IV. Environmental Impact Analysis

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

1. Introduction

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

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on the August 15, 2024, Water Supply Assessment (WSA)[1] prepared for the Project and adopted by LADWP, provided as Attachment F of Appendix M.1 of this Draft EIR, which also includes a copy of Resolution No. 025-054 approving the WSA. Additional technical information used in the analysis is based on the Water and Sewer Infrastructure Report (Water and Sewer Report) prepared for the Project and included in Appendix M.1 of this Draft EIR.[2]

2. Environmental Setting

a. Regulatory Framework

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

- California Urban Water Management Plan Act

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[1] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024. This WSA supersedes the one that was prepared on January 10, 2023.*

[2] *Fuscoe Engineering, Inc, Water and Sewer Infrastructure Report, December 16, 2024.*

- Senate Bill 610, Senate Bill 221, and Senate Bill 7
- Senate Bill X7-7 (Water Conservation Act of 2009)
- Sustainable Groundwater Management Act of 2014
- California Code of Regulations
  - Appliance Efficiency Regulations (Title 20)
  - California Green Building Standards Code
  - Plumbing Code
- Executive Order B-40-17
- Executive Order N-10-21
- Executive Order N-7-22
- Executive Order N-5-23
- Metropolitan Water District
  - 2020 Urban Water Management Plan
  - 2015 Integrated Resources Plan and 2020 Integrated Resources Plan Update
  - Water Surplus and Drought Management Plan
  - Long-Term Conservation Plan
  - Water Supply Allocation Plan
- Los Angeles Department of Water and Power's 2020 Urban Water Management Plan
- L.A.'s Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan, including:
  - Framework Element
  - 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 Planning Act

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

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

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

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

- Residential developments of more than 500 dwelling units;

- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use projects that include one or more of the projects specified above; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 10912, 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.[3] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

(c) Senate Bill X7-7 Water Conservation Act

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

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

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

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

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

[5] *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.*

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

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

[8] *California Department of Water Resources, SGMA Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management, accessed September 24, 2024.*

sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

(e) California Code of Regulations

(i) Appliance Efficiency Regulations (Title 20)

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

(ii) California Green Building Standards Code

Part 11 of Title 24 of the CCR, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must 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.

[9] *California Code of Regulations, Title 20, Section 1605.3(h).*

(iii) California Plumbing Code

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

(f) Executive Order B-40-17

On April 7, 2017, Executive Order B-40-17 was issued to formally end the drought emergency and lifted the drought emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne. In response to Executive Order B-40-17, on April 26, 2017, the State Water Resources Control Board (SWRCB) partially repealed the emergency regulation in regard to water supply stress test requirements and remaining mandatory conservation standards for urban water suppliers. The order also rescinded two drought-related emergency proclamations and four drought-related executive orders. Cities and water districts throughout the State are required to continue reporting their water use each month. Executive Order B-40-17 continues the ban on wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

(g) Executive Order N-10-21

On July 8, 2021, Executive Order N-10-21 was issued calling for voluntary cutbacks of water usage by 15 percent from 2020 usage levels. Executive Order N-10-21 lists commonsense measures Californians can undertake to achieve water usage reduction goals and identifies the SWRCB for tracking of monthly reporting on the State's progress. Executive Order N-10-21 also directs state agencies, led by the Department of Water Resources (DWR) and in coordination with local agencies, to encourage actions by all Californians, in their residential, industrial, commercial, agricultural, or institutional use, to reduce water usage, including through the statewide Save Our Water conservation campaign. Furthermore, Executive Order N-10-21 directs DWR to monitor hydrologic conditions such as cumulative precipitation, reservoir storage levels, soil moisture and other metrics, and the SWRCB to monitor progress on voluntary conservation as ongoing indicators of water supply risk that may inform future drought response actions.

(h) Executive Order N-7-22

On March 28, 2022, Executive Order N-7-22 was issued to the SWRCB to consider adopting regulations by May 25, 2022, that require urban water suppliers with water shortage contingency plans to implement, at a minimum, shortage response actions for a shortage level of up to 20 percent (a "Level 2" shortage). On May 24, 2022, in response to the

executive order, the SWRCB adopted a new emergency water conservation regulation. The new regulation bans irrigating turf at commercial, industrial, and institutional properties, such as grass in front of or next to large industrial or commercial buildings. The ban does not include watering turf that is used for recreation or other community purposes, water used at residences or water to maintain trees. The regulation also requires all urban water suppliers to implement conservation actions under Level 2 of their water shortage contingency plans.

(i) Executive Order N-5-23

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

(2) Regional

(a) Metropolitan Water District

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

(i) 2020 Urban Water Management Plan

MWD's 2020 Urban Water Management Plan (2020 MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.[10] Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions (i.e., under the most challenging weather conditions, such as drought and service interruptions caused by natural disasters) is presented in Table 2-5 of the 2020 MWD UWMP.[11] The analysis in the 2020 MWD UWMP concluded that reliable water resources would be available to continuously meet demand

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

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

through 2045.[12] In the 2020 MWD UWMP, the projected 2045 water demand during multiple-dry year conditions is 1,564,000 AFY, whereas the expected and projected 2045 supply is 2,239,000 AFY based on current programs, for a potential surplus in 2045 of 675,000 AFY.[13]

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. In addition, MWD is working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Sacramento–San Joaquin Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. Furthermore, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.[14]

(ii) 2015 Integrated Resources Plan and 2020 Integrated Resources Plan Update

MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply, such as water quality, climate change, and regulatory and operational changes. The most current IRP (2015 IRP) was adopted in January 2016.[15] It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

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

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

[14] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. ES-7.*

[15] *Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report 1518, January 2016.*

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

The 2020 IRP planning process was organized into a Regional Needs Assessment (Phase 1) and an implementation Phase (Phase 2).[17] The 2020 IRP Regional Needs Assessment identifies the uncertain factors that can affect future water supply, such as climate change, economics and demographics, legislations and regulations, federal and state support, technological advances in water, and aging infrastructure. In collaboration with its 26 member agencies, other interested parties, and its Board of Directors, MWD has broadened its perspectives with scenario planning and thoroughly analyzing four potential future scenarios. In the future scenarios, demands on MWD's imported supplies vary due to different weather and demographic patterns, among other factors. Supplies vary as well, due to reasons, such as climate change severity and regulatory impacts. Based on these scenarios, the 2020 IRP Regional Needs Assessment identifies significant threats facing Southern California's water supply reliability through successive qualitative and quantitative analysis steps. The assessment sizes up the scope of reliability challenges and the management solutions that could be in store for the region by the year 2045 under a wide range of conditions.[18]

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

[17] *Metropolitan Water District of Southern California, Climate Adaptation Master Plan for Water (CAMP4W), Working Memorandum 3: IRP 2020 Regional Needs Assessment Summary, August 2023.*

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

Building upon the foundation of the IRP Regional Needs Assessment, the implementation phase of the IRP will be coordinated through the Climate Adaptation Master Plan for Water (CAMP4W) process. This phase will involve the continuation of extensive collaboration among Metropolitan's Board, Member Agencies, and other interested parties to develop an adaptive management strategy and decision-making framework. CAMP4W will also establish a process for monitoring key reliability indicators and find joint approaches to the regional problems and resource needs identified in the assessment.[19]

(iii) Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[20]

(iv) Long-Term Conservation Plan

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

(v) Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan (WSAP). The WSAP includes a

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[19] *Metropolitan Water District of Southern California, Climate Adaptation Master Plan for Water (CAMP4W), Working Memorandum 3: IRP 2020 Regional Needs Assessment Summary, August 2023.*

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

formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.[21] 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 2020 UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's 2020 UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2050. Long-range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). LADWP's water use efficiency goals include reducing per capita water use to 100 gallons per capita per day by 2035 and to maintain this usage through 2050. As provided in LADWP's 2020 Urban Water Management Plan, in accordance with SB X7-7, LADWP developed a final reported 2020 target of 142 gallons per capita per day. LADWP's actual gallons per capita per day in 2020 was 106 gallons per capita per day, less than the 2020 target.[22]

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[21] *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 2-21.*

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

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

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAn, which includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[23] The Sustainable City pLAn was intended to be updated every four years.

In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAn, renamed as L.A.'s Green New Deal, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.[24] L.A.'s Green New Deal augments, expands, and elaborates in more detail the City's vision for a sustainable future and includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability.

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.[25] The One Water LA Plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[26] 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.

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

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

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

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

(d) City of Los Angeles General Plan

(i) General Plan Framework Element

The General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[27] The Framework Element sets forth a comprehensive citywide long-range growth strategy and defines citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services (Infrastructure and Public Services Chapter), of the Framework Element identifies goals, objectives, and policies for City utilities, including water service. Goal 9C of the Infrastructure and Public Services Chapter is to provide adequate water supply, storage facilities, and delivery systems to serve the needs of existing and future water needs.[28] The goals, objectives, and policies are addressed by the City in its ordinances and preparation of its UWMP. Table IV.O.1-1 on page IV.O.1-15 identifies General Plan goals, objectives and policies related to water supply.

(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 Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans include 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 Community Plan does not include water supply and water infrastructure objectives that are applicable to the Project.

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

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

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

Goal/Objective/Policy	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, re-adopted 2001.

The City of Los Angeles Department of City Planning updated the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (also known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. On May 3, 2023, the Los Angeles City Council voted unanimously to approve the DTLA 2040 Plan. Following City Council approval, the implementing ordinances will be reviewed and finalized by the City Attorney to ensure clarity of regulations and consistency with state law, a process which is ongoing. When the implementing ordinances are reviewed and finalized, the ordinances will be acted upon by the Council and the DTLA 2040 Plan will be brought into effect at that time.

The DTLA 2040 Plan includes the following policy related to water supply and infrastructure: 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 local water supply.

(e) Los Angeles Municipal Code

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

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

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

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

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

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

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

The City has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire

water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gpm in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 psi is to remain in the water system with the required gpm flowing. LAMC Section 57.507.3.2 also addresses land use–based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

b. Existing Conditions

(1) Water Supply

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

The Los Angeles Aqueducts (LAA), local groundwater, purchased water from MWD, and recycled water are the primary sources of water supplies for the City.[29] As shown in Table IV.O.1-2 on page IV.O.1-18, LADWP had an available water supply of 440,855 AF in 2023 (the latest full year for which data is available) with a vast majority of this supply from imported sources, including the LAA and MWD.[30] LADWP's water sources are described in further detail below.

(a) Los Angeles Aqueducts

As provided in the approved WSA for the Project included as Attachment F of the Water and Sewer Report, the City receives surface water and groundwater from the Eastern Sierra Nevada Mountains through the LAA. LADWP constructed the first LAA in 1913 to convey water from the Eastern Sierra to the City. In 1940, the LAA was extended 40 miles north from the Owens River to the Mono Basin. To meet additional water demands from the City, a second barrel of the LAA was constructed and completed in 1970. The second LAA

[29] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 11.*

[30] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 11.*

Table IV.O.1-2
LADWP Water Supply

Fiscal Year Ending	Los Angeles Aqueducts (AF)	Local Groundwater (AF)	MWD (AF)	Recycled Water (AF)	Transfer, Spread, Spills, and Storage (AF)	Total (AF)
2019	312,456	32,233	137,775	7,512	1,710	488,266
2020	292,095	34,363	152,647	9,641	1,155	487,591
2021	128,268	51,070	316,627	11,455	-938	508,359
2022	69,183	53,057	366,690	12,022	208	500,743
2023	184,320	28,170	219,406	9,428	468	440,855

AF = acre-feet

Source: Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, Table III.

increased the City's capacity to deliver water from the Mono Basin and the Owens Valley from 485 cubic feet per second (cfs) to 755 cfs.[31]

The City's water rights in the Eastern Sierra Nevada are comprised of riparian rights, pre-1914 appropriations, and post-1914 appropriation licenses held on various streams in the Mono Basin and Owens Valley.[32]

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

[31] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 11.*

[32] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 11.*

from approximately 184,200 afy to 192,000 afy for average hydrologic conditions.[33] As indicated in Table IV.O.1-2 on page IV.O.1-18, approximately 184,320 af of LADWP's water supplies were from the LAA in 2023.

The primary reliance on LAA supply with impacts due to natural variability and water set aside for environmental projects is not sufficient to meet the City's annual water demands; therefore, LADWP has implemented, and continues to increase, stormwater capture, local groundwater, water conservation, water use efficiency, and water recycling programs to mitigate the reduction of LAA supplies. Additionally, LADWP can purchase supplemental imported water from MWD to meet the City's remaining water demands.[34]

(b) Local Groundwater Supplies

Local groundwater provided approximately 8 percent of the City's total water supply, from FYE 2019 to FYE 2023. This amount declined considerably since 1979 when local groundwater provided up to 23 percent of total supply during extended dry periods. In recent years, contamination issues have impacted LADWP's ability to fully utilize its local groundwater entitlements and supplies. In response to this issue and to address the hydrologic variability impacts to imported water supplies, LADWP has focused on the sustainable management of its local groundwater basins. LADWP continues to invest in stormwater capture projects as well as advanced water purification systems to produce advanced treated recycled water for groundwater replenishment. Furthermore, LADWP has, and will continue to, conjunctively use the groundwater basin within the City to store wet year LAA flows in wet years as future supply during dry periods.[35]

The City's total adjudicated water rights are approximately 109,809 AFY, which are located within the San Fernando Basin (SFB), Sylmar Basin, Central Basin, and West Coast Basin. There are additional groundwater basins near and within the Los Angeles area, such as the unadjudicated Hollywood, Santa Monica, and northern Central Basins that may provide additional groundwater supplies for the City.[36]

The SFB is the primary source of local groundwater for the City. It is located in the Upper Los Angeles River Area (ULARA) and spans 112,000 acres. The ULARA

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[33] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 12.*

[34] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 12.*

[35] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 12.*

[36] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 12.*

encompasses the San Fernando, Sylmar, Verdugo and eagle Rock Basins. It is managed by court-appointed Watermaster and administrative committee that oversees the operation of groundwater system and report the groundwater elevations and water quality. The City's average groundwater rights in the SFB is approximately 87,000 afy. LADWP is implementing its SFB Groundwater Remediation Program to help restore the access to SFB as a drinking water source and groundwater storage. The SFB groundwater remediation facilities are expected to be complete and operational by 2025.[37]

LADWP also receives SFB water through the Los Angeles–Burbank Interim Interconnection Pipeline. In 2015, the City of Los Angeles and the City of Burbank entered into an agreement to construct and operate the Los Angeles–Burbank Interim Interconnection and began delivery of a minimum of 500 af of blended water in August 2019. The blended water consists of SFB groundwater treated at the Burbank Operable Unit and MWD imported water supply. This connection began service in August 2019 and will operate until June 30, 2025.[38]

The Central Basin is another source of groundwater supply for the City. The Central Basin Watermaster oversees this area that is located in the southeastern part of the Los Angeles Coastal Plan in Los Angeles County. The City has approximately 17,236 AFY of groundwater rights in this basin. With additional carryover and storage of unused water rights, the City has accrued a total of 22,943 af of stored water as of fiscal year-end 2020 as documented in the latest UWMP. LADWP is implementing the Manhattan and 99th Street Wellfield Improvement Projects to address several issues such as water quality matters, deteriorating groundwater pumps, and necessary upgrades. These projects are expected to be completed in 2025.[39]

Aside from the SFB and Central Basin, the City holds water rights in the Sylmar, Eagle Rock, and West Coast Basins. The City's water rights in the Sylmar Basin is 3,570 AFY. The majority of the Sylmar Basin's groundwater production facilities are inoperable due to high levels of contamination and deteriorated facilities. The Mission Wellfield facility has been undergoing continued improvements since the early 2000s to restore Sylmar Basin groundwater production capacity. The facility has restored limited operational capacity since early 2022.[40]

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[37] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 13.*

[38] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 13.*

[39] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 13.*

[40] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 13.*

The City's water rights in the Eagle Rock Basin are 500 AF. Although the City has the right to produce groundwater from the Eagle Rock Basin, there are no current plans to establish groundwater production facilities there.[41]

The West Coast Basin is managed by the West Coast Basin Watermaster and is located in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. The City has the right to pump 1,503 AF per year from this basin. In 2014, the West Coast Basin Judgement was amended to increase certain parties' such as LADWP's, pumping capacity to 5,000 AFY of unused West Coast Basin rights out of the Central Basin. This basin has known groundwater quality problems; therefore, LADWP discontinued the use of West Coast Basin facilities in 1980 until further studies are completed to restore groundwater pumping.[42]

Table IV.O.1-3 on page IV.O.1-22 provides data regarding the groundwater produced for the City during the fiscal years of 2018-2019 through 2022–2023. As shown therein, during the 2022-2023 fiscal year, 24,804 AF were produced from the SFB, 1,858 AF were produced from the Sylmar Basin, and 3,298 AF were produced from the Central Basin.[43]

LADWP also has groundwater rights outside of the City. There are 3,975 AF of groundwater rights in the Antelope Valley Groundwater Basin. This basin only allows the native water rights to be used locally within the Antelope Valley; however, LADWP would have the ability to store water it imports into the basin for future export. LADWP would be able to recover imported and stored water for export to the City at times when it is necessary to manage seasonal peak demand or augment supplies during dry periods, emergencies, or natural disasters.[44]

The Central and West Los Angeles areas of the City overlie the unadjudicated groundwater basins of Hollywood Basin, Santa Monica Basin, and the northerly portion of the unadjudicated Central Basin. LADWP is considering and exploring opportunities to develop groundwater resources in a manner that is locally sustainable and in cooperation with its regional partners to increase the City's use of natural resources. For the Santa Monica Basin, LADWP and four other local agencies have formed the Santa Monica Basic

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[41] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 13.*

[42] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 13.*

[43] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, Table IV.*

[44] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 14.*

Table IV.O.1-3
Local Groundwater Basin Supply[a]

Fiscal Year (July–June)	San Fernando (AF)	Sylmar (AF)	Central (AF)
2018–2019	36,870	1[a]	5[a]
2019-2020	35,949	2[a]	10[a]
2020-2021	53,625	1,368[a]	2,247
2021-2022	48,408	3,018	4,562
2022-2023	24,804	1,858	3,298

AF = acre-feet

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

Source: Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, Table IV.

Sustainability Agency to create a Groundwater Sustainability Plan that was approved by the Department of Water Resources in October 2023.[45]

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for domestic and municipal uses in California. As one of the 26 member agencies of MWD, the City, through LADWP, purchases water from MWD to supplement its water supplies. Between FYE 2019 to FYE 2023, LADWP purchased an average of 197,264 AFY from MWD or approximately 41 percent of the City's total water supply.[46]

MWD imports water from two principal sources: the Sacramento-San Joaquin Delta via the California State Water Project (SWP) and the Colorado River Aqueduct (CRA). MWD also manages and owns in-basin surface storage facilities, stores groundwater within the basin via contracts, engages in groundwater storage outside the basin, and conducts water transfers to provide additional supplies for its member agencies. All member agencies have preferential rights to purchase water from MWD, pursuant to Section 135 of the MWD Act. As of FYE 2023, LADWP has a preferential right to purchase 17.52 percent of MWD's total

[45] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 14.*

[46] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 20.*

water supply.[47] Summaries of MWD's individual supplies, along with each supply's challenges and specific responsive actions taken by MWD, are presented below.

(i) State Water Project

The SWP is one of MWD's two major sources of water. The SWP is owned by the State and operated by the Department of Water Resources (DWR), delivering municipal and industrial water to approximately 27 million of California's residents and 750,000 acres of farmland.[48] The SWP watershed encompasses the mountains and waterways around the Feather River in the Sacramento Valley of Northern California. The SWP facilities include a complex system of dams, reservoirs, powerplants, pumping plants, canals and aqueducts to deliver water. Water from rainfall and snowmelt runoff is captured and stored in SWP conservation facilities and then delivered through SWP transportation facilities to water agencies and districts located throughout the Upper Feather River, Bay Area, Central Valley, Central Coast, and Southern California. MWD receives water from the SWP through the main stem of the aqueduct system, the California Aqueduct, which is 444 miles long.[49]

MWD is the largest of the 29 SWP contractors, holding a contract for approximately 1.912 million AF (MAF) per year, or 46 percent of the total contracted amount of the 4.173 MAF ultimate delivery capacity of the SWP.[50] However, in accordance with the State Water Contract with DWR, the contracted amount varies annually due to a number of factors, including existing supplies in storage, forecasted hydrology, water quality, environmental flow obligations, and other operational considerations.[51] DWR annually approves the amount of contract allocations SWP receives, which is shown in DWR's "Table A." Due to water quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, SWP deliveries in the most critically dry years have declined. From calendar year 2012 through 2021, the amount of water received by MWD from the SWP varied from a low of 588,000 AF in calendar year 2020 to a high of 1,473,000 AF in 2017. In 2021, the DWR's allocation to MWD commenced as 10 percent

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[47] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 20.*

[48] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, pp. A-16.*

[49] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-53.*

[50] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 20.*

[51] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-8.*

and then was reduced to 5 percent (95,575 AF).[52] The DWR's allocation to MWD increased to 40 percent as of April 23, 2024, due to above average snowmelt runoff.[53]

Challenges to State Water Project Supply

Numerous factors have created challenges for the SWP. Based on DWR's 2021 Final State Water Project Delivery Capability Report, all but five of the 29 SWP contractors receive SWP deliveries by diversions from the Delta. These diversion facilities are regulated by several state and federal agencies that maintain and enhance the Delta's long-term sustainability. Ongoing regulatory restrictions, such as those aimed at protecting the Delta estuary's resident and migratory fish species, are challenges to a reliable and sustainable water delivery capability for the SWP. In particular, a substantial decrease in SWP Delta exports occurred with new regulations that culminated in the federal Biological Opinions that went into effect in 2008–2009. Complications induced by climate change also pose a threat of increased variability in the frequency and magnitude of both floods and droughts in the Delta. In addition, the projected sea level rise caused by the increase in average temperature also complicates efforts to manage salinity levels in the channels affected by tides in the Delta. Furthermore, higher ocean levels could also result in more frequent water quality degradation in the Delta channels, requiring additional Delta outflow to maintain water quality objectives. Other challenges include the continued subsidence of Delta islands, many of which are already below sea level and supported by levee systems that are under threat of catastrophic failure as water pressure increases against the levees and with seismic events and extreme flood events.[54] In addition to challenges within the Delta, as discussed in detail in MWD's Water Revenue Refunding Bonds, 2022 Series B Appendix A, various agreements and litigation regarding the State Water Contract have affected water supplies from the SWP.[55]

(ii) The Colorado River

The Colorado River was MWD's original source of water after MWD's establishment in 1928. MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. Water from the Colorado River and its tributaries is also available to other users in California, as well as users in the states

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[52] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-16.*

[53] *California Department of Water Resources, State Water Project Increases Projected Water Supply Allocation, https://water.ca.gov/News/News-Releases/2024/Apr-24/State-Water-Project-Increases-Projected-Water-Supply-Allocation, accessed September 25, 2024.*

[54] *California Department of Water Resources, The State Water Project Final State Water Project Delivery Capability Report 2021, September 2022.*

[55] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, pp. A-17 to A-24 and A-30 to A-37.*

of Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming, resulting in both competition and the need for cooperation among these holders of Colorado River entitlements.[56]

Construction of the CRA, which is owned and operated by MWD, was undertaken by MWD to provide for the transportation of its Colorado River water entitlement to its service area. The CRA originates at Lake Havasu on the Colorado River and extends approximately 242 miles through a series of pump stations and reservoirs to its terminus at Lake Mathews in Riverside County.[57] MWD holds the fourth and fifth priority rights to the Colorado River water supplies. Thus, water diverted by MWD is dependent on unused apportionment from other users.[58] Up to 1.25 million af of water per year may be conveyed through the CRA to MWD's member agencies, subject to availability of Colorado River water for delivery to MWD.[59] Since 2003, MWD's net diversions of Colorado River water have ranged from a low of 537,607 af in 2019 to a high of approximately 1,179,000 af in 2015. Preliminary average annual net diversions for 2012 through 2021 were 909,585 af, with annual volumes dependent primarily on programs to augment supplies, including transfers of conserved water from agriculture. A portion of the available supply that was not diverted was stored in Lake Mead for future usage.[60]

Conveyance from the Colorado River has also experienced many challenges including persistent drought conditions, litigation, and the presence of endangered species.[61]

(iii) Additional MWD Actions to Address Supply

As summarized above in Subsection 2.a, Regulatory Framework, MWD has been developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. These plans include MWD's 2015 IRP, the 2020 UWMP, the Water Surplus and WSDM Plan, the LTCP and the WSAP. These long-term plans have been developed to meet MWD's member agencies' growing reliability needs through

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[56] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-24.*

[57] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-24.*

[58] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-25.*

[59] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-24.*

[60] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, pp. A-24 to A-25.*

[61] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-24 to A-29.*

improvements to the SWP, conjunctive management efforts on the Colorado River, water transfer programs, outdoor conservation measures, and development of additional local resources, such as recycling, brackish water desalination, and seawater desalination. Additionally, MWD has planned and prepared for dry conditions by investing in vital infrastructure to increase its storage capacity.

(d) Precipitation Conditions

As of September 2024, much of the State is classified as abnormally dry according to the U.S. Drought Monitor. Furthermore, portions of Modoc, Lassen, Inyo, San Bernardino, Riverside, and Imperial Counties are in a state of moderate drought.[62] An extended drought period is also ongoing in the Colorado River Basin, which is another source of water for southern California as described above.[63]

The City of Los Angeles receives an average of 13.36 inches of precipitation per year according to the National Weather Service.[64] As of September 25, 2024, year-to-date precipitation for 2024 is 18.97 inches.[65] In 2023, Downtown Los Angeles received 29.44 inches of precipitation, compared with 7.18 inches in 2022, 14.27 inches in 2021, and 9.81 inches in 2020.[66]

(e) Global Warming and Climate Change

As discussed in LADWP's 2020 UWMP, water supplies that are dependent on natural hydrology, such as LADWP's imported supplies and local groundwater, are susceptible to climate risks. Imported sources that originate from mountain snowpack are particularly sensitive to changes in temperatures as small increases in temperature can significantly influence the melting of snowpack. In addition to water supply impacts, shifts in weather conditions can influence water demands by approximately five percent when compared to average conditions. LADWP continues to monitor the latest developments to advance the

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62 *National Drought Mitigation Center, U.S. Drought Monitor, West, Data valid: September 17, 2024, https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?West, accessed September 25, 2024.*

63 *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-9.*

64 *National Weather Service, Monthly Summarized Precipitation for Los Angeles Downtown Area, CA 2000–2024, www.weather.gov/wrh/Climate?wfo=lox, accessed September 25, 2024.*

65 *National Weather Service, Accumulation Graph for Los Angeles Downtown Area, CA January 1, 2024, through September 25, 2024, www.weather.gov/wrh/Climate?wfo=lox, accessed September 25, 2024.*

66 *National Weather Service, Monthly Summarized Precipitation for Los Angeles Downtown Area, CA 2000–2024, www.weather.gov/wrh/Climate?wfo=lox, accessed September 25, 2024.*

accuracy of hydrologic forecasts and projections to improve resources planning efforts that better respond to natural hydrologic variability and other potential future climate risks.[67]

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 IRP, described above.[68]

In addition, DWR addresses climate change impacts on water supply in its California Water Plan Updates, which also account for uncertainty, risk, and sustainability in planning for the future. California Water Plan Update 2018 provides recommended actions, funding scenarios, and an investment strategy to bolster efforts by water and resource managers, planners, and decision-makers to overcome California's most pressing water resource challenges.[69] Furthermore, California Water Plan Update 2023 promotes climate resilience across regions and water sectors with a statewide vision, clear goals, watershed planning framework and toolkit, and progress-tracking dashboard of indicators.[70] The DWR completed its Climate Action Plan in 2020.[71] Phases I and II of the Climate Action Plan include the guidance of DWR in reducing greenhouse gas emissions and the expertise of a climate change technical advisory group formed in 2012, respectively. As part of Phase I, DWR's Greenhouse Gas Emissions Reduction Plan was completed in 2012 and updated in 2020. As part of Phase II, DWR completed a Climate Change Analysis Guidance in 2018. Phase III of the Climate Action Plan was completed in 2020 with a Climate Change Vulnerability Assessment in 2019 and Climate Change Adaption Plan in 2020 regarding DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.[72] As such, climate change and its impacts on water supplies are key factors of new water supply regulations and UWMPs.

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

[68] *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-9.*

[69] *California Department of Water Resources, Update 2018, https://water.ca.gov/Programs/California-Water-Plan/Previous-Updates/Update-2018#:~:text=Update%202018%20presents%20a%20vision,for%20a%20more%20sustainable%20future, accessed September 25, 2024.*

[70] *California Department of Water Resources, Update 2023, https://water.ca.gov/Programs/California-Water-Plan/Update-2023, accessed September 25, 2024.*

[71] *California Department of Water Resources, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed September 25, 2024.*

[72] *California Department of Water Resources, DWR Climate Action Plan, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed September 25, 2024.*

(f) Water Conservation and Recycling

LADWP has developed many progressive water conservation and use efficiency programs in conjunction with state and local conservation ordinances and plumbing codes to achieve water conservation throughout its service area and customer classes (refer to Subsection 2.a, Regulatory Framework, above for a summary of these plans and regulations). Specifically, to meet multiple water conservation goals established in L.A.'s 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. LADWP will also comply with the State's water use requirements of AB 1668 (2018) and SB 606 (2018). Following the target reduction of potable water use per capita by 25 percent by 2035, L.A.'s Green New Deal adds an additional target for the City to maintain or reduce 2035 per capita water use through 2050.[73] L.A.'s Green New Deal also has a target to recycle 100 percent of all wastewater for beneficial reuse by 2035.[74] Beneficial reuse includes, but is not limited to, non-potable reuse, groundwater recharge, and supporting environmental and recreational uses such as those in the Los Angeles River.

Since the inception of LADWP's conservation programs, the estimated cumulative annual active savings is over 150,000 AFY. In addition, LADWP completed a Stormwater Capture Master Plan in 2015 to comprehensively evaluate stormwater capture potential within the City. Stormwater capture can be achieved by increasing infiltration into groundwater basins and by on-site capture and reuse of stormwater for landscape irrigation (i.e., direct use). The total baseline amount of stormwater captured is 64,000 AFY.[75] The implementation of additional centralized and distributed stormwater capture projects and programs, in development and in construction, could provide for increased groundwater recharge in the amount of 66,000 AFY and increased direct use in the amount of 2,000 AFY. Under LADWP's current implementation strategy, the total estimated stormwater capture capacity is projected to be 155,000 AFY by 2035.[76] Furthermore, LADWP's recycled water use is projected to increase to 67,000 AFY through FYE 2045, which is inclusive of planned municipal/industrial use, indirect potable reuse (groundwater replenishment), and environmental reuse.[77]

In addition, the City is pursuing a groundwater replenishment project to replenish the San Fernando Groundwater Basin with highly treated recycled water. LADWP's recycled

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

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

[75] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 16.*

[76] *Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. ES-18.*

[77] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 19.*

water use is projected to reach 50,900 AFY by fiscal year ending (FYE) 2025 by adding 8,000 AFY of planned municipal/industrial use and 7,000 AFY of indirect potable reuse (groundwater replenishment), and further increase to 67,600 AFY through FYE 2045. Reuse is expected to remain relatively constant at approximately 26,600 AFY.[78]

(2) Water Demand

(a) Regional Water Demand

LADWP's 2020 UWMP provides water supply and demand projections in five-year increments to 2045, based on projected population estimates provided by SCAG in its 2020–2045 RTP/SCS.[79] Table IV.O.1-4 on page IV.O.1-30 shows the projected water demand from the year 2025 through 2045 for the City. In 2045, during average year hydrological conditions, the City's water demand is forecasted to be approximately 710,500 AFY (with existing water conservation).[80,81]

As shown in Table IV.O.1-4, LADWP's water supply would be equal to the water demand within LADWP's service area during average, single-dry and multi-dry years from 2025 through at least 2045.[82] LADWP's 2020 UWMP, therefore, concludes that adequate water supplies would be available to meet the projected demands of the service areas under normal, single-dry, and multi-dry year conditions through 2045.[83] Therefore, the City's water supply projections in LADWP's 2020 UWMP are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the 2020–2045 RTP/SCS adopted by SCAG.[84]

(b) Existing On-Site Water Demand

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is partially developed, with portions of the Project Site currently used for transportation

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78 *Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. ES-17.*

79 *It should be noted that SCAG released the 2024-2050 RTP/SCS which was approved in April of 2024. However, the LADWP 2020 UWMP was prepared based on projections provided in the 2020-2045 RPT/SCS.*

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

81 *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 21.*

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

83 *Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. ES-28. Also, Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 21.*

84 *Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. 11-19.*

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

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

af = acre-feet

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

[b] *First year of multi-dry year.*

Source: Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, Exhibits 11E, 11F, and 11G, May 2021. Also, with respect to average year demand and supply, Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, Table V.

operations and maintenance-related facilities, bus parking and construction staging.The WSA conservatively assumed that there is no existing water demand associated with the current uses on the Project Site.[85]

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 117 tanks and reservoirs, 86 pump stations, nine ammonization stations, 19 chlorination stations, 354 regulator and relief stations, 7,341 miles of distribution mains and trunk lines, and 61,122 fire hydrants within the City, with a total storage capacity of 323,546 AF according to the estimates for fiscal year 2022–2023.[86]

[85] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, Table I.*

[86] *Los Angeles Department of Water and Power, 2023–2024 Briefing Book, 2024, p. 27.*

Water service is available to the Project Site via LADWP water lines within the adjacent streets. As noted in the Water and Sewer Report included in Appendix M.1 of this Draft EIR, there is a 24-inch water main and a 40-inch water main in North Broadway. Additionally, there is a 12-inch water main in North Spring Street. Furthermore, there are currently nine existing fire hydrants located within 300 feet of the Project Site boundary, along the north side of North Broadway. The hydrants are served by the main lines in North Broadway.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.***[87]

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

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

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

[87] *Refer to Section IV.H, Hydrology and Water Quality, of this Draft EIR, for a discussion of stormwater impacts; Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of wastewater impacts; and Sections IV.D, Energy, and IV.O.4, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts as well as energy and telecommunications infrastructure.*

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

b. Methodology

(1) Water Supply

The analysis of the Project's impacts to water supply is based on the WSA for the Project prepared by LADWP pursuant to SB 610 and included as Attachment F of the Water and Sewer Report. The WSA includes a conservative calculation of the Project's anticipated water demand by applying 100 percent of City Department of Public Works, Bureau of Sanitation (LASAN) wastewater generation rates to proposed land uses under the Project. In addition, the analysis conservatively does not account for water demand associated with existing conditions. The WSA accounts for the reduction in Project water demand associated with the implementation of required and proposed water conservation features. In accordance with SB 610, the resulting increase in demand for water associated with the Project is then analyzed relative to LADWP's existing and planned future water supplies over the next 20 year period as set forth in LADWP's 2020 UWMP to determine if LADWP would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry year hydrologic conditions in combination with LADWP's existing and projected future water commitments.

(2) Water Infrastructure

The analysis with regard to water infrastructure is based on the Water and Sewer Report prepared for the Project by Fuscoe Engineering, which is included in Appendix M.1 of this Draft EIR. The Water and Sewer Report includes a comparison of the estimated net domestic and fire flow water demand for the Project to the available capacity of the existing water infrastructure system. As discussed therein, LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the existing fire hydrants surrounding the Project Site. LADWP's approach consisted of analyzing their water system model near the Project Site. Based on the results, LADWP determined whether the existing infrastructure is sufficient to meet the Project fire hydrant flow needs. See Attachment B of the Water and Sewer Report for the results of the Information of Fire Flow Availability Request (IFFAR). In addition, LADWP performed a hydraulic analysis to determine if adequate water supply exists for future development of the Project as part of the Service Advisory Request (SAR). LADWP's hydraulic analysis provides flow and pressure data for the approximate connection locations. Based on the results, LADWP determines whether they can meet the projected needs based on the existing infrastructure. See Attachment A of the Water and Sewer Report for the results of the SAR.

c. Project Design Features

The following Project Design Feature is proposed with regard to water supply:

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

Fixtures:

- ENERGY STAR Certified Residential Clothes Washers—Front-loading or Top-loading with Integrated Water Factor of 2.5 or less and capacity of three cubic feet.
- ENERGY STAR Certified Residential Dishwashers—standard with 3.2 gallons/cycle or less.
- High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less.
- Showerheads with a flow rate of 1.4 gallons per minute, or less.
- Waterless urinals.

Landscape and Irrigation:

- California Friendly® plants or native plants.
- Drip/Subsurface Irrigation (Mirco-Irrigation).
- Micro-Spray.
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together)

Pool

- Install a meter on the pool make-up line or leak detection system so water use can be monitored and leaks can be identified and repaired.
- Pool splash troughs around the perimeter that drain back into the pool.
- Reuse pool backwash water for irrigation.

Utilities

- Individual metering and billing for water use for every commercial unit.
- Leak detection and water monitoring.

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?[88]

(1) Impact Analysis

(a) Construction

Project construction activities would require water for dust control, cleaning of equipment, excavation, and grading/recompaction activities. As provided in the Water and Sewer Report included as Appendix M.1 of this Draft EIR, construction is typically less demanding than the water usage for the proposed Project. As discussed further below, the existing water infrastructure would be adequate to meet Project operational demand (i.e., 138,117 gallons per day [gpd]). Therefore, the existing water infrastructure would have adequate capacity to meet Project construction-related water demand, and new water mains or upgrades to the existing water mains would not be required.

The Project would require decommissioning/abandonment of existing water lines to the Project Site and construction of new on-site water distribution lines to serve new buildings, connections to the existing off-site mains, as well as the potential relocation of existing on-site lines. Construction activities associated with the installation of these infrastructure improvements would primarily involve trenching in order to place the lines below surface. Installation of new water infrastructure would be limited to on-site water distribution and minor off-site work associated with connections to the public main. No upgrades to public water mains are anticipated. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Lastly, while trenching and water line connection installation activities could temporarily affect traffic flow and access in adjacent rights-of-way, as discussed in Section IV.M, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe vehicular and pedestrian access remains available within and near the Project Site during construction activities. Appropriate construction traffic

[88] *Refer to Section IV.O.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of wastewater impacts; Sections IV.D, Energy, and IV.O.4, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts as well as energy and telecommunications infrastructure; and Section IV.H, Hydrology and Water Quality, of this Draft EIR, for a discussion of stormwater impacts.*

control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure that emergency access to the Project Site and traffic flow are maintained on adjacent rights-of-way during the construction period.

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

(b) Operation

When analyzing the capacity of the water infrastructure system to serve a project, the estimated operational demands of the project for both fire suppression and domestic water are considered. Although domestic water demand would be the Project's main contributor to water demand in the long term, the Project's fire flow demands have a much greater instantaneous impact on infrastructure and, therefore, are the primary means for analyzing infrastructure capacity. Nevertheless, a conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project (i.e., the SAR and IFFAR included as Attachments A and B, respectively, of the Water and Sewer Report). These analyses, which together indicate that adequate water infrastructure exists to serve the Project, are summarized below and described in more detail in the Water and Sewer Report included as Appendix M.1 of this Draft EIR.

(i) Domestic Water and Fire Service Analyses—SAR

A SAR was submitted to LADWP to determine whether there is adequate water capacity for both the on-site fire suppression system (i.e. building sprinkler system) and domestic water service. Two locations at the 24-inch water main in North Broadway, one each for the North and South Parcels, were separately analyzed for capacity to provide water service simultaneously for the on-site fire suppression system and domestic water service. The SAR analysis confirmed that proposed water service can be connected from the existing 24-inch water main in North Broadway that has the capacity for water pipe infrastructure. The expected water demand of the Project would require a 10-inch domestic water service and a 10-inch fire water service connection. Per the City's SAR analysis, the total tested flow at the minimum pressure reading was approximately 31 psi at the two tested locations, each with a flowrate of 5,000 gpm. This value exceeds the minimum 20 psi requirement, and, therefore, no additional upgrades to the system are anticipated. However, due to the heights of the proposed buildings, residual pressure at the higher elevations may be less than the required minimum of 20 psi. As such, on-site booster pumps are anticipated to be required to ensure that adequate pressure requirements are met. A low-pressure agreement with the City would also be implemented.

Overall, the approved SAR confirms that sufficient off-site water infrastructure is available for the Project. Proposed water service can be connected from the existing 24-inch water main in North Broadway. The service laterals would be adequately sized to accommodate the on-site fire suppression system demand and domestic demand flowing simultaneously. The new water services would also include backflows and would be metered separately per City requirements.

(ii) Fire Water—IFFAR

The application for IFFAR was requested from LADWP that verified the capacity of the fire hydrants to provide adequate fire flows to the Project. The required fire-flow for the Project set by the LAFD is 9,000 gpm from four to six fire hydrants flowing simultaneously. The hydrants were analyzed with flows of 1,500 gpm each, resulting in residual pressures of 28 to 108 psi. Thus, the existing water mains and hydrants surrounding the Project would adequately service the minimum 9,000 gpm from six hydrants running simultaneously.

The proposed multi-level buildings would be serviced by the existing hydrants. Due to the loss in water pressure resulting from the multi-level structures, a booster pump system would be required to provide the minimum flow and pressures to the buildings. The IFFAR confirms that the hydrants would meet the minimum required flow and that no new off-site public hydrants would need to be installed.

Based on the above, operation of the Project would not exceed the available capacity of the existing water distribution infrastructure that would serve the Project Site, and new or expanded off-site water facilities would not be required. Accordingly, Project operation would not require or result in the relocation or construction of new or expanded off-site water facilities, the construction or relocation of which could cause significant environmental effects, and impacts to water infrastructure during Project operation would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

As previously described above, Project construction activities would require water for dust control, cleaning of equipment, excavation, and grading/recompaction activities. These activities would occur intermittently throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. As provided in the Water and Sewer Report, based on a review of construction projects of similar size and duration, the anticipated water demand associated with construction activities would be less than the new water demand of the Project at buildout set forth in Table IV.O.1-5 on page IV.O.1-38. As stated in the WSA and summarized below, LADWP concluded that the projected water supplies for average, single-dry, and multiple-dry years reported in LADWP's 2020 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2045. Therefore, the Project's temporary and intermittent demand for water during construction could be similarly met by the City's available supplies during each year of Project construction.

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

(b) Operation

Development of the Project would result in an increase in long-term water demand for consumption resulting from the operational uses, maintenance, and other activities on the Project Site. In accordance with SB 610, LADWP prepared a WSA for the Project, included as Attachmemt F of the Water and Sewer Report. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on estimates of the Project's operational water demand as compared to LADWP's existing and forecasted future water supplies and demand through 2045 during normal, single-dry and multiple dry years as set forth in LADWP's 2020 UWMP. As indicated in the WSA, the estimates of Project operational water demand in the WSA are based on 100 percent of LASAN sewage generation rates.

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

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit)[a]	Demand (gpd)
Existing Uses to be Removed			
Restaurant Building	2,132 sf		
Maintenance Building	12,800 sf		
Total Existing Demand to be Removed			0[b]
Proposed Uses			
Residential Apartment: Studio	144 du	75	10,800
Residential Apartment: 1 BDR	468 du	110	51,480
Residential Apartment: 2 BDR	307 du	150	46,050
Residential Apartment: 3 BDR	60 du	190	11,400
Residential Apartment Live/Work: 1 BDR	7 du	185	1,295
Residential Fitness	2,400 sf	0.65	1,560
Residential Community Space	28 occ	3	84
Residential Lounge Areas	17,640 sf	0.05	882
Residential Outdoor Amphitheater	100 seats	3	300
Residential Barbeque Area	500 sf	0.13	64
Residential Outdoor Fitness Area	2,500 sf	0.65	1,625
Retail	15,000 sf	0.025	375
Restaurant	1,587 seats	30	47,610
Leasing Office	2,250 sf	0.12	270
Base Demand Adjustment (Residential Units)[c]			13,858
Landscaping, Pool/Spa, Water Feature[d]	93,932 sf	[0.1]	9,302
Covered Parking[e]	565,660 sf	0.02	372
Subtotal Water Demand	—	—	***197,327***
Less Required Ordinances Water Savings[f]	—	—	(48,402)
Project Water Demand	—	—	***148,925***
Less Existing to be Removed	—	—	(0)[b]
Less Additional Conservation[g]	—	—	(10,808)
Net Project Water Demand (Proposed – Existing – Additional Conservation)	—	—	**138,117**[k]

sf = square feet

du = dwelling unit

gpd = gallons per day

occ = occupants

[a] *Rate source: LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, updated June 10, 2019, https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart, accessed June 27, 2025.*

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

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit)[a]	Demand (gpd)
[b] *Conservatively assumes no water is used by existing uses on-site.*			
[c] *Base Demand Adjustment (for residential uses) is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.*			
[d] *Landscaping, Pool/Spa, and Water Feature's water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance. Landscaping and Pool/Spa includes 89,232 sf of irrigated landscaping areas and 4,700 sf of swimming pool/spa and water feature.*			
[e] *Automobile parking water use is based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, assuming cleaning 12 times per year.*			
[f] *Water savings for plumbing fixtures and appliances due to current codes.*			
[g] *Water conservation due to additional conservation commitments agreed by the Applicant. See Table II of the WSA.*			
Source: Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, Table I.			

Table IV.O.1-5 on page IV.O.1-38 shows the estimated water demand associated with the Project, as presented in the WSA. As shown therein, the Project would generate an estimated maximum increase in domestic water demand of up to approximately 138,117 gpd, or approximately 155 AFY, including water savings from both compliance with applicable regulatory requirements and implementation of the additional voluntary water conservation measures as set forth in Project Design Feature WAT-PDF-1, above. Based on the projected water demand estimates for LADWP's service area from the 2020 UWMP, as identified in Table IV.O.1-4, the Project's estimated operational domestic water demand of 138,117 gpd (155 AFY) would represent approximately 0.023 percent, 0.022 percent, and 0.022 percent of LADWP's projected 2030 average, single-dry, and multi-dry year water demand and supply, respectively.[89] Therefore, the Project's domestic operational water demand would represent a small percentage of LADWP's projected water demand and supply in 2035. Furthermore, as stated in the WSA, LADWP has concluded that projected LADWP water supplies during normal, single-dry, and multiple-dry years would be sufficient to meet the Project's estimated water demand in addition to the existing and projected future water demands within LADWP's service area through the year 2045.[90]

As outlined in its 2020 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2020 LADWP UWMP takes into account the realities of climate

[89] *The Project is compared to LADWP's projected 2035 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2034.*

[90] *Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, p. 23.*

change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2020 LADWP UWMP also furthers the goals of L.A.'s Green New Deal (also discussed above), addresses the current and future SWP supply shortages, and concludes that MWD's actions in response to the threats to the SWP will ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, as reaffirmed in L.A.'s Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.[91,92]

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2034, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program would continue to provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, as previously discussed, LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Additionally, in the WSA for the Project, LADWP determined that the demand associated with the Project is included in its 2020 UWMP, which shows that there is an adequate 20-year water supply.

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[91] *Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. ES-1.*

[92] *City of Los Angeles, L.A.'s Green New Deal, 2019, p. 11.*

Therefore, a long-term buildout scenario for the Project is already accounted for in the analysis herein. LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for the water supplies required to serve existing and projected demands within its service area. The main purpose of the UWMP is to forecast future water demands and water supplies under average and dry hydrologic conditions; identify future water supply projects; provide a reliability assessment for average, single dry year, and multi-dry years; and assess near-term drought risk. As such, should hydrologic conditions change under a long-term buildout scenario, LADWP has policies and procedures in place to address such changes and ensure an adequate water supply. Furthermore, with regard to water infrastructure capacity, the results of the conservative analyses of both fire suppression and domestic water flows completed for the Project would remain unchanged as a long-term buildout scenario would not affect the maximum flow conditions evaluated above. While future years could generate greater service area demands, which could begin to strain the existing water distribution system in the surrounding area, LADWP continues to evaluate the need for infrastructure upgrades and expansion based on long-term growth and demand projections. As such, a later buildout date would not affect the impacts or significance conclusions presented above. In addition, no changes to the proposed Project design feature would be necessary in the event of an extended buildout, except as needed to comply with future new or updated regulatory standards.

f. Cumulative Impacts

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. There are 25 related projects in the Project vicinity, as listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, all of which are located within the LADWP service area. The projected growth associated with these 25 related projects is a conservative assumption regarding future development as some of the related projects may not be built out by 2034, may never be built, or may be approved and/or built at reduced densities. To provide a conservative forecast, the future baseline forecast assumed that Related Project Nos. 1 through 25 are fully built out by 2034, unless otherwise noted. In addition, all residential units are conservatively assumed to be three-bedroom units, resulting in greater water demand.

(1) Impact Analysis

(a) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and related projects within this geographic area would cumulatively increase demand on the existing water infrastructure system. However, as with

the Project, the related projects would be subject to LADWP review (e.g., preparation of a SAR and IFFAR, where applicable) to ensure that the existing water infrastructure is adequate to meet the domestic and fire water demands of each project and would be required to provide water infrastructure improvements to serve such project if the existing infrastructure is inadequate. In addition, to ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement and update its Water Infrastructure Plan, with the current (2022-2023) Water Infrastructure Plan containing a five-year water system capital improvement plan that includes $5.6 billion for needed water system infrastructure improvements and maintenance.[93] Furthermore, in accordance with City requirements, prior to ground disturbance, the related projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects.

As with the Project, off-site connection activities and infrastructure improvements associated with the related projects could temporarily affect access in adjacent rights-of-way. However, as with the Project, related projects would implement a construction traffic management plan to ensure that adequate and safe access remains available within and near the related project sites during construction activities. As part of the construction traffic management plan, appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the related project sites and traffic flow is maintained on adjacent rights-of-way. Lastly, as discussed in the Project-level analysis under Threshold (a) above, the Project would result in less-than-significant water infrastructure impacts. Thus, the Project's contribution to water infrastructure impacts would not be cumulatively considerable.

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

(b) Water Supply

The geographic context for the cumulative impact analysis of water supply is the LADWP service area. As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for the water supplies required to serve existing and projected demands within its service area. LADWP's

[93] *Los Angeles Department of Water and Power, 2022–2023 Water Infrastructure Plan, p. 2.*

2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045.[94]

The estimated water demand of the related projects is shown in Table IV.O.1-6 on page IV.O.1-44. As indicated therein, the related projects would generate a total average water demand of approximately 1,345,541 gpd (1,507 AFY). Together with the Project, the total cumulative water demand would be approximately 1,483,658 gpd (1,662 AFY). These estimates are conservative because, while the water demand estimates for the Project account for required and proposed water conservation measures, the estimates for the related projects do not account for required and proposed water conservation measures or subtract the water demand associated with the existing uses to be removed.

Based on the projected water demand and supply estimates for LADWP's service area from the 2020 UWMP identified previously in Table IV.O.1-4 on page IV.O.1-30, the estimated total water demand of the Project and related projects of 1,662 AFY would represent approximately 0.24 percent, 0.23 percent, and 0.24 percent of the 2030 water demand and supply within LADWP's service area during average, single-dry, and multi-dry years, respectively.[95] Hence, the water demand of the Project, together with the related projects, would represent a very small percentage of LADWP's total 2030 water demand and supply, with the Project's share representing an even smaller percentage.

As previously stated, based on water demand projections in its 2020 UWMP, LADWP has determined that it will be able to reliably provide water to meet the existing and forecasted future demand through the year 2045. In addition, the Project and the related projects would comply with the numerous regulatory requirements that promote water conservation described in the Regulatory Framework subsection above, which would reduce water demand on a cumulative basis. For example, certain related projects would be subject to the Los Angeles Green Building Code requirement to reduce indoor water use by at least 20 percent, and all related projects would be required to use fixtures that conserve water. In addition, certain large, related projects meeting the thresholds under SB 610 would be required to prepare and receive LADWP approval of a WSA that demonstrates how such project's water demand would be met.

Overall, as discussed above, LADWP's 2020 UWMP demonstrates that the City will meet all existing and projected future water demand through 2045 during average, single-dry, and multi-dry years. The 2020 UWMP specifically outlined the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP's 2020

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

[95] *The Project is compared to LADWP's projected 2035 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2034.*

Table IV.O.1-6
Cumulative Water Demand

No.	Project Location[c]	Land Use	Size[d]	Generation Factor[a,b,d]	Total Wastewater Generation (gpd)[e]
1	1101 North Main Condos 1101 N Main St.	Condominiums	318 du	190	60,420
2	Mixed-Use 511 N. Grand Ave.	Apartments	299 du	190	56,810
		Retail	8,000 sf	0.025	200
3	Hill Mixed-Use Project 708 N. Hill St.	Apartments	162 du	190	30,780
		Retail	5,000 sf	0.025	125
4	Alpine Mixed-Use 211 W. Alpine St.	Apartments	160 du	190	30,400
		Retail	2,499 sf	0.025	62
5	College Station Mixed-Use 129 W. College St., 924 N. Spring St.	Apartments	725 du	190	137,750
		Commercial	51,600 sf	0.05	2,580
6	Ferrante 1000 W. Temple St.	Apartments	1,500 du	190	285,000
		Retail	30,000 sf	0.025	750
7	1201 North Broadway Mixed-Use 1201 N. Broadway	Apartments	118 du	190	22,420
		Office/Commercial	8,800 sf	0.12	1,056
8	Mixed-Use Barranca Project 169 N. Avenue 21	Residential	95 du	190	18,050
		Affordable Housing	5 du	190	950
		Hotel	100 rm	120	12,000
		Retail	4,946 sf	0.025	124
9	643–655 North Spring Street 643–655 N. Spring St	Apartments	294 du	190	55,860
		Hotel	149 rm	120	17,880
		Commercial	15,878 sf	0.05	794
10	Data Center 900 N. Alameda St.	Data Center	179,900 sf	0.12	21,588
11	942 North Broadway 942 N. Broadway	Residential	169 du	190	32,110
		Affordable Housing	9 du	190	1,710
		Restaurant and Office Space	35,805 sf	0.12	4,297

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

No.	Project Location[c]	Land Use	Size[d]	Generation Factor[a,b,d]	Total Wastewater Generation (gpd)[e]
12	Sunset Boulevard Mixed-Use (Holy Hill Mixed-Use) 1111 W. Sunset Blvd.	Apartments	737 du	190	140,030
		Hotel	180 rm	120	21,600
		Hotel Retail	10,000 sf	0.025	250
		Hotel Restaurant	10,000 sf (approx. 333 seats)	30	10,000
		Office	48,000 sf	0.12	5,760
		Retail/Gym/Grocery	50,000 sf	0.025	1,250
		Restaurant	25,000 sf (approx. 833 seats)	30	25,000
13	843 N. Spring St Mixed-Use 843 N. Spring St.	Office and Restaurant Space	100,517 sf	0.12	12,062
14	Mixed-Use 1457 N. Main St.	Live-Work	244 du	190	46,360
		Retail	9,829 sf	0.025	246
15	Clean Water Campus Project 303 N. San Fernando Rd.	Office	150,000 sf	0.12	18,000
16	Stadium Way and Chavez Ravine Apartments 959 E. Stadium Wy.	Apartments	237 du	190	45,030
		Affordable Housing	30 du	190	5,700
17	Pagoda Hotel 995 N. Broadway	Hotel	101 rm	120	12,120
		Restaurant	6,211 sf (approx. 207 seats)	30	6,211
18	1101 N. Broadway 1009-1015 N. Broadway	Hotel	92 rm	120	11,040
		Restaurant	1,713 sf (approx. 57 seats)	30	1,713
		Café/Retail	895 sf	0.025	22
		Café	978 sf (approx. 33 seats)	30	978

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

No.	Project Location[c]	Land Use	Size[d]	Generation Factor[a,b,d]	Total Wastewater Generation (gpd)[e]
19	1635 North Main Street 1635 N. Main St.	Office	140,000 sf	0.12	16,800
		Retail	5,000 sf	0.025	125
		Restaurant	8,000 sf (approx. 267 seats)	30	8,000
20	TRJLA Mixed-Use 717 N. Hill St.	Apartments	411 du	190	78,090
		Affordable Housing	39 du	190	7,410
		Retail	17,140 sf	0.025	429
21	College Street Residential Project 871 N. Figueroa Ter.	Apartments	153 du	190	29,070
		Affordable Housing	17 du	190	3,230
22	950 Stadium Way Residential 950 E. Stadium Wy.	Apartments	57 du	190	10,830
		Affordable Housing	8 du	190	1,520
23	130 College Office Project 130 W. College St.	Office	224,597 sf	0.12	26,952
		Retail	4,110 sf	0.025	103
		Restaurant	5,894 sf (approx. 196 seats)	30	5,894
Related Total Water Demand					**1,345,541**
Project Total Water Demand					**138,117**
Related + Project Total Water Demand					**1,483,658**

du = dwelling units

rm = rooms

sf = square feet

[a] *Rate source (except where otherwise noted): LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, revised June 10, 2019, https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart.*

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

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

No.	Project Location[c]	Land Use	Size[d]	Generation Factor[a,b,d]	Total Wastewater Generation (gpd) [e]

[c] *Related Project Nos. 24 and 25 would generate a limited demand for water, if any, associated with potentially restrooms, drinking fountains, and cleaning. No other data are available to estimate the limited water demand that could be generated by these potential related projects. As such, they are not included in this analysis.*

[d] *Restaurant use demand is based on number of seats. Number of seats for restaurant uses were estimated based on one seat per 30 square feet.*

[e] *The number of seats in the description reflects a rounded number to the nearest seat and the calculations reflect the precise number.*

Source: Eyestone Environmental, 2025.

UWMP also incorporates the goals of L.A.'s Green New Deal. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high-efficiency water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that sufficient water supply continues to be available.

Lastly, as indicated in the Project-level analysis under Threshold (b) above, the Project would result in less-than-significant water supply impacts. Thus, the Project's contribution to water supply impacts would not be cumulatively considerable.

Based on the above, LADWP would be able to meet its existing water demands and the water demand associated with the Project and projected future growth within its service area through at least 2045. Therefore, the Project, together with the related projects, would not result in significant cumulative impacts related to water supply. As such, cumulative water supply impacts would be less than significant

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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