IV. Environmental Impact Analysis

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

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts to water supply and the water infrastructure system serving the Project Site. The analysis includes a description of regional water supplies and the 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. This analysis is based on the Water Supply Assessment (WSA) prepared for the Project by the Los Angeles Department of Water and Power (LADWP) and adopted by LADWP's Board of Water and Power Commissioners on February 12, 2019, and the *1111 Sunset Utility Infrastructure Technical Report: Water, Wastewater, and Energy* (Utility Report), prepared for the Project by KPFF Consulting Engineers, February 2021, included as Appendices S.1 and S.2, respectively, of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

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

The California Urban Water Management Planning Act (California Water Code, Sections 10610–10656) addresses several state policies regarding water conservation and development of water management plans to ensure that adequate supplies are available to meet existing and future demands. The California Urban Water Management Planning Act also requires water suppliers to develop 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 every five years.[1]

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.[2]

(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, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation includes the setting of an overall goal of reducing per capita urban water use, compared to 2009 levels, by 20 percent by December 31, 2020. The state was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 13.3 percent in January 2019 as compared to production in January 2013.[3]

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

SB 610, codified in the California Water Code Sections 10910 et seq., became effective January 1, 2002. SB 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 WSA 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 WSA 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, it 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 preparation of a WSA include the following:

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1 *LADWP, 2015 Urban Water Management Plan, April 2016.*

2 *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

3 *SWRCB, Fact Sheet, December 2018 Statewide Conservation Data.*

- 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;
- 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 WSA 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 WSA.

As described below, the Project includes more than 500 dwelling units; therefore, a WSA was required. The approved WSA prepared by the LADWP is provided in Appendix S.1 of this Draft EIR.

(d) Senate Bill 606 and Assembly Bill 1668

On May 31, 2018, Governor Edmund G. "Jerry" Brown (Governor Brown) signed SB 606 and Assembly Bill (AB) 1668 into law.[4] The pair of bills sets permanent overall targets for indoor and outdoor water consumption. The bills set an initial limit for indoor water use of 55 gallons per person per day in 2022, dropping to 50 gallons per person per day by 2030. The Department of Water Resources (DWR) and the State Water Resources Control Board (SWRCB) will recommend standards for outdoor use by October 2021.

(e) 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

[4] *Office of Edmund G. Brown, Jr., "Governor Brown Signs Legislation Establishing Statewide Water Efficiency Goals," May 31, 2018.*

(i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2019 California Plumbing Code, which is based on the 2018 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2020.

(f) Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act of 2014,[5,6] 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. 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 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, DWR published on its website the best management practices (BMPs) for sustainably managing groundwater:

- 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.[7]

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

[6] *California Department of Water Resources, SGM Sustainable Groundwater Management, www.water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed November 3, 2020.*

[7] *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 November 3, 2020.*

In November 2017, BMP 6 for Sustainable Management Criteria was released for public comments to be received by January 8, 2018. As of November 2020, BMP 6 is still in draft form.[8] Furthermore, under Section 10720.7 of the Sustainable 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.

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

In response to California's drought conditions, Governor Brown issued numerous Executive Orders regarding water conservation. Executive Order B-37-16, which was issued in May 2016, extended the mandatory water reduction measures outlined in a previous Executive Order B-29-15 and further directed DWR and the 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 established longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating wasteful practices, strengthening urban drought contingency plans, and improving agricultural water management and drought plans.

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.[9] Executive Order B-40-17 also 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.[10] The regulatory requirements resulting from the existing Executive Orders have been codified in Article 22.5, Drought Emergency Water Conservation, of the CCR.

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[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 November 3, 2020.*

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

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

(h) California Water Plan

Required by Water Code Section 10005(a), the California Water Plan is the State'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 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 California 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, policymakers and lawmakers have the ability to authorize specific actions and appropriate necessary funding. California Water Plan Update 2018 represents the latest update to the Water Plan.

(i) California Water Action Plan

The first California Water Action Plan (Action Plan) was published in January 2014 to provide a roadmap for the State's path toward sustainable water management.[11] 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 growth, and climate change and floods. The following ten actions were presented:[12]

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;

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[11] *California Department of Natural Resources, California Water Action Plan, https://resources.ca.gov/Initiatives/California-Water-Action-Plan, accessed November 3, 2020.*

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

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; and
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 was released, its implementation progress has also been documented with focuses on policy, funding, and coordinated projects. The Action Plan will continue to be implemented simultaneously with the California Water Plan Update 2018.

(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, 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. MWD's IRP is updated every five years. The goal of MWD's IRP is for Southern California to have a reliable water system that extends to the future. MWD's 2015 IRP Update, adopted in January 2016, provides MWD's strategy for water resource reliability through the year 2040. MWD's 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 MWD's 2015 IRP Update include investments to maintain the reliability of imported water

supplies, expansion of local water supplies, and reduction in water demand through a variety of conservation and water use efficiency initiatives.[13]

(b) MWD's 2015 Regional Urban Water Management Plan

MWD's 2015 Urban Water Management Plan (2015 LADWP UWMP) addresses the future of MWD's water supplies and demand through the year 2040.[14] 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. 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 deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix including programs in the Colorado River Aqueduct, State Water Project, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs. As set forth in its 2015 UWMP, MWD will also continue investments in water use efficiency measures to help the region achieve a 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.[15] 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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[13] *Metropolitan Water District of Southern California, Integrated Water Resources Plan Draft 2015 Update, January 12, 2016.*

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

[15] *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 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 included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, MWD adopted a water supply plan called the Water Supply Allocation Plan in February 2008, which has since been implemented three times, most recently in April 2015. The Water Supply Allocation Plan 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.

(3) Local

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

The City is required to adopt an UWMP every five years. In June 2016, LADWP adopted its 2015 Urban Water Management Plan (2015 LADWP UWMP). The 2015 LADWP UWMP 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.[16]

A number of important changes have occurred since the LADWP prepared its 2010 UWMP. The year 2012 marked the start of a multi-year drought in California, in response

[16] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

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 mandates 25-percent reductions in water use statewide. In October 2014, City of Los Angeles Mayor Eric Garcetti (Mayor Garcetti) issued Executive Directive No. 5 (ED 5), which set goals to reduce per capita water use, reduce purchases of imported potable water by 50 percent, and create an integrated water strategy to increase local supplies and improve water security considering climate change and seismic vulnerability. In addition, in April 2015, Mayor Garcetti released the first Sustainable City pLAn (discussed further below), establishing targets for the City that strengthen and promote sustainability throughout the year 2035. The 2019 L.A.'s New Green Deal, also discussed below, expands on the vision of the Sustainable City pLAn. The 2015 LADWP UWMP incorporates the objectives of these recent initiatives. Overall, the 2015 LADWP UWMP projects a 7-percent lower water demand trend than what was projected in LADWP's previous 2010 UWMP.[17] The draft 2020 LADWP UWMP has yet to be released for public comment and is anticipated in February of 2021.[18]

(b) Sustainable City pLAn and L.A.'s Green New Deal

The City's first Sustainable City pLAn, released in April 2015, 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 Sustainable City pLAn enhances 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 capita per day. The Sustainable City pLAn also includes targets to continue the remediation of the San Fernando Groundwater Basin aquifer, to reduce LADWP purchases of imported water by 50 percent by 2025, and to source 50 percent of water locally by 2035. As the Sustainable City pLAn presents specific strategies and desired outcomes for conservation, recycled water, and stormwater capture, proposed investments will also contribute to the progress and implementation of state-of-the art technology, rebates and incentives promoting water-efficient appliances, tiered water pricing, a technical assistance

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[17] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[18] *LADWP, 2015 Urban Water Management Plan, www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln;jsessionid=srj2gkVc23LGBJMXpvvGy9SSg9vn3fTXSHRrxL0dfkLqcKh7b9y1!-114950872?_afrWindowId=null&_afrLoop=401170800003490&refer_pv_id=3d7728c3nwfAWr&_afrWindowMode=0&_adf.ctrl-state=qn78i5dod_9#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D401170800003490%26refer_pv_id%3D3d7728c3nwfAWr%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dnf203bt8x_4, accessed February 10, 2021.*

program for business and industry, and large landscaped irrigation and water-efficiency programs.[19]

In April 2018, the Sustainable City pLAn's Third Annual Report for 2017–2018 was released. It reported that the City had reduced per capita water use by 20 percent to achieve both the City's and the pLAn's water use reduction goal.[20]

In 2019, the first four-year update to the 2015 Sustainable City pLAn was released. This updated document, known as L.A.'s Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals.[21] L.A.'s Green New Deal focuses on environmental justice, renewable energy, local water, clean and healthy buildings, housing and development, mobility and public transit, zero emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, and green jobs. In addition, all targets have been aligned with the United Nations Sustainable Development Goals.

L.A.'s Green New Deal provides the following targets related to local water in the City:

- Source 70 percent of L.A.'s water locally and capture 150,000 AFY of stormwater by 2035.
- Recycle 100 percent of all wastewater for beneficial reuse by 2035.
- Build at least 10 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050.
- Reduce potable water use per capita by 22.5 percent by 2025; and 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Install or refurbish hydration stations at 200 sites, prioritizing municipally owned buildings and public properties such as parks, by 2035.

L.A.'s Green New Deal also provides specific milestones and initiatives to meet such targets.

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

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

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

(c) Resilient Los Angeles

In March 2018, the City released its Resilient Los Angeles Plan, which includes strategies to fortify the City's infrastructure, protect its economy, and make Los Angeles safer.[22] Goal 11, *Restore, Rebuild, and Modernize Los Angeles' Infrastructure*, includes measures related to water supply. Specific goals include, but are not limited to, expanding the City's seismic resilient pipe network, replacing aging infrastructure, and expanding and protecting water sources to reduce dependence on imported water and strengthen the City's local water supply.

(d) Los Angeles Municipal Code

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

- Ordinance 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

[22] *City of Los Angeles, Resilient Los Angeles, March 2018.*

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.

- 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.

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

The City of Los Angeles also has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). Fire Code Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing. As identified by the LAFD in their written correspondence provided in Appendix L of this Draft EIR, the required fire water flow for the Project has been set at 9,000 gpm from four to six hydrants flowing simultaneously with a minimum residual water pressure of 20 psi, which corresponds to the Industrial and Commercial land use category.

(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 supplies. 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.[23] As shown in Table IV.N.1-1 on page IV.N.1-15, in 2017, the most recent year for which data is available, LADWP had an available water supply of 510,835 acre-feet. LADWP water sources are described in further detail below.

(a) Los Angeles Aqueducts

As provided in the WSA prepared for the Project included in Appendix S.1 of this Draft EIR, snowmelt runoff from the Eastern Sierra Nevada Mountains is collected and conveyed to the City via the Los Angeles Aqueducts. The Los Angeles Aqueducts 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 Los Angeles Aqueducts water supplies originate. These supplies originate from both streams and groundwater. As indicated in Table IV.N.1-1, approximately 380,329 acre-feet of LADWP's water supplies were from the Los Angeles Aqueducts in 2017. Average deliveries from the Los Angeles Aqueducts system from fiscal year 2011/2012 through fiscal year 2015/2016 were approximately 111,293 acre-feet of water annually. During this period, the record low snowpack for Los Angeles Aqueducts watershed in the Eastern Sierra Nevada Mountains was recorded on April 1, 2015. Supply conditions have changed drastically since 2015.

[23] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

Table IV.N.1-1
Los Angeles Department of Water and Power 2007–2017 Water Supply

Calendar Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage[a]	Total
2007	127,392	88,041	439,353	3,595	**(57)**	**658,438**
2008	148,407	64,604	427,422	7,048	**1,664**	**645,817**
2009	137,261	66,998	351,959	7,570	**554**	**563,234**
2010	251,126	68,346	205,240	6,900	**(938)**	**532,550**
2011	357,752	49,915	119,481	7,708	**(153)**	**535,009**
2012	166,858	59,109	326,123	5,965	**1,182**	**556,873**
2013	64,690	66,272	438,534	9,253	**(2,404)**	**581,153**
2014	63,960	96,394	391,307	11,307	**2,020**	**560,948**
2015	33,244	80,155	378,539	9,829	**430**	**501,337**
2016	95,573	72,503	314,336	9,095	**(981)**	**492,487**
2017	380,329	14,695	113,033	8,509	**5,730**	**510,835**

Units are in acre-feet.

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

Source: LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019, Table III.

Snowpack in the Eastern Sierra Nevada Mountains was at 171 percent of an average year on April 1, 2019.[24]

Various lawsuits and injunctions, and resulting agreements, affect water supplies from the Los Angeles Aqueduct. 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. Upon completion of the Phase 9/10 Project on December 31, 2017, LADWP had mitigated dust emissions from 48.6 square-miles of Owens Lake. Based on the agreement, the Great

[24] *LADWP, Eastern Sierra Snow Survey Results, April 1, 2019.*

Basin Unified Air Pollution Control District's potential future dust mitigation orders to LADWP cannot exceed an additional 4.8 square miles. As a result, LADWP expects to save significant amounts of water over the next 10 years with implementation of the Owens Lake Master Project and other water conservation projects.[25]

Based on historical hydrological conditions from fiscal year 1961/1962 to fiscal year 2010/2011, LADWP projects that the average annual long-term Los Angeles Aqueduct delivery between 2015 and 2040 is expected to be approximately 278,000 AFY and gradually decline to 267,000 AFY due to projected climate change impacts.[26] However, with completion of the Owens Lake Master Project by 2024, the projected Los Angeles Aqueducts 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.[27]

(b) Groundwater

As discussed in the WSA prepared for the Project included in Appendix S.1 of this Draft EIR, LADWP pumps groundwater from three adjudicated basins, including the San Fernando, Sylmar, and Central Basins.

LADWP has accumulated 523,529 acre-feet of stored water credits in the San Fernando Basin as of October 1, 2016.[28] This water can be withdrawn from the basin during normal and dry years or in an emergency, in addition to LADWP's approximately 87,000 AFY entitlement in the basin. The City's current annual entitlement in the Sylmar Basin is 3,570 acre-feet. LADWP's annual entitlement in the Central Basin is 17,236 acre-feet.

As shown in Table IV.N.1-2 on page IV.N.1-17, during the 2017–2018 fiscal year (July through June), LADWP extracted 22,259 acre-feet from the San Fernando Basin and 0.77 acre-feet from the Central Basin.[29] LADWP plans to continue production from its groundwater basins in the coming years to offset reductions in imported water supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection. 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

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[25] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[26] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[27] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[28] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[29] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

Table IV.N.1-2
Local Groundwater Basin Supply

Fiscal Year (Jul–Jun)	San Fernando	Sylmar	Central
2012–2013	50,550	1,952	6,310
2013–2014	68,784	891	9,727
2014–2015	80,097	1	6,948
2015–2016	75,958	683	8,395
2016–2017	55,116	0	3,005
2017–2018	22,259	0	1
2019–2020*	90,000	4,170	18,500
2024–2025*	88,000	4,170	18,500
2029–2030*	84,000	4,170	18,500
2034–2035*	92,000	4,170	18,500
2039–2040*	92,000	3,570	18,500

Units are in acre-feet.

**Projected production from 2015 UWMP.*

Source: LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019. Table IV.

Watermaster and the Upper Los Angeles River Area (ULARA) Administrative Committee of representatives from five public water supply agencies overlying the ULARA Committee.[30] 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.

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for domestic and municipal uses in Southern California. MWD imports a portion of its water supplies from Northern California through the State Water Project'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

[30] *LADWP, 2015 Urban Water Management Plan, June 2016.*

Aqueducts and local groundwater. As of June 30, 2018, LADWP has a preferential right to purchase 18.36 percent of MWD's total water supply.[31]

The Sustainable City pLAn, discussed above, calls for a reduction in purchased imported water by 50 percent by 2025 from the Fiscal Year 2013–2014 level, which was approximately 441,870 acre-feet.[32] L.A.'s Green New Deal also reaffirms this initiative.[33] To meet these targets, LADWP plans to increase conservation, enhance the ability for 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.[34]

Through continued and additional local supply development and conservation savings, LADWP's reliance on MWD water supplies may be reduced significantly from the five-year average from Fiscal Years 2010–2011 through 2014–2015 of 57 percent of total demand to 11 percent under average weather conditions and to 44 percent under single-dry year conditions by fiscal year 2040.[35] As indicated in Table IV.N.1-1 on page IV.N.1-15, LADWP received approximately 113,033 acre-feet of water from MWD in 2017, which was a substantial reduction from previous years. Summaries of MWD's individual supplies, along with each supply's challenges and specific responsive actions taken by MWD, are presented below.

(i) State Water Project

MWD imports water from the State Water Project, owned by the state of California and operated by DWR. The State Water Project is a water storage and delivery system of pump stations, reservoirs, aqueducts, tunnels, and power plants. The main purpose of the State Water Project is to divert and store surplus water during wet periods and distribute it to areas throughout the State. Other purposes of the State Water Project include flood control, power generation, recreation, fish and wildlife protection, and water quality management in the Sacramento–San Joaquin River Delta. The State Water Project transports Feather River water stored in and released from Oroville Dam and conveyed

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[31] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[32] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

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

[34] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[35] *LADWP, 2015 Urban Water Management Plan, April 2016.*

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 State Water Project 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).[36]

The SWP, under the original contracted amount at 100 percent allocation, provides MWD with 1,911,500 acre-feet of water each calendar year.[37] However, due to water quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, State Water Project deliveries in the most critically dry years have varied. For 2019, DWR estimated an initial allocation of 10 percent[38] but increased the allocation to 15 percent[39] by January 25 due to changes in precipitation and available water supplies.

Challenges to State Water Project Supply

Litigation and various regulations have created challenges for the State Water Project.[40] In particular, the listing of several fish species in the Delta as threatened or endangered under the federal and/or California Endangered Species Acts (ESA/CESA) has constrained State Water Project operations and created more uncertainty in State Water Project supply reliability. Based on DWR's 2015 *State Water Project Delivery Capability Report*, future State Water Project deliveries will continue to be impacted by restrictions on State Water Project and Central Valley Project Delta pumping, and climate change, which is altering the hydrologic conditions in the State.

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[36] *LADWP, Water Supply Assessment—1111 Sunset Project, Appendix F, February 12, 2019.*

[37] *LADWP, Water Supply Assessment—1111 Sunset Project, Appendix F, February 12, 2019.*

[38] *California Department of Water Resources, Notice to State Water Project Contractors, Number 18-06, 2019 State Water Project Initial Allocation—10 Percent.*

[39] *California Department of Water Resources, Notice to State Water Project Contractors, Number 19-03, 2019 State Water Project Allocation Increase—15 Percent.*

[40] *LADWP, Water Supply Assessment—1111 Sunset Project, Appendix F, February 12, 2019.*

(ii) The Colorado River

MWD owns and operates the Colorado River Aqueduct, which has delivered water from the Colorado River to Southern California since 1942.[41] 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.[42] 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.[43] In addition, California has historically been allowed to use Colorado River water apportioned to, but not used by, Arizona or Nevada. 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.[44] MWD's total supply from the Colorado River for Calendar Year 2016 was approximately 985,000 acre-feet.[45]

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.[46] 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.[47] 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. Furthermore, in May 2008, MWD joined the Central Arizona Water Conservation District and the Southern Nevada Water Authority in funding the Warren H. Brock Reservoir, which conserves approximately 70,000 AFY of water. MWD is also participating in numerous pilot programs

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[41] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[42] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[43] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[44] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[45] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[46] *LADWP, Water Supply Assessment—1111 Sunset Project, Appendix F, February 12, 2019.*

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

to augment its water supplies. Other agreements and guidelines that continue to affect the management of water supplies from the Colorado River include the Quantification Settlement Agreement, executed in October 2003, and the Transfer Agreement executed in 1998. Additional guidelines and programs that influence management of the Colorado River water supplies include the Interim Surplus Guidelines, the Lower Basin Shortage Guidelines and Coordinated Management Strategies for Lake Powell and Lake Mead, the Intentionally Created Surplus Program, and the Quagga Mussel Control Program.

(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.[48]

In addition, MWD continues to develop plans and make efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of these water resource development plans.[49] As discussed above, MWD's long-term plans to meet its member agencies reliability needs include improvements to the State Water Project, conjunctive management efforts on the Colorado River, water transfer programs and outdoor conservation measures, and development of additional local resources, such as recycling brackish water desalination and seawater desalination.[50]

Additionally, MWD has more than 5 million acre-feet of storage capacity of available reservoirs and banking/transfer programs, with approximately 1.29 million acre-feet of water in Water Surplus Drought Management storage and an additional 626,000 acre-feet in emergency storage as of January 1, 2017.[51] With implementation of new and modified existing storage programs to manage the available surplus supplies, MWD was able to store approximately 1.18 million acre-feet of water in 2017 and began 2018 with approximately 2.46 million acre-feet of water in its dry-year storage portfolio. As described in the MWD's 2015 UWMP, MWD has supply capabilities that would be sufficient to meet

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

[49] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[50] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

[51] *LADWP, Water Supply Assessment—1111 Sunset Street Project, February 12, 2019.*

expected demands from 2020 through 2040 under average-year, single dry-year, and multiple dry-year hydrologic conditions.

(d) Precipitation Conditions

During the 2018 water year (i.e., October 1, 2016, through September 30, 2017), California experienced dry conditions statewide, with nearly all the state experiencing below average precipitation and much of Southern California receiving half or less of its average annual precipitation. Water year 2018 followed California's second-wettest year of record as measured by statewide runoff, ending a historic five-year drought.[52] The City of Los Angeles receives an average of 14.77 inches of precipitation per year according to the National Weather Service. As of November 3, 2020, the City has not received any precipitation.[53]

According to the National Drought Mitigation Center, as of November 3, 2020, 15.40 percent of the state was not in a drought condition, and 84.60 percent of the state was considered abnormally dry.[54] This indicates a shift from the previous year on October 29, 2019, when 82.26 percent of the state was not in a drought condition, and 17.74 percent of the state was considered abnormally dry.[55] Thus, the State continues to develop and implement necessary strategies and actions to address future drought conditions and account for year-to-year fluctuations in precipitation.

(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 Los Angeles Aqueducts, though local sources can also expect to see some changes in the future. 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. LADWP continues to monitor the latest developments in scientific knowledge and will

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[52] *California Department of Water Resources, Water Year 2018: Hot and Dry Conditions Return, October 1, 2018.*

[53] *California Department of Water Resources, Daily Precipitation Stations, Los Angeles/USC, https://cdec.water.ca.gov/dynamicapp/QueryDaily?s=USC, accessed November 3, 2020.*

[54] *United States Drought Monitor, State Drought Monitor, California, November 3, 2020.*

[55] *United States Drought Monitor, State Drought Monitor, California, November 3, 2020.*

continue to assess future research for the potential impacts of climate change on its water resources.[56]

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.[57] As mentioned above, with updates published every five years, the most recent *California Water Plan Update 2018* built on its predecessor by identifying specific performance tracking metrics, recommending financing methods with stable revenues, and incorporating principles of sustainability.[58]

DWR has also been in the process of completing its Climate Action Plan since 2012. Phases I and II of the Climate Action Plan include the guidance of DWR in reducing greenhouse gas emission and the expertise of a climate change technical advisory group formed in 2012, respectively. Phase III of the plan was completed in 2017 with a vulnerability assessment and adaptation plan DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.[59] As such, climate change and its impacts on water supplies are key factors of new water supply regulations and urban water management plans.

(f) Water Conservation and Recycling

LADWP'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 ED 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 22.5 percent by 2025 and by 25 percent by 2035.[60] Following the target reduction of potable water use per capita by

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[56] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, p. 12-1.*

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

[58] *California Department of Water Resources, California Water Plan Update 2018, https://water.ca.gov/Programs/California-Water-Plan/Update-2018, accessed November 3, 2020.*

[59] *California Department of Water Resources, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed November 3, 2020.*

[60] *LADWP, 2015 Urban Water Management Plan, June 2016.*

25 percent by 2035, L.A.'s Green New Deal adds an additional target for the City to maintain or reduce 2035 per capita water use through 2050.[61] The City also intends to build upon the success of Save the Drop and develop additional water conservation campaigns; continue benchmarking customer use and recognizing innovative water reduction initiatives; improve data gathering to identify program effectiveness; expand top performing conservation incentive programs for landscape transformation, washing machines, etc.; and expand sub-metering and evaluate smart water meter technologies.

Further, based on LADWP's 2015 UWMP, recycled water use is projected to reach 59,000 AFY by 2025 and further increase to 75,400 AFY by 2040.[62] Overall, the 2015 LADWP UWMP projects a 7-percent lower water demand trend than what was projected in the previous 2010 UWMP.[63] In addition, based on programs and improvements contemplated in the 2015 LADWP UWMP, locally developed water supplies will increase from the current 14 percent to 49 percent in dry years, or to 47 percent in average years by 2040.[64] L.A.'s Green New Deal also has a target to recycle 100 percent of all wastewater for beneficial reuse by 2035.[65] Beneficial reuse includes, but is not limited to, non-potable reuse, groundwater recharge, and supporting environmental and recreational uses such as those in the L.A. River.

(2) Water Demand

(a) Regional 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).[66] Table IV.N.1-3 on page IV.N.1-25 shows the projected water demand from the year 2020 through 2040 for the City of Los Angeles.

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

[62] *LADWP, 2015 Urban Water Management Plan, June 2016.*

[63] *LADWP, 2015 Urban Water Management Plan, June 2016.*

[64] *LADWP, 2015 Urban Water Management Plan, June 2016.*

[65] *Baseline from LASAN: In Fiscal Year 2017–2018, 27 percent of wastewater was recycled.*

[66] *Since preparation of the 2015 UWMP, new growth forecasts have become available in SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). According to SCAG, the 2016 forecast is lower than the 2012 forecast in terms of current estimates and future projections. Therefore, LADWP's 2015 UWMP is based on a more conservative overall growth scenario.*

Table IV.N.1-3
City of Los Angeles Water Demand Projections Based on Hydrological Conditions
(thousand AFY)

Hydrological Conditions	Years				
	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
Source: LADWP, 2015 Urban Water Management Plan, Exhibits 11F, 11G, and 11H.

As shown in Table IV.N.1-3, 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.[67]

(b) On-Site Water Demand

As discussed in Section II, Project Description, of this Draft EIR, a portion of the Project Site is currently developed with the Elysian apartment building, and four vacant structures, most recently used as church facilities. The Project Site also includes surface parking and circulation areas generally located on the eastern half of the Project Site. While the Elysian apartment building is located within the Project Site, it is not part of the Project and it would remain on the Project Site. As such, the water demand generated by the Elysian apartment building is not considered in this analysis. In addition, as the remaining structures on the Project Site are vacant, there is no water demand associated with those structures.

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 118 storage tanks and reservoirs, 96 pump

[67] *LADWP, 2015 Urban Water Management Plan, June 2016.*

stations, 7,337 miles of distribution mains and trunk lines within the City, and a total storage capacity of 311,000 acre-feet according to the estimates for Fiscal Year 2017–2018.[68] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueducts Filtration Plant in Sylmar, which is owned and operated by LADWP. Water entering the Los Angeles Aqueducts Filtration Plant undergoes treatment and disinfection before being distributed throughout the LADWP's water service area.[69]

Domestic water service is available to the Project Site via LADWP water lines within the adjacent streets. According to the Utility Report, included as Appendix S.2 of this Draft EIR, there is an 8-inch water main in Sunset Boulevard located 60 feet west of the Project Site boundary.[70] This water main supplies an existing fire hydrant at the intersection of Sunset Boulevard and Beaudry Avenue. In addition, there is a 31-inch and an 8-inch water main in Beaudry Avenue 23 and 33 feet south, respectively, of the Project Site boundary.[71] The 8-inch water main continues from Beaudry Avenue to Alpine Street east of the property line and supplies a hydrant located at the intersection of these streets. Lastly, there is an 8-inch water main within White Knoll Road located 47 feet north of the property line.[72] This main supplies an additional fire hydrant located at the corner of White Knoll Road and Sunset Boulevard.

In addition to providing domestic water service, LADWP also provides water for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). According to the Utility Report, there are eight existing LADWP fire hydrants surrounding the Project Site. There are three fire hydrants located on Sunset Boulevard; one at the northeast intersection of White Knoll Drive, one at the southeast corner of the intersection with Beaudry Avenue, and one at the northwestern side of Sunset Boulevard across the project site. There are three more hydrants on Beaudry Avenue; two at the two intersections of Alpine Street and one at the intersection of Bartlett Street. The other two hydrants are located on White Knoll Drive, at the northwest corner of the intersection of Marview Avenue and at the northwest intersection of White Knoll Drive.

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[68] *LADWP, 2017–2018 Briefing Book, June 2016.*

[69] *LADWP, 2015 Urban Water Management Plan, June 2016.*

[70] *KPFF Consulting Engineers, 1111 Sunset Utility Technical Report: Water, Wastewater, and Energy, February 2021.*

[71] *KPFF Consulting Engineers, 1111 Sunset Utility Technical Report: Water, Wastewater, and Energy, February 2021.*

[72] *KPFF Consulting Engineers, 1111 Sunset Utility Technical Report: Water, Wastewater, and Energy, February 2021.*

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.[73]

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

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

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

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

[73] *Refer to Section IV.N.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of wastewater impacts; Section IV.G, Hydrology and Water Quality of this Draft EIR for a discussion of stormwater impacts; Section IV.C, Energy, of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts.*

b. Methodology

The analysis of the Project's impacts to water supply is based on the WSA for the Project prepared by LADWP pursuant to Senate Bill 610. The WSA includes a conservative calculation of the Project's anticipated water demand by applying the City Department of Public Works, Bureau of Sanitation's (LASAN) wastewater generation rates to the proposed land uses associated with the Project. The WSA accounts for the reduction in Project water demand with implementation of water conservation features. In accordance with Senate Bill 610, the resulting net demand for water associated with the Project is then analyzed relative to LADWP's existing and planned future water supplies to determine if LADWP would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry years hydrologic conditions.

The analysis with regard to water infrastructure is based on the Utility Report prepared for the Project by KPFF Consulting Engineers, which is included in Appendix S.2 of this Draft EIR. The Utility Report includes a comparison of the estimated net water demand for the Project to the available capacity of the existing water infrastructure.

c. Project Design Features

The following project design feature, based on the Project's WSA commitment letter, is applicable to the Project with regard to water supply and infrastructure:

Project Design Feature WAT-PDF-1: In addition to regulatory requirements, the Project design shall incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

- High-Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less.
- Showerheads with a flow rate of 1.5 gallons per minute, or less.
- Residential Lavatory Faucets (manual) with a flow rate of 0.5 gallons per minute, or less.
- ENERGY STAR Certified Residential Clothes Washers—Front-loading with Integrated Water Factor of 2.7 or less and capacity of 5.6 cubic feet.
- ENERGY STAR Certified Residential Dishwashers—standard with 3.2 gallons/cycle or less.
- Domestic Water Heating System located in close proximity of point(s) of use.

- Individual metering and billing for water use for every residential dwelling unit and commercial unit.
- Water-saving Pool Filter or Reuse pool backwash water for irrigation.
- Pool/Spa recirculating filtration equipment.
- Pool splash troughs around the perimeter that drain back into the pool.
- Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired.
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. Both development scenarios are evaluated in the following analysis.

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?[74]

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

(Footnote continued on next page)

(1) Impact Analysis

(a) Construction

As discussed in the Utility Report included as Appendix S.2 of this Draft EIR, as part of the Project, a new water distribution system consisting of new water distribution lines would be required to supply water to the proposed uses. This new water system will obtain water from a metered connection and will then distribute the water to the Project Site. During construction, water would be required intermittently for dust control, equipment cleaning, and soil grading and preparation during the early construction phases. The latter phases of construction normally require less water usage. Prior to buildout of the new water distribution system, temporary water supply needs during construction may be obtained from existing metered water connections or fire hydrants, with approval from LADWP and the Los Angeles Department of Public Works. As such, water needed during construction would not result in the construction of new or expanded water distribution facilities, and the existing off-site LADWP water infrastructure system would be adequate to provide for the water flow necessary to serve the Project during construction.

Construction of the new water distribution lines would primarily involve on-site trenching to place the lines below the surface, and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations described above. In accordance with City requirements, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). The limited off-site connection activities could also temporarily affect access in adjacent right-of-ways. However, as discussed Section IV.L, Transportation, of this Draft EIR, a Construction Management Plan (Project Design Feature TR-PDF-1) would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure 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 water facilities or expansion of existing facilities that could cause a significant environmental effect. As such, construction-related impacts to water infrastructure would be less than significant.

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gas impacts; and Section VI, Other CEQA Considerations, of this Draft EIR for a discussion of telecommunications facility impacts.

(b) Operation

Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. As discussed in the Utility Report, while domestic water demand is typically the main contributor to operational water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore, are the primary means for analyzing infrastructure capacity. Nevertheless, conservative analyses for both fire suppression and domestic water flows have been completed by LADWP for the Project. These analyses are summarized below and described in more detail in the Utility Report included as Appendix S.2 of this Draft EIR.

Fire flow to the proposed buildings of the Project would be required to meet City fire flow requirements. Specifically, the Project would comply with LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As previously described, the required fire water flow for the Project Site has been set at 9,000 gpm from four to six hydrants flowing simultaneously with a minimum residual water pressure of 20 psi, which corresponds to the Industrial and Commercial land use category. As discussed above, there are eight existing fire hydrants adjacent to the Project Site. As part of the Utility Report included in Appendix S.2 of this Draft EIR, an Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP to determine available fire hydrant flow from six of the eight existing public fire hydrants. Based on the completed IFFAR (see Exhibit 1 of Appendix S.2 of this Draft EIR), six of the eight existing public fire hydrants (two on Sunset Boulevard, two on Beaudry Avenue, one on Alpine Street, and one on White Knoll Drive) flowing simultaneously can deliver combined flows of 9,000 gpm, which meets the required flow set for the Project Site. Therefore, based on the IFFAR, there is adequate fire flow available for the Project to comply with the fire flow requirements identified for the Project in accordance with LAMC Section 57.507.3.1. Furthermore, as provided in Section IV.K.1, Public Services—Fire Protection, of this Draft EIR, in accordance with LAMC Section 57.4705.4, the Project would incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting of the Project and would reduce public hydrant demands.

With regard to the domestic water infrastructure, new domestic services would be connected from the existing 24-inch main on Sunset Boulevard. No expanded main water facilities would be required by the Project.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

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 and the short-term and intermittent water use during construction of the Project, the anticipated water demand associated with construction activities would be expected to be less than the net new water consumption of the Project at buildout provided in Table IV.N.1-4 on page IV.N.1-34 and Table IV.N.1-5 on page IV.N.1-37 in the analysis below. As stated in the WSA, LADWP concluded that the projected water supplies for normal, single-dry, and multiple-dry years reported in LADWP's 2015 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2040. Therefore, the Project's temporary and intermittent demand for water during construction could be similarly met by the City's available supplies during each year of Project construction.

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

(b) Operation

As described above, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario.

The Mixed Use Development Scenario would include:

- up to 737 residential units,
- up to 180 hotel rooms,
- up to 48,000 square feet of office space, and
- up to 95,000 square feet of general commercial floor area.

The No-Hotel Development Scenario would include:

- up to 827 residential units,
- up to 48,000 square feet of office space, and
- up to 95,000 square feet of general commercial floor area.

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

As previously discussed, based on the proposed land uses and the Project's resulting estimated water demand, the Project is subject to the requirements of SB 610 (preparation of a WSA, as described above in Subsection 2.a.(1)(c)). Specifically, the Project is anticipated to demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project. Therefore, a WSA was prepared for the Project and is provided in Appendix S.1 of the Draft EIR.

As shown in Table IV.N.1-4 on page IV.N.1-34, assuming constant water use throughout the year, it is estimated that the Mixed Use Development Scenario would result in a average daily water demand of approximately 224,374 gpd, or approximately 251.3 AFY, including water savings as required by the LAMC and additional water saving features as set forth in Project Design Feature WAT-PDF-1, above.

Table IV.N.1-4
Mixed Use Development Scenario: Estimated Water Demand[a]

Land Use	No. of Units/ Floor Area	Water Demand Rate (gpd/unit)[b]	Demand (gpd)
Existing to Be Removed			
Vacant Buildings	114,600 sf	N/A	0
Total Existing[c]			***0***
Proposed			
Residential Units			
Residential: 1 bd	368 du	110	40,480
Residential: 2 bd	369 du	150	55,350
Base Demand Adjustment[d]			10,898
Total Residential Units	***737 du***		***106,728***
Residential Amenities			
Lobby	3,800 sf	0.05	190
Outdoor Deck, Patio, Lounge, etc.[e]	11,397 sf	0.05	570
Lounge	2,000 sf	0.05	100
Health Club	6,050 sf	0.65	3,933
Pool	3,303 sf		310
Total Residential Amenities			***5,103***
Hotel			
Hotel Room	180 rm	120	21,600
Base Demand Adjustment[d]			1,956
Total Hotel			***23,556***
Hotel Amenities			
Lobby	1,800 sf	0.05	90
Full Service Restaurant[f]	1,333 seat	30	39,990
Meeting Space	4,200 sf	0.35	1,470
Pool	1,870 sf		176
Water Feature	2,044 sf		192
Total Hotel Amenities			***41,918***
Commercial			
Grocery	27,300 sf	0.05	1,365
Health Club/Spa	14,500 sf	0.65	9,425
Retail	8,200 sf	0.025	205
Full Service Restaurant[f]	1,667 seat	30	50,010
Office	48,000 sf	0.12	5,760
Water Feature	1,517 sf		142
Base Demand Adjustment[d]			249
Total Commercial			***67,157***

Table IV.N.1-4 (Continued)
Mixed Use Development Scenario: Estimated Water Demand

Land Use	No. of Units/ Floor Area	Water Demand Rate (gpd/unit)[b]	Demand (gpd)
Landscaping[g]	**103,556 sf**		**9,673**
Covered Parking[h]	**686,860 sf**	**0.02**	**452**
Cooling Tower Total	**2,500 ton**	**21.06**	**52,650**
Subtotal Water Demand			**307,237**
Less Required Ordinances Water Savings[i]			(71,493)
Proposed Water Demand			**235,744**
Less Existing to be Removed			0
Less Additional Conservation[j]			(11,370)
Net Additional Water Demand (Proposed – Existing – Additional Conservation)			**224,374**

du = dwelling units

bd = bedroom

sf = square feet

gpd = gallons per day

[a] *This scenario refers to the "Main Option" represented in the WSA Table 1-A.*

[b] *Based on 2012 LASAN Sewer Generation Rates.*

[c] *The existing vacant buildings have no wastewater generation.*

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

[e] *The total area available is used to provide a conservative estimate and assumed to have water use similar to lobby waiting area but may not have any.*

[f] *Restaurant space is assumed to be all full-service restaurant and assumed to be equivalent to 15 sf per seat for a conservative water demand estimate.*

[g] *Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance. The Project's hydrozone plan will not be developed until the project enters more detailed design phase, upon full entitlements. General generic and estimated hydrozone areas are given. Residential and non-residential landscape use is assumed to be a 50/50 split. Overhead spray is assumed as a conservative estimate.*

[h] *Auto parking water uses are based on LASAN Generation Rates table, and 12 times/year cleaning assumption.*

[i] *The proposed development would conform to City of Los Angeles Ordinance No. 184248, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen) 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code.*

[j] *Water conservation due to additional conservation commitments agreed to by the Applicant. Table II-C of the WSA provides a detailed breakdown of these conservation commitments and is included in Appendix S.1 of this Draft EIR.*

Source: LADWP, Water Supply Assessment—1111 Sunset Project, February 12, 2019.

As shown in Table IV.N.1-5 on page IV.N.1-37, assuming constant water use throughout the year, it is estimated that the No-Hotel Development Scenario would result in a daily water demand of approximately 192,330 gpd, or approximately 215.4 AFY, including water savings as required by the LAMC and additional water saving features as set forth in Project Design Feature WAT-PDF-1, above.

As stated in the WSA, LADWP concluded that the projected water supplies for normal, single-dry, and multiple-dry years reported in LADWP's 2015 UWMP would be sufficient to meet both the Mixed Use Development Scenario's and the No-Hotel Development Scenario's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2040.[75]

The 2015 UWMP utilized SCAG's 2012–2035 RTP/SCS data that provide for more reliable water demand forecasts, taking into account changes in population, housing units and employment. As discussed in Section IV.J, Population, Housing, and Employment, of this Draft EIR, the Mixed Use Development Scenario, would generate up to 1,777 new residents[76] and 737 new households and the No-Hotel Development Scenario would generate up to 1,994 new residents[77] and 827 new households. Both development scenarios would be consistent with growth projections anticipated by the SCAG and the demographic projections for the City in both the 2012–2035 RTP/SCS and 2016–2040 RTP/SCS.[78] Specifically, based on SCAG's projections for the City of Los Angeles Subregion between 2018 and 2028 (buildout year), the estimated 1,777 residents generated by the Mixed Use Development Scenario would represent approximately 0.65 percent of the projected population growth and the estimated 737 households would

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[75] *LADWP, Water Supply Assessment—1111 Sunset Project, February 12, 2019.*

[76] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[77] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[78] *In September 2020, SCAG adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), which includes a long-range visioning plan with strategies that are similar to the 2016–2040 RTP/SCS. As the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the Notice of Preparation (NOP) for the Project on May 21, 2018, this Draft EIR focuses on the 2016–2020 RTP/SCS.*

Table IV.N.1-5
No-Hotel Development Scenario: Estimated Water Demand[a]

Facility	No. of Units/Floor Area	Sewer Generation Rate (gpd/unit)[b]	Demand (gpd)
Existing to Be Removed			
Vacant Buildings	114,600 sf	N/A	0
Total Existing[c]			***0***
Proposed			
Residential Units			
1-Bedroom Apartments	413 du	110	45,430
2-Bedroom Apartments	414 du	150	62,100
Base Demand Adjustment[d]			12,228
Total Residential Units	*827 du*		*119,758*
Residential Amenities			
Lobby	3,800 sf	0.05	190
Outdoor Deck, Patio, Lounge, etc.[e]	11,397 sf	0.05	570
Lounge	2,000 sf	0.05	100
Health Club	6,050 sf	0.65	3,933
Pool	3,303 sf	—	310
Total Residential Amenities			*5,103*
Commercial			
Grocery	27,300 sf	0.05	1,365
Health Club/Spa	14,500 sf	0.65	9,425
Retail	18,200 sf	0.025	455
Full Service Restaurant[f]	2,333 seats	30	69,990
Office	48,000 sf	0.12	5,760
Water Feature	1,517 sf	—	142
Base Demand Adjustment[d]			249
Total Commercial			*67,157*
Landscaping[g]	103,556 sf	—	9,673
Parking[h]	686,860 sf	20	452
Cooling Tower Total	2,500 tons	21.06 ton	52,650
Subtotal Water Demand			**275,022**
Less Required Ordinances Savings[i]			(70,966)
Proposed Water Demand			**204,056**
Less Existing to be Removed			0
Less Additional Conservation[j]			(11,726)
Net Additional Water Demand (Proposed – Existing – Additional Conservation)			**192,330**

Table IV.N.1-5 (Continued)
No-Hotel Development Scenario: Estimated Water Demand

Facility	No. of Units/Floor Area	Sewer Generation Rate (gpd/unit)[b]	Demand (gpd)

du = dwelling units

sf = square feet

gpd = gallons per day

[a] *This scenario generally refers to the "Option Set 1" represented in the WSA Table 1-B, included as Appendix S.1 of this Draft EIR. Note that the modification to provide 95,000 square feet of total commercial area rather than 75,000 square feet of commercial has been incorporated herein for the No-Hotel Development Scenario.*

[b] Based on 2012 LASAN Sewer Generation Rates.

[c] *The existing vacant buildings have no wastewater generation.*

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

[e] *The total area available is used to provide a conservative estimate and assumed to have water use similar to lobby waiting area, but may not have any.*

[f] *Restaurant space is assumed to be all full-service restaurant and assumed to be equivalent to 15 sf/seat for a conservative water demand estimate. Each number was estimated using the proposed square footage and the factor of 1 seat/30 sf for the restaurant space.*

[g] *Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance. The project's hydrozone plan will not be developed until the project enters more detailed design phase, upon full entitlements. General generic and estimated hydrozone areas are given in the WSA. Residential and non-residential landscape use is assumed to be a 50/50 split. Overhead spray is assumed as a conservative estimate*

[h] *Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.*

[i] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green*

[j] *Water conservation due to additional conservation commitments agreed by the Owner, Palisades.*

Source: LADWP, Water Supply Assessment—1111 Sunset Project, February 12, 2019.

represent approximately 0.57 percent of the projected household growth.[79] The estimated 1,994 residents generated by the No-Hotel Development Scenario would represent

[79] *Based on a linear interpolation of SCAG's 2012–2040 data, the 2018 values for population, housing, and employment are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2028.*

Population growth between 2018 (4,009,193 persons) and 2028 (4,282,014 persons) is approximately 272,821 persons. The Mixed Use Development Scenario's 1,777 new residents would represent approximately 0.65 percent of this growth ((1,777 ÷ 272,821) x 100 = 0.65).

(Footnote continued on next page)

approximately 0.73 percent of the projected population growth and the estimated 827 households would represent approximately 0.63 percent of the projected household growth.[80] As such, both development scenarios would be well within SCAG's projections for the City of Los Angeles Subregion.

Based on the above, LADWP determined that the Mixed Use Development Scenario's net water demand of 224,374 gpd (approximately 251.3 AFY) as well as the No-Hotel Development Scenario's net water demand of 192,330 gpd (approximately 215.4 AFY) has been accounted for in the City's overall total demand projections set forth in its 2015 UWMP.[81] Specifically, the 2015 LADWP UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2040 during average years, single-dry years, and multiple-dry years. LADWP, therefore, concluded that the increase in water demand for both development scenarios falls within the available and projected water supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., 2028), as described in its 2015 UWMP.

As outlined in its 2015 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2015 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2015 LADWP UWMP also furthers the goals of the City's ED 5 and Sustainable City pLAn, addresses the current and future State Water Project supply shortages, and concludes that MWD's actions in response to the threats to the State Water Project 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

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Household growth between 2018 (1,403,671 households) and 2028 (1,533,957 households) is approximately 130,286 households. The Mixed Use Development Scenario's 737 new households would represent approximately 0.57 percent of this growth ((737 ÷ 130,286) x 100 = 0.57).

[80] *Based on a linear interpolation of SCAG's 2012–2040 data, the 2018 values for population, housing, and employment are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2028.*

Population growth between 2018 (4,009,193 persons) and 2028 (4,282,014 persons) is approximately 272,821 persons. The No-Hotel Development Scenario's 1,994 new residents would represent approximately 0.73 percent of this growth ((1,994 ÷ 272,821) x 100 = 0.73).

Household growth between 2018 (1,403,671 households) and 2028 (1,533,957 households) is approximately 130,286 households. The No-Hotel Development Scenario's 827 new households would represent approximately 0.63 percent of this growth ((827 ÷ 130,286) x 100 = 0.63).

[81] *KPFF Consulting Engineers, 1111 Sunset Utility Technical Report: Water, Wastewater, and Energy, February 2021.*

be exacerbated by potential future shortages. Additionally, as reaffirmed by L.A.'s Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

(a) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the water infrastructure that would serve both the Project and related projects). 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 ensure 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, to ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement its $6.3 billion five-year water system capital improvement plan, which includes replacement of distribution mainlines, trunk lines, large valves, and water meters, as well as ongoing maintenance and rehabilitation of facilities such as pump stations, pressure regulators, and in-city reservoirs and tanks.[82] In addition,

[82] *LADWP, 2017–18 Water Infrastructure Plan, revised June 2018.*

in accordance with City requirements, prior to ground disturbance, related projects would also coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects. Off-site connection activities and infrastructure improvements associated with the related projects could temporarily affect access in adjacent right-of-ways. However, as with the Project, related projects would also implement a Construction Management Plan (Project Design Feature TR-PDF-1) to ensure that adequate and safe access remains available within and near the related project sites during construction activities. As part of the Construction Management Plan, appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the related project sites and traffic flow is maintained on adjacent right-of-ways. **Therefore, the Project and related projects would not result in significant cumulative impacts related to the construction or expansion water infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Water Supply

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City and portions of the cities of West Hollywood, Culver City, South Pasadena, and the Owens Valley). As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update its 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 the City, as well as projected growth through the year 2040.

As identified in Section III, Environmental Setting, of this Draft EIR, there are 89 related projects located in the vicinity of the Project Site. The estimated water demand of the related projects is shown in Table IV.N.1-6 on page IV.N.1-42. As shown therein, the related projects would generate a total average water demand of approximately 6,468,221 gpd (or approximately 7,245 AFY). The estimate of the related projects' water demand is conservative as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code. The related projects' demand combined with the Mixed Use Development Scenario's net increase in water demand of 224,374 gpd (approximately 251.3 AFY) would result in a cumulative increase in average daily water use of approximately 6,692,595 gpd (approximately 7,497 AFY), or approximately 1.47 percent of LADWP's water supply in 2017 (510,835 AFY as shown in Table IV.N.1-1 on page IV.N.1-15). The related projects' demand combined with the No-Hotel Development Scenario's net increase in water

Table IV.N.1-6
Cumulative Water Demand

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
1	Bus Maintenance & Inspection Facility 454 E. Commercial St.	Bus Maintenance Facility (87,120 sf)	2 ac	0.050 gpd/sf	4,356
2	Tenten Wilshire Expansion (the Icon) 1027 W. Wilshire Blvd.	Condominium	402 du	190 gpd/du	76,380
		Retail	47,280 sf	0.025 gpd/sf	1,182
3	Da Vinci Apartments 327 N. Fremont Ave.	Apartment	600 du	190 gpd/du	114,000
		Retail	30,000 sf	0.025 gpd/sf	750
4	1101 North Main Condos 1101 N. Main St.	Condominium	316 du	190 gpd/du	60,040
5	5th & Olive (formerly Park Fifth Project) 437 S. Hill St.	Condominium	660 du	190 gpd/du	125,400
		Restaurant	16,309 sf	30 gpd/seat	16,309
6	Beverly + Lucas Project 1430 W. Beverly Blvd	Apartment	157 du	190 gpd/du	29,830
		Commercial	3,500 sf	0.025 gpd/sf	88
7	Wilshire Grand Project 900 W. Wilshire Bl.	Hotel	889 rm	120 gpd/rm	106,680
		Office	368,299 sf	0.12 gpd/sf	44,196
		Retail/Restaurant	34,765 sf	30 gpd/seat	34,765
		Ancillary Space[c]	46,170 sf	0.120 gpd/sf	5,540
8	Mixed Use 1435 W. 3rd St.	Apartment	122 du	190 gpd/du	23,180
		Retail	3,500 sf	0.025 gpd/sf	88
9	Grand Avenue Project 100 S. Grand Ave.	Condominium	968 du	190 gpd/du	183,920
		Apartment	242 du	190 gpd/du	45,980
		Hotel	225 rm	120 gpd/rm	27,000
		Retail	152,150 sf	0.050 gpd/sf	7,608
		Office	650,000 sf	0.12 gpd/sf	78,000
		Restaurant	52,000 sf	30 gpd/seat	52,000
		Supermarket	53,000 sf	0.025 gpd/sf	1,325
		Health Club	24,000 sf	0.65 gpd/sf	15,600
		Event Facility[d]	250 seat	3 gpd/seat	750

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
10	La Civic Center 150 N. Los Angeles St.	Office	712,500 sf	0.12 gpd/sf	85,500
		Retail	35,000 sf	0.025 gpd/sf	875
		Child Care	2,500 sf	9 gpd/ch	22,500
11	Residential 1329 W. 7th St.	Apartment	87 du	190 gpd/du	16,530
12	Mixed Use 534 S. Main St.	Apartment	160 du	190 gpd/du	30,400
		Retail	18,000 sf	0.025 gpd/sf	450
		Restaurant	3,500 sf	30 gpd/seat	3,500
		Fast Food	3,500 sf	30 gpd/seat	3,500
13	Retail/Restaurant 201 S. Broadway	Retail/Restaurant	27,765 sf	30 gpd/seat	27,765
14	Mixed Use 400 S. Broadway	Apartment	450 du	190 gpd/du	85,500
		Retail	6,904 sf	0.025 gpd/sf	173
		Bar	5,000 sf	0.72 gpd/sf	3,600
15	Mixed Use 601 S. Main St.	Apartment	452 du	190 gpd/du	85,880
		Retail	25,000 sf	0.025 gpd/sf	625
16	L a Plaza Cultura Village 527 N. Spring St.	Apartment	345 du	190 gpd/du	65,550
		Retail	23,000 sf	0.025 gpd/sf	575
		Specialty Retail	21,000 sf	0.025 gpd/sf	525
		Restaurant	11,000 sf	30 gpd/seat	11,000
17	Mixed Use 1335 W. 1st St.	Apartment	102 du	190 gpd/du	19,380
		Retail	3,463 sf	0.025 gpd/sf	87
18	Residential 401 N. Boylston St	Apartment	101 du	190 gpd/du	19,190
19	Apartments 1218 W. Ingraham St.	Apartment	80 du	190 gpd/du	15,200

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
20	Mixed Use 1145 W. 7th St.	Condominium	241 du	190 gpd/du	45,790
		Retail	7,291 sf	0.025 gpd/sf	182
21	Apartments 118 S. Astronaut E.S. Onizuka St.	Apartment	77 du	190 gpd/du	14,630
22	Stadium Way and Chavez Ravine Apartments 959 E. Stadium Way	Apartment	158 du	190 gpd/du	30,020
23	Mixed Use 700 W. Cesar E. Chavez Ave.	Apartment	300 du	190 gpd/du	57,000
		Retail	8,000 sf	0.025 gpd/sf	200
24	Metro Emergency Security Operations Center 410 N. Center St.	Office	110,000 sf	0.12 gpd/sf	13,200
25	Medallion Phase 2 300 S. Main St.	Apartment	471 du	190 gpd/du	89,490
		Restaurant	27,780 sf	30 gpd/seat	27,780
		Retail	5,190 sf	0.025 gpd/sf	130
26	Apartments 340 N. Patton St.	Apartment	43 du	190 gpd/du	8,170
27	Giannini Place (Nomad Hotel) 649 S. Olive St.	Hotel	241 rm	120 gpd/rm	28,920
28	Sapphire Mixed Use (Revised) 1111 W. 6th St.	Apartment	362 du	190 gpd/du	68,780
		Retail	25,805 sf	0.025 gpd/sf	645
29	Sunset Everett Mixed Use 1185 W. Sunset Blvd.	Apartment	214 du	190 gpd/du	40,660
		Single-Family Home	6 du	230 gpd/du	1,380
		Condominium	6 du	190 gpd/du	1,140
30	Hotel & Apartments 675 S. Bixel St.	Apartment	422 du	190 gpd/du	80,180
		Hotel	126 rm	120 gpd/rm	15,120
		Retail	4,874 sf	0.025 gpd/sf	122

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
31	Spring St. Hotel 633 S. Spring St.	Hotel	176 rm	120 gpd/rm	21,120
		Bar	5,290 sf	0.72 gpd/sf	3,809
		Restaurant	8,430 sf	30 gpd/seat	8,430
32	Everett Street (1013) Project 1013 Everett St.	Apartment	49 du	190 gpd/du	9,310
33	Hill Mixed Use Project 708 N. Hill St.	Apartment	162 du	190 gpd/du	30,780
		Retail	5,000 sf	0.025 gpd/sf	125
34	Alpine Mixed Use 211 W. Alpine St.	Apartment	122 du	190 gpd/du	23,180
		Retail	7,500 sf	0.025 gpd/sf	188
35	Beaudry Ave & 2nd Street Mixed Use Project 130 S. Beaudry Ave.	Apartment	220 du	190 gpd/du	41,800
		Other[e]	9,000 sf	0.120 gpd/sf	1,080
36	College Station Mixed Use 129 W. College St., 924 N. Spring St.	Apartment	770 sf	190 gpd/du	146,300
		Commercial	51,390 sf	0.025 gpd/sf	1,285
37	Apartments 422 S. Lake St.	Apartment	80 du	190 gpd/du	15,200
38	Title Insurance Building	Office	320,000 sf	0.12 gpd/sf	38,400
39	Mitsui Fudosan (Eighth and Figueroa Tower) 744 S. Figueroa St.	Apartment	436 du	190 gpd/du	82,840
		Restaurant	3,750 sf	30 gpd/seat	3,750
		Retail	3,750 sf	0.025 gpd/sf	94
40	945 West 8th Street 845 W. 8th St.	Apartment	781 du	190 gpd/du	148,390
		Commercial	6,700 sf	0.025 gpd/sf	168
41	Brooks Building 644 S. Broadway	Apartment	30 du	190 gpd/du	5,700
		Bar	2,500 sf	0.72 gpd/sf	1,800
42	Ferrante 1000 W. Temple St.	Apartment	1,500 du	190 gpd/du	285,000
		Retail	30,000 sf	0.025 gpd/sf	750

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
43	Marionette Lofts 1345 W. 1st St.	Apartment	102 du	190 gpd/du	19,380
44	Budokan of Los Angeles 237 S. Los Angeles St.	Sports Center[f]	43,453 sf	0.200 gpd/sf	8,691
45	643–655 North Spring Street 643-655 N. Spring St.	Apartment	281 du	190 gpd/du	53,390
		Hotel	142 rm	120 gpd/rm	17,040
		Commercial	17,003 sf	0.025 gpd/sf	425
		Restaurant	2,532 sf	30 gpd/seat	2,532
46	1201 North Broadway Mixed Use 1201 N. Broadway	Apartment	118 du	190 gpd/du	22,420
		Office	9,000 sf	0.12 gpd/sf	1,080
47	Sunset Flats Mixed Use 2225 W. Sunset Blvd.	Condominium	65 du	190 gpd/du	12,350
		Retail/Restaurant	15,550 sf	30 gpd/seat	15,550
48	Mixed Use 1924 W. Temple St.	Condominium	205 du	190 gpd/du	38,950
		Apartment	46 du	190 gpd/du	8,740
		Retail	19,103 sf	0.025 gpd/sf	478
49	Barlow Hospital Replacement & Master Plan 2000 Stadium Way	Condominium	888 du	190 gpd/du	168,720
		Hospital	56 beds	70 gpd/bed	3,920
		Retail	15,000 sf	0.025 gpd/sf	375
50	LA Hotel 1625 W. Palo Alto St.	Hotel	89 rm	120 gpd/rm	10,680
51	Urban View Lofts Project 495 S. Hartford Ave.	Apartment	220 du	190 gpd/du	41,800
52	1316 Court & 1323 Colton Apartments 1316 W. Court St.	Apartment	60 du	190 gpd/du	11,400
53	433 South Main Street 433 S. Main St.	Condominium	196 du	190 gpd/du	37,240
		Retail	5,300 sf	0.025 gpd/sf	133
		Restaurant	900 sf	30 gpd/seat	900

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
54	Tribune (L.A. Times) South Tower Project 222 W. 2nd St.	Condominium	107 du	190 gpd/du	20,330
		Office	534,044 sf	0.12 gpd/sf	64,085
		Retail	7,200 sf	0.025 gpd/sf	180
55	Elysian Park Lofts 1030–1380 N. Broadway	Apartment	920 du	190 gpd/du	174,800
		Restaurant	16,147 sf	30 gpd/seat	16,147
56	Mixed Use (Times Mirror Square) 100 S. Broadway	Apartment	1,127 du	190 gpd/du	214,130
		Office	285,088 sf	0.12 gpd/sf	34,211
		Supermarket	50,000 sf	0.025 gpd/sf	1,250
		Restaurant	75,589 sf	30 gpd/seat	75,589
57	Apartments 1246 W. Court St.	Apartment	54 du	190 gpd/du	10,260
58	1018 West Ingraham Street 1018 W. Ingraham St.	Apartment	43 du	190 gpd/du	8,170
		Retail	7,400 sf	0.025 gpd/sf	185
59	8th/Grand/Hope Project 754 S. Hope St.	Condominium	409 du	190 gpd/du	77,710
		Retail	7,329 sf	0.025 gpd/sf	183
60	4th & Spring Hotel 361 S. Spring St.	Hotel	315 rm	120 gpd/rm	37,800
		Meeting Space[g]	2,000 sf	0.12 gpd/sf	240
61	Mixed Use 1800 Beverly Blvd.	Apartment	243 du	190 gpd/du	46,170
		Restaurant	3,500 sf	30 gpd/seat	3,500
62	425 South Union Apartments 425 S. Union Ave.	Apartment	33 du	190 gpd/du	6,270
63	1301 Colton Apartments 1301 Colton St.	Apartment	29 du	190 gpd/du	5,510
64	Apartments 1301 W. Sunset Blvd.	Apartment	45 du	190 gpd/du	8,550
65	1346 Court Apartments 1346 W. Court St.	Apartment	43 du	190 gpd/du	8,170

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
66	Kaiser Medical Center 765 W. College St.	Medical Office Building	100,000 sf	0.25 gpd/sf	25,000
67	Alameda District Plan Union Station Terminal Annex	Apartment	22 du	190 gpd/du	4,180
		Office	7,443,200 sf	0.12 gpd/sf	893,184
		Retail	645,000 sf	0.050 gpd/sf	32,250
		Hotel	750 rm	120 gpd/rm	90,000
		Restaurant	20,000 sf	30 gpd/seat	20,000
		Museum	70,000 sf	0.03 gpd/sf	2,100
68	Hellman/Banco Building 354 S. Spring St.	Apartment	212 du	190 gpd/du	40,280
69	Foreman and Clark Building 701 S. Hill St.	Apartment	165 du	190 gpd/du	31,350
		Restaurant	11,902 sf	30 gpd/seat	11,902
		Restaurant	14,032 sf	30 gpd/seat	14,032
70	Data Center 900 N. Alameda St.	Data Center[h]	179,900 sf	0.12 gpd/sf	21,588
71	Equity Residential Mixed Use 340 S. Hill St.	Apartment	406 du	190 gpd/du	77,140
		Affordable Apartment	22 du	190 gpd/du	4,180
		Office	2,980 sf	0.12 gpd/sf	358
		Retail	2,630 sf	0.025 gpd/sf	66
72	Mixed Use (Lifan Tower) 1235 W. 7th St.	Apartment	303 du	190 gpd/du	57,570
		Retail	5,960 sf	0.025 gpd/sf	149
73	Apartments 459 S. Hartford Ave.	Affordable Apartment	101 du	190 gpd/du	19,190
74	Hotel 1011 N. Broadway	Hotel	92 rm	120 gpd/rm	11,040
75	708 South New Depot Street Residential 708 S. New Depot St.	Apartment	33 du	190 gpd/du	6,270

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
76	Mixed Use 1322 W. Maryland St.	Apartment	47 du	190 gpd/du	8,930
		Retail	760 sf	0.025 gpd/sf	19
77	5th & Hill 323 W. 5th St.	Hotel	190 rm	120 gpd/rm	22,800
		Meeting Room[i]	6,100 sf	0.12 gpd/sf	732
		Apartment	31 du	190 gpd/du	5,890
		Restaurant	29,200 sf	30 gpd/seat	29,200
78	Restaurant & Retail 1455 N. Alvarado St.	Restaurant	5,050 sf	30 gpd/seat	5,050
		Retail	2,984 sf	0.025 gpd/sf	75
79	Men's Central Jail Replacement 441 E. Bauchet St.	Prison	3,885 beds	175 gpd/inmate	679,875
80	Residential 2335 W. Temple St.	Apartment	71 du	190 gpd/du	13,490
81	Restaurant & Theater 2139 W. Sunset Bl.	Restaurant and Theater	5,979 sf	30 gpd/seat	5,979
82	Restaurants 1453 N. Alvarado St.	Restaurant	7,300 sf	30 gpd/seat	7,300
83	Apartments 740 S. Hartford Ave.	Apartment	80 du	190 gpd/du	15,200
84	Condominiums 742 S. Hartford Ave.	Condominium	42 du	190 gpd/du	7,980
85	Apartments & Retail 1324 W. Wilshire Blvd.	Apartment	50 du	190 gpd/du	9,500
		Retail	5,730 sf	0.025 gpd/sf	143
86	Community Center 445 W. Cottage Home St.	Community Center[j]	8,530 sf	0.350 gpd/sf	2,986
87	Apartments 418 N. Alvarado St.	Apartment	73 du	190 gpd/du	13,870
88	Condominiums 1100 W. Temple St.	Condominium	53 du	190 gpd/du	10,070

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
89	Mixed Use 1150 W. Wilshire Blvd.	Condominium	140 du	190 gpd/du	26,600
		Retail/Restaurant	9,115 sf	30 gpd/seat	9,115
Related Projects Water Demand					**6,468,221**
Mixed Use Development Scenario Water Demand					**224,374**
Total Water Demand for Related Projects and Mixed Use Development Scenario					**6,692,595**
Related Projects Water Demand					**6,468,221**
No-Hotel Development Scenario Water Demand					**192,330**
Total Water Demand for Related Projects and No-Hotel Development Scenario					**6,660,551**

ac = acre

du = dwelling units

rm = rooms

sf = square feet

[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.*

[c] *This related project does not specify this use. Therefore, the most comparable rate for non-residential uses typical of mixed use projects for "Office" is applied.*

[d] *Sewage generation rates provided by LASAN do not include a rate for "Event Facility" uses. Therefore, the most comparable land use rate of 3 gallons per seat for "Auditorium." is applied.*

[e] *This related project does not specify this use. Therefore, the most comparable rate for non-residential uses typical of mixed use projects for "Office" is applied.*

[f] *Sewage generation rates provided by LASAN do not include rates for sports center uses. Therefore, the most comparable land use rate of 200 gpd per 1,000 square feet for "Gymnasium" is applied.*

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
[g] *Sewage generation rates provided by LASAN do not include a rate for "Meeting Space" uses. Therefore, the most comparable land use rate of 120 gallons per 1,000 square feet for "Conference Room of Office Bldg." is applied.*					
[h] *Sewage generation rates provided by LASAN do not include a rate for "Data Center" uses. Therefore, the most comparable land use rate of 120 gallons per 1,000 square feet for "Office Building" is applied.*					
[i] *Sewage generation rates provided by LASAN do not include a rate for "Meeting Room" uses. Therefore, the most comparable land use rate of 120 gallons per 1,000 square feet for "Conference Room of Office Bldg." is applied.*					
[j] *Sewage generation rates provided by LASAN do not include a rate for "Community Center" uses. Therefore, the most comparable land use rate of 350 gallons per 1,000 square feet for "Banquet Room" is applied.*					
Source: Eyestone Environmental, 2021.					

demand of 192,330 gpd (approximately 215.4 AFY) would result in a cumulative increase in average daily water use of approximately 6,660,551 gpd (approximately 7,461 AFY), or approximately 1.46 percent of LADWP's water supply in 2017 (510,835 AFY as shown in Table IV.N.1-5 on page IV.N.1-37.

As previously stated, based on water demand projections through 2040 in its 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., 2028, the project buildout year) based on demographic growth projections in SCAG's 2012–2035 RTP/SCS, which includes the Project and related projects. The WSA prepared for the Project and included as Appendix S.1 of this Draft EIR also concluded that LADWP will be able to meet proposed water demand of the Project together with the existing and planned future water demands of the City. 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, like the Project, certain large related projects meeting the thresholds under SB 610 would be required to prepare and receive LADWP approval of a WSA that demonstrates how the project's water demand will be met.

Overall, as discussed above, the 2015 LADWP UWMP demonstrates that the City will meet all new water demands from projected population growth, through a combination of water conservation and water recycling. LADWP's 2015 UWMP specifically outlined the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP's 2015 UWMP also incorporates the goals of ED 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.[83] To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that sufficient water supply continues to be available.

Based on the above analysis, it is anticipated that LADWP would be able to meet the water demands of the Project and future growth through 2028 and beyond. Therefore, the Project and related projects would not result in significant cumulative impacts related to water demand. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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[83] *LADWP, 2015 Urban Water Management Plan, June 2016.*

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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