditions

In the summer of 2016, parts of Northern California remained at below-average precipitation, and Southern California precipitation was well below average. In addition, the Delta, which supplies a substantial portion of Southern California's water, had remained less than half full, while the Colorado River Basin continued to experience drought conditions.[98] The State continued to develop and implement necessary strategies and actions to address California's drought conditions. In particular, on January 15, 2016, DWR and the U.S. Bureau of Reclamation finalized the 2016 Drought Contingency Plan that outlined SWP and Central Valley Project operations for February 2016 through November 2016.[99] In addition, as described above, in May 2016, Governor Brown issued Executive Order B-37-16 to build on the temporary statewide emergency water restrictions and establish longer-term water conservation measures.

Although water year 2017 (i.e., October 1, 2016, to September 30, 2017) was the second wettest on record, water year 2018 (i.e., October 1, 2017, to September 30, 2018) represented a return to dry conditions statewide, with most of the State experiencing below-average precipitation.[100] The April 1, 2018 reading of snowpack was 58 percent of average, compared to 163 percent of average the previous year. Southern California experienced drier conditions than northern California, with Los Angeles, Riverside, and San Diego receiving 32, 46, and 32 percent of average precipitation, respectively, compared to 79 percent of average in the Sacramento River Basin watershed.

The outlook for the 2019 water year is unclear. Present forecasting capability cannot provide a reliable prediction. Water year 2018 may have been an isolated dry year or could represent a return to drought conditions, interrupted by a wet 2017. This would be

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97 *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

98 *California Department of Water Resources, Water Conditions Update, June 2016.*

99 *California Department of Water Resources and U.S. Bureau of Reclamation, Central Valley Project and State Water Project 2016 Drought Contingency Plan for Water Project Operations, February–November 2016, submitted January 15, 2016.*

100 *California Department of Water Resources, Water Year 2018: Hot and Dry Conditions Return, September, 2018.*

similar to conditions in the Colorado River Basin, where a 19-year dry period has included occasional average or wet years.

(e) Global Warming and Climate Change

As discussed in the LADWP's 2015 UWMP, generally speaking, any water supplies that are dependent on natural hydrology are vulnerable to climate change, especially if the water source originates from mountain snowpack. For LADWP, the most vulnerable water sources subject to climate change impacts are imported water supplies from MWD and the LAA. Local sources can expect to see some changes in the future as well. In addition to water supply impacts, changes in local temperature and precipitation are expected to alter water demand patterns. However, there is still general uncertainty within the scientific community regarding the potential impacts of climate change within the City of Los Angeles. LADWP continues to monitor the latest developments in scientific knowledge and will continue to assess future research for the potential impacts of climate change on its water resources.

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 also account for uncertainty, risk, and sustainability in planning for the future.[101] As mentioned above, with updates published every five years, the most recent *California Water Plan Update 2013* will be followed by an update for 2018 that will incorporate the issue of climate change. A 30-day public review period for the draft California Water Plan Update 2018 (Update 2018) concluded on January 21, 2019. Comments received on the draft will be used to inform the final Update 2018 release.[102] DWR has also been in the process of completing its Climate Action Plan since 2012. Phases I and II of the 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 is expected to be completed in 2018 with a vulnerability assessment and adaptation plan of DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.[103] As such, climate change and its impacts on

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[101] *California Department of Water Resources, California Water Plan Update 2013, Investing in Innovation & Infrastructure, Highlights, October 2014.*

[102] *California Department of Water Resources, California Water Plan, www.water.ca.gov/Programs/California-Water-Plan, accessed February 1, 2019.*

[103] *California Department of Water Resources, Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed February 1, 2019.*

water supplies are key factors of new water supply regulations and urban water management plans.

(f) Water Conservation and Recycling

LADWP's 2015 UWMP details the City's efforts to promote the efficient use and management of its water resources and provides the basic policy principles that guide LADWP's decision-making process to secure a sustainable water supply for the City of Los Angeles in the next 25 years. To meet multiple water conservation goals established in Executive Directive 5, the Sustainable City pLAn, and the Water Conservation Act of 2009, LADWP's 2015 UWMP aims to reduce per capita potable water use by 20 percent by 2017, by 22.5 percent by 2025, and by 25 percent by 2035, based on Fiscal Year 2013–2014 levels.[104] Furthermore, the LADWP is projected to increase recycled water use to 59,000 AFY by 2025 through planned municipal/industrial use and indirect potable reuse (i.e., groundwater replenishment). With the potential growth in customer demand, the LADWP projects that recycled water use will reach 75,400 AFY by 2040.[105] This will increase recycled water use in the City more than six-fold as a percentage of supply, from the current 2 percent to 13 percent by 2040.[106] Overall, LADWP's 2015 UWMP projects a 7 percent lower water demand trend than what was projected in the previous 2010 UWMP.[107] To achieve its goals, the LADWP has initiated water recycling projects in Elysian Park, Downtown Los Angeles, and other parts of the City, and is pursuing strategies related to groundwater replenishment and the non-potable reuse of water by irrigation and industrial customers.

(2) Water Demand

(a) LADWP Water Demand

LADWP's 2015 UWMP provides water supply and demand projections in five-year increments to 2040, based on projected population estimates provided by the Southern California Association of Governments (SCAG) in its 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS).[108] Table IV.L.2-3 on

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[104] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

[105] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

[106] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[107] *Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[108] *As discussed above, the 2015 UWMP was prepared based on SCAG's 2012–2035 RTP/SCS. Since the release of the 2015 UWMP, however, new growth forecasts have become available in SCAG's 2016–2040 RTP/SCS. In order to compare the growth forecasts (i.e., population, households, and employment) of the 2012–2035 RTP/SCS and the 2016–2040 RTP/SCS, straight-line interpolations were*

(Footnote continued on next page)

page IV.L.2-33 shows the projected water demand from the year 2020 through 2040 for the City of Los Angeles.

As shown in Table IV.L.2-3, in 2040 during average year hydrological conditions, the City's water demand is forecasted to be approximately 675,700 AFY. Use of the current demand per capita within this demand forecast provides a conservative estimate of projected future water demand to ensure that water supplies are available to meet projected demands. LADWP's 2015 UWMP anticipates adequate water supplies would be available to meet the projected demands of the service areas under normal, single-dry, and multi-dry year conditions through 2040.[109]

(b) On-Site Water Demand

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by a 6,393 square foot low-rise commercial building and surface parking areas. As provided in Table IV.L.2-4 on page IV.L.2-39 later in this discussion, the existing uses on the Project Site have a water demand of approximately 12,786 gallons per day (gpd) or approximately 14.3 acre-feet per year (AFY).

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by the LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 7,337 miles of distribution mains and trunk lines, 96 pump stations, and 118 storage tanks and reservoirs within the City, and total storage capacity of 311,000 acre-feet.[110] A large portion of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant in Sylmar, which is owned and operated by LADWP. Water entering the Los Angeles Aqueduct Filtration Plant undergoes treatment and disinfection before being distributed throughout LADWP's water service area.[111]

Domestic water service is available to the Project Site via LADWP water lines within the adjacent streets. Based on the Utility Report, included as Appendix J of this Draft EIR,

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conducted to determine current (2016) and future (2040) estimates. From these calculations, the growth forecasts from the 2016–2040 RTP/SCS were observed to be only marginally higher than those from the 2012–2035 RTP/SCS. Thus, the growth forecast of the 2016–2040 RTP/SCS would not significantly affect water demand projections.

[109] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016 Exhibits 11E–11K.*

[110] *Los Angeles Department of Water and Power, Briefing Book 2017-2018, August 2017.*

[111] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

Table IV.L.2-3
City of Los Angeles Water Demand Projections Based on Hydrological Conditions
(thousand AFY)

Hydrological Conditions[a]	Year				
	2020	2025	2030	2035	2040
Average Year	611.8	644.7	652.9	661.8	675.7
Single Dry Year (FY 2014–2015)	642.4	676.9	685.5	694.9	709.5
Multi-Dry Year (2011–2015)	642.4	676.9	685.5	694.9	709.5

AFY = acre-feet per year

Demands include existing passive conservation.

[a] *The LADWP defined three hydrologic conditions: average year (50-year average hydrology from Fiscal Years 1961-1962 through 2010–2011; single dry year (such as a repeat of the Fiscal Year 2014–2015 drought; and multi-dry year (such as a repeat of Fiscal Years 2012–2013 through 2014–2015).*

Source: Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibits 11F, 11G, and 11H.

water service to the Project Site is currently available via two domestic water connections off of a 24-inch water main in Vine Street: an existing 1.5-inch service, and an existing 1-inch connection. However, the LADWP has removed the meter from the 1-inch connection indicating that the 1-inch connection is no longer in use.

In addition to providing domestic water service, LADWP also provides water for firefighting services in accordance with the City Fire Code (Chapter V, Article 7 of the LAMC). The Utility Report identified an existing LAFD connection that provides water service to the fire sprinklers on the building face along Vine Street. This connection would be removed with the demolition of the Project Site's existing uses and replaced with a new connection that would meet all LAFD and City of Los Angeles Department of Building and Safety regulations and standards. As discussed in the Utility Report, based on the service map provided by the LADWP, there is an existing 4-inch fire service line along Vine Street. In the immediate vicinity of the Project Site, two fire hydrants are located on the east side of Vine Street. One hydrant is located approximately 160 feet north of the Project Site, and the second hydrant is located approximately 170 feet to the south. In addition, multiple fire hydrants are located in the greater vicinity of the Project Site.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (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;112

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 are relied upon. The analysis utilizes factors and considerations identified in the 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate water supply:

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

b. Methodology

The analysis of the Project's impacts relative to water supply is based on a calculation of the Project's anticipated net water demand. Consistent with LADWP's methodology, the estimated net water demand for the Project is calculated by applying the City of Los Angeles Bureau of Sanitation's (LASAN) wastewater generation rates to the Project's proposed uses. The water demand of the existing uses to be removed was then subtracted from the Project's total water demand to determine the Project's net water demand. The resulting net demand for water associated with the Project is then analyzed relative to LADWP's existing and 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 hydrologic conditions.

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[112] *Refer to the Project's Initial Study included as Appendix A of this Draft EIR for a discussion of wastewater and stormwater impacts; Section IV.L.1, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas infrastructure;, and Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts.*

The analysis with regard to water infrastructure is based on the Utility Report included in Appendix J to 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. Capacity determinations are based on coordination with LADWP and LAFD.

c. Project Design Features

No project design features are proposed with regard to water supply and infrastructure. As described in Section II, Project Description, of this Draft EIR, the Project would incorporate sustainability features related to water conservation in compliance with minimum code requirements.

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?[113]

(1) Construction

As discussed in the Utility Report included as Appendix J to this Draft EIR and as summarized below, the existing LADWP water infrastructure would be adequate to provide for the water flow necessary to serve the Project during operation. Thus, no upgrades to the mainlines that serve the Project Site would be required. However, the Project would require new service connections to connect to the existing water mainlines adjacent to the Project Site. The design and installation of new service connections would be required to meet applicable City standards. Installation of the new water distribution lines would primarily involve on-site trenching to place the lines below the surface, and minor off-site work to connect to the existing public water mains. Coordination with LADWP would be required prior to ground disturbance in order to identify the locations and depth of all lines. In addition, LADWP would be notified in advance of proposed ground disturbance activities in order to avoid water lines and disruption of water service.

The limited off-site connection activities could also temporarily affect access in adjacent right-of-ways. However, as discussed in Section IV.J, Transportation, of this Draft

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[113] *Refer to the Project's Initial Study included as Appendix A of this Draft EIR for a discussion of wastewater and stormwater impacts; Section IV.L.1, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas infrastructure;, and Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts.*

EIR, a Construction Traffic Management Plan would be implemented during project construction 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. The Construction Traffic Management Plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways.

Overall, construction activities associated with the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction of which could cause significant environmental effects. In addition, the existing water distribution capacity would be adequate to serve the Project. Furthermore, as discussed above, minor off-site construction impacts associated with installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water service or material inconvenience to motorists or pedestrians. **As such, construction-related impacts to water infrastructure would be less than significant and mitigation is not required.**

(2) Operation

As discussed above, water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. 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.

Fire flow to the Project Site would be required to meet City fire flow requirements. Specifically, the Project would comply with Section 57.507.3.1 of the LAMC, which establishes fire flow standards by development type. The Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously with a residual pressure of 20 psi. This translates to a required flow of 1,500 gpm for each hydrant. There are currently six fire hydrants in the immediate vicinity of the Project Site. As part of the Utility Report included in Appendix J to this Draft EIR, an Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP in order to determine if the existing public infrastructure could meet the fire flow demands of the Project. Based on the IFFAR results (see Exhibit 1 of the Utility Report, included as Appendix J to this Draft EIR), the six nearby fire hydrants within the vicinity of the Project Site have the capacity to provide 1,500 gpm each, with localized residual pressures ranging from 61 to 67 psi. The combined capacity of all six fire hydrants exceeds the 6,000 to 9,000 gpm fire flow and 20 psi residual pressure requirements. Therefore, LADWP would be able to supply sufficient flow and pressure to satisfy the fire suppression needs of the Project. Furthermore, as discussed in Section IV.I, Public

Services—Fire Protection, of this Draft EIR, the Project would include the installation of automatic fire sprinklers, which would reduce or eliminate water demand upon these public fire hydrants. Installation of the proposed automatic fire sprinklers would be subject to LAFD review and approval during LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for the Project, as set forth in Section 57.118 of the LAMC.

A Service Advisory Request (SAR) was also submitted to LADWP to determine if the existing public water infrastructure could meet the water demands of the Project. As described in the Utility Report, the Project proposes to connect to the existing 24-inch main in Vine Street with a lateral that would be adequately sized to simultaneously accommodate fire demand and domestic demand. Based on the SAR results (see Exhibit 2 of the Utility Report, included as Appendix J to this Draft EIR), the existing 24-inch main in Vine Street has a static pressure of 63 psi and a flow of up to 2,500 gpm with a residual pressure of 61 psi. In addition, the SAR identifies a 6-inch domestic service line with a simultaneous flow of 700 gpm. The approved SAR confirms that there is sufficient infrastructure capacity available to meet the Project's estimated water demand.

As discussed above, the approved IFFAR and SAR confirm that sufficient capacity is available to serve the water demands of the Project. The Project would provide a new metered service connection to the existing water mainline adjacent to the Project Site. Project-related infrastructure would be designed and installed to meet all applicable City requirements. No upgrades to the mainlines that serve the Project Site would be required, as they currently have capacity to serve the Project's water demand.

Based on the above, the Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site. Accordingly, the Project would not require or result in the construction or relocation of new water facilities or expansion of expanded water facilities, the construction or relocation of which could cause significant environmental effects. In addition, the water distribution capacity would be adequate to serve the Project. **Therefore, the Project's operational impacts on water infrastructure would be 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) Construction

Construction activities for the Project would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These

activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption of the Project at buildout. In addition, water use during construction would be somewhat offset by the water currently consumed by the existing uses, all of which would be removed as part of the Project. As described in the Utility Report, based on a review of construction projects that are similar size and duration to that of the Project, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd, which is substantially less than the approximately 12,786 gpd of estimated existing water consumption at the Project Site. Water for construction activities would be conveyed using the existing water infrastructure at the Project Site. No infrastructure improvements would be needed to provide water during the construction of the Project. Furthermore, as concluded in LADWP's 2015 UWMP, projected water demand for the City would be met by the available supplies during a normal year, single-dry year, and multiple-dry year in each year from 2015 through 2040. Project construction would occur over approximately 21 months, beginning in 2020, and is estimated to be completed in 2022. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction, and no new or expanded entitlements are needed. **As such, construction-related impacts to water supply would be less than significant.**

(2) Operation

As described in Section II, Project Description, of this Draft EIR, the Project would develop a hotel that would include 240 guest rooms, approximately 2,742 square feet of guest amenities, and approximately 5,373 square feet of shared guest and public spaces. The Project would also include five underground parking levels. Upon completion, the Project would result in approximately 73,440 square feet of new floor area. Based on the size of these land uses and the Project's resulting estimated water demand, the Project is not subject to the requirements of Senate Bill 610 (i.e., preparation of a water supply assessment), as described above in Subsection 2.a.(1)(c) on page IV.L.2-2.

Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation rates established by LASAN, which also serve to estimate water demand, to the proposed uses, as provided in Table IV.L.2-4 on page IV.L.2-39. As shown in Table IV.L.2-4, it is estimated that the Project would result in a net increase in the Project Site's average daily water demand of approximately 24,621 gpd, or approximately 27.6 AFY (assuming constant water use throughout the year). It should be noted that LASAN's wastewater generation rates do not account for water conservation features and therefore, the Project's estimated water demand is conservative. Specifically, as discussed

Table IV.L.2-4
Estimated Project Water Consumption

Land Use	Unit	Generation Factor[a]	Total Water Demand (gpd)
EXISTING			
Restaurant[b]	6,393 sf	30 gpd/15 sf	12,786
Subtotal Existing			*12,786*
PROPOSED			
Hotel Guest Rooms	240 rm	120 gpd/rm	28,800
Guest Amenity Spaces			
Level 1 Lobby	1,248 sf	0.050 gpd/sf	62
Level 12 Restrooms	677 sf	0.200 gpd/sf	135
Level 12 Hotel Guest Gym	817 sf	0.200 gpd/sf	163
Shared Guest & Public Spaces			
Level 1 Outdoor Seating[c]	563 sf	0.050 gpd/sf	28
Level 1 Coffee Bar[d]	280 sf	0.720 gpd/sf	202
Level 13 Living Room & Covered Terrace[b,e]	4,530 sf	25 gpd/15 sf	7,550
Corridors, Elevator Lobbies, and Circulation			
Elevator Lobbies and Circulation (Levels 1, 1M, 12, & 13)	3,015 sf	0.050 gpd/sf	151
Guestroom Corridors (Levels 2–11)[f]	20,340 sf	—	—
Back of House[g]			
Level 1	603 sf	0.120 gpd/sf	72
Level 12	1,314 sf	0.120 gpd/sf	158
Level 13 Living Room & Covered Terrace	497 sf	0.120 gpd/sf	60
Roof Level	216 sf	0.120 gpd/sf	26
Subtotal Proposed			*37,407*
TOTAL NET PROJECT DEMAND			**24,621**

gpd = gallons per day

sf = square feet

rm = rooms

[a] *Based on 100 percent of sewage generation rates provided by LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

[b] *Assumes 15 square feet per person to estimate existing seat count. Based on the assumption that 1 restaurant seat = 15 square feet. Source: International Code Council. (2014). 2015 International Building Code, Section 1004.1.2. Country Club Hills. ICC.*

[c] *The LASAN sewage generation rate for "Lounge" uses (i.e., 50 gpd per 1,000 square feet) is applied.*

[d] *The LASAN sewage generation rate for "Coffee House: No Food Preparation" uses (i.e., 50 gpd per 1,000 square feet) is applied.*

[e] *The Project may allocate a portion of this square footage to food-related services. Therefore, to provide a conservative estimate of wastewater generation, the LASAN sewage generation rate for "Restaurant: Fast Food" uses (i.e., 25 gpd per seat) is applied to the entire 4,530 square feet of Level 13 shared*

Table IV.L.2-4 (Continued)
Estimated Project Water Consumption

Land Use	Unit	Generation Factor[a]	Total Water Demand (gpd)
guest and public spaces.			
[f] Water demand from this use is included above in water demand of the Project's proposed hotel guest rooms.			
[g] LASAN does not provide a sewage generation rate for this type of use. Therefore, the LASAN sewage generation rate for office uses (i.e., 120 gpd per 1,000 square feet) is applied.			
Source: KPFF Consulting Engineers, 2018; Eyestone Environmental, 2018.			

above, the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) requires newly constructed 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. Accordingly, the Project would incorporate sustainability features such as efficient plumbing features, updated landscaping, modern irrigation, and efficient appliances that would reduce the Project's net increase in water demand by at least 20 percent pursuant to the requirements of the City of Los Angeles Green Building Code.

The 2015 UWMP utilized SCAG's 2012–2035 RTP data that provide for more reliable water demand forecasts, taking into account changes in population, housing units and employment. The Project would generate approximately 65 net new employees.[114] The Project, anticipated to be complete by 2022, would be consistent with the growth projections anticipated by SCAG and the demographic projection for the City in the 2012–2035 RTP/SCS.[115] Specifically, based on SCAG's employment projections for the City of Los Angeles Subregion between 2016 and 2022, the estimated 65 net new employees would represent approximately 0.17 percent of the projected employment growth.[116]

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[114] Based on a rate of 0.00113 employee per square foot for "Lodging" uses provided in the LAUSD 2016 Developer Fee Justification Study, March 2017, the Project's 73,440 square feet of hotel uses would generate approximately 83 employees. Based on a rate of 0.00271 employee per square foot for "Neighborhood Shopping Centers" uses, the existing 6,393 square feet of commercial restaurant and nightclub uses generates approximately 18 employees. Therefore, the Project is estimated to generate a net of 65 new employees on-site.

[115] The demand projections in LADWP's 2015 UWMP are based on demographic growth projections in SCAG's 2012–2035 RTP/SCS, the 2000 U.S. Census data, and the 2010 U.S. Census data. Since preparation of LADWP's 2015 UWMP, new growth forecasts have become available in SCAG's 2016–2040 RTP/SCS. However, the 2016 forecast is only slightly higher than the 2012 forecast in terms of current (2016) estimates and future (2040) projections. Therefore, LADWP's 2015 UWMP is based on a more conservative overall growth scenario.

[116] Based on a linear interpolation of SCAG's 2012–2020 data, the 2016 values for population, housing, and employment are calculated using SCAG's 2012 and 2020 values to find the average increase between
(Footnote continued on next page)

Therefore, the Project would be well within SCAG's 2012–2035 projections for the City of Los Angeles Subregion.

The Project's net water demand of 24,621 gpd (approximately 27.6 AFY) has been accounted for in the City's overall total demand projections set forth in LADWP's 2015 UWMP. Specifically, the 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City for normal, single-dry and multiple-dry years through the year 2040. As outlined in the 2015 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2015 UWMP accounts for the realities of climate change and the concerns of drought and dry weather and asserts that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2015 UWMP also furthers the goals of the City's Executive Directive No. 5 and Sustainable City pLAn, addresses the current and future SWP supply shortages, and concludes that MWD's actions in response to the threats to the SWP will ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, water conservation and recycling will play an increasing role in meeting future water demands in the City.

Based on the above, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Thus, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area during normal, single dry, and multiple dry years, and no new or expanded entitlements are needed. **Therefore, the Project's operation-related impacts on water supply would be less than significant.**

Based on the above, the Project 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 impacts on water supply would be less than significant.

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years and then applying that annual increase to each year until 2016. The 2022 values for population, housing, and employment are calculated using SCAG's 2020 and 2035 values to find the average increase between years and then applying that annual increase to each year until 2022.

Employment growth between 2016 (1,790,200 employees) and 2022 (1,829,580 employees) is approximately 39,380 employees. The Project's 65 net new employees would represent approximately 0.17% of this growth ((65 ÷ 39,380) × 100 = 0.17).

4. Cumulative Impacts

The Project, in conjunction with growth forecasted in the City through 2022 (i.e., the Project's buildout year), would cumulatively increase the demand for water, thus potentially resulting in cumulative impacts on water supplies and water infrastructure. Cumulative growth in the vicinity of the Project Site through 2022 includes specific known development projects, growth that may be projected as a result of the Hollywood Community Plan Update, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR.[117]

a. Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the water infrastructure that would serve the Project). Development of the Project and future new development in the vicinity of the Project Site would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, other new development projects would be subject to LADWP review to assure that the existing public infrastructure would be adequate to meet the domestic and fire water demands of each project, and individual projects would be subject to LADWP and City requirements regarding infrastructure improvements needed to meet respective water demands, flow and pressure requirements, etc. Furthermore, LADWP, Los Angeles Department of Public Works, and the LAFD would conduct ongoing evaluations of its infrastructure to ensure facilities are adequate. **Therefore, Project impacts on water infrastructure would not be cumulatively considerable, and cumulative impacts on the water infrastructure system would be less than significant.**

b. Water Supply

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City and portions of the cities of West Hollywood, Culver City, South Pasadena, and the Owens Valley). As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update its urban water management plan to plan and provide for water supplies to serve existing and projected demands. LADWP's 2015 UWMP accounts for existing development within LADWP's service area, which includes the City, as well as projected growth through the year 2040. Additionally, under the provisions of SB 610, LADWP is required to prepare a

[117] *As described in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 106, which itself is a conservative assumption, would account for any initial amount of growth that may occur between the adoption of the Community Plan Update and Project buildout.*

comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The water supply assessment for such projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed.

As identified in Section III, Environmental Setting, of this Draft EIR, there are 106 related development projects located in the Project vicinity, as well as the Hollywood Community Plan Update. The estimated water demand of the related projects is shown in Table IV.L.2-5 on page IV.L.2-44. As shown therein, the related projects would generate a total average water demand of approximately 4,925,590 gpd. The estimate of the related projects' water demand is conservative as it does not account for water conservation measures that would be implemented beyond Code requirements. The net water demand of the Project would be 24,621 gpd. Accordingly, the Project in conjunction with the related projects would yield a cumulative average water demand of approximately 4,950,211 gpd.

As previously stated, based on water demand projections through 2040 in LADWP's 2015 UWMP, LADWP determined that it will be able to reliably provide water to its customers through the year 2040, as well as the intervening years (i.e., 2022, the Project's buildout year) based on the growth projections in SCAG's RTP/SCS. In addition, compliance of the Project and other future development projects with the numerous regulatory requirements that promote water conservation described above would also reduce water demand on a cumulative basis. For example, certain related projects would be subject to the City's Green Building Code requirement to reduce indoor water use by at least 20 percent and all projects would be required to use fixtures that conserve water. In addition, certain large related projects meeting the thresholds under Senate Bill 610 would be required to prepare and receive LADWP approval of a water supply assessment that demonstrates how the project's water demand will be met. Each individual project would also be required to meet LAFD fire flow requirements and ensure adequate fire suppression coverage could be met through existing or upgraded infrastructure.

Overall, as discussed above, the LADWP's 2015 UWMP demonstrates that LADWP will meet all new water demands from projected population growth, through a combination of water conservation and water recycling. LADWP's 2015 UWMP specifically outlines the creation of sustainable sources of water to reduce dependence on imported supplies. LADWP's 2015 UWMP also incorporates the goals of Executive Directive 5 and the City's Sustainability pLAn. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high-efficiency water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system

Table IV.L.2-5
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
1	Millennium Hollywood Mixed-Use Project 1740 N. Vine St.	Apartment	492 du	190 gpd/du	93,480
		Hotel	200 rm	120 gpd/rm	24,000
		Office	100,000 sf	0.120 gpd/sf	12,000
		Fitness Club	35,000 sf	0.650 gpd/sf	22,750
		Retail	15,000 sf	0.025 gpd/sf	375
		Restaurant (34,000 sf)	2,267 seats	30 gpd/seat	68,000
2	Pantages Theater Office 6225 W. Hollywood Blvd.	Office	210,000 sf	0.120 gpd/sf	25,200
3	Yucca Street Condos 6230 W. Yucca St.	Apartment	114 du	190 gpd/du	21,660
		Commercial	2,697 sf	0.050 gpd/sf	135
4	BLVD 6200 Mixed Use 6200 W. Hollywood Blvd. (Phase 1 Complete)	Joint Living/Working Quarters	28 du	190 gpd/du	5,320
		Apartment	1,014 du	190 gpd/du	192,660
		Retail	175,000 sf	0.050 gpd/sf	8,750
5	Mixed-Use 6220 W. Yucca St.	Hotel	210 rm	120 gpd/rm	25,200
		Apartment	136 du	190 gpd/du	25,840
		Restaurant (6,980 sf)	465 seats	30 gpd/seat	13,960
6	Argyle Hotel Project 1800 N. Argyle Ave.	Hotel	225 rm	120 gpd/rm	27,000
7	Selma & Vine Office Project 1601 N. Vine St.	Office	100,386 sf	0.120 gpd/sf	12,046
		Commercial	2,012 sf	0.050 gpd/sf	101
8	Hotel & Restaurant Project 6381 W. Hollywood Blvd.	Hotel	80 rm	120 gpd/rm	9,600
		Restaurant (15,290 sf)	1,019 seats	30 gpd/seat	30,580
9	6140 Hollywood Blvd.	Hotel	102 rm	120 gpd/rm	12,240
		Condominium	27 du	190 gpd/du	5,130
		Restaurant (11,460 sf)	764 seats	30 gpd/seat	22,920

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
10.	Hollywood Gower Mixed-Use 6100 W. Hollywood Blvd.	Apartment	220 du	190 gpd/du	41,800
		Restaurant (3,270 sf)	218 seats	30 gpd/seat	6,540
11.	Modera Argyle 1546 N. Argyle Ave.	Apartment	276 du	190 gpd/du	52,440
		Retail	9,000 sf	0.025 gpd/sf	225
		Restaurant (15,000 sf)	1,000 seats	30 gpd/seat	30,000
12.	Sunset & Vine Mixed-Use 1538 N. Vine St.	Apartment	306 du	190 gpd/du	58,140
		Retail	68,000 sf	0.025 gpd/sf	1,700
13.	Hollywood & Wilcox 6430-6440 W. Hollywood Blvd.	Apartment	260 du	190 gpd/du	49,400
		Office	3,580 sf	0.120 gpd/sf	430
		Retail	11,020 sf	0.025 gpd/sf	276
		Restaurant (3,200 sf)	213 seats	30 gpd/seat	6,400
14.	Selma Hotel 6417 W. Selma Ave.	Hotel	180 rm	120 gpd/rm	21,600
		Restaurant (12,840 sf)	856 seats	30 gpd/seat	25,680
15.	Palladium Residences 6201 W. Sunset Blvd.	Apartment (37 Affordable)	731 du	190 gpd/du	138,890
		Retail/Restaurant[c] (24,000 sf)	1,600 seats	30 gpd/seat	48,000
16.	TAO Restaurant 6421 W. Selma Ave.	Quality Restaurant (17,607 sf)	1,174 seats	30 gpd/seat	35,214
17.	Selma–Wilcox Hotel 6421 W. Selma Ave.	Hotel	114 rm	120 gpd/rm	13,680
		Restaurant (1,993 sf)	133 seats	30 gpd/seat	3,986
18.	Wilcox Hotel 1717 N. Wilcox Ave.	Hotel	133 rm	120 gpd/rm	15,960
		Retail	3,580 sf	0.025 gpd/sf	90
19.	1723 N. Wilcox Ave. Residential	Apartment	68 du	190 gpd/du	12,920
		Retail	3,700 sf	0.025 gpd/sf	93

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
20.	Hudson Building 6523 W. Hollywood Blvd.	Restaurant (10,402 sf)	693 seats	30 gpd/seat	20,804
		Office	4,074 sf	0.120 gpd/sf	489
		Storage	890 sf	0.030 gpd/sf	27
21.	Columbia Square Mixed-Use 6121 W. Sunset Blvd.	Apartment	200 du	190 gpd/du	38,000
		Office	422,610 sf	0.120 gpd/sf	50,713
		Retail/Restaurant[c] (41,300 sf)	2,753 seats	30 gpd/seat	82,600
		Hotel	125 rm	120 gpd/rm	15,000
22.	Cahuenga Boulevard Hotel 1525 N. Cahuenga Blvd.	Hotel	64 rm	120 gpd/rm	7,680
		Restaurant/Lounge[c] (700 sf)	47 seats	30 gpd/seat	1,400
		Restaurant (3,300 sf)	220 seats	30 gpd/seat	6,600
23.	Ivar Gardens Hotel 6409 W. Sunset Blvd.	Hotel	275 rm	120 gpd/rm	33,000
		Retail	1,900 sf	0.025 gpd/sf	48
24.	Nickelodeon 6250 W. Sunset Blvd.	Apartment	200 du	190 gpd/du	38,000
		Retail	4,700 sf	0.025 gpd/sf	118
25.	Hotel 6500 W. Selma Ave.	Hotel	70 rm	120 gpd/rm	8,400
		Restaurant (4,320 sf)	288 seats	30 gpd/seat	8,640
26.	Selma Hotel 6516 W. Selma Ave.	Hotel	212 rm	120 gpd/rm	25,440
		Bar/Lounge[d]	3,855 sf	0.720 gpd/sf	2,776
		Bar/Event Space[d]	8,500 sf	0.720 gpd/sf	6,120
27.	6400 Sunset Mixed-Use 6400 Sunset Blvd.	Apartment	232 du	190 gpd/du	44,080
		Restaurant (7,000 sf)	467 seats	30 gpd/seat	14,000

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
28.	6200 W. Sunset Blvd.	Apartment	270 du	190 gpd/du	51,300
		Quality Restaurant (1,750 sf)	117 seats	30 gpd/seat	3,500
		Pharmacy	2,300 sf	0.025 gpd/sf	58
		Retail	8,070 sf	0.025 gpd/sf	202
29.	Sunset + Wilcox 1541 N. Wilcox Ave.	Hotel	200 rm	120 gpd/rm	24,000
		Restaurant (9,000 sf)	600 seats	30 gpd/seat	18,000
30.	1600 Schrader Blvd.	Hotel	168 rm	120 gpd/rm	20,160
		Restaurant (5,979 sf)	399 seats	30 gpd/seat	11,958
31.	Hotel 1921 Wilcox Ave.	Hotel	122 rm	120 gpd/rm	14,640
		Restaurant (4,225 sf)	282 seats	30 gpd/seat	8,450
32.	1719 Whitley Hotel 1719 N. Whitley Ave.	Hotel	156 rm	120 gpd/rm	18,720
33.	Onni Group Mixed-Use Development 1360 N. Vine St.	Condominium	429 du	190 gpd/du	81,510
		Grocery	55,000 sf	0.025 gpd/sf	1,375
		Retail	5,000 sf	0.025 gpd/sf	125
		Restaurant (8,988 sf)	599 seats	30 gpd/seat	17,976
34.	Godfrey Hotel 1400 N. Cahuenga Blvd.	Hotel	221 rm	120 gpd/rm	26,520
		Restaurant (3,000 sf)	200 seats	30 gpd/seat	6,000
35.	1717 N. Bronson Ave.	Apartment	89 du	190 gpd/du	16,910
36.	Academy Square 1341 Vine St.	Office	285,719 sf	0.120 gpd/sf	34,286
		Apartment	200 du	190 gpd/du	38,000
		Restaurant (16,135 sf)	1,076 seats	30 gpd/seat	32,270

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
37.	Mixed-Use 5939 W. Sunset Blvd.	Apartment	299 du	190 gpd/du	56,810
		Office	38,440 sf	0.120 gpd/sf	4,613
		Restaurant (5,064 sf)	338 seats	30 gpd/seat	10,128
		Retail	3,739 sf	0.025 gpd/sf	93
38.	Emerson College Project (Student Housing) 1460 N. Gordon St.	Student Housing	224 du	190 gpd/du	42,560
		Faculty/Staff Housing	16 du	190 gpd/du	3,040
		Retail	6,400 sf	0.025 gpd/sf	160
39.	Selma Community Housing 1603 N. Cherokee Ave.	Affordable Apartment	66 du	190 gpd/du	12,540
40.	Las Palmas Residential (Hollywood Cherokee)	Residential	224 du	190 gpd/du	42,560
		Retail	985 sf	0.025 gpd/sf	25
41.	Mixed-Use 5901 Sunset Blvd.	Office	274,000 sf	0.120 gpd/sf	32,880
		Supermarket	26,000 sf	0.025 gpd/sf	650
42.	Montecito Senior Housing 6650 W. Franklin Ave.	Senior Apartment	68 du	190 gpd/du	12,920
43.	6630 W. Sunset Blvd.	Apartment	40 du	190 gpd/du	7,600
44.	Hollywood Central Park Hollywood Freeway (US 101)	Park[e] (14.35 acres)	625,086 sf	0.093 gpd/sf	58,395
		Amphitheater	500 seats	3 gpd/seat	1,500
		Inn	5 rm	120 gpd/rm	600
		Community Center[f]	30,000 sf	0.350 gpd/sf	10,500
		Banquet Space	15,000 sf	0.350 gpd/sf	5,250
		Commercial	29,000 sf	0.050 gpd/sf	1,450
		Apartments (Low Income)	15 du	190 gpd/du	2,850
45.	Mixed-Use 1310 N. Cole Ave.	Apartment	369 du	190 gpd/du	70,110
		Office	2,570 sf	0.120 gpd/sf	308

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
46.	1749 Las Palmas Ave.	Apartment	70 du	190 gpd/du	13,300
		Retail	3,117 sf	0.025 gpd/sf	78
47.	1601 N. Las Palmas Ave.	Apartment	86 du	190 gpd/du	16,340
48.	1824 N. Highland Ave.	Apartment	118 du	190 gpd/du	22,420
49.	5750 Hollywood Blvd.	Apartment	161 du	190 gpd/du	30,590
		Commercial	4,747 sf	0.050 gpd/sf	237
50.	Sunset Bronson Studios 5800 W. Sunset Blvd.	Office	404,799 sf	0.120 gpd/sf	48,576
51.	Mixed-Use 1600-1610 N. Highland Ave.	Apartment	248 du	190 gpd/du	47,120
		Retail	12,785 sf	0.025 gpd/sf	320
52.	Hollywood Production Center 1149 N. Gower St.	Apartment	57 du	190 gpd/du	10,830
53.	Hotel 1133 N. Vine St.	Hotel	112 rm	120 gpd/rm	13,440
		Cafe (661 sf)	44 seats	25 gpd/seat	1,102
54.	Hollywood Crossroads 1540-1552 Highland Ave.	Residential	950 du	190 gpd/du	180,500
		Hotel	308 rm	120 gpd/rm	36,960
		Office	95,000 sf	0.120 gpd/sf	11,400
		Commercial Retail	185,000 sf	0.050 gpd/sf	9,250
55.	Apartments 1411 N. Highland Ave.	Apartment	76 du	190 gpd/du	14,440
		Commercial	2,500 sf	0.050 gpd/sf	125
56.	5600 W. Hollywood Blvd.	Apartment	33 du	190 gpd/du	6,270
		Commercial	1,289 sf	0.050 gpd/sf	64
57.	Mixed-Use (High Line West) 5550 W. Hollywood Blvd.	Apartment	280 du	190 gpd/du	53,200
		Retail	12,030 sf	0.025 gpd/sf	301

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
58.	John Anson Ford Theater 2580 Cahuenga Blvd. East	New Theater Seats	311 seats	3 gpd/seat	933
		Restaurant (5,400 sf)	360 seats	30 gpd/seat	10,800
		Office[g] (30 emp)	7,500 sf	0.120 gpd/sf	900
59.	Hollywood De Longpre Apartments 5632 De Longpre Ave.	Apartment	185 du	190 gpd/du	35,150
60.	Television Center (TVC Expansion) 6300 W. Romaine St.	Office	114,725 sf	0.120 gpd/sf	13,767
		Gym	40,927 sf	0.650 gpd/sf	26,603
		Dance Studio	38,072 sf	0.050 gpd/sf	1,904
61.	Mixed-Use 1233 N. Highland Ave.	Apartment	72 du	190 gpd/du	13,680
		Commercial	12,160 sf	0.050 gpd/sf	608
62.	The Lexington Mixed-Use 6677 W. Santa Monica Blvd.	Apartment	695 du	190 gpd/du	132,050
		Commercial	24,900 sf	0.050 gpd/sf	1,245
63.	McCadden Campus (LGBT) 1118 N. McCadden Pl.	Youth/Senior Housing	45 du	190 gpd/du	8,550
		Social Service Support Facility[h]	50,325 sf	0.120 gpd/sf	6,039
		Office	17,040 sf	0.120 gpd/sf	2,045
		Commercial Retail/Restaurant[c] (1,885 sf)	126 seats	30 gpd/seat	3,770
		Temporary housing	100 beds	70 gpd/bed	7,000
64.	SunWest Project (Mixed-Use) 5525 W. Sunset Blvd.	Apartment	293 du	190 gpd/du	55,670
		Commercial	33,980 sf	0.050 gpd/sf	1,699
65.	Mixed-Use 1657 N. Western Ave.	Apartment	91 du	190 gpd/du	17,290
		Retail	15,300 sf	0.025 gpd/sf	383
66.	Lanewood Apartments 7045 W. Lanewood Ave.	Apartment	43 du	190 gpd/du	8,170

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
67.	Hollywood Center Studios Office 6601 W. Romaine St.	Office	106,125 sf	0.120 gpd/sf	12,735
68.	Seward Street Office Project 956 N. Seward St.	Office	126,980 sf	0.120 gpd/sf	15,238
69.	Target Retail Shopping Center Project 5520 W. Sunset Blvd.	Discount Store	163,862 sf	0.050 gpd/sf	8,193
		Shopping Center	30,887 sf	0.025 gpd/sf	772
70.	Mixed-Use 1868 N. Western Ave.	Apartment	96 du	190 gpd/du	18,240
		Retail	5,546 sf	0.025 gpd/sf	139
71.	Mixed-Use 901 N. Vine St.	Apartment	70 du	190 gpd/du	13,300
		Commercial	3,000 sf	0.050 gpd/sf	150
72.	Hollywood 959 959 N. Seward St.	Office	241,568 sf	0.120 gpd/sf	28,988
73.	Sunset & Western 5420 W. Sunset Blvd.	Apartment	735 du	190 gpd/du	139,650
		Commercial	95,820 sf	0.050 gpd/sf	4,791
74.	Mixed-Use 1350 N. Western Ave.	Apartment	200 du	190 gpd/du	38,000
		Guest Rooms	4 rm	120 gpd/rm	480
		Retail/Restaurant[c] (5,500 sf)	367 seats	30 gpd/seat	11,000
75.	Paseo Plaza Mixed-Use 5651 W. Santa Monica Blvd.	Condominium	375 du	190 gpd/du	71,250
		Retail	377,900 sf	0.050 gpd/sf	18,895
76.	Mixed-Use 7107 Hollywood Blvd.	Apartment	410 du	190 gpd/du	77,900
		Restaurant (5,000 sf)	333 seats	30 gpd/seat	10,000
		Retail	5,000 sf	0.025 gpd/sf	125
77.	Apartments 5460 W. Fountain Ave.	Apartment	75 du	190 gpd/du	14,250
78.	1276 N. Western Ave.	Apartment	75 du	190 gpd/du	14,250

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
79.	Archstone Hollywood Mixed-Use Project 6901-6911 W. Santa Monica Blvd.	Apartment	231 du	190 gpd/du	43,890
		Restaurant (5,000 sf)	333 seats	30 gpd/seat	10,000
		Retail	10,000 sf	0.025 gpd/sf	250
80.	Tutoring Center 927 N. Highland Ave.	School[i]	100 stu	11 gpd/stu	1,100
			18 emp	11 gpd/emp	198
81.	The Chaplin Hotel Project 7219 W. Sunset Blvd.	Hotel	93 rm	120 gpd/rm	11,160
		Restaurant (2,800 sf)	187 seats	30 gpd/seat	5,600
82.	1001 N. Orange Dr.	Office	53,537 sf	0.120 gpd/sf	6,424
83.	Residential 712 N. Wilcox Ave.	Apartment	103 du	190 gpd/du	19,570
84.	Condos & Retail 5663 Melrose Ave.	Condominium	96 du	190 gpd/du	18,240
		Retail	3,350 sf	0.025 gpd/sf	84
85.	2014 Residential 707 N. Cole Ave.	Apartment	84 du	190 gpd/du	15,960
86.	Paramount Pictures 5555 W. Melrose Ave.	Production Office	635,500 sf	0.120 gpd/sf	76,260
		Office	638,100 sf	0.120 gpd/sf	76,572
		Retail	89,200 sf	0.025 gpd/sf	2,230
		Stage[j]	21,000 sf	0.050 gpd/du	1,050
		Support[j]	1,900 sf	0.050 gpd/du	95
87.	Temple Israel of Hollywood 7300 W. Hollywood Blvd.	Temple Renovation[k]	*N/A*	*N/A*	0
88.	Melrose & Beachwood 5570 W. Melrose Ave.	Apartment	52 du	190 gpd/du	9,880
		Commercial	5,500 sf	0.050 gpd/sf	275
89.	Mixed-Use Office/Retail 936 N. La Brea Ave.	Office	88,750 sf	0.120 gpd/sf	10,650
		Retail	12,000 sf	0.025 gpd/sf	300

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
90.	Faith Plating 7143 Santa Monica Blvd.	Residential	145 du	190 gpd/du	27,550
		Retail/Restaurant[c] (7,858 sf)	524 seats	30 gpd/seat	15,716
91.	904 La Brea Ave.	Apartment	169 du	190 gpd/du	32,110
		Retail	37,057 sf	0.025 gpd/sf	926
92.	925 La Brea Ave.	Retail	16,360 sf	0.025 gpd/sf	409
		Office	45,432 sf	0.120 gpd/sf	5,452
93.	La Brea Gateway 915 N. La Brea Ave.	Supermarket	33,500 sf	0.025 gpd/sf	838
		Apartment	179 du	190 gpd/du	34,010
94.	7445 Sunset Grocery 7445 W. Sunset Blvd.	Specialty Grocery Store	32,416 sf	0.025 gpd/sf	810
95.	Mixed-Use 5245 W. Santa Monica Blvd.	Apartment	49 du	190 gpd/du	9,310
		Retail	32,272 sf	0.025 gpd/sf	807
96.	747 N. Western Ave.	Apartment	44 du	190 gpd/du	8,360
		Retail	7,700 sf	0.025 gpd/sf	193
97.	Movietown 7302 W. Santa Monica Blvd.	Apartment	371 du	190 gpd/du	70,490
		Office	7,800 sf	0.120 gpd/sf	936
		Retail/Restaurant[c] (5,000 sf)	333 seats	30 gpd/seat	10,000
		Commercial	19,500 sf	0.050 gpd/sf	975
98.	Sunset Mixed-Use 7500-7510 W. Sunset Blvd.	Apartment	213 du	190 gpd/du	40,470
		Restaurant (10,000 sf)	667 seats	30 gpd/seat	20,000
		Retail	20,000 sf	0.025 gpd/sf	500
99.	Mixed-Use 6915 Melrose Ave.	Condominium	13 du	190 gpd/du	2,470
		Retail	6,250 sf	0.025 gpd/sf	156
100.	Apartments 525 N. Wilton Pl.	Apartment	88 du	190 gpd/du	16,720

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
101.	Melrose Crossing Mixed-Use 7000 Melrose Ave.	Apartment	40 du	190 gpd/du	7,600
		Retail	6,634 sf	0.025 gpd/sf	166
102.	Mixed-Use 4914 W. Melrose Ave.	Live/Work	45 du	190 gpd/du	8,550
		Retail	3,760 sf	0.025 gpd/sf	94
103.	Hardware Store 4905 W. Hollywood Blvd.	Retail	36,600 sf	0.025 gpd/sf	915
104.	4900 Hollywood Mixed-Use 4900 W. Hollywood Blvd.	Apartment	150 du	190 gpd/du	28,500
		Retail	13,813 sf	0.025 gpd/sf	345
105.	Select @ Los Feliz (Mixed-Use) 4850 W. Hollywood Blvd.	Apartment	101 du	190 gpd/du	19,190
		Restaurant (10,000 sf)	667 seats	30 gpd/seat	20,000
106.	NBC Universal Evolution Plan 100 Universal City Plaza	Studio	307,949 sf	0.050 gpd/sf	15,397
		Studio Offices	647,320 sf	0.120 gpd/sf	77,678
		Office	495,406 sf	0.120 gpd/sf	59,449
		Entertainment[l]	337,895 sf	0.350 gpd/sf	118,263
		Entertainment Retail	39,216 sf	0.025 gpd/sf	980
		Hotel[m] (900,000 sf)	1,385 rm	120 gpd/rm	166,154
107.	Hollywood Community Plan Update South of City of Burbank, City of Glendale, and SR 134; west of Interstate 5; north of Melrose Avenue; south of Mulholland Drive, City of West Hollywood, Beverly Hills, including land south of the City of West Hollywood and north of Rosewood Avenue between La Cienega Boulevard and La Brea Avenue.	Based on preliminary information available from the City, the draft Hollywood Community Plan Update will propose updates to land use policies and the land use diagram. The proposed changes would primarily increase commercial and residential development potential in and near the Regional Center Commercial portion of the community and along selected corridors in the Community Plan area.			

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
		The decreases in development potential would be primarily focused on low to medium scale multi-family residential neighborhoods to conserve existing density and intensity of those neighborhoods.[n]			
Related Projects Water Demand					**4,925,590**
Project Net Water Demand					**24,621**
Total Water Demand for Related Projects and Project					**4,950,211**

du = dwelling units

sf = square feet

rm = rooms

emp = employees

stu = students

[a] *This analysis is based on sewage generation rates provided by LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

[b] *This analysis conservatively assumes that all dwelling units are 3-bedroom units. In addition, the analysis for restaurant uses is based on the assumption of 1 seat per 15 square feet according to KPFF Consulting Engineers.*

[c] *This related project does not distinguish square footage between these uses. Therefore, to provide a conservative analysis, this related project is assumed to include only restaurant uses.*

[d] *This related project does not distinguish square footage between these uses. Therefore, to provide a conservative analysis, this related project is assumed to include only bar uses.*

[e] *Sewage generation rates provided by LASAN do not include rates for parks uses per acre. Therefore, the water demand rate for park uses is assumed to be equivalent to that of landscaping needs. The water demand rate for landscaping is based on calculations from Los Angeles Department of Water and Power, Water Supply Assessment for the 945 W. 8th Street Project, February 13, 2018.*

[f] *Sewage generation rates provided by LASAN do not include rates for community center uses per square foot. Therefore, the most comparable*

Table IV.L.2-5 (Continued)
Cumulative Water Demand

No.	Project	Description	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
	land use rate of 350 gallons per day per 1,000 square feet for "Banquet Room" is applied.				
g	*Sewage generation rates provided by LASAN do not include rates per employee. Therefore, the rate of 4 employees per 1,000 square feet is applied, based on Section IV.N.(1) Water Consumption of the Draft EIR for Village at Playa Vista Draft EIR, August 2003.*				
h	*Sewage generation rates provided by LASAN do not include rates for social service support uses. Therefore, the most comparable land use rate of 120 gallons per day per 1,000 square feet for "Office Building" is applied.*				
i	*Sewage generation rates provided by LASAN do not include rates per employee for school uses. Therefore, it is assumed that the most comparable land use rate per employee is equivalent to the rate per student for "School" uses.*				
j	*Sewage generation rates provided by LASAN do not include rates for stage or support area uses. Therefore, the most comparable land use rate of 50 gallons per day per 1,000 square feet for "Studio: Film/TV/Recording" is applied.*				
k	*Information for this related project is not available. Therefore, water demand is not calculated.*				
l	*Sewage generation rates provided by LASAN do not include rates for entertainment uses. Therefore, the most comparable land use rate of 350 gallons per day per 1,000 square feet for "Banquet Room" is applied.*				
m	*For hotel uses, a square footage rate of 650 square feet per room is applied. Source: deRoos, J. A. (2011). Planning and programming a hotel [Electronic version]. Retrieved December 13, 2016, from Cornell University, School of Hospitality Administration site, http://scholarship.sha.cornell.edu/articles/310.*				
n	*As described in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 106, which itself is a conservative assumption, would account for any initial amount of growth that may occur between the adoption of the Community Plan Update and Project buildout.*				
Source: Eyestone Environmental, 2019.					

to provide water for irrigation, industrial use, and groundwater recharge.[118] Furthermore, LADWP will continue to update its UWMP every five years to ensure that water supply continues to be available.

Based on the above analysis, it is anticipated that LADWP would be able to meet the water demands of the Project and future growth through 2022 and beyond. The 2015 UWMP forecasts adequate water supplies to meet all projected water demand increases in the City through the year 2040. Therefore, no cumulative significant impacts with respect to water supply are anticipated from the development of the Project and the related projects. **Project impacts on water supply would not be cumulatively considerable, and cumulative impacts on water supply would be less than significant.**

In conclusion, Project impacts on water infrastructure and water supply would not be cumulatively considerable, and cumulative impacts on the water infrastructure system and on water supply would be less than significant.

5. Mitigation Measures

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

6. Level of Significance After Mitigation

Project-level and cumulative impacts related to water supply and infrastructure would be less than significant without mitigation.

[118] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, April 2016.*