IV. Environmental Impact Analysis

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

1. Introduction

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

The analysis is based on the *2159 Bay Street Utility Infrastructure Technical Report: Water* (Water Utility Report), prepared for the Project and included in Appendix O of this Draft EIR.[1]

2. Environmental Setting

a. Regulatory Framework

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

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

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[1] *KPFF Consulting Engineers, 2159 Bay Street Utility Infrastructure Technical Report: Water, August 29, 2022.*

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

(1) State

(a) California Urban Water Management Plan

The California Urban Water Management Planning Act (Water Code, Section 10610, et seq.) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water

Suppliers to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water to customers.

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

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

- Residential developments of more than 500 dwelling units;
- Shopping center or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use projects that include one or more of the projects specified in this subdivision; or

- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a)).

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

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

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

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20-percent-per-capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.[2] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this

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

water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

(c) Senate Bill X7—Water Conservation Act

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

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

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.[7] The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The SGMA provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new

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

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

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

[6] *Sustainable Groundwater Management Act [And Related Statutory Provisions from SB1168 (Pavley), AB1739 (Dickinson), and SB1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2019.*

[7] *California Department of Water Resources, Sustainable Groundwater Management Act (SGMA), https://water.ca.gov/programs/groundwater-management/sgma-groundwater-management, accessed January 7, 2022.*

subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

(e) California Code of Regulations

(i) Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gpm at 80 psi; and lavatory faucets manufactured after July 1, 2016, is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.[8]

(ii) CALGreen Code

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

[8] *California Code of Regulations, Title 20, Section 1605.3(h), https://energycodeace.com/site/custom/public/reference-ace-t20/index.html#!Documents/section16053statestandardsfornonfederallyregulatedappliances.htm, accessed January 7, 2022.*

(iii) Plumbing Code

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

(f) Executive Order B-40-17

On April 7, 2017, Executive Order B-40-17 was issued. Cities and water districts throughout the state are required to report their water use each month and ban wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

(g) Executive Order N-10-21

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code set forth on July 8, 2021, Executive Order N-10-21 (Order) was issued calling for voluntary cutbacks of water usage by 15 percent from 2020 usage levels. The Order lists commonsense measures Californians can undertake to achieve water usage reduction goals and identifies the State Water Resources Control Board (Water Board) for tracking of monthly reporting on the State's progress.

(2) Regional

(a) Metropolitan Water District

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

(i) 2020 Urban Water Management Plan

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

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

(ii) 2015 Integrated Resources Plan

The MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It

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

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

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

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

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

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

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. IRP Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP, shows the supply reliability and conservation targets. As presented in the IRP, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after conservation is estimated to be 4,273,000 acre-feet and the total supply reliability target is approximately 4,539,000 acre-feet, representing an excess of 266,000 acre-feet.[14]

The 2020 IRP planning process is currently in development.[15] The 2020 IRP analyzes multiple scenarios that could plausibly unfold in the future due to climate change, economic growth, legislation and regulations affecting water sources and demands, and other variables. With the variability of these impacts in mind, MWD is developing four scenarios to help understand the challenges of the future and effectively plan to ensure water reliability in the face of those challenges.

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

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

[15] *Metropolitan Water District of Southern California, Integrated Water Resources Plan website, accessed September 27, 2022.*

(iii) Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water shortage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside and then outside of the region. The Shortage Actions of the WSDM Plan are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[16]

(iv) Long-Term Conservation Plan

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

(v) Water Supply Allocation Plan

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

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking

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

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.[17] The allocation period covers 12 consecutive months from July of a given year through the following June.

(3) Local

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

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

(b) City of Los Angeles Green New Deal

The City released the first Sustainable City pLAn in April 2015,[18] which has been updated in 2019 as the City's Green New Deal. The Green New Deal 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.

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

[18] *City of Los Angeles, Sustainable City pLAn, 2015, www.lacity.org/highlights/sustainable-city-plan, accessed January 7, 2022.*

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.[19] The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[20] Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes

(d) City of Los Angeles General Plan

(i) General Plan Framework Element

The Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[21] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the City's Framework Element identifies goals, objectives, and policies for City utilities including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.[22] The goals, objectives and policies are addressed by the City in its ordinances and preparation of its UWMP.

Table IV.M.1-1 on page IV.M.1-13 shows General Plan goals, objectives and policies relate to water supply.

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

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

[21] *City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, adopted July 27, 1995, re-adopted August 8, 2001.*

[22] *City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services—Water Supply, adopted July 27, 1995, re-adopted August 8, 2001.*

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

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

Source: City of Los Angeles, City of Los Angeles General Plan, Framework Element, adopted 1995, re-adopted 2001.

(ii) Central City North Community Plan

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

and the locations and characteristics of public service facilities. The Project Site is located within the Central City North Community Plan area. The Central City North Community Plan does not include objectives or policies related to water supply and infrastructure.

In addition, the City of Los Angeles Department of City Planning is currently updating the Central City North Community Plan in conjunction with an update to the Central City Community Plan, whose areas together make up Downtown Los Angeles, in a combined planning process referred to as the DTLA 2040 Plan. The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles that supports and sustains ongoing revitalization while thoughtfully accommodating projected future growth.[23] The draft DTLA 2040 Plan contains the following policies related to water supply and infrastructure:

- **Policy LU 17.1:** Implement strategies such as expanding shade cover and more efficient water use to lessen the urban heat island effect and increase reliance on renewable energy sources.

- **Policy LU 17.2:** Seek opportunities to underground utility line infrastructure under sidewalks and public right of way to support disaster preparedness, improve the quality of the urban environment, and reduce barriers to pedestrians.

- **Policy LU 17.3:** Support the expansion and redundancy of utility capacity to accommodate a range of activities over time.

- **Policy LU 17.5:** Support Citywide water use reduction goals by focusing on water management practices, and stormwater capture and treatment in Downtown that can increase can local water supply.

- **Policy PO 3.1:** Encourage design features of both private and public open spaces that reduce polluted runoff, maximize groundwater recharge, and reduce the heat-island effect.

The above information about the DTLA 2040 Plan is provided for informational purposes only, and does not factor into the analysis, as the DTLA 2040 Plan has not yet been adopted by the City.

[23] *City of Los Angeles, Downtown Los Angeles Community Plan Update, June 21, 2021.*

(e) Los Angeles Municipal Code

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

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

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

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

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

- Ordinance No. 184,692—Amended LAMC Chapter IX, Article 4 (Plumbing Code) by adopting by reference various sections of the California Plumbing Code. This ordinance also added requirements for plumbing fixtures and fixture fitting.

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

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

occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 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. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

b. Existing Conditions

(1) Water Supply

LADWP is responsible for providing water within the City of Los Angeles limits (as well as to portions of West Hollywood, Culver City, and small parts of L.A. County), and for ensuring that this water quality meets applicable California health standards for drinking water.[24] 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.[25] As shown in Table IV.M.1-2 on page IV.M.1-17, in 2020, the most recent year for which data is available, LADWP estimates that there was an available water supply of approximately 487,591 acre-feet. LADWP water sources are described in further detail below.

(a) Los Angeles Aqueducts

Snowmelt runoff from the Eastern Sierra Nevada Mountains is collected and conveyed to the City via the Los Angeles Aqueducts. 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.M.1-2, approximately 292,095 acre-feet of LADWP's water supplies were from the Los Angeles Aqueducts in 2020.[26] Annual water deliveries

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[24] *LADWP, 2020 Urban Water Management Plan, May 2021, p. ES-6.*

[25] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

[26] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

Table IV.M.1-2
LADWP Water Supply

Fiscal Year Ending	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage[a]	Total
2016	57,853	79,056	339,975	9,913	-3,509	**490,306**
2017	224,724	50,439	216,299	8,032	9,350	**490,144**
2018	307,671	21,760	182,706	9,778	-200	**522,116**
2019	312,456	32,233	137,775	7,512	1,710	**488,266**
2020	292,095	34,363	152,647	9,641	1,155	**487,591**

Units are in acre-feet.

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

Source: LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021, Table III.

from the Los Angeles Aqueducts to the City are impacted by hydrologic variability in the Eastern Sierra Nevada and water set aside for environmental projects. Snowpack in the Eastern Sierra Nevada Mountains was at 46 percent of an average year as recorded on April 1, 2021.[27]

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.[28] Based on the agreement, the Great Basin Unified Air Pollution Control District's potential future dust mitigation orders to

[27] *LADWP, Eastern Sierra Snow Survey Results, April 1, 2021.*

[28] *LADWP, LADWP News, The Los Angeles Department of Water and Power Continues its Commitment to the Preservation and Restoration of the Owens Valley, www.ladwpnews.com/the-los-angeles-department-of-water-and-power-continues-its-commitment-to-the-preservation-and-restoration-of-the-owens-valley/, accessed January 13, 2022.*

LADWP cannot exceed an additional 4.8 square miles.[29] As a result, LADWP expects to reduce total lake-wide water use by at least 50 percent, through the strategic use of waterless or water efficient control measures and groundwater under Owens Lake for dust control.[30]

(b) Groundwater

LADWP pumps groundwater from three basins, including the San Fernando, Sylmar, and Central Basins, that are adjudicated by decisions of the Superior Court of Los Angeles County. LADWP has accumulated 591,460 acre-feet of stored groundwater in the San Fernando Basin as of October 1, 2018 (the latest year for which data is available).[31] A portion of this water is available for the City to withdraw during normal and dry years, or in an emergency, in addition to the City's approximately 87,000 acre-feet per year entitlement.[32] 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.[33]

As shown in Table IV.M.1-3 on page IV.M.1-19, during the 2020–2021 fiscal year (July through June), LADWP extracted 53,623 acre-feet from the San Fernando Basin, 1,363 acre-feet from the Sylmar Basin, and 2,247 acre-feet from the Central Basin.[34] 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 Watermaster and the Upper Los Angeles River Area (ULARA) Administrative Committee of representatives from five public water supply agencies overlying the ULARA Committee. 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.[35]

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

[30] *LADWP, Owens Lake Master Project, April 2013.*

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

[32] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

[33] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

[34] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021, Appendix F.*

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

Table IV.M.1-3
LADWP Local Groundwater Basin Supply
(in AF)

Fiscal Year (July–June)	San Fernando	Sylmar	Central
2016–2017	55,116	0*	3,005
2017–2018	22,259	0*	1*
2018–2019	36,870	1*	5*
2019–2020	35,949	2*	10*
2020-2021	53,623	1,363	2,247

AF = acre-feet * Small quantities pumped from Sylmar and Central Basin were for water quality testing purposes, not water supply.*

Source: LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021, Table IV.

(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 Aqueducts and local groundwater. As of Fiscal Year 2020, LADWP has a preferential right to purchase 18.12 percent of MWD's total water supply.[36]

L.A.'s Green New Deal calls for a reduction in purchased imported water by 50 percent by 2025 from the FY 2013/2014 level, which was approximately 441,870 acre-feet.[37] To meet these targets, LADWP plans to reduce purchase of MWD water supplies through increased conservation, increased recycle water production, and enhanced groundwater pumping through stormwater capture and groundwater replenishment.[38] This would allow LADWP to further reduce dependence on purchased imported water from MWD and maintain a resilient and sustainable water supply for the City.

[36] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021, Appendix F.*

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

[38] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

As indicated in Table IV.M.1-2 on page IV.M.1-17, LADWP received approximately 152,647 acre-feet of water from MWD in 2020, which was a reduction from previous years.[39] Summaries of MWD's individual supplies are presented below.

(i) State Water Project

MWD imports water from the State Water Project, owned by the State of California and operated by the 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 (Delta). The State Water Project transports Feather River water stored in and released from Oroville Dam and conveyed through the Delta, as well as unregulated flows diverted directly from the 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 19 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 50 percent for 2019-2020).[40]

The State Water Project, under the original contracted amount at 100 percent allocation, provides MWD with 1,911,500 acre-feet of water each calendar year.[41] 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[42] but increased the allocation to 15 percent[43] by January 25 and to

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[39] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

[40] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021, Appendix F..*

[41] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021, Appendix F..*

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

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

35 percent[44] by February 20 due to changes in precipitation and available water supplies. In May 2020, DWR adjusted the allocation to 20 percent.[45]

Litigation and various regulations have created challenges for the State Water Project. In particular, the listing of several fish species in the Delta as threatened or endangered under the federal and/or California Endangered Species Acts has constrained State Water Project operations and created more uncertainty in State Water Project supply reliability. Under direction by Governor Gavin Newsom, DWR is beginning an environmental review and planning process for a single tunnel project to address delta conveyance.[46]

In addition, as discussed in DWR's Bulletin 132-17, Management of the California State Water Project published in January 2019 (which reports on State Water Project planning, construction, finance, management, and operations during calendar year 2016), demands for State Water Project water are expected to increase and change as California's population continues to grow and as the effects of climate change impact the State's water resources. Increasingly, issues such as escalating costs, environmental concerns, and increased non-State Water Project demand for limited water supplies have become important factors affecting the planning and construction of new facilities.[47]

(ii) Colorado River Aqueduct

MWD owns and operates the Colorado River Aqueduct, which has delivered water from the Colorado River to Southern California since 1942. The Colorado River currently supplies approximately 25 percent of Southern California's water needs.[48] 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.[49] In addition, California

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[44] *California Department of Water Resources, Notice to State Water Project Contractors, Number 19-06, 2019 State Water Project Allocation Increase—35 Percent.*

[45] *California Department of Water Resources, Notice to State Water Project Contractors, Number 20-05, 2020 State Water Project Allocation Increase—20 Percent.*

[46] *CA DWR, State Withdraws WaterFix Approvals, Initiates Planning and Permitting for a Smaller Single Tunnel, published May 2, 2019, https://water.ca.gov/News/News-Releases/2019/May/State-Withdraws-WaterFix-Approvals, accessed January 13, 2022.*

[47] *CA DWR, Bulletin 132-17, Management of the California State Water Project, January 2019.*

[48] *The Metropolitan Water District of Southern California, Metropolitan Declares Water Supply Alert In Response To Severe Drought, August 17, 2021, www.mwdh2o.com/newsroom-press-releases/metropolitan-declares-water-supply-alert-in-response-to-severe-drought/, accessed January 13, 2022.*

[49] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021, Appendix F.*

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.

(iii) Additional MWD Actions to Address Supply

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. 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 approximately 6.0 million acre-feet of storage capacity of available reservoirs and banking/transfer programs. MWD was estimated to have 3.91 million acre-feet of water in Water Surplus Drought Management storage and additional 750,000 acre-feet in emergency storage as of January 1, 2021. Continued efficiency in the region kept demands low in 2020, resulting in available water supplies far exceeding demands. With implementation of new and modified existing storage programs to manage the available surplus supplies, MWD was able to add to storage in 2020.[51]

MWD's 2020 UWMP reports on water reliability and identifies projected supplies to meet the long-term demand within MWD's service area. MWD's 2020 UWMP summarizes MWD's water reliability (e.g., water demand, supply, etc.) in five-year increments extending to 2045 and is based on information contained in LADWP's 2020 UWMP. As indicated in MWD's 2020 UWMP, for the average, single dry-year and multiple dry-year, respectively, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2045 under average, single dry-, and multiple dry-year hydrologic conditions.[52,53]

(d) Precipitation Conditions

During the 2018 water year (i.e., October 1, 2017, through September 30, 2018), California experienced dry conditions statewide, with nearly all the state experiencing

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[50] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021, Appendix F.*

[51] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021, Appendix F.*

[52] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

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

below precipitation and much of Southern California receiving half or less of its average annual precipitation. The 2018 water year followed California's second-wettest year of record as measured by statewide runoff, ending a historic five-year drought.[54]

The 2019 water year (i.e., October 1, 2018, to September 30, 2019) ended with significantly more water in storage than the previous year due to above-average snow and precipitation.[55]

During the 2020 water year (i.e., October 1, 2019, to September 30, 2020), dry conditions in October and November were followed by precipitation in December that measured 120 percent of average. Then, very dry conditions returned to much of the State in January and February, with March and April storms leading to the snowpack peaking at just 66 percent of average on April 9, 2020.[56] While March and April storms brought needed snow to the Sierras, the gains were not nearly enough to offset a very dry January and February.[57] Based on DWR's survey on April 30, 2020, DWR forecasted that snowmelt runoff into the reservoirs would be below average.[58]

According to the National Drought Mitigation Center, as of January 11, 2022, approximately zero percent of the California was not experiencing drought conditions, while approximately 100 percent was abnormally dry, 99.25 percent was experiencing moderate drought, 66.39 was experiencing severe drought, and 1.39 percent was experiencing extreme drought.[59] This indicates a shift from the previous year on January 12, 2021, when approximately 95.20 percent of the State was experiencing moderate drought, 79.10

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[54] *CA DWR, Water Year 2018: Hot and Dry Conditions Return, September 2018.*

[55] *CA DWR, News Release, Water Year 2020 Begins with Robust Reservoir Storage, October 1, 2019, https://water.ca.gov/News/News-Releases/2019/October-19/Water-Year-2020-Begins-with-Robust-Reservoir-Storage, accessed January 13, 2022.*

[56] *CA DWR, News Release, Spring Storms Not Enough to Offset Dry Winter: California Enters Summer with Precipitation and Snowpack Below Average, April 30, 2020, https://water.ca.gov/News/News-Releases/2020/April-20/April-30-2020-Snow-Survey, accessed January 13, 2022.*

[57] *CA DWR, News Release, Spring Storms Not Enough to Offset Dry Winter: California Enters Summer with Precipitation and Snowpack Below Average, April 30, 2020, https://water.ca.gov/News/News-Releases/2020/April-20/April-30-2020-Snow-Survey, accessed January 13, 2022.*

[58] *CA DWR, News Release, Spring Storms Not Enough to Offset Dry Winter: California Enters Summer with Precipitation and Snowpack Below Average, April 30, 2020, https://water.ca.gov/News/News-Releases/2020/April-20/April-30-2020-Snow-Survey, accessed January 13, 2022.*

[59] *United States Drought Monitor, State Drought Monitor, California Map, January 11, 2022, https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA, accessed January 13, 2022.*

percent was experiencing severe drought, and 39.50 percent was experiencing severe drought conditions.[60]

California continues to experience variable weather and precipitation, as does the City of Los Angeles with its many periods of dry years and wet years. Therefore, 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) Climate Change

As discussed in the LADWP's 2020 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 continue to assess future research for the potential impacts of climate change on its water resources.[61]

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.[62] 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.[63]

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[60] *United States Drought Monitor, State Drought Monitor, California Map, January 11, 2022, https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA, accessed January 13, 2022.*

[61] *LADWP, 2020 Urban Water Management Plan, May 2021, p. 12-1.*

[62] *California Department of Water Resources, California Water Plan Update 2018, June 2019.*

[63] *California Department of Water Resources, California Water Plan Update 2018, June 2019.*

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 Climate Action Plan includes a vulnerability assessment, which was completed in February 2019 and identifies DWR assets and activities that have vulnerabilities related climate change and the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply. Phase III also includes an adaptation plan, which was released in July 2020.[64] The adaptation plan will help prioritize DWR resiliency efforts such as infrastructure improvements, enhanced maintenance and operation procedures, revised health and safety procedures, and improved habitat management.[65] 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 2020 UWMP details the City's efforts to promote the efficient use and management of its water resources and provides the basic policy principles that guide LADWP's decision-making process to secure a sustainable water supply for the City of Los Angeles in the next 25 years. To meet multiple water conservation goals established in ED 5, the Green New Deal, and the Water Conservation Act of 2009, LADWP's 2020 UWMP aims to reduce per capita potable water use by 22.5 percent by 2025 and by 25 percent by 2035.[66] Following the target reduction of potable water use per capita by 25 percent by 2035, the Green New Deal adds an additional target for the City to maintain or reduce 2035 per capita water use through 2050.[67] The City 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.[68]

Further, based on LADWP's 2020 UWMP, recycled water use is projected to reach 24,300 acre-feet per year by 2025 and further increase to 41,000 acre-feet per year by

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[64] *CA DWR, Climate Action Plan Phase III: Climate Change Adaption Plan, July 28, 2020.*

[65] *CA DWR, Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed September 28, 2022.*

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

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

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

2045.[69] Overall, the 2020 LADWP UWMP reports a 67-percent lower recycled water trend for municipal and industrial uses along with environmental uses than what was projected in the previous 2015 UWMP.[70] In addition, based on programs and improvements contemplated in the 2020 LADWP UWMP, locally developed water supplies (including groundwater replenishment and stormwater capture) will increase from the current 11 percent to 48 percent in dry years, or to 43 percent in average years by 2045.[71]

(2) Water Demand

(a) LADWP Service Area Water Demand[72]

LADWP's 2020 UWMP provides water supply and demand projections in five-year increments to 2045, based on projected population estimates provided by the Southern California Association of Governments (SCAG) in its 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS).[73] Table IV.M.1-4 on page IV.M.1-27 shows the projected water demand from the year 2025 through 2045 within LADWP's service area.

As shown in Table IV.M.1-4, in 2045 during average year hydrological conditions, the water demand within LADWP's service area is forecasted to be approximately 710,500 AFY.[74,75] LADWP's 2020 UWMP concludes that adequate water supplies would be available to meet the projected water demand within its service area under normal, single-dry, and multi-dry year conditions through 2045.[76] Because the water demand projections in LADWP's 2020 UWMP are based on the growth projections in SCAG's 2020–2045 RTP/SCS, proposed projects that the City determines are consistent with the 2020–2045 RTP/SCS would have adequate water supplies to serve it through at least the 2025 planning horizon of the UWMP.[77]

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

[70] *LADWP, 2020 Urban Water Management Plan, May 2021, p. 7-25.*

[71] *LADWP, 2020 Urban Water Management Plan, May 2021, p. 11-7.*

[72] *LADWP's service area includes the City of Los Angeles, portions of West Hollywood, Culver City, and small parts of L.A. County (LADWP, 2020 Urban Water Management Plan, May 2021, p. ES-6).*

[73] *LADWP, 2020 Urban Water Management Plan, May, 2021, p.1-5.*

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

[75] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

[76] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

[77] *LADWP, Water Supply Assessment—8th and Alameda Project, November 10, 2021.*

Table IV.M.1-4
LADWP Service Area Water Demand Projections Based on Hydrological Conditions
(in Thousand AFY)

Hydrological Conditions	Years				
	2025	2030	2035	2040	2045
Average Year	642.6	660.2	678.8	697.8	710.5
Single Dry Year (FY 2014–2015)	674.7	693.2	712.7	732.7	746
Multi-Dry Year (based on 1988–1992)[a]	662.3	680.4	699.6	719.2	732.3

AFY = acre-feet per year

[a] *Demand projects shown here are an average of those provided in Exhibit 11G of LADWP's 2020 UWMP.*

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

(b) On-Site Water Demand

The Project Site is currently developed with three buildings totaling 39,328 square feet of floor area, including 7,106 square feet of office, 16,222 square feet of light industrial, and 16,000 square feet of creative office. As provided in Table IV.M.1-5 on page IV.M.1-35 further below, these existing uses currently generate a water demand of approximately 3,584 gpd from LADWP.

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by the LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 117 storage tanks and reservoirs, 84 pump stations, 7,326 miles of distribution mains and trunk lines within the City, and a total storage capacity of 311,000 acre-feet.[78] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant in Sylmar, which is owned and operated by LADWP. Water entering the Los Angeles Aqueduct Filtration Plant undergoes treatment and disinfection before being distributed throughout LADWP's water service area.[79]

Domestic water service is available to the Project Site via LADWP water lines within the adjacent streets. According to the Water Utility Report, included as Appendix O of this

[78] *LADWP, 2018-19 Briefing Book, June 2019.*

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

Draft EIR, there is an existing 8-inch water main in Bay Street and an existing 8-inch water main in Sacramento Street, both of which serve the existing on-site uses via multiple active domestic water connections.

In addition to providing domestic water service, LADWP also provides water for fire protection services in accordance with the City's Fire Code (Chapter V, Article 7 of the LAMC). According to the Information of Fire Flow Availability Request (IFFAR) included as Exhibit 2 of the Water Utility Report, there are six existing public fire hydrants located within a little over a one-block radius of the Project Site (see the map in Exhibit 2 for hydrant locations). Four of these hydrants are located along Bay Street, while two are located along Sacramento Street. According to the IFFAR, each of these six hydrants is capable of providing a fire flow of 1,500 gpm at 33 to 72 psi (i.e., 9,000 gpm total at 20+ psi).

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.[80]***

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

In assessing impacts related to water supply and infrastructure in this section, the City will use Appendix G as the thresholds of significance. The factors and considerations identified below from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

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

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[80] *Refer to Section IV.F, Hydrology and Water Quality, of this Draft EIR for a discussion of stormwater impacts; Section IV.L.2, Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas infrastructure; and Section VI, Other CEQA Considerations, of this Draft EIR for a discussion of wastewater and telecommunications facility impacts.*

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

b. Methodology

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

The analysis with regard to water infrastructure is based on the Water Utility Report, included in Appendix O of this Draft EIR. The Water Utility Report includes a comparison of the estimated net water demand for the Project to the available capacity of the existing water infrastructure. Capacity determinations are also based on a Service Advisory Report (SAR) and IFFAR prepared for the Project by LADWP included as Exhibits 1 and 2, respectively, of the Water Utility Report.

c. Project Design Features

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

Project Design Feature WAT-PDF-1: The Project design will incorporate environmentally sustainable building features required by the Los Angeles Green Building Code and CALGreen and be designed to meet the requirements for LEED Silver or equivalent. The following design features to support water conservation are in addition to those required by codes and ordinances for the entire Project:

- High-Efficiency Toilets for commercial projects with a flush volume of 1.0 gallon per flush.
- High-Efficiency Showerheads with a flow rate of 1.5 gallons per minute.
- Self-Closing Valves for faucets and drinking fountains. The flow rate for all indoor faucets will be 0.4 gallon per minute except for kitchen faucets for commercial use, which will be 1.8 gallons per minute.
- ENERGY STAR–Certified Appliances.
- Domestic Water Heating System located in close proximity to point(s) of use.
- Tankless and On-Demand Water Heaters for common areas and commercial uses.
- Leak Detection System for reflecting pools, swimming pools, and jacuzzi, if proposed for development.
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- Landscape Irrigation—micro-spray nozzles.

Project Design Feature WAT-PDF-2: Fire sprinkler suppression systems meeting City design standards will be installed in the proposed Project buildings.

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?[81]

[81] *Refer to Section IV.F, Hydrology and Water Quality, of this Draft EIR for a discussion of stormwater impacts; Section IV.L.2, Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas infrastructure; and Section VI, Other CEQA Considerations, of this Draft EIR for a discussion of wastewater and telecommunications facility impacts.*

(1) Impact Analysis

(a) Construction

As discussed in the Water Utility Report, included as Appendix O to this Draft EIR, the Project would connect to the existing LADWP 8-inch water main in Bay Street via new laterals sized to accommodate the domestic and fire flow requirements of the Project. As part of the Project, new on-site water distribution system infrastructure to connect these laterals to the proposed buildings would also be installed. As indicated in the Water Utility Report and discussed further in the operational analysis below, the existing 8-inch Bay Street water main would be adequate to serve the Project during operation. Thus, no upgrades to the existing off-site water mains would be required. Therefore, construction impacts associated with the installation of the required water infrastructure would primarily involve on-site trenching to place the lines below the surface, and minor off-site work to connect to the existing Bay Street water main. These construction activities could temporarily affect traffic flow and access along the segment of Bay Street fronting the Project Site. However, as discussed in Section IV.J, Transportation, of this Draft EIR, a Construction Management Plan and Worksite Traffic Control Plan would be implemented during project construction pursuant to Project Design Feature TR-PDF-1 to ensure the free flow of traffic and that adequate and safe vehicular and pedestrian access is maintained to and around the Project Site during construction activities. Furthermore, the design of the required water infrastructure improvements would occur in accordance with City design standards, and prior to conducting any ground disturbing activities, Project contractors would coordinate with LADWP to identify the locations and depths of existing water lines in the Project Site vicinity to avoid disruption of water service. Lastly, the associated construction impacts would be of limited scale, temporary, and of relatively short duration (i.e., months), and would cease once the installation is complete.

Therefore, 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 have a significant environmental effect. As such, construction-related impacts to water infrastructure would be less than significant.

(b) Operation

As discussed above, water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. While domestic water demand is typically the main contributor to operational water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore, are the primary means for analyzing water infrastructure capacity. Conservative analyses for both fire suppression and domestic water flows have been completed by LADWP for the Project (i.e., IFFAR and SAR). These analyses are summarized below and described in more detail in the Water Utility Report included in Appendix O 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. Based on fire flow standards and input from the LAFD, the Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gpm from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 psi.[82] This translates to a required flow of 1,500 gpm for each of the six hydrants that were tested within the immediate vicinity of the Project Site. As part of the Water Utility Report, included in Appendix O of this Draft, EIR, an IFFAR was submitted to LADWP to determine available fire hydrant flow from these six existing public fire hydrants. Based on the completed IFFAR (see Exhibit 2 of Appendix O of this Draft EIR), the six existing public fire hydrants flowing simultaneously can deliver a combined flow of 9,000 gpm at a minimum residual pressures ranging from 33 to 72 psi. Therefore, based on the IFFAR, the Project has adequate fire flow available to comply with the LAFD-identified fire flow requirements for the Project and the standards specified in LAMC Section 57.507.3.1.

Furthermore, the Project would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands in accordance with Project Design Feature WAT-PDF-2 . As indicated previously, an SAR was submitted to LADWP in order to determine if the existing public water infrastructure is able to meet the Project's demands. The approved SAR (see Exhibit 1 of Appendix O of this Draft EIR) for the 8-inch main in Bay Street shows a static pressure of 53 psi and that a flow of up to 1,400 gpm can be delivered to the Project Site with a residual pressure of 37 psi. As such, the approved SAR confirms that sufficient capacity is available for the Project (including for the Projects proposed fire sprinkler system), and the Project would connect to the existing water main in Bay Street with laterals that will be adequately sized to accommodate both fire and domestic demand. In addition, the services will include backflows and be metered separately in accordance with City requirements.

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

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[82] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 30, 2018. Included in Appendix K of this Draft EIR.*

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to water infrastructure were determined to be less than significant without mitigation. Therefore, no mitigation measures were required 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. The Water Utility Report, included as Appendix O of this Draft EIR, provides a conservative estimate ranging from 1,000 gpd to 2,000 gpd for daily water usages during construction. This water use would be more than offset by the estimated 3,584 gpd of water currently consumed by the existing on-site uses which would be demolished. Furthermore, as concluded in LADWP's 2020 UWMP, projected water demand within LADWP's service area would be met by available LADWP supplies during average, single-dry and multiple-dry years through at least 2045. Project construction is anticipated to be completed by 2025. Lastly, Project construction-related water demand would be intermittent, temporary, and short-term, ending at the end of Project construction activities. Therefore, the Project's water demand during construction could be met by LADWP's available supplies during each year of Project construction.

Based on the above, LADWP would have sufficient water supplies available to serve the Project 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 in Section II, Project Description, of this Draft EIR, the three-building creative office campus Project would include 217,189 square feet of creative office floor area, 5,000 square feet of retail and restaurant floor area, structured parking, landscaping, and open space (including a "wet deck" on the proposed rooftop terrace). As discussed above, based on the size of proposed land uses and the Project's resulting estimated water demand, the Project is not subject to the requirements of SB 610 regarding preparation of a WSA.

Development and operation of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying 100 percent of the sewage generation rates established by LASAN, which also serve to estimate water demand to the proposed uses. Accordingly, as provided in Table IV.M.1-5 on page IV.M.1-35, it is estimated that the Project would generate a net water demand of approximately 40,216 gpd, or approximately 45.1 AFY.

The 2020 UWMP utilized SCAG's 2020–2045 RTP/SCS data that provide for more reliable water demand forecasts, taking into account changes in population, housing units and employment. The Project does not propose residential units and thus would not generate residents, but would generate approximately 781 net employees.[83] The Project would be consistent with growth projections anticipated by the SCAG and the demographic projection for the City in the 2020–2045 RTP/SCS.[84] Specifically, based on SCAG's projections for the City of Los Angeles Subregion between 2019 and 2025 (the Project's buildout year), the estimated 781 employees would represent approximately 1.3 percent of

[83] *Based on the employee generation factors from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Existing: 0.001 employees per square foot for the 16,222 square feet of existing light industrial floor area (16 employees); and 0.004 employees per square foot for the existing 23,106 square feet of office and creative office floor area (92 employees). 16 + 92 = 108 existing employees. Project: 0.004 employees per square foot for the proposed 217,189 square feet of creative office floor area (869 employees); and 0.004 employees per square foot for the proposed 5,000 square feet of retail/restaurant floor area (20 employees). 869 + 20 = 889 gross Project employees. 889 – 108 = 781 net Project employees.*

[84] *The demand projections in LADWP's 2020 Urban Water Management Plan are based on demographic growth projections in SCAG's 2020–2045 RTP/SCS Demographics and Growth Forecast Technical Report, September 3, 2020.*

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

Land Use	Units	Water Demand Rate (gpd/unit)[a]	Water Demand (gpd)
Existing Uses			
Creative Office	16,000 sf	0.120 gpd/sf	1,920
Office	7,106 sf	0.120 gpd/sf	853
Light Industrial	16,222 sf	0.050 gpd/sf	811
Total Existing			*3,584*
Proposed Uses			
Office Building	217,189 sf	0.120 gpd/sf	26,063
Retail/Restaurant (5,000 sf)	333 seats[b]	30 gpd/seat	10,000
Parking	266,688 sf	0.020 gpd/sf	5,334
Landscaping	9,518 sf	—	189[c]
Wet Deck	2,214 gal	100% daily replacement	2,214
Total Proposed			*43,800*
Project Net Water Demand			**40,216**

gpd = gallons per day

sf = square feet

All totals have been rounded and may not sum due to rounding.

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

[b] *The estimated seat count is based on the assumption that 1 person = 15 square feet from the International Building Code, Section 1004.1.2.*

[c] *Based on landscaping water demand estimated by Shimoda Design Group.*

Source: KPFF Consulting Engineers, 2159 Bay Street Utility Infrastructure Technical Report: Water, August 29, 2022.

the projected employment growth.[85] Therefore, the Project would be well within SCAG's projections for the City of Los Angeles Subregion.

Based on the above, the Project's net water demand of 40,216 gpd has been accounted for in LADWP's overall total demand projections as set forth in LADWP's 2020

[85] *Based on a linear interpolation of SCAG's 2020–2045 data, as shown in SCAG's 2020–2045 RTP/SCS Demographics and Growth Forecast Technical Report, September 3, 2020, Table 13: Employment growth between 2019 (1,878,052 employees) and 2025 (1,937,555 employees) is approximately 59,503 employees. The Project's net 781 employees would represent approximately 1.3% of this growth [(781 ÷ 59,503) × 100 = 1.3].*

UWMP. Specifically, the 2020 UWMP forecasts adequate water supplies to meet all projected water demands in LADWP's service area through the year 2045 during normal, single-dry, and multiple-dry years. Therefore, the projected water supply available during normal, single-dry, and multiple-dry water years, as included in the 25-year projection of the 2020 UWMP through the year 2045, would be sufficient to meet the projected water demand associated with the Project in addition to the existing and planned future demand on LADWP.[86] Furthermore, as outlined in the 2020 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2020 UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that LADWP will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2020 UWMP also furthers the goals of the City's Executive Directive No. 5 and the Green New Deal, 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 be exacerbated by potential future shortages. Additionally, as provided in L.A.'s Green New Deal, water conservation and recycling will play an increasing role in meeting future water demands in the City.

Based on the above, the estimated operational water demand for the Project would not exceed the available supplies projected by LADWP. LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area, during normal, 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 with regard to water supply would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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

e. Cumulative Impacts

(1) Impact Analysis

The Project, in conjunction with growth forecasted in the City and greater LADWP service area through 2025 (i.e., the Project's buildout year), would increase the demand for water, thus potentially resulting in cumulative impacts on water supplies and water infrastructure. Cumulative growth in the Project Site vicinity through 2025 includes specific known development projects as well as general ambient growth projected to occur. As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 72 is a conservative assumption, as some of the related projects may not be built out by 2025, may never be built, or may be approved and/or built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 72 are fully built out by 2025, unless otherwise noted. Much of this growth has been anticipated by the City and incorporated into the combined Central City Community Plan update and Central City North Community Plan update, known as the DTLA 2040 Plan (or the Downtown Community Plan Update): (1) for which an EIR was prepared; (2) the City Planning Commission recommended approval on September 23, 2021; (3) the City Council has yet to adopt; and (4) is subject to change. According to the DTLA 2040 projections, an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to Downtown by 2040.[87]

(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 (including the preparation of SARs and IFFARS, as applicable) to assure that the existing public infrastructure would be adequate to meet the domestic and fire water demands of each project, and individual projects would be subject to LADWP and City requirements regarding infrastructure improvements needed to meet respective water demands, flow and pressure requirements, etc. In addition, as indicated under Threshold (a) in the Project-level analysis above, LADWP has determined (through the SAR and IFFAR prepared for the Project) that it would be able to supply sufficient water flow and pressure to satisfy the domestic and fire flow needs of the Project, including the needs of the proposed fire sprinkler suppression system. 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

[87] *City of Los Angeles, DTLA 2040, About This Project, https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about, accessed January 13, 2022.*

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.[88] Furthermore, LADWP, the Los Angeles Department of Public Works, and the LAFD would conduct on-going evaluations of its infrastructure to ensure facilities are adequate. **Therefore, significant cumulative impacts related to water infrastructure would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts on the water infrastructure system would be less than significant.**

(b) Water Supply

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City, portions of the cities of West Hollywood, Culver City, and small areas of Los Angeles County[89]). 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 2020 UWMP accounts for existing development within the LADWP service area, as well as projected growth through the year 2045. As identified in Section III, Environmental Setting, of this Draft EIR, there are 72 related projects located in the Project vicinity. The estimated water demand of these known related projects is shown in Table IV.M.1-6 on page IV.M.1-39. As shown therein, the related projects would generate a total average water demand of approximately 5,262,876 gpd (or approximately 5,895.2 AFY). This estimate of the related projects' water demand is conservative as it does not account for water conservation measures such as the those required by Ordinance No. 184,248 or mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code. The related projects' water demand and the Project's net water demand of 40,216 gpd (approximately 45.1 AFY) would result in a cumulative increase in average daily water use of approximately 5,303,092 gpd (or approximately 5,940.2 AFY), or 1.22 percent of LADWP's estimated water supply in 2020 (i.e., 487,591 AFY). The Project's share of this cumulative water demand would not be cumulatively considerable (i.e., would represent approximately 0.76 percent of the related projects' demand and approximately 0.0092 percent of LADWP's estimated water supply in 2020).

As previously stated, based on water demand projections through 2045 in LADWP's 2020 UWMP, LADWP determined that it will be able to reliably provide water to its customers through the year 2045, as well as the intervening years (i.e., 2025, the Project buildout year) based on the growth projections in SCAG's RTP/SCS.

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[88] *LADWP, 2018-2019 Water Infrastructure Plan.*

[89] *LADWP, 2020 Urban Water Management Plan, May 2021, p. ES-6.*

Table IV.M.1-6
Cumulative Water Demand

No.	Project	Description/Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
1	Linda Vista Senior Housing and Medical Office 610 S. Saint Louis St.	Condominiums	100 du	190 gpd/du	19,000
		Medical Office	33,000 sf	0.25 gpd/sf	8,250
2	Santa Fe Freight Yard Redevelopment 950 E. 3rd St.	Apartments	635 du	190 gpd/du	120,650
		Retail	30,100 sf	0.025 gpd/sf	753
		School	532 stu	11 gpd/stu	5,852
3	Sears Project 2650 E. Olympic	Apartment	1,000 du	190 gpd/du	190,000
		High-Turnover Restaurant (46,000 sf)	3,067 seats	30 gpd/seat	92,000
		Office	230,000 sf	0.12 gpd/sf	27,600
4	Mixed-Use Project 826 S. Mateo St.	Live/Work Condos	90 du	190 gpd/du	17,100
		Retail	11,000 sf	0.025 gpd/sf	275
		Restaurant (5,600 sf)	373 seats	30 gpd/seat	11,200
5	Ford Factory 2030 E. 7th St.	Office	243,583 sf	0.12 gpd/sf	29,230
		Retail	40,000 sf	0.025 gpd/sf	1,000
6	Office 540 S. Santa Fe	Office	65,800 sf	0.12 gpd/sf	7,896
7	Camden Arts Project 1525 Industrial St.	Apartments	328 du	190 gpd/du	62,320
		Office	27,300 sf	0.12 gpd/sf	3,276
		Restaurant (5,700 sf)	380 seats	30 gpd/seat	11,400
		Retail	6,400 sf	0.025 gpd/sf	160
8	Restaurant 500 S. Mateo St.	Restaurant (12,882 sf)	859 seats	30 gpd/seat	25,764
9	Mixed-Use 2130 E. Violet St.	Office	94,000 sf	0.12 gpd/sf	11,280
		Retail	7,450 sf	0.025 gpd/sf	187
10	Mixed-Use Project 1800 E. 7th St.	Apartments	122 du	190 gpd/du	23,180
		Office	13,600 sf	0.12 gpd/sf	1,632

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

No.	Project	Description/Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
11	Affordable Housing Development 713 E. 5th St.	Apartments	51 du	190 gpd/du	9,690
12	Metro Emergency Security Operation Center 410 N Center St.	Office	110,000 sf	0.12 gpd/sf	13,200
13	Mixed-Use Project (Mostly private club) 929 E. 2nd St.	Mixed-Use Private Club	48,900 sf	0.05 gpd/sf	2,445
14	Restaurant 1722 E. 16th St.	Restaurant (8,515 sf)	568 seats	30 gpd/seat	17,030
15	SB OMEGA 601 S. Main St.	High-Rise Condo	452 du	190 gpd/du	85,880
		Retail	25,000 sf	0.025 gpd/sf	625
16	Boyle Heights Mixed-Use Project 2901 E. Olympic Blvd.	Apartments	4,400 du	190 gpd/du	836,000
		Retail	185,000 sf	0.025 gpd/sf	4,625
		Office	125,000 sf	0.12 gpd/sf	15,000
		Medical Office	25,000 sf	0.25 gpd/sf	6,250
		Day Care	15,000 sf	0.05 gpd/sf	750
		Library	15,000 sf	0.05 gpd/sf	750
17	785 South Town 785 S. Town Ave.	Joint Living and Work Quarters	60 du	190 gpd/du	11,400
18	Affordable Housing Development 508 E. 4th St.	Apartments	41 du	190 gpd/du	7,790
19	City Market Project San Pedro St. between 9th St. and 12th St. 1057 S. San Pedro St.	University	1,400 stu	16 gpd/stu	22,400
		Shopping Center	176,733 sf	0.05 gpd/sf	8,837
		Cinema	744 seats	3 gpd/seat	2,232
		Apartments	945 du	190 gpd/du	179,550
		Hotel	210 rm	120 gpd/rm	25,200
		Office	294,641 sf	0.12 gpd/sf	35,357

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

No.	Project	Description/Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
20	Mixed-Use 520 S. Mateo St.	Apartments	600 du	190 gpd/du	114,000
		Restaurant (15,000 sf)	1,000 seats	30 gpd/seat	30,000
		Retail	15,000 sf	0.025 gpd/sf	375
		Office	30,000 sf	0.12 gpd/sf	3,600
21	Mixed-Use 534 S. Main St.	Apartments	160 du	190 gpd/du	30,400
		Retail	18,000 sf	0.025 gpd/sf	450
		Restaurant (3,500 sf)	233 seats	30 gpd/seat	7,000
		Fast-Food Restaurant (3,500 sf)	233 seats	30 gpd/seat	7,000
22	Weingard Mixed-Use Affordable Housing Project 554 S. San Pedro St. and 600 S. San Pedro St.	Affordable Housing	676 du	190 gpd/du	128,440
		Apartment	9 du	190 gpd/du	1,710
		Retail	5,450 sf	0.025 gpd/sf	137
		Office	36,130 sf	0.12 gpd/sf	4,336
		Dining Room/Flex Space	11,000 sf	0.05 gpd/sf	550
23	Mixed-Use Project 2407 E. 1st St.	Apartment	50 du	190 gpd/du	9,500
		Retail	53,400 sf	0.025 gpd/sf	1,335
		Office	8,500 sf	0.12 gpd/sf	1,020
24	Palmetto 527 Colyton St.	Apartments	346 du	190 gpd/du	65,740
		Retail/Restaurant (12,396 sf)	827 seats	30 gpd/seat	24,810
		Leasable Art Production	12,396 sf	0.05 gpd/sf	620
		Resident Art Production	512 sf	0.05 gpd/sf	26
25	Clinic 649 S. Wall St.	Apartments	55 du	190 gpd/du	10,450
		Clinic	25,000 sf	0.25 gpd/sf	6,250
26	400 South Alameda Hotel 400 S. Alameda St.	Hotel	66 rm	120 gpd/rm	7,920
		Restaurant (2,130 sf)	142 seats	30 gpd/seat	4,260
		Retail	840 sf	0.025 gpd/sf	21
27	Mixed-Use 118 S. Astronaut E. S. Onizuka St.	Apartment	77 du	190 gpd/du	14,630

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

No.	Project	Description/Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
28	Mixed-Use 360 S. Alameda	Apartment	55 du	190 gpd/du	10,450
		Retail	2,500 sf	0.025 gpd/sf	63
		Creative Office	6,300 sf	0.12 gpd/sf	756
29	AMP Lofts 2051 E. 7th St.	Apartments	320 du	190 gpd/du	60,800
		Retail	15,000 sf	0.025 gpd/sf	375
		Restaurant (5,000 sf)	333 seats	30 gpd/seat	10,000
30	Industrial Park 1005 S. Mateo St.	Industrial Park	94,800 sf	0.12 gpd/sf	11,376
31	Retail 555 S. Mateo St.	Retail	153,000 sf	0.025 gpd/sf	3,825
32	Greystar GP II 330 Alameda St.	Apartments	186 du	190 gpd/du	35,340
		Commercial	22,000 sf	0.05 gpd/sf	1,100
33	Mixed-Used 668 Alameda St.	Apartments	475 du	190 gpd/du	90,250
		Commercial	84,000 sf	0.05 gpd/sf	4,200
34	Mixed-Used 676 S. Mateo St.	Apartments	185 du	190 gpd/du	35,150
		Commercial	27,000 sf	0.05 gpd/sf	1,350
35	Row DTLA 747 Warehouse St.	Restaurant (117,375 sf)	7,825 seats	30 gpd/seat	234,750
		Retail	66,155 sf	0.025 gpd/sf	1,654
		Office	850,400 sf	0.12 gpd/sf	102,048
		Hotel	125 rm	120 gpd/rm	15,000
36	Mixed-Used 1000 S. Mateo St.	Apartments	113 du	190 gpd/du	21,470
		Commercial	134,000 sf	0.05 gpd/sf	6,700
37	Wakaba LA Southwest corner of San Pedro and 2nd	Apartments	240 du	190 gpd/du	45,600
		Retail	16,000 sf	0.025 gpd/sf	400

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

No.	Project	Description/Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
38	ELACC/Bridge Housing Project 119 S. Soto St.	Apartments	66 du	190 gpd/du	12,540
		Retail	2,500 sf	0.025 gpd/sf	63
		High-Turnover Restaurant (2,500 sf)	167 seats	30 gpd/seat	5,000
39	2110 Bay Development 2110 Bay St.	Apartments	110 du	190 gpd/du	20,900
		General Office	11,300 sf	0.12 gpd/sf	1,356
		Shopping Center	43700 sf	0.025 gpd/sf	1,093
40	1100 East 5th Street (Mixed-Use) 1100 E. 5th St.	Apartment	220 du	190 gpd/du	41,800
		Commercial	49,000 sf	0.05 gpd/sf	2,450
41	670 Mesquit Project 670 Mesquit	Office	944,100 sf	0.12 gpd/sf	113,292
		Apartments	308 du	190 gpd/du	58,520
		Hotel	236 rm	120 gpd/rm	28,320
		Retail	79,200 sf	0.025 gpd/sf	1,980
		Restaurant (89,600 sf)	5,973 seats	30 gpd/seat	179,200
		Gym	62,200 sf	0.2 gpd/sf	12,440
		Event Space	93,600 sf	0.12 gpd/sf	11,232
		Grocery	56,900 sf	0.025 gpd/sf	1,423
42	Southern California Flower Market Project 755 S. Wall St.	Apartment	323 du	190 gpd/du	61,370
		Office	53,200 sf	0.12 gpd/sf	6,384
		Retail	4,400 sf	0.025 gpd/sf	110
43	Mixed-Use 220 N. Center St. (North of 1st St. Bridge)	Apartments	430 du	190 gpd/du	81,700
		Retail	8,742 sf	0.025 gpd/sf	219
44	1340 E. 6th St.	Live/Work Residence Units	193 du	190 gpd/du	36,670
		Commercial	255,088 sf	0.05 gpd/sf	12,755
45	Hewitt & 4th Mixed-Use 940 E. 4th St.	Apartments	93 du	190 gpd/du	17,670
		Office	6,000 sf	0.12 gpd/sf	720
		Retail	12,300 sf	0.025 gpd/sf	308

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

No.	Project	Description/Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
46	Housing Development by Little Tokyo Galleria 333 Alameda St.	Apartments	994 du	190 gpd/du	188,860
		Retail	99,300 sf	0.025 gpd/sf	2,483
47	Mixed-Use 1101 E. 5th St. 1129 E. 5th St.	Apartments	129 du	190 gpd/du	24,510
		Retail	27,000 sf	0.025 gpd/sf	675
		Hotel	113 rm	120 gpd/rm	13,560
		Restaurant (31,700 sf)	2,113 seats	30 gpd/seat	63,400
		Art Space	10,341 sf	0.05 gpd/sf	518
		Art School	3,430 sf	0.05 gpd/sf	172
48	1745 East 7th Street 1745 E. 7th St.	Apartments	57 du	190 gpd/du	10,830
		Commercial	6,000 sf	0.05 gpd/sf	300
49	1200 South Santa Fe Avenue 1200 S. Santa Fe Ave	Apartments	53 du	190 gpd/du	10,070
		Retail	13,000 sf	0.025 gpd/sf	325
50	Fashion District Tower 222 E. 7th St. 701 Maple St.	Apartments	452 du	190 gpd/du	85,880
		Retail	6,801 sf	0.025 gpd/sf	171
		Restaurant (6,802 sf)	453 seats	30 gpd/seat	13,604
51	640 South Santa Fe Avenue 640 S. Santa Fe Ave	General Office	91,185 sf	0.12 gpd/sf	10,943
		Retail	9,430 sf	0.025 gpd/sf	236
		Restaurant (6,550 sf)	437 seats	30 gpd/seat	13,100
52	Mixed-Use 755 S. Los Angeles	Retail	16,700 sf	0.025 gpd/sf	418
		Office	60,200 sf	0.12 gpd/sf	7,224
		Restaurant (27,000 sf)	1,800 seats	30 gpd/seat	54,000
53	Mixed-Use 601 S. Central Ave	Apartments	236 du	190 gpd/du	44,840
		Retail	12,000 sf	0.025 gpd/sf	300
54	Soho House 1000 S. Santa Fe Ave	Restaurant (10,065 sf)	671 seats	30 gpd/seat	20,130
		Retail	14,193 sf	0.025 gpd/sf	355
		Health Club	6,793 sf	0.025 gpd/sf	170

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

No.	Project	Description/Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
55	Mixed-Use 401 S. Hewitt St.	Retail	4,970 sf	0.025 gpd/sf	125
		Office	255,500 sf	0.12 gpd/sf	30,660
56	Apartments 609 E. 5th St.	Apartments	151 du	190 gpd/du	28,690
57	Catalina Building 443 S. San Pedro St.	Live/Work	78 du	190 gpd/du	14,820
58	6th & Alameda 1206 E. 6th St.	Apartments	1,305 du	190 gpd/du	247,950
		Condominiums	431 sf	190 gpd/du	81,890
		Office	253,514 sf	0.12 gpd/sf	30,422
		Community-Serving Commercial	127,609 sf	0.05 gpd/sf	6,381
		Art Space	22,429 sf	0.03 gpd/sf	673
		Hotel	412 rm	120 gpd/sf	49,440
		School	300 stu	11 gpd/stu	3,300
59	806 E. 3rd St.	Bar/Lounge	3,047 sf	30 gpd/seat	6,094
		Restaurant (7,720 sf)	515 seats	30 gpd/seat	15,440
		Retail	6,171 sf	0.025 gpd/sf	155
60	656 S. Standford Ave.	Apartments	82 du	190 gpd/du	15,580
61	Apartments 655 San Pedro St.	Apartments	81 du	190 gpd/du	15,390
62	605 East 4th Street 605 E. 4th St.	Restaurant (3,798 sf)	253 seats	30 gpd/seat	7,596
63	Charter School 443 S. Soto	School	625 stu	3 gpd/stu	1,875

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

No.	Project	Description/Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)
64	Mixed-Use 1024 S. Mateo	Apartments	104 du	190 gpd/du	19,760
		Office	101,983 sf	0.12 gpd/sf	12,238
		Restaurant (16,279 sf)	1,085 seats	30 gpd/seat	32,558
		Retail	5,830 sf	0.025 gpd/sf	146
		Arts & Production	5,519 sf	0.05 gpd/sf	276
65	Mixed-Use 2143 E. Violet	Apartments	347 du	190 gpd/du	65,930
		High-Turnover Restaurant (21,858 sf)	1,457 seats	30 gpd/seat	43,716
		Office	187,374 sf	0.12 gpd/sf	22,485
66	Municipal Solid Waste Facility 2001 E. Washington Blvd.	Industrial	187,000 sf	0.05 gpd/sf	9,350
67	634 Mateo 634 S. Mateo St.	Restaurant	499 seats	30 gpd/seat	998
68	2053 E. 7th St.	Hotel (53,400 sf)[c]	83 rm	120 gpd/rm	9,859
69	401 East 7th Street 401 E. 7th St.	Affordable Housing	99 du	190 gpd/du	18,810
70	Mixed-Use 719 E. 5th St.	Apartments	160 du	190 gpd/du	30,400
		Retail	7,500 sf	0.025 gpd/sf	188
71	641 Imperial 641 Imperial St.	Apartments	140 du	190 gpd/du	26,600
		Office	14,700 sf	0.12 gpd/sf	1,764
72	Mixed-Use 100 S. Boyle Ave 1800 E. 1st St.	Apartments	65 du	190 gpd/du	12,350
		Retail	5,000 sf	0.025 gpd/sf	125
Total Water Demand from Related Projects					**5,262,876**
Net Water Demand from Project					**40,216**
Total Water Demand from Related Projects and Project					**5,303,092**

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

No.	Project	Description/Land Use	Size	Generation Factor[a,b]	Total Daily Water Demand (gpd)

du = dwelling units

gpd = gallons per day

rm = rooms

sf = square feet

stu = students

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

[b] *This analysis conservatively assumes all dwelling units are 3-bedroom units. In addition, consistent with assumptions applied by KPFF Consulting Engineers, a standard factor of 15 square feet per seat was assumed to calculate the number of seats for restaurant uses.*

[c] *For hotel uses, a square footage rate of 650 square feet per room is applied. Source: deRoos, J. A. (2011). Planning and programming a hotel [Electronic version]. Retrieved from Cornell University, School of Hospitality Administration site, http://scholarship.sha.cornell.edu/articles/310.*

Source: Eyestone Environmental, 2022.

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.[90] Furthermore, certain related projects (as defined by Section 10912 of the Water Code) meeting the thresholds under Senate Bill 610 (see the discussion in the Regulatory Framework subsection above for size criteria) would be required to prepare and receive LADWP approval of a WSA that demonstrates how the project's water demand would be met. The WSAs for such projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed.

Overall, as discussed above, the LADWP's 2020 UWMP demonstrates that LADWP will meet all new water demands from projected population growth, through a combination of water conservation and water recycling. LADWP's 2020 UWMP specifically outlined the creation of sustainable sources of water within LADWP's service area to reduce dependence on imported supplies. LADWP's 2020 UWMP also incorporates the goals of Executive Directive 5 and the City's Green New Deal. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high-efficiency water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that water supply continues to be available.[91]

Based on the related project list and projections provided in adopted plans (e.g., MWD's 2020 UWMP, LADWP's 2020 UWMP, and City's Green New Deal), it is anticipated that LADWP would be able to meet the water demands of the Project and future growth through 2025 and beyond. The 2020 UWMP forecasts adequate water supplies to meet all projected water demands in the City and greater LADWP service area through the year 2045 during average years, single dry years, and multiple dry years. **Therefore, significant cumulative impacts related to water supply would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts on water supply would be less than significant.**

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[90] *Per the City's Green Building Code, projects subject to this 20% reduction requirement include: all new buildings (residential and non-residential); all additions (residential and non-residential); alterations with building valuations of $200,000 or more (residential and nonresidential); and residential alterations that increase the building's conditioned volume.*

[91] *LADWP, 2020 Urban Water Management Plan, May 2021, p. ES-2.*

(2) Mitigation Measures

Cumulative impacts with regard 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.