

IV. Environmental Impact Analysis

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

1. Introduction

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

Additional technical information used in the analysis is based on the Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas (Utility Report) prepared for the Project dated June 2026 and included in Appendix H of this Draft EIR. The data and conclusions in this section regarding the availability of water supply to serve the Project are based on the Water Supply Assessment (WSA) prepared for the Project adopted by LADWP along with a copy of Resolution No. 024060 approving the WSA, both of which are included as Exhibit 9 of the Utility Report.

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
- California Senate Bill 610, Senate Bill 221, and Senate Bill 7
- California Senate Bill X7-7 (Water Conservation Act of 2009)

- State Sustainable Groundwater Management Act of 2014
- California Code of Regulations
 - Appliance Efficiency Regulations (Title 20)
 - California Green Building Standards Code
 - Plumbing Code
- California Executive Order B-40-17
- California Executive Order N-10-21
- California Executive Order N-7-22
- California Executive Order N-5-23
- Metropolitan Water District
 - 2020 Urban Water Management Plan
 - 2015 Integrated Resources Plan
 - Water Surplus and Drought Management Plan
 - Long-Term Conservation Plan
 - Water Supply Allocation Plan
- Los Angeles Department of Water and Power’s 2020 Urban Water Management Plan
- L.A.’s Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan, including:
 - Framework Element
 - Land Use Element – Wilshire 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, a Water Supply Verification (WSV) as required by SB 221 is prepared at the end of the planning process for such projects. Under SB 221, a water supplier must prepare and adopt a WSV, indicating sufficient water supply is available to serve a proposed subdivision, or the local agency must make a specific finding that sufficient water supplies are or will be available prior to completion of a project, as part of the conditions for the approval of a final subdivision map. SB 221 specifically applies to residential subdivisions of 500 units or more. However, Government Code Section 66473.7(i) exempts "... any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses; or housing projects that are exclusively for very low and low-income households."

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

(c) Senate Bill X7-7 Water Conservation Act

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.² Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.³ Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.⁴ As provided in LADWP’s 2020 Urban Water Management Plan, in accordance with SB X7-7, LADWP developed a final reported 2020 target of 142 gallons per capita per day. LADWP’s actual gallons per capita per day in 2020 was 106 gallons per capita per day, less than the 2020 target.⁵

(d) Sustainable Groundwater Management Act of 2014⁶

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

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

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

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

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

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

⁶ *Sustainable Groundwater Management Act [And Related Statutory Provisions from SB 1168 (Pavley), AB 1739 (Dickinson), and SB 1319 (Pavley) as Chaptered]*, 2015 Amendments, effective January 1, 2016.

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

(ii) California Green Building Standards Code

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

⁷ California Department of Water Resources, SGMA Groundwater Management, <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>, accessed July 1, 2026.

⁸ California Code of Regulations, Title 20, Section 1605.3(h) and 1605.3(i).

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.

(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 2025 California Plumbing Code, which is based on the 2024 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2026. The City of Los Angeles has adopted select portions of the California Plumbing Code.

(f) Executive Order B-40-17

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

(g) Executive Order N-10-21

On July 8, 2021, Executive Order N-10-21 was issued calling for voluntary cutbacks of water usage by 15 percent from 2020 usage levels. Executive Order N-10-21 lists commonsense measures Californians can undertake to achieve water usage reduction goals and identifies the SWRCB for tracking of monthly reporting on the State's progress. 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 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 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 2045.⁹ Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year

⁹ 2020 MWD UWMP.

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.¹⁰ The analysis in the 2020 MWD UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.¹¹ In the 2020 MWD UWMP, the projected 2045 water demand during multiple-dry year conditions is 1,564,000 AFY, whereas the expected and projected 2045 supply is 2,239,000 AFY based on current programs, for a potential surplus in 2045 of 675,000 AFY.¹²

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. In addition, MWD is working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Sacramento–San Joaquin Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. Furthermore, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.¹³

(ii) 2015 Integrated Resources Plan

MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply, such as water quality, climate change, and regulatory and operational changes. The most current IRP (2015 IRP) was adopted in January 2016.¹⁴ It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

¹⁰ 2020 MWD UWMP, p. 2-19.

¹¹ 2020 MWD UWMP, p. 2-19.

¹² 2020 MWD UWMP, p. 2-19.

¹³ 2020 MWD UWMP, p. ES-7.

¹⁴ MWD 2015 IRP, Report No. 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 acre-feet, representing an excess of 266,000 AF.¹⁵

The 2020 IRP planning process is currently in development.¹⁶ The 2020 IRP analyzes multiple scenarios that could plausibly unfold in the future due to climate change, economic growth, legislation and regulations affecting water sources and demands, and other variables. With the variability of these impacts in mind, MWD is developing four scenarios to help understand the challenges of the future and effectively plan to ensure water reliability in the face of those challenges. These four scenarios include (A) low demand, stable imports; (B) high demand, stable imports; (C) low demand, reduced imports; and (D) high demand, reduced imports.¹⁷

(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

¹⁵ MWD 2015 IRP, Report No. 1518, January 2016, p. VIII.

¹⁶ MWD, *Integrated Water Resources Plan*, www.mwdh2o.com/how-we-plan/integrated-resource-plan/, accessed July 1, 2026.

¹⁷ MWD, *Preliminary Gap Analysis of the 2020 Integrated Resources Plan (Presentation)*, December 15, 2020. Low demand = slow economic growth; stable imports = gradual climate change and low regulatory impacts; high demand = high economic growth; and reduced imports = severe climate impacts and high regulatory impacts.

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.¹⁸

(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 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.¹⁹ The allocation period covers 12 consecutive months from July of a given year through the following June.

¹⁸ MWD, *Water Surplus and Drought Management Plan, Report No. 1150. August 1999.*

¹⁹ MWD, *2015 UWMP, p. 2-21.*

(3) Local

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

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. LADWP adopted the 2020 UWMP on May 25, 2021. The 2020 UWMP complies with the Urban Water Management Planning Act, builds upon the goals and progress made in the 2015 UWMP, and currently serves as the City's master plan for reliable water supply and resource management consistent with the City goals and objectives. The 2020 UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's 2020 UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2050. Long-range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). LADWP's water use efficiency goals include reducing per capita water use to 100 gallons per capita per day by 2035 and to maintain this usage through 2050.

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

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAn, which includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.²⁰ 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.²¹ 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.

²⁰ City of Los Angeles, *Sustainable City pLAn*, April 2015.

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

(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.²² 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 2024.²³ Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

*(d) City of Los Angeles General Plan**(i) General Plan Framework Element*

The General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.²⁴ The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for City utilities, including water service. Goal 9C of the Infrastructure and Public Services Chapter is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.²⁵ The goals, objectives, and policies are addressed by the City in its ordinances and preparation of its UWMP.

Table IV.K.1-1 on page IV.K.1-14 identifies General Plan goals, objectives and policies that relate to water supply.

²² City of Los Angeles, *One Water LA 2040 Plan, Volume 1, Summary Report, April 2018*.

²³ City of Los Angeles, Office of the Mayor, *Executive Directive No. 5, Emergency Drought Response—Creating a Water Wise City, October 14, 2014*.

²⁴ City of Los Angeles Department of City Planning, *Citywide General Plan Framework, An Element of the Los Angeles General Plan, July 27, 1995*.

²⁵ City of Los Angeles, *General Plan Framework Element, Chapter 9: Infrastructure and Public Services—Water Supply*.

Table IV.K.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.
<i>Source: City of Los Angeles, City of Los Angeles General Plan, Framework Element, re-adopted 2001.</i>	

(ii) Land Use Element (Wilshire Community Plan)

The Land Use Element of the City's General Plan includes 34 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' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Wilshire Community Plan area. The Community Plan does not include water supply and water infrastructure objectives that are applicable to the Project.²⁶

(e) Los Angeles Municipal Code

The City 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

²⁶ City of Los Angeles, *Wilshire Community Plan*, adopted September 19, 2001, last amended September 7, 2016.

standards and mandate a number of new fixture requirements and methods of construction for plumbing and irrigation systems.

The City has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gpm in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 psi is to remain in the water system with the required gpm flowing. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

b. Existing Conditions

(1) Water Supply

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

Water is supplied to the City from four primary sources: the Los Angeles Aqueducts (LAA), local groundwater, purchased water from MWD, and recycled water.²⁷ As shown in Table IV.K.1-2 on page IV.K.1-17, LADWP had an available water supply of 500,743 AF in 2022 (the latest full year for which data is available) with a vast majority of this supply from imported sources, including the LAA and MWD.²⁸ LADWP's water sources are described in further detail below.

²⁷ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 11. Included as Exhibit 9 of the Utility Report.

²⁸ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 11. Included as Exhibit 9 of the Utility Report.

**Table IV.K.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)
2018	307,671	21,760	182,706	9,778	-200	522,116
2019	312,456	32,233	137,775	7,512	1,710	488,266
2020	292,095	34,363	152,647	9,641	1,155	487,591
2021	128,268	51,070	316,627	11,455	-938	508,359
2022	69,183	53,057	366,690	12,022	208	500,743
<i>AF = acre-feet</i> <i>Source: Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, Table III. Included as Exhibit 9 of the Utility Report.</i>						

(a) Los Angeles Aqueducts

As provided in the WSA prepared for the Project included as Exhibit 9 of the Utility Report included as Appendix H of this Draft EIR, 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 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.²⁹

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 of water to the City. Concerns over environmental impacts have required the City to reallocate approximately 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

²⁹ *Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, p. 11. Included as Exhibit 9 of the Utility Report.*

projects and uses. The expected annual long term LAA delivery from 2020 to 2045 will range from approximately 184,200 AFY to 192,000 AFY for average years.³⁰

As indicated in Table IV.K.1-2 on page IV.K.1-17, 69,183 AF of LADWP's water supplies were from the LAA in 2022. The average deliveries from the LAA from fiscal year 2017–2018 through fiscal year 2021–2022 were 260,123 AF of water annually. As of December 30, 2025 (the latest date for which data is available), the snowpack was 71 percent of average year for this date.³¹

The sole reliance on LAA supply with impacts due to natural variability and water set aside for environmental projects is not sufficient to meet the City's annual water demands; therefore, LADWP has implemented, and continues to increase, stormwater capture, local groundwater, water conservation, water use efficiency, and water recycling programs to mitigate the reduction of LAA supplies. Additionally, LADWP can purchase supplemental imported water from MWD to meet the City's remaining water demands.³²

(b) Local Groundwater Supplies

Local groundwater provided 8 percent of the City's total water supply, from FYE 2018 to FYE 2022. This amount significantly differs from 50 years ago when local groundwater provided up to 23 percent of total supply during extended dry periods. In recent years, contamination issues have impacted LADWP's ability to fully utilize its local groundwater entitlements and provide groundwater supplies to support annual water demands. LADWP continues to invest in stormwater recharge projects to restore local groundwater basin levels as well as advanced treatment systems to produce purified recycled water for groundwater replenishment. Furthermore, LADWP has, and will continue to, conjunctively use this large groundwater basin within the City to store wet year LAA flows to supply water during dry periods.³³

³⁰ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 12. Included as Exhibit 9 of the Utility Report.

³¹ California Department of Water Resources, *Late December Storms Deliver Much-Needed Snowpack and Water Supply for California*, <https://water.ca.gov/News/News-Releases/2025/Dec-25/Late-December-Storms-Deliver-Much-Needed-Snowpack-and-Water-Supply-for-California>, accessed January 16, 2026.

³² Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 12. Included as Exhibit 9 of the Utility Report.

³³ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 13. Included as Exhibit 9 of the Utility Report.

The City's total adjudicated water rights are 109,809 AFY, which are located within the San Fernando Basin (SFB), Sylmar Basin, Central Basin, and West Coast Basin.³⁴ There are additional groundwater basins near and within the Los Angeles area, such as the unadjudicated Hollywood, Santa Monica, and northern Central Basins that may provide additional groundwater supplies for the City.

The 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.³⁵ The City's average groundwater rights in the SFB is approximately 87,000 AFY.³⁶ LADWP is implementing its SFB Groundwater Remediation Program to help restore the capacity of SFB as a drinking water source and groundwater storage. A ULARA Judgment allows groundwater to be stored within the SFB when the City pumps less than its annual water right, and stored water credits may be pumped to supplement the City's water supply. The direct spreading of both imported surface water and recycled water by the City increased the water rights by an equal amount. As of October 1, 2018, the City had accrued 591,460 AF of stored water credits.³⁷ LADWP also receives additional 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. This connection began service in August 2019 and will operate for five years.³⁸

The Central Basin is another source of groundwater supply for the City. The Central Basin Watermaster oversees this area located in the southeastern part of the Los Angeles Coastal Plan in Los Angeles County. The City has 17,236 AFY of groundwater rights in this basin, which was increased from the 15,000 AFY originally awarded through the Central Basin Third Amended Judgment dated December 23, 2013, through three purchase transactions completed between 2014 and 2015.^{39,40} With additional carryover and storage

³⁴ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 13. Included as Exhibit 9 of the Utility Report.

³⁵ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 13. Included as Exhibit 9 of the Utility Report.

³⁶ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 13. Included as Exhibit 9 of the Utility Report.

³⁷ Los Angeles Department of Water and Power, *2020 Urban Water Management Plan*, May 2021, p. 5-7.

³⁸ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 13. Included as Exhibit 9 of the Utility Report.

³⁹ Los Angeles Department of Water and Power, *2020 Urban Water Management Plan*, May 2021, p. 5-3.

⁴⁰ Los Angeles Department of Water and Power, *2020 Urban Water Management Plan*, May 2021, p. H-56.

of unused water rights, the City has accrued a total of 22,943 AF of stored water as of fiscal year-end 2020.⁴¹

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 are 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 replace the existing deteriorated facilities and restore Sylmar Basin groundwater production capacity. 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. The West Coast Basin is managed by the West Coast Basin Watermaster and is located in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County. LADWP has the right to pump 1,503 AF 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. However, the West Coast Basin has groundwater quality problems related to total dissolved solids (TDS), chloride, and hydrocarbon pollutants; therefore, LADWP discontinued the use of West Coast Basin facilities in 1980 until further studies are completed to restore groundwater pumping.⁴²

Table IV.K.1-3 on page IV.K.1-21 provides data regarding the groundwater produced for the City during the fiscal years of 2017-2018 through 2021-2022. As shown therein, during the 2021-2022 fiscal year, 48,408 AF were produced from the SFB, 3,018 AF were produced from the Sylmar Basin, and 4,562 AF were produced from the Central Basin.⁴³ The City plans to continue to develop production from its groundwater basins in the coming years to offset reductions in imported supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection. LADWP's groundwater pumping practice is based on a "safe yield" operation. Furthermore, basin management is achieved by collective efforts of a court-appointed Watermaster and the ULARA Administrative Committee of representatives from five public water supply agencies overlying the ULARA Committee.⁴⁴ These efforts include the operation of groundwater remediation systems, use of an extensive network of groundwater monitoring wells, routine reporting on groundwater elevation and

⁴¹ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 13. Included as Exhibit 9 of the Utility Report.

⁴² Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 14. Included as Exhibit 9 of the Utility Report.

⁴³ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, Table IV. Included as Exhibit 9 of the Utility Report.

⁴⁴ Los Angeles Department of Water and Power, *2020 Urban Water Management Plan*, May 2021, p. 5-4.

**Table IV.K.1-3
Local Groundwater Basin Supply^a**

Fiscal Year (July–June)	San Fernando (AF)	Sylmar (AF)	Central (AF)
2017–2018	22,259	0 ^a	1 ^a
2018–2019	36,870	1 ^a	5 ^a
2019–2020	35,949	2 ^a	10 ^a
2020–2021	53,625	1,368	2,247
2021–2022	48,408	3,018	4,562
<i>AF = acre-feet</i> <i>Historical data from the Upper Los Angeles River Area Watermaster Monthly Reports, July 2014</i> ^a <i>Small quantities pumped for Sylmar and Central Basin were for quality testing purposes, not water supply.</i> <i>Source: LADWP, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, Table IV. Included as Exhibit 9 of the Utility Report.</i>			

water quality, management and mitigation of urban runoff water quality, and development of enhanced stormwater recharge and groundwater replenishment.⁴⁵ There are additional groundwater basins near and within the Los Angeles area where LADWP is considering and exploring opportunities to develop groundwater resources in a manner that is locally sustainable and in cooperation with its regional partners. For example, there are 3,975 AF of groundwater rights in the Antelope Valley Groundwater Basin, which only allows local use of water rights; 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.⁴⁶

(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 from LAA, local groundwater, and recycled water. Between FYE 2018 to FYE 2022, LADWP purchased an average of 231,289 AFY from MWD or approximately 46 percent of the City's total water supply.⁴⁷

⁴⁵ Los Angeles Department of Water and Power, *2020 Urban Water Management Plan*, May 2021, p. 5-4.

⁴⁶ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 14. Included as Exhibit 9 of the Utility Report.

⁴⁷ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, p. 20. Included as Exhibit 9 of the Utility Report.

MWD imports water from two principal sources: northern California via the California Aqueduct 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 Metropolitan Water District Act.^{48,49} As of June 30, 2022, LADWP has a preferential right to purchase 17.69 percent of MWD's total water supply.⁵⁰

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 DWR, delivering municipal and industrial water to approximately 27 million California residents and 750,000 acres of farmland.⁵¹ 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, San Francisco 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.⁵²

MWD is the largest of the 29 SWP contractors, holding a contract for 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.⁵³ However, in accordance with the State Water Contract with DWR, the contracted amount varies annually due to a number of factors, including existing

⁴⁸ *Metropolitan Water District Act, Chapter 2, Section 135.*

⁴⁹ *Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, p. 20. Included as Exhibit 9 of the Utility Report.*

⁵⁰ *Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, p. 20. Included as Exhibit 9 of the Utility Report.*

⁵¹ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, pp. A-16.*

⁵² *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-53.*

⁵³ *Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, p. 20. Included as Exhibit 9 of the Utility Report.*

supplies in storage, forecasted hydrology, water quality, environmental flow obligations, and other operational considerations.⁵⁴ 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 and then was reduced to 5 percent (95,575 AF).⁵⁵ In May 2026, DWR increased the allocation for 2026 from 30 percent to 45 percent based on hydrological conditions.⁵⁶

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 relatively unstable levee systems.⁵⁷ 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.⁵⁸

⁵⁴ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-17.*

⁵⁵ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-16.*

⁵⁶ *California Department of Water Resources, State Water Project Allocation Increases Heading into Summer Months*, <https://water.ca.gov/News/News-Releases/2026/May-2026/State-Water-Project-Allocation-Increases-Heading-into-Summer-Months>, accessed July 1, 2026.

⁵⁷ *California Department of Water Resources, The State Water Project Final State Water Project Delivery Capability Report 2021, September 2022.*

⁵⁸ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, pp. A-13-21 and A-31-34.*

(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 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.⁵⁹

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 242 miles through a series of pump stations and reservoirs to its terminus at Lake Mathews in Riverside County.⁶⁰ 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.⁶¹ 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.⁶² 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 2011 through 2020 were 871,947 AF, with annual volumes dependent primarily on programs to augment supplies, including transfers of conserved water from agriculture. In 2020, the preliminary total available Colorado River supply to MWD was just over one million AF. A portion of the available supply that was not diverted was stored in Lake Mead for future usage.⁶³

Conveyance from the Colorado River has also experienced many challenges including persistent drought conditions, litigation, and the presence of endangered species.⁶⁴

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, p. A-24.*

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

⁶² *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-24.*

⁶³ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A, p. A-25.*

⁶⁴ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, Appendix A.*

(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 MWD 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 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.

(d) Precipitation Conditions

As of June 2026, a significant portion of the State is classified as abnormally dry or in moderate drought according to the U.S. Drought Monitor. In Southern California, portions of San Bernardino, Riverside, San Diego, and Imperial Counties are classified as abnormally dry, and the easternmost portion of San Bernardino County is classified as in moderate drought. Los Angeles County is currently not considered abnormally dry or in drought conditions.⁶⁵

The City receives an average of 13.59 inches of precipitation per year according to the National Weather Service.⁶⁶ Precipitation for 2025 year was 19.28 inches,⁶⁷ compared with 19.13 inches of precipitation in 2024, 29.44 inches in 2023, 7.18 inches in 2022, and 14.27 inches in 2021.⁶⁸

(e) Global Warming and Climate Change

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

MWD and DWR also continue to study climate change and address the implications of climate change on water supplies. MWD has established a technical process to identify

⁶⁵ National Drought Mitigation Center, U.S. Drought Monitor, West, Data valid: June 23, 2026, <https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA>, accessed July 1, 2026.

⁶⁶ National Weather Service, Monthly Summarized Precipitation for City of Los Angeles, CA 2000-2025, www.weather.gov/wrh/Climate?wfo=lox, accessed July 1, 2026.

⁶⁷ National Weather Service, Accumulation Graph City of Los Angeles, CA January 1, 2025, through December 31, 2025, www.weather.gov/wrh/Climate?wfo=lox, accessed January 16, 2026.

⁶⁸ National Weather Service, Monthly Total Precipitation for City of Los Angeles, CA 2021-2025, www.weather.gov/wrh/Climate?wfo=lox, accessed January 16, 2026.

key vulnerabilities from various sources, including climate change, in order to provide comprehensive analyses within its Integrated Water Resources Plans. In addition, DWR addresses climate change impacts on water supply in its California Water Plan Updates, which are updated every five years and serve as the State's strategic plan for sustainably and equitably managing, developing, and stewarding water resources.⁶⁹ The most recent *California Water Plan Update 2023* focuses on three intersecting themes of addressing climate urgency, strengthening watershed resilience, and achieving equity in water management.⁷⁰

DWR has also been in the process of completing its Climate Action Plan since 2012. Phases I and II of the Climate Action Plan include the guidance of DWR in reducing greenhouse gas emission and the expertise of a climate change technical advisory group formed in 2012, respectively. Phase III of the plan was completed in 2017 with a vulnerability assessment and adaptation plan related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.⁷¹ As such, climate change and its impacts on water supplies are key factors of new water supply regulations and UWMPs.

(f) Water Conservation

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

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

⁶⁹ California Department of Water Resources, *California Water Plan Update 2023*, December 2023.

⁷⁰ California Department of Water Resources, *California Water Plan Update 2023*, December 2023.

⁷¹ California Department of Water Resources, *DWR Climate Action Plan*, <https://water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan>, accessed July 1, 2026.

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

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

LADWP offers rebates and incentives to promote the installation of water-efficient fixtures and appliances. In 2008, MWD's region-wide "SoCal Water\$mart Program" for residential and commercial water use efficiency rebates replaced previous LADWP rebate programs. This program administers uniform rebate amounts across the MWD service area to all MWD member agencies like LADWP. LADWP takes full advantage of regional programs for many product rebates offered through MWD for the residential and Commercial, Industrial, and Institutional (CII) sector, and adds supplemental funding to increase the rebate amount provided for LADWP customers for many qualifying products. Also, since 1992, LADWP has continued the Technical Assistance Program to promote innovative solutions to saving water. The program provides customized incentives for retrofitting water-intensive equipment in the CII or multi-family customer sector. LADWP plans its future water conservation programs, focusing on obtaining additional active and passive water savings in the water end uses that have the most non-conserving devices still remaining for each of the customer sectors.

(g) Stormwater Capture

Stormwater runoff from urban areas is an underutilized local water resource. Within the City, the majority of stormwater runoff is directed to storm drains and ultimately channeled into the ocean. This unused stormwater carries many pollutants that are harmful to marine life and public health. In addition, local groundwater aquifers that could be replenished by stormwater are receiving less recharge than in past historical times due to increased urbanization. Urbanization has increased the City's hardscape, which has resulted in less

infiltration of stormwater and a decline in groundwater elevations. In response, LADWP completed a Stormwater Capture Master Plan in 2015 to comprehensively evaluate stormwater capture potential within the City. Stormwater capture can be achieved by increasing infiltration into groundwater basins and by onsite capture and reuse of stormwater for landscape irrigation (i.e., direct use). The total baseline amount of stormwater captured is 64,000 AF. Through the implementation of additional centralized and distributed stormwater capture projects and programs, in development and in construction, it will provide for increased groundwater recharge in the amount of 66,000 AFY and increased direct use in the amount of 2,000 AFY. Under LADWP's current implementation strategy, the total estimated stormwater capture capacity is projected to be 155,000 AFY by 2035. This amount is between the conservative estimate of 132,000 AFY and aggressive scenario of up to 178,000 AFY by 2035.

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

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

LADWP's Stormwater Capture Parks Program (Parks Program) has identified nine City-owned parks suitable for stormwater capture projects. The primary objective of the

Parks Program is to recharge the San Fernando Valley Groundwater Basin by capturing urban runoff and diverting stormwater from the Tujunga Wash Central Branch storm drain. The anticipated Parks Program capture capacity is 3,088 AFY. The Parks Program provides multiple benefits, such as improvements to the Los Angeles River water quality, reducing localized flooding, raising public awareness, and providing open space enhancements through active and passive recreation space.

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

(h) Water Recycling

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

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

(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. Table IV.K.1-4 on page IV.K.1-31 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 passive water conservation).^{72,73} As shown in Table IV.K.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 2045.⁷⁴ 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.^{75,76} 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.⁷⁷

(b) Existing On-Site Water Demand

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with commercial buildings along Wilshire Boulevard containing retail, restaurant, and office uses totaling 48,229 square feet and surface parking areas to the south of these buildings. As provided in the WSA, based on LADWP data, the existing water demand associated with the existing uses to be removed is approximately 172 gallons per day (gpd) or 0.19 AFY.⁷⁸

⁷² Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

⁷³ Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, p. 21. Included as Exhibit 9 of the Utility Report.

⁷⁴ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

⁷⁵ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. ES-28.

⁷⁶ Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, p. 22. Included as Exhibit 9 of the Utility Report.

⁷⁷ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. 11-19.

⁷⁸ Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, Table I. Included as Exhibit 9 of the Utility Report.

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

Hydrologic Conditions	Year				
	2025	2030	2035	2040	2045
Demand^a (AF)					
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 (AF)					
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
<i>AF = acre-feet</i> ^a Note that this total demand number is conservative as it only includes passive conservation prior to FYE 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 Wilshire and Cloverdale Project, prepared on August 10, 2023, Table V.					

(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 2023–2024.⁷⁹

Water service is available to the Project Site via LADWP water lines within the adjacent streets. As noted in the Utility Report included in Appendix H of this Draft EIR, there is an 8-inch water main along Wilshire Boulevard, a 6-inch water main along Cloverdale Avenue, a 6-inch water main along Detroit Street, and a 12-inch water main along 8th Street. In addition to providing domestic water service, LADWP provides water to the Project Site for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). Furthermore, based on existing record information, the Project Site has domestic

⁷⁹ Los Angeles Department of Water and Power, 2023–2024 Briefing Book, 2024.

water and fire water connections coming off four nearby streets. Specifically, there is one fire hydrant, one fire department connection, four 1-inch water meters, two 1.5-inch water meters, and one 2-inch water meter off of Wilshire Boulevard; one water meter off of Cloverdale Avenue; two fire hydrants and one 1.5-inch water meter off of Detroit Street; and 2 fire hydrants off 8th Street. According to the Utility Report, a Service Advisory Report (SAR) obtained from LADWP (included as Exhibit 1 of the Utility Report) indicates that the existing 6-inch water mains in Cloverdale Avenue and Detroit Street, which appear to service the existing development, each have an existing capacity of 1,400 gpm (2,016,000 gpd) at 83 psi.

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.⁸⁰

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

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;

⁸⁰ Refer to: Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR for a discussion of wastewater impacts; Sections IV.C, Energy, and IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations, of this Draft EIR for a discussion of telecommunications facility impacts. See Section X, Hydrology and Water Quality, of the Initial Study, included as Appendix A of this Draft EIR, for a discussion of stormwater impacts.

- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of project completion; and,
- The degree to which scheduled water infrastructure or project design features would reduce or offset service impacts.

b. Methodology

(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 Exhibit 9 of the Utility Report prepared for the Project by KPFF Consulting Engineers, which is included in Appendix H of this Draft EIR. The WSA includes a conservative calculation of the Project's anticipated net 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, and the existing water demand is based on the LADWP water billing data. 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 net 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 Utility Report, which 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. As discussed therein, LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. Based on the results, LADWP determined whether the existing infrastructure is sufficient to meet the Project fire hydrant flow needs. See Exhibit 4 of the Utility Report for the results of the 2024 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 SAR. LADWP's hydraulic analysis provided flow and pressure data for the approximate connection locations. Based on the results, LADWP determined whether they can meet the projected needs of the Project based on the existing infrastructure. See Exhibit 1 of the Utility Report for the results of the SAR.

c. Project Design Features

The following project design feature is proposed with regard to water supply:

WAT-PDF-1: The Project design will incorporate the following design features to support water conservation in excess of LAMC requirements:

- Fixtures:
 - ENERGY STAR Certified Residential Clothes Washers—Front-loading with Integrated Water Factor of 2.9 or less and capacity of 4.5 cubic feet.
 - ENERGY STAR Certified Residential Dishwashers—standard with 3.4 gallons/cycle or less.
 - High Efficiency Toilets with a flush volume of 1.0 gallons per flush, or less.
- Landscape and Irrigation:
 - California Friendly® plants or native plants.
 - Drip/Subsurface Irrigation (Micro-Irrigation).
 - Drought Tolerant Plants.
 - 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.
- Utilities:
 - Individual metering and billing for water use for residential and commercial units.
- Cooling Towers:
 - Use grey water collection to meet 100% of the cooling tower make-up water requirements.

d. Analysis of Project Impacts

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

construction or relocation of which could cause significant environmental effects?⁸¹

(1) Impact Analysis

(a) Construction

Project construction activities would require water for dust control, cleaning of equipment, excavation, and grading/compaction activities. As provided in the Utility Report included as Appendix H of this Draft EIR, based on a review of construction projects of similar size and duration, a conservative estimate of Project water use during construction ranges from 1,000 to 2,000 gpd. Therefore, based on the WSA approved for the Project, Project construction water demand would be substantially less than the Project's operational water demand (before accounting for existing uses to be removed and additional water conservation) of 124,636 gpd.^{82,83} Additionally, based on the temporary nature of construction activities, it can be assumed that construction water use would be substantially less than the proposed operational water demand of the Project. It is anticipated that if the existing water infrastructure can meet the demands of the Project, it would also be able to meet the limited and temporary water demand associated with construction of the Project. Therefore, proposed operational demands are the primary means for analyzing infrastructure capacity, and no further analysis of construction water demand impacts is required. 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 construction of new, on-site water distribution lines to serve the new residential tower. Construction activities associated with the installation of water distribution lines would be limited to trenching within the Project Site and minor off-site work including trenching and installation of distribution lines associated with connections to the public main lines. Additionally, in order to comply with the established fire flow for the Project in consultation with LAFD, the Project would upgrade approximately 685 feet of the Detroit Street water main from a 6-inch line to an 8-inch line and install three new fire hydrants that

⁸¹ Refer to Section IV.K.2, *Utilities and Service Systems—Wastewater*, of this Draft EIR for a discussion of wastewater impacts; Sections IV.C, *Energy*, and IV.K.3, *Utilities and Service Systems—Energy Infrastructure*, of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, *Other CEQA Considerations*, of this Draft EIR for a discussion of telecommunications facility impacts. See Section X, *Hydrology and Water Quality*, of the Initial Study included as Appendix A of this Draft EIR, for a discussion of stormwater impacts.

⁸² KPFF Consulting Engineers, *Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas*, June 2026. Appendix H of this Draft EIR, Tables 1 and 5.

⁸³ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023, Table I. Included as Exhibit 9 of the Utility Report.

would connect to the existing water mains located along 8th Street, Cloverdale Avenue, and Wilshire Boulevard. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines and LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s). Lastly, while trenching and installation activities could temporarily affect traffic flow and access on the adjacent streets and sidewalks, a Construction Traffic Management Plan would be prepared pursuant to Project Design Feature TR-PDF-1 included in Section IV.I, Transportation of this Draft EIR, which would ensure the safe and efficient flow of vehicular and pedestrian traffic, and that emergency access to the Project Site and adjacent properties would be maintained 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 supply and 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 IFFAR and SAR included as Exhibits 4 and 1, respectively, of the Utility Report). These analyses, which together indicate that, following completion of code-required improvements to local water distribution infrastructure, adequate water infrastructure exists to serve the Project, are summarized below and described in more detail in the Utility Report included as Appendix H of this Draft EIR.

(i) Fire Flow

Fire flow for the Project would comply with LAMC Section 57.507.3.1, which establishes fire flow standards by development type. Based on consultation with the LAFD, via written correspondence included as Exhibit 11 of the Utility Report, the required fire flow for the Project is set at 12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will

be required).⁸⁴ A minimum residual water pressure of 20 psi is to remain in the water system. As discussed in the Utility Report, an IFFAR was submitted to LADWP to determine if the existing public water system would have adequate water pressure to serve the Project's anticipated fire water needs. Based on the completed IFFAR, attached as Exhibit 4 of the Utility Report, upgrading approximately 685 feet of the existing 6-inch water main on Detroit Street to an 8-inch main, as well as the installation of three new fire hydrants connecting to existing water mains located along 8th Street, Cloverdale Avenue, and Wilshire Boulevard, would be necessary to meet the required 12,000 gpm fire flow demand for the Project. With completion of these improvements, the existing public water system would have sufficient fire flow to serve the Project. These improvements are part of the Project and are evaluated throughout this Draft EIR.

Furthermore, in accordance with LAMC Section 57.507.3.3, the Project would also incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting phase of the Project. Per LAMC Section 94.2020.0, which adopts by reference National Fire Protection Association (NFPA) 14, Section 7.10.1.1, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. As noted previously, a SAR was submitted to LADWP to determine if the existing public water infrastructure could meet the water demands of the Project. The approved SAR (see Exhibit 1 of the Utility Report), shows a static pressures of 82 psi to 84 psi and flows of 500 to 1,400 gpm can be delivered to the Project Site with a residual pressure of 49 psi to 65 psi, which exceeds the 20 psi requirement for the surrounding public hydrants⁸⁵ Therefore, there is sufficient pressure to serve the Project and adequate water pressure is available to operate the proposed fire sprinkler suppression system.⁸⁶

(ii) Domestic Water Infrastructure

Domestic water consumption estimates were prepared by LADWP as part of the WSA based on 100 percent of LASAN sewerage generation factors for commercial categories and are summarized in Table IV.K.1-5 on page IV.K.1-38. The approved SAR indicates that 1,400 gpm (2,016,000 gpd) are available from the existing 6-inch water mains along Cloverdale Avenue and Detroit Street. Also, the calculation summarized in Table IV.K.1-5 shows the net water demand for the new development as 122,317 gpd. Therefore, the SAR result confirms that sufficient infrastructure capacity is available for the domestic water needs

⁸⁴ *Written Correspondence from David Perez, Fire Marshall, Los Angeles Fire Department, Fire Development Services Section, Hydrants and Access Unit, June 16, 2023. Included as Exhibit 11 of the Utility Report.*

⁸⁵ *KPFF Consulting Engineers, Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas, June 2026. Appendix H of this Draft EIR, p. 35.*

⁸⁶ *KPFF Consulting Engineers, Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas, June 2026. Appendix H of this Draft EIR, p. 35.*

**Table IV.K.1-5
Estimated Project Water Demand**

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit) ^a	Demand (gpd)
Existing Uses to be Removed			
Retail	20,001 sf		
Restaurant	18,870 sf		
Office	9,358 sf		
Total Existing Demand to be Removed			172 ^b
Proposed Uses			
Residential Apartment: 1 BDR	206 du	110	22,660
Residential Apartment: 2 BDR	208 du	150	31,200
Residential Apartment Penthouse: 3 or 4 BDR ^c	5 du	230	1,150
Fitness	4,304 sf	0.65	2,798
Lounges ^d	8,216 sf	0.05	411
Barbecue Area	459 sf	0.13	59
Leasing Office	386 sf	0.12	46
Restaurant	2,449 seats	30	73,470
Office	8,000	0.12	960
Base Demand Adjustment ^e			90
Landscaping, Pool, Hot Tub ^f	8,210 sf	—	889
Covered Parking ^g	257,961 sf	0.02	170
Cooling Tower ^h	690 ton	19	27,786
Subtotal Water Demand	—	—	167,974
Less Required Ordinances Water Savings ⁱ	—	—	(43,339)
Project Water Demand	—	—	124,636
Less Existing to be Removed	—	—	(172) ^b
Less Additional Conservation ^j	—	—	(2,147)
Net Project Water Demand	—	—	122,317^k
<i>sf = square feet</i> <i>gpd = gallons per day</i> ^a Rate source: Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, Table I. Included as Exhibit 9 of the Utility Report. ^b The water demand for all existing uses on-site are based on LADWP billing data from May 2018 to April 2023. The existing buildings will be partially removed and partially retained and reconfigured. For a conservative water demand estimate, all existing plumbing fixtures are assumed to be removed as part of the Project. ^c The sewer generation rate for a 4-bedroom dwelling unit is applied for a conservative water demand estimate. ^d The proposed lounges will not serve food or drinks.			

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

Land Use	Quantity/ Floor Area	Water Demand Rate (gpd/unit) ^a	Demand (gpd)
^e Base Demand Adjustment (for both residential and non-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, which does not apply to the current uses. ^f Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance. ^g 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. ^h The cooling tower chiller capacity, hours of operation (16 hours/day, 322 days/year on average), and the cooling tower make-up water demand estimate were provided by the Applicant. The Project proposes building over 25 residential stories, and 100 percent of cooling tower make-up water supply is required to come from non-potable water sources. The Applicant proposes to use greywater collection to meet 100 percent of the cooling tower make-up water requirements. ⁱ The WSA assumes the proposed land uses would comply with City of Los Angeles Ordinance No. 186,488, Ordinance No. 184,248, the 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code. As noted above, newer, more stringent codes are now in effect. ^j Water conservation due to additional conservation commitments agreed by the Applicant including water conservation from residential and non-residential uses only (excluding water conservation associated with landscaping). See Table II of the WSA. ^k Total may not add up exactly due to rounding. Source: Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, Table I. Included as Exhibit 9 of the Utility Report.			

of the Project. The Project proposes to connect to the existing 6-inch mains in Cloverdale Avenue and Detroit Street with laterals.⁸⁷ In addition, the services will include backflows and be metered separately per City requirements.

Based on the above, with the installation of the required infrastructure improvements included in the Project, the Project would not exceed the available capacity of the existing water distribution infrastructure that would serve the Project Site. Accordingly, Project operation 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, and impacts to water infrastructure during Project operation would be less than significant.

⁸⁷ KPFF Consulting Engineers, Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas, June 2026. Appendix H of this Draft EIR, p. 31.

(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 discussed, Project construction activities would require water for dust control, cleaning of equipment, excavation, and grading/compaction activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. As provided in the Utility Report, based on a review of construction projects of similar size and duration, a conservative estimate of Project water use during construction ranges from 1,000 to 2,000 gpd. Project construction water demand would be substantially less than the Project's operational water demand of 124,636 gpd as set forth in Table IV.K.1-5 on page IV.K.1-38. Additionally, based on the temporary nature of construction activities, it can be assumed that construction water use would be substantially less than the proposed operational water consumption at the Project. As stated in the WSA and summarized below, LADWP concluded that the projected water supplies for normal, 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. Project construction is anticipated to be completed by 2029. Therefore, LADWP water supplies would be adequate to meet Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction.

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, operational uses, maintenance, and other activities on the Project Site. In accordance with SB 610, LADWP prepared a WSA for the Project, which is included as Exhibit 9 of the Utility Report included as Appendix H of this Draft EIR. 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 over the next 25-year period 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.K.1-5 on page IV.K.1-38 shows the estimated water demand associated with the Project from the WSA. As shown therein, the Project could generate an estimated maximum net increase in domestic water demand of up to 122,317 gpd over existing conditions, or 137 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 and WSA identified previously in Table IV.K.1-4 on page IV.K.1-31, the Project's estimated net operational domestic water demand of 122,317 gpd (137 AFY) would represent approximately 0.0208 percent, 0.0198 percent, and 0.0203 percent of LADWP's projected 2030 average, single-dry, and multi-dry year water demand and supply, respectively.⁸⁸ Therefore, the Project's domestic operational water demand would represent a miniscule proportion of LADWP's projected water demand and supply in 2030. 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 2045.⁸⁹

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 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 the

⁸⁸ *The Project is compared to LADWP's projected 2030 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 2029.*

⁸⁹ *Los Angeles Department of Water and Power, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023, p. 4. Included as Exhibit 9 of the Utility Report.*

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 the City's Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.^{90,91}

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. 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 five related projects in the Project Site vicinity, as listed in Table III-1 in Section III, Environmental Setting, of this Draft EIR, all of which are located in the City. The projected growth associated with these five related projects is a conservative assumption regarding future development, as some of the related projects may not be built out by 2029, may never be built, or may be approved and built at reduced densities. To provide a conservative analysis, the future baseline forecast assumes that these five related projects would be fully built out by 2029.

⁹⁰ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

⁹¹ City of Los Angeles, L.A.'s Green New Deal, 2019.

(1) Impact Analysis

(a) Water Infrastructure

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and the cumulative or related projects within this geographic area would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of a SAR and 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 the 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 most recent (2023–2024) Water Infrastructure Plan containing a five-year water system capital improvement plan that includes \$6.3 billion for needed water system infrastructure improvements and maintenance.⁹² 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's off-site improvements (e.g., minor off-site work including trenching and installation of distribution lines, upgrades to the Detroit Street water main from a 6-inch line to an 8-inch line, and installation of three new fire hydrants), 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 be required to ensure that adequate and safe access remains available within and near the related project sites during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the related project sites and traffic flow is maintained on adjacent rights-of-way.

Lastly, as indicated 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 cumulative water infrastructure impacts would not be considerable.

⁹² Los Angeles Department of Water and Power, 2023-2024 Water Infrastructure Plan.

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 of water facilities or contribute considerably to cumulative water infrastructure impacts. 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 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045.⁹³

As identified in Section III, Environmental Setting, of this Draft EIR, there are five related projects located in the vicinity of the Project Site, all of which are located within the LADWP service area. The estimated water demand of these related projects is shown in Table IV.K.1-6 on page IV.K.1-45. As indicated therein, the related projects would generate a total average water demand of approximately 745,789 gpd (835 AFY). Together with the Project, the total cumulative water demand would be approximately 868,106 gpd (972 AFY). These estimates are conservative because, while the water demand estimates for the Project account for required and proposed water conservation measures and subtract the water demand associated with the existing uses to be removed, the estimates for the related projects do not. This estimate also conservatively assumes all residential units in the related projects are 3-bedroom units, although many units would likely have fewer bedrooms and would therefore be projected to use less water.

Based on the projected water demand and supply estimates for LADWP's service area from the 2020 UWMP identified previously in Table IV.K.1-4 on page IV.K.1-31, the estimated total water demand of the Project and related projects of 972 AFY would represent approximately 0.15 percent, 0.14 percent, and 0.14 percent of the 2030 water demand and supply within LADWP's service area during average, single-dry, and multi-dry years, respectively.⁹⁴ Hence, the water demand of the Project, together with the related projects, would represent a very small proportion of the LADWP's total 2030 water demand and supply, with the Project's share representing an even smaller proportion.

⁹³ LADWP, 2020 Urban Water Management Plan, May 2021.

⁹⁴ The Project is compared to LADWP's projected 2030 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 2029.

**Table IV.K.1-6
Cumulative Water Demand**

No.	Project	Description	Unit/Area	Generation Factor ^{a,b}	Total Water Demand
1	Mirabel Transit Priority Project 688 South Cochran Ave (5411 Wilshire Blvd)	Multi-Family	348 du	190 gpd/du	66,120 gpd
		Retail	5,000 sf	0.025 gpd/sf	125 gpd
		Other	6,000 sf	0.05 gpd/sf ^d	300 gpd
2	Wilshire Courtyard Project (Residential Option) ^c 5700 Wilshire Blvd	Multi-Family	2,586 du	190 gpd/du	491,340 gpd
		Office	445,627 sf	0.120 gpd/sf	53,475 gpd
		Restaurant	24,427 sf (1,629 seats)	30 gpd/seat	48,870 gpd
		Supermarket	31,977 sf	0.025 gpd/sf	799 gpd
3	629 La Brea Ave	Multi-Family	121 du	190 gpd/du	22,990 gpd
		Retail	13,000 sf	0.025 gpd/sf	325 gpd
		Hotel	125 rm	120 gpd/rm	15,000 gpd
4	5001 Wilshire Boulevard	Multi-Family	243 du	190 gpd/sf	46,170 gpd
		Retail	11,000 sf	0.025 gpd/sf	275 gpd
5	Metro D Line Extension ^d	—	—	—	—
Related Projects Water Demand					745,789 gpd (835 afy)
Project Net Water Demand					122,317 gpd (137 afy)
Total Water Demand for Related Projects and Project					868,106 gpd (972 afy)
afy = acre-feet per year du = dwelling units gpd = gallons per day 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. ^c This related project includes both a residential option and an office option. The residential option is analyzed herein because it would result in greater water demand. ^d The proposed Metro D Line extension would generate only a very a limited demand for water, if any, associated with potential restrooms, drinking fountains, and cleaning. As such it is not included in this analysis. Source: Eyestone Environmental, 2026.					

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 City's 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 the project's water demand would be met.

Overall, as discussed above, LADWP's 2020 UWMP demonstrates that the City will meet all existing and projected future water demand through 2045 during average, single-dry, and multi-dry years. The 2020 UWMP specifically outlined the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP's 2020 UWMP also incorporates the goals of the City's Sustainability pLAn (i.e., 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 cumulative water supply impacts would not be 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 or contribute considerably to cumulative water demand. 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.