

Appendix H

Utility Report



**WILSHIRE AND CLOVERDALE
(706-716 CLOVERDALE AVE., 5350-5376 WILSHIRE BLVD., 721 & 725 DETROIT
ST., LOS ANGELES, CA)**

**UTILITY INFRASTRUCTURE TECHNICAL REPORT: WATER, WASTEWATER, ENERGY, AND
GAS**

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1. INTRODUCTION

1.1. PROJECT LOCATION AND EXISTING ON-SITE USES:

The Project Site is located at 5350–5376 Wilshire Boulevard, 708–716 Cloverdale Avenue, and 721–725 Detroit Street within the Wilshire Community Plan Area. The Project Site is bound by Wilshire Boulevard to the north, residential buildings and surface parking to the south, Detroit Street to the east, and Cloverdale Avenue to the west. Regional access to the Project Site is provided by the Interstate-10 Freeway, which is accessible approximately 1.9 miles south of the Project Site. Local access to the Project Site is provided by several major local streets and avenues, including Wilshire Boulevard, La Brea Avenue, and Olympic Boulevard.

The Project Site is currently developed with commercial buildings along Wilshire Boulevard and surface parking areas to the south of these buildings. The existing buildings are connected and range from one to two stories and include approximately 48,229 square feet of commercial uses. Vehicular access to the Project Site is provided via two driveways on Cloverdale Avenue and a dead end 20-foot alley that is accessed from Detroit Street and terminates at the middle of the Site. Pedestrian access to the Project Site is located along Wilshire Boulevard, Detroit Street, and Cloverdale Avenue. Existing landscaping within the Project Site includes 18 non-protected trees. In addition, nine street trees and two empty tree wells are located in the public right of way along the perimeter of the Project Site.

1.2. PROJECT DESCRIPTION

The Wilshire and Cloverdale Project (Project) is a mixed-use development comprised of residential and commercial uses with associated parking located on an approximately 59,168 gross square foot¹ (1.36 acre) site located at 5350–5376 Wilshire Boulevard, 708–716 Cloverdale Avenue, and 721–725 Detroit Street (Project Site) within the Wilshire Community Plan Area of the City of Los Angeles (City). The Project proposes to utilize the City's Transit Oriented Communities (TOC) Guidelines and would develop a residential tower that would accommodate up to 419 residential units, including 46 Extremely Low Income affordable units (Residential Tower). The Residential Tower would also include 2,645 square feet of restaurant floor area within the ground floor adjacent to the residential entrance. As part of the Project, existing commercial buildings along the Wilshire Boulevard frontage would be retained and would provide approximately 42,092 square feet of commercial uses. In addition, approximately 6,137 square feet of

¹ Lot area after proposed vacation and merger of alley into the Project Site. The existing lot area prior to vacation is 56,366 square feet.

existing building area that was an addition to the southwestern portion of the commercial building along Wilshire Boulevard would be removed. Upon completion, the Project would result in a total floor area of approximately 419,074 square feet. When including mechanical levels, an emergency helipad, and above grade parking levels, the Residential Tower would be comprised of 46 levels with a height of approximately 530 feet. The Residential Tower would also include approximately 26,623 square feet of common open space, as well as 20,950 square feet of private open space.

1.3. SCOPE OF WORK

The purpose of this report is to analyze the potential impact of the Project to the existing water, wastewater, and energy infrastructure system.

2. REGULATORY FRAMEWORK

2.1. WATER

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

- California Urban Water Management Plan Act
- Senate Bill 610, Senate Bill 221, and Senate Bill 7
- Senate Bill X7-7 (Water Conservation Act of 2009)
- Sustainable Groundwater Management Act of 2014
- California Code of Regulations
 - Title 20
 - CALGreen Code
 - Plumbing Code
- Executive Order B-40-17
- Executive Order N-10-21
- Executive Order N-7-22
- Executive Order N-5-23
- Metropolitan Water District

- 2020 Urban Water Management Plan
- 2020 Integrated Resources Plan – Regional Needs Assessment
- Water Surplus and Drought Management Plan
- Long-Term Conservation Plan
- Water Supply Allocation Plan
- Los Angeles Department of Water and Power’s 2020 Urban Water Management Plan
- City of Los Angeles Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan, including:
 - Framework Element
 - Community Plan
- Los Angeles Municipal Code (Ordinance Nos. 180,822, 181,480, 181,899, 183,833, 182,849, 184,692, and 184,248)

2.1.1. STATE

(a) California Urban Water Management Plan

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

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

- Residential developments of more than 500 dwelling units;
- Shopping 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 in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a).

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

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

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

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20-percent-per-capita water consumption reduction by the year 2020 statewide, as described in the “20 x 2020” State Water Conservation Plan.² As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

(c) Senate Bill X7-7—Water Conservation Act

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.⁶ Cumulative

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

⁶ State Water Resources Control Board, Fact Sheet, February 2017 Statewide Conservation Data, updated April 4, 2017.

statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.⁷ 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.⁸ 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.⁹

(d) Sustainable Groundwater Management Act of 2014¹⁰

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.¹¹ The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The SGMA provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

(e) California Code of Regulations

(i) Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gallons per minute (GPM) at 80 pounds per

⁷ 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.

⁸ State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, updated October 3, 2017.

⁹ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan for the Los Angeles Department of Water & Power, p. 1-8.

¹⁰ Sustainable Groundwater Management Act [And Related Statutory Provisions from SB1168 (Pavley), AB1739 (Dickinson), and SB1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2016.

¹¹ California Department of Water Resources, SGMA Groundwater Management. <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>, accessed June 27, 2026.

square inch (PSI); and lavatory faucets manufactured after July 1, 2016, is 1.2 GPM at 60 PSI. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.¹²

(ii) CALGreen Code

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

(iii) Plumbing Code

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

(f) Executive Order B-40-17

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

¹² California Code of Regulations, Title 20, Section 1605.3(h), <https://energycodeace.com/content/section-16053-state-standards-for-non-federally-regulated-app#ra-chunk--250760>, accessed June 27, 2026.

(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. The Order 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.

2.1.2. REGIONAL

(a) Metropolitan Water District

As discussed in detail below, the Metropolitan Water District of Southern California (MWD) is a primary source of water supply within Southern California. Based on the water supply planning requirements imposed on its member agencies and ultimate customers, MWD has adopted a series of official reports on the state of its water supplies. As described in further detail below, in response to recent developments in the Sacramento

Delta, the MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, including the City of Los Angeles.

(i) 2020 Urban Water Management Plan

The Metropolitan Water District's (MWD) 2025 UWMP (MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.¹³ Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions; i.e., under the most challenging weather conditions, such as drought and service interruptions caused by natural disasters, is presented in Table 2-5 of the 2020 RUWMP.¹⁴ The analysis in the 2020 RUWMP concluded that reliable water resources would be available to continuously meet demand through 2045.¹⁵ In the 2020 RUWMP, the projected 2045 demand water during multiple-dry year conditions is 1,564,000 afy, whereas the expected and projected 2045 supply is 2,239,000 afy based on current programs, for a potential surplus in 2045 of 675,000 afy.¹⁶

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

(ii) 2020 Integrated Resources Plan – Regional Needs Assessment

The MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply, such as water quality, climate change, and regulatory and operational changes. The most recent IRP (2020 IRP) was adopted in April 2022.¹⁷ 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

¹³ Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, May 2021.

¹⁴ Metropolitan Water District of Southern California, 2025 Urban Water Management Plan, p. 2-19.

¹⁵ Metropolitan Water District of Southern California, 2025 Urban Water Management Plan, p. 2-19.

¹⁶ Metropolitan Water District of Southern California, 2025 Urban Water Management Plan, p. 2-19.

¹⁷ Metropolitan Water District of Southern California, 2025 Integrated Water Resources Plan – Needs Assessment, adopted April 12, 2022.

in an environmentally and economically responsible way. Among other topics, the 2020 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

The 2020 IRP anticipates how much water Southern California can expect from its imported and local supplies, and forecasts regional water demands. Understanding the gap between supplies and demand helps set the targets to maintain reliability and inform the board on what actions Metropolitan and its member agencies can take to close that gap.

But past plans looked at a single forecast. Given all the uncertainties MWD faces, the 2020 IRP looks at multiple scenarios that could plausibly unfold in the future. From these collaborative exercises, MWD are investigating resources, policies, and investments needed to maintain reliable water supplies through 2045. MWD are developing an adaptive management strategy along with a series of performance measures and reality checks to help inform MWD on what plausible future we are heading towards, so that plans can be adjusted as needed.

The year 2025 marked the conclusion of a 25-year planning cycle that was first envisioned by Metropolitan's inaugural IRP in 1996. And Metropolitan has never been more reliable. Regional water demands are far lower than expected, thanks in large part to Southern Californians adopting and maintaining water-saving behaviors. Metropolitan has also stored a record amount of water for drought or other emergencies.

(iii) Water Surplus and Drought Management Plan

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

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

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.

2.1.3. LOCAL

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

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

¹⁹ Metropolitan water District, 2015 Urban Water Management Plan, p. 2-21.

(b) City of Los Angeles 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.²¹ 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.²² L.A.'s Green New Deal augments, expands, and elaborates in more detail the City's vision for a sustainable future and includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability.

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.²³ The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.²⁴ 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

²¹ City of Los Angeles, Sustainable City pLAn, April 2015.

²² City of Los Angeles, L.A.'s Green New Deal, 2019.

²³ City of Los Angeles, One Water LA 2040 Plan, April 2018, Volume 1, Summary Report.

²⁴ City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response—Creating a Water Wise City, October 14, 2014.

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

Draft EIR Table IV.K.1-1 on page 14 shows General Plan goals, objectives, and policies related to water supply.

²⁷ City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, July 27, 1995. https://planning.lacity.org/odocument/c9dd48c1-d9ed-4569-a448-74216c30cfe1/Infrastructure_Systems.pdf [Delete URL from footnote after saving document in the project’s Reference Library.]

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

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

Goal/Objective/Policy	Goal/Objective/Policy Description
Goal 9C	Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses.
Objective 9.1	Monitor and forecast demand based upon actual and predicted growth.
Objective 9.8	Monitor and forecast water demand based upon actual and predicted growth.
Policy 9.8.1	Monitor water usage and population and job forecast to project future water needs.
Objective 9.9	Manage and expand the City’s water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses.
Policy 9.9.1	Pursue all economically efficient water conservation measures at the local and statewide level.
Policy 9.9.7	Incorporate water conservation practices in the design of new projects so as not to impede the City’s ability to supply water to its other users or overdraft its groundwater basins.
Objective 9.10	Ensure that water supply, storage, and delivery systems are adequate to support planned development.
Policy 9.10.1	Evaluate the water system’s capability to meet water demand resulting from the Framework Element’s land use patterns.
Policy 9.10.2	Solicit public involvement, when appropriate, in evaluating options for the construction of new and/or expansion of existing water facilities.
Objective 9.11	Ensure, to the maximum extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.
Policy 9.11.1	Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.
<i>Source: City of Los Angeles, City of Los Angeles General Plan, Framework Element, re-adopted 2001.</i>	

(ii) Community Plan

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

(e) Los Angeles Municipal Code

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

- Ordinance No. 180,822—amended LAMC Chapter XII, Article 5 to establish water efficiency requirements For new development and renovation of existing buildings, and mandate installation of high efficiency plumbing fixtures in residential and commercial buildings.
- Ordinance No. 181,480—Amended LAMC Chapter IX by adding Article 9 (Green Building Code) to the LAMC to incorporate various provisions of the CALGreenCode. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20 percent by: (1) using water saving fixtures or flow restrictions; and/or (2) demonstrating a 20-percent reduction in baseline water use.
- Ordinance Nos. 181,899 and 183,833—Amended LAMC Chapter VI, Article 4.4, Section 64.72, regarding stormwater and urban runoff to include new requirements, including Low Impact Development (LID) requirements that promote water conservation.
- Ordinance No. 182,849—Amended LAMC Chapter IX, Article 9 (Green Building Code) to mandate that for new water service or for additions or alterations requiring upgraded water service for landscaped areas of at least 1,000 square feet, separate sub-meters or metering devices shall be installed for outdoor potable water use. This ordinance also required that for new non-residential construction with at least 1,000 square feet of cumulative landscaped area, weather or soil moisture-based irrigation controllers and sensors be installed.
- Ordinance No. 184,692—Amended LAMC Chapter IX, Article 4 (Plumbing Code) by adopting by reference various sections of the California Plumbing Code. This ordinance also added requirements for plumbing fixtures and fixture fitting.
- Ordinance No. 184,248—Amended LAMC Chapter IX, Article 4 (Plumbing Code) and Article 9 (Green Building Code) to establish Citywide water efficiency standards and mandate a number of new fixture requirements and methods of construction for plumbing and irrigation systems.

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

flow requirements vary from 2,000 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.

2.2. WASTEWATER

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

- California Green Building Standards Code;
- City of Los Angeles General Plan Framework;
- Los Angeles Integrated Resources Plan;
- One Water LA 2040 Plan; and
- Los Angeles Municipal Codes:
 - Los Angeles Green Building Code (Ordinance No. 181,480);
 - Water Efficiency Requirements Ordinance (Ordinance No. 180,822); [if applicable]
 - Sewer Capacity Availability Review (SCAR; LAMC Section 64.15);
 - Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1); and
 - Bureau of Engineering Special Order No. SO 06-0691.

2.2.1. (1) STATE

(a) California Green Building Code

The CALGreen Code is set forth in CCR Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush. In addition, maximum flow rates for faucets are established at 2.0 GPM at 80 PSI for showerheads, 1.2 GPM at 60 PSI for residential lavatory faucets, and 1.8 GPM at 60 PSI for kitchen faucets.

2.2.2. (2) LOCAL

(a) City of Los Angeles General Plan Framework

The Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.³¹ 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 utilities in the City, including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.³²

(b) Los Angeles Integrated Resources Plan

The City of Los Angeles Integrated Resources Plan (IRP) was developed by multiple departments in order to address the facility needs of the City's wastewater program, recycled water, and urban runoff/stormwater management through the year 2020.

The Final IRP 5-Year Review was released in June 2012, which included 12 projects that were separated into two categories: (1) "Go Projects" for immediate implementation; and (2) "Go-If Triggered Projects" for implementation in the future once a trigger is reached.³³ Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the Final IRP 5-Year Review, the Go Projects consisted of six capital improvement projects for which triggers were considered to have been met at the time the IRP EIR was certified. The Go-If Triggered Projects consisted of six capital improvement projects for which triggers were not considered to have been met at the time the IRP EIR was certified.

Since the implementation of the IRP, new programs and projects, which have resulted in a substantial decrease in wastewater flows, have affected the Go Projects and Go-If Triggered Projects. Based on the Final IRP 5-Year Review, two of the Go Projects have been moved to the Go-If Triggered category (Go Project 2 and Go Project 3) and two have been deferred beyond the 2020 planning window of the IRP (Go Project 4 and Go Project 5). Construction of wastewater storage facilities at the Donald C. Tillman Water

³¹ City of Los Angeles, Ordinance No. 181480.

³² City of Los Angeles Department of City Planning, Citywide General Plan Framework Element, Chapter 9: Infrastructure and Public Services—Wastewater, originally adopted by City Council on December 11, 1996, and re-adopted on August 8, 2001. <http://cityplanning.lacity.org/cwd/frmwk/chapters/09/09.htm> **[Print to pdf and save in the project's Reference Library, then delete URL from footnote.]**

³³ City of Los Angeles, Department of Public Works, Bureau of Sanitation and Department of Water and Power, Water IRP 5-Year Review FINAL Documents, June 2012.

Reclamation Plant (Go Project 1) has been completed. In addition, Go Project 6, involving the design of the North East Interceptor Sewer Phase II, is no longer being pursued.³⁴

(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.³⁵ The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.³⁶ 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) *Los Angeles Municipal Code*

(i) *Los Angeles Green Building Code*

The City has been pursuing a number of green development initiatives intended to promote energy conservation and reductions in the amount of greenhouse gas emissions generated within the City. While these ordinances do not focus on the provision of sewer services, they do mandate the use of water conservation features in new developments. Examples of such water conservation features include, but are not limited to, low water shower heads, toilets, clothes washers and dishwashers. Because the flow through these fixtures is reduced, residual wastewater passing through is reduced, in turn reducing the demand for sewage conveyance and treatment.

LAMC Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),³⁷ was adopted in April 2008 and provides standards and a mechanism for evaluating projects for their water conservation features during site plan review. The LA Green Building Code has been subsequently amended to incorporate various provisions of the CALGreen Code. The LA Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the first of which applies to this Project: (1) low-rise residential

³⁴ City of Los Angeles, Department of Public Works, Bureau of Engineering, Project Information Report, North East Interceptor Sewer (NEIS) Phase 2A.

³⁵ City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

³⁶ City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response—Creating a Water Wise City, October 14, 2014.

³⁷ City of Los Angeles, Ordinance No. 181480.

buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings.

(ii) Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),³⁸ effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

(iii) Sewer Capacity Availability Review

The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

(iv) Sewerage Facilities Charge

LAMC Sections 64.11 and 64.12 require approval of a sewer permit, also called an "S" Permit, prior to connection to the wastewater system. LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City's sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength, as well as volume. The determination of wastewater flow strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

(v) Bureau of Engineering Special Order

The City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City standards (Bureau of Engineering Special Order No. SO 06-0691). Per the Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather

³⁸ City of Los Angeles, Ordinance No. 180,822.

flow depth during their planning period does not exceed one-half of the pipe diameter (D) (i.e., depth-to-diameter ratio or d/D).³⁹

2.3. ENERGY

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding energy at the federal, state, regional, and City of Los Angeles levels that apply to the Project. As described below, these plans, guidelines, and laws include the following:

- Energy Independence and Security Act of 2007
- Corporate Average Fuel Economy Standards
- Federal Energy Policy and Conservation Act
- Public Utility Regulatory Policies Act of 1978
- National Energy Policy Act of 1992
- Energy Policy Act of 2005
- Clean Air Act
- Clean Cities Program
- Senate Bill 1389
- Renewables Portfolio Standards
- California Building Standards
 - California Building Energy Efficiency Standards
 - California Green Building Standards
- California Assembly Bill 1493
- California Air Resources Board
 - Scoping Plan
 - Advanced Clean Car Program

³⁹ City of Los Angeles Department of Public Works, Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

- Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- In-Use Off-Road Diesel Fueled Fleets Regulation
- Senate Bill 375
- Regional Transportation Plan/Sustainable Communities Strategy
- LA100 Plan
- L.A.'s Green New Deal
- City of Los Angeles Green Building Code
- City of Los Angeles Mobility Plan 2035

2.3.1. (1) FEDERAL

(a) Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national greenhouse gas (GHG) emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that require fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014;
- Requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- Establishing miles per gallon (mpg) targets for cars and light trucks and directing the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks, as superseded by the U.S. Environmental Protection Agency (USEPA) and the NHTSA actions described below.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”⁴⁰

(b) Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The NHTSA and the USEPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy. The standards require an industry-wide fleet average of 50.4 miles per gallon (mpg) in model year (MY) 2031 for passenger cars and light trucks, and an industry fleet-wide average for heavy-duty pickup trucks and vans (HDPUVs) of 2.851 gallons per 100 miles in MY 2035. The CAFE standards increase at a rate of two percent per year for passenger cars in MYs 2027-2031 and two percent per year for light trucks in model years 2029-2031. The final HDPUV fuel efficiency standards increase at a rate of 10 percent per year in MYs 2030-2032 and eight percent per year in MYs 2033-2035.⁴¹

(c) Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve, the Energy Conservation Program for Consumer Products, and CAFE regulations.

(d) Public Utility Regulatory Policies Act of 1978, Public Law 95-617

The purpose of Public Utility Regulatory Policies Act of 1978 (PURPA) is to promote conservation of electric energy. Additionally, PURPA created a new class of nonutility generators (small power producers) from which, along with qualified co-generators, utilities are required to buy power.

PURPA was in part intended to augment electric utility generation with more efficiently produced electricity and to provide equitable rates to electric consumers. Utility companies

⁴⁰ A “green job,” as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources. U.S. Department of Labor, Bureau of Labor Statistics, Green Jobs Overview, www.bls.gov/green/overview.htm, accessed June 17, 2026.

⁴¹ U.S. Department of Transportation, National Highway Traffic Safety Administration, Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027 and Beyond and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030 and Beyond, 49 CFR Parts 523, 531, 533, 535, 536, and 537, June 2024.

are required to buy all electricity from qualifying facilities (Qfs) at avoided cost (i.e., the incremental savings associated with not having to produce additional units of electricity). PURPA expanded participation of nonutility generators in the electricity market and demonstrated that electricity from nonutility generators could successfully be integrated with a utility's own supply. In addition, PURPA requires utilities to buy whatever power is produced by Qfs (usually cogeneration or renewable energy). The Fuel Use Act (FUA) of 1978 (repealed in 1987) also helped Qfs become established. Under FUA, utilities were not allowed to use natural gas to fuel new generating technologies, but Qfs were able to take advantage of abundant natural gas and abundant new technologies (such as combined-cycle). The technologies lowered the financial threshold for entrance into the electricity generation business as well as shortened the lead time for constructing new plants.

(e) National Energy Policy Act of 1992

The National Energy Policy Act of 1992 (EPACT92) calls for programs that promote efficiency and the use of alternative fuels. EPACT92 requires certain federal, state, and local government and private fleets to purchase a percentage of light duty alternative fuel vehicles (AFV) capable of running on alternative fuels each year. In addition, EPACT92 has financial incentives. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. EPACT92 also requires states to consider a variety of incentive programs to help promote AFVs.

(f) Energy Policy Act of 2005

The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

(g) Clean Air Act

Clean Air Act (CAA) Section 211(o), as amended by the Energy Policy Act of 2005, requires the Administrator of the USEPA to annually determine a RFS, which is applicable to refineries, importers, and certain blenders of gasoline, and to publish the standard in the Federal Register by November 30 each year. On the basis of this standard, each obligated party determines the volume of renewable fuel that it must ensure is consumed as motor vehicle fuel. This standard is calculated as a percentage, by dividing the amount of renewable fuel that the Energy Policy Act requires to be blended into gasoline for a given year by the amount of gasoline expected to be used during that year, including certain adjustments.

2.3.2. (2) STATE

(a) Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code (PRC) Sections 25300–25323) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State’s electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State’s economy; and protect public health and safety (PRC Section 25301[a]). The 2023 Integrated Energy Policy Report provides the results of the CEC’s assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles (ZEV), energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

(b) Renewable Portfolio Standards

First established in 2002 under SB 1078, California’s Renewables Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030.⁴² SB 350, signed on October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. On September 10, 2018, former Governor Jerry Brown signed SB 100, which further increased California’s RPS and required retail sellers and local publicly-owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and that the California Air Resources Board (CARB) should plan for 100-percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC’s responsibilities include (1) determining annual procurement targets and enforcing compliance, (2) reviewing and approving each investor-owned utility’s renewable energy procurement plan, (3) reviewing contracts for RPS-eligible energy, and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.⁴³

In March 2021, the CEC, CPUC, and CARB issued an SB 100 Joint Agency Report that assesses barriers and opportunities to implementing the 100-percent clean electricity policy.⁴⁴ The report’s initial findings suggest that the goals of SB 100 are achievable, though opportunities remain to reduce overall system costs; however, the report also notes that the findings are intended to inform State planning and are not intended as a

⁴² California Public Utilities Commission, California Renewables Portfolio Standard (RPS), <https://www.cpuc.ca.gov/rps/>, accessed June 17, 2026.

⁴³ California Public Utilities Commission, RPS Program Overview, www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps/rps-program-overview, accessed June 17, 2026.

⁴⁴ California Energy Commission, California Public Utilities Commission, and California Air Resources Board, 2021 SB 100 Joint Agency Report Achieving 100 Percent Clean Electricity in California: An Initial Assessment, CEC-200-2021-001, March 2021.

comprehensive or prescriptive roadmap to 2045, and future work is needed on critical topics, such as system reliability and land use, and further addresses energy equity and workforce needs.⁴⁵ Refer to Section IV.E, Greenhouse Gas Emissions, of the Draft EIR for additional details regarding this regulation.

(c) California Building Standards

(i) California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023. The 2022 Title 24 standards continue to improve upon the preceding versions of the Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings, which encourage use of electric heat pumps, requiring newly constructed residences to be electric-ready and introduces solar and battery storage standards as an optional measure to achieve compliance and increases minimum ventilation requirements to improve air quality.

(ii) California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code (CCR Title 24, Part 11) are commonly referred to as the CALGreen Code. The 2025 CALGreen Code includes mandatory measures for non-residential development related to site development, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.⁴⁶ The 2025 CALGreen Code improves upon the preceding versions of the CALGreen Code by simplifying the code and its application by offering choices related to new voluntary measures to builders, including battery storage systems, electric heat pump space, and water heating that encourage building electrification. The 2025 CALGreen Code went into effect on January 1, 2026.

(d) California Assembly Bill 1493 (AB 1493, Pavley)

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO₂) emissions, Assembly Bill (AB) 1493 (commonly referred to as CARB's Pavley regulations), enacted on July 22, 2002, requires CARB to set GHG emission standards for new passenger vehicles, light duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established

⁴⁵ California Energy Commission, California Public Utilities Commission, and California Air Resources Board, 2021 SB 100 Joint Agency Report Achieving 100 Percent Clean Electricity in California: An Initial Assessment, CEC-200-2021-001, March 2021.

⁴⁶ California Building Standards Commission, Guide to the 2022 California Green Building Standards Code Nonresidential, 2022.

standards for model years 2017–2025.⁴⁷⁴⁸ In March 2020, the NHTSA and the USEPA issued the SAFE Vehicles Rule, which amends existing CAFE standards and tailpipe CO₂ emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026. Refer to Section IV.E, Greenhouse Gas Emissions, of the Draft EIR for additional details regarding this regulation.

(e) California Air Resources Board

(i) Scoping Plan

AB 32 required CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (Health and Safety Code [HSC] Section 38561 (h)). The 2008 Climate Change Scoping Plan proposed a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”⁴⁹ The 2008 Climate Change Scoping Plan had a range of GHG reduction actions, which included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a Cap-and-Trade Program, and an AB 32 implementation fee to fund the program.

The 2008 Climate Change Scoping Plan called for a “coordinated set of solutions” to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to use energy more efficiently. Utility energy providers were required to include more renewable energy sources through implementation of the RPS.⁵⁰ Additionally, the 2008 Climate Change Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas will be accomplished through “improving energy efficiency by 25 percent.”

The 2008 Climate Change Scoping Plan identified several specific issues relevant to development projects, including:

⁴⁷ California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493.

⁴⁸ United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017–2025 Cars and Light Trucks, 2012.

⁴⁹ CARB, Climate Change Scoping Plan, December 2008.

⁵⁰ For a discussion of Renewables Portfolio Standard, refer to subsection California Renewables Portfolio Standard.

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting that:

A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.

- The importance of supporting the Department of Water Resources' work to implement the Governor's objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The Climate Change Scoping Plan notes that water use requires significant amounts of energy, including approximately one-fifth of Statewide electricity.
- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

The latest update is the 2022 Scoping Plan, which is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.⁵¹ Measures to reduce GHG emissions include building decarbonization, energy efficiency improvements and transportation electrification.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

(ii) Advanced Clean Cars Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations.⁵² The program requires a greater number of ZEV models for years 2015 through 2025 to control smog, soot and GHG emissions.

⁵¹ CARB, California's 2017 Climate Change Scoping Plan, 2017.

⁵² CARB, Clean Car Standards—Pavley, Assembly Bill 1493, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program accessed October 22, 2025.

This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles and the ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered.

(iii) Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 CCR Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

(iv) In-Use Off-Road Diesel Fueled Fleets Regulation

Because off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the “In-Use Off-Road Diesel Fueled Fleets Regulation” to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and higher. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2023, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines beginning January 1, 2024. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year or has completed the Best Available Control Technology requirements (BACT) requirements. Large fleets have compliance deadlines each year from 2024 through 2028, medium fleets each year from 2026 through 2030, and small fleets each year from 2028 through 2032. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines.

(f) SB 375 (Sustainable Communities Strategy)

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for

the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excluding emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) reflects CARB's updated SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035 relative to 2005.

2.3.3. (3) REGIONAL

(a) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law, it is designated as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. The agency develops long-range regional transportation plans including sustainable communities strategy (SCS) and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and a portion of the SCAQMD's Air Quality management plans (AQMP).⁵³

On April 4, 2024, SCAG's Regional Council adopted 2024 Connect SoCal, which is SCAG's 2024–2050 RTP/SCS. The 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the needs of the region both today and in the future. The goals for the 2024–2050 RTP/SCS address mobility, communities, environment, and economy, as follows:

- Mobility: Build and maintain an integrated multimodal transportation network;
- Communities: Develop, connect and sustain livable and thriving communities;
- Environment: Create a healthy region for the people of today and tomorrow; and

⁵³ SCAG, 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal), adopted April 4, 2025.

- Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.

The 2024–2050 RTP/SCS also includes growth forecasts through 2050 at the regional, county, and local jurisdictional levels, and Traffic Analysis Zones (TAZ). Projections at the jurisdiction level or smaller geographies, including TAZ, are utilized to conduct required modeling, and generally illustrate how regional policies and strategies may be reflected at the neighborhood level. These projections are advisory and non-binding. While the 2024–2050 RTP/SCS remains focused on SCAG’s core responsibilities, and on the requirements of comprehensive regional transportation planning integrated with the development of a SCS, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband, and mobility hubs. The 2024–2050 RTP/SCS also includes a detailed project list and strategic investments to bridge local plans with overarching performance targets and goals. If fully implemented, the 2024–2050 RTP/SCS would reduce traffic congestion, improve air quality, and improve the region’s long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern.⁵⁴

As part of the 2024–2050 RTP/SCS, SCAG developed a set of Regional Planning Policies to guide decision-making in the region that aligns with the 2024–2050 RTP/SCS’s vision and achievement of SCAG’s goals. These policies carry forward priorities that have been refined over several planning cycles to promote a multimodal transportation system and sustainable land use and development. These policies address Priority Development Areas (PDAs), housing in the region, 15-minute communities, equitable engagement and decision-making, sustainable development, air quality, clean transportation, natural and agricultural lands preservation, and climate resilience. SCAG has identified development within such areas as the framework for implementing the Regional Planning Policies.

The 2024–2050 RTP/SCS defines Priority Development Areas (PDAs) as areas within the SCAG region where future growth can be located to help the region reach 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool to facilitate plan development and analysis, and are used for different purposes, such as growth visioning, performance measurement, or grant applications. As a general principle, development in PDAs indicates a greater alignment with the goals of the 2024–2050 RTP/SCS. These PDAs are comprised of Neighborhood Mobility Areas (NMAs), Livable Corridors⁵⁵, TPAs, and Spheres of

⁵⁴ SCAG, 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal), adopted March 25, 2025.

⁵⁵ SCAG defines Livable Corridors as areas where local jurisdictions can plan and zone for increased density at nodes along key corridors, and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. Growth at strategic nodes along key corridors, many of which are High Quality Transit Corridors (HQTCs), will make transit a more convenient and viable option. The Livable Corridors network is developed utilizing select variables from past plans and input from local jurisdictions during the Local Data Exchange process. Additionally, this strategy integrates certain transit improvements, including Bus Rapid Transit

Influence. SCAG also recognizes that many Livable Corridors are also located within High Quality Transit Corridors (HQTCs).⁵⁶

(b) South Coast Air Quality Management District (SCAQMD) Rules

The SCAQMD adopted SCAQMD Rule 1146.2 which requires new large natural gas-fired water heaters, boilers, pool heaters, and process heaters to be zero emission units (i.e., electric instead of natural gas) beginning on January 1, 2028 to reduce NOX emissions.

2.3.4. (4) LOCAL

(a) LA100 Plan

The LA100 Plan (formerly 2022 Power Strategic Long-Term Resource Plan) serves as a comprehensive roadmap through 2045 that guides LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The 2022 SLTRP is largely driven by Mayoral directives and City Council motions that instructed LADWP to prepare an SLTRP to achieve 100 percent carbon-free energy by 2035 for the City.

(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.⁵⁷ Specific targets included the construction of new housing units within 1,500 feet of transit by 2017, reducing VMT per capita by five percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. 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.⁵⁸ The Green New Deal augments, expands, and elaborates in more detail the City's vision for a sustainable future, and it tackles the climate emergency with accelerated targets and new aggressive goals.

(BRT) and other features improving bus performance and user experience, and certain active transportation improvements to support safe bicycling and walking.

⁵⁶ A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The City of Los Angeles defines peak hours as Monday through Friday, between 6:00 a.m. and 9:00 a.m. and between 3:00 p.m. and 7:00 p.m.

⁵⁷ City of Los Angeles, Sustainable City pLAn, April 2015.

⁵⁸ City of Los Angeles, LA's Green New Deal, 2019.

Within the Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025, 25 percent by 2035, and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square foot for all building types 22 percent by 2025, 34 percent by 2035, and 44 percent by 2050 (from a baseline of 68 thousand British thermal units (MBtu) per square foot in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025 and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/ matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050.
- Increase the percentage of electric vehicles (EVs) and ZEVs in the city to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025, 95 percent by 2035, and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025 and three degrees by 2035.
- Ensure the proportion of Angelenos living within 0.5 miles of a park or open space is at least 65 percent by 2025, 75 percent by 2035, and 100 percent by 2050.

(c) Los Angeles Green Building Code

Article 9 of Chapter IX of the Los Angeles Municipal Code (LAMC) is referred to as the “Los Angeles Green Building Code,” which incorporates by reference portions of the CALGreen Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings. The Los Angeles Green Building Code includes some requirements that are more stringent than State requirements, such as increased requirements for EV charging spaces and water efficiency, which result in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency.

(d) City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City’s General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.⁵⁹ The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. While the Mobility Plan mainly relates to transportation, certain components would serve to reduce VMT and mobile-source GHG emissions. There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding energy at the federal, state, regional, and City of Los Angeles levels that apply to the Project. As described below, these plans, guidelines, and laws include the following:

3. ENVIRONMENTAL SETTING

The Project Site is located at 5350–5376 Wilshire Boulevard, 708–716 Cloverdale Avenue, and 721–725 Detroit Street within the Wilshire Community Plan Area. The Project Site is bound by Wilshire Boulevard to the north, residential buildings and surface parking to the south, Detroit Street the east, and Cloverdale Avenue to the west. Regional access to the Project Site is provided by the Interstate-10 Freeway, which is accessible approximately 1.9 miles south of the Project Site. Local access to the Project Site is provided by several major local streets and avenues, including Wilshire Boulevard, La Brea Avenue, and Olympic Boulevard.

3.1. WATER

LADWP is responsible for providing water supply to the City while complying with County, State, and Federal regulations.

3.1.1. REGIONAL

Primary sources of water for the LADWP service area are the Los Angeles Aqueduct

⁵⁹ Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

(LAA), SWP (supplied by MWD) and local groundwater. The LAA has been the primary source of the City’s water supply. In recent years, however, the amount of water supplies from the LAA has been limited due to environmental concerns, and the City’s water supply relied heavily (average of 57% in recent years) on the purchased water from MWD delivered from the Colorado River or from the Sacramento-San Joaquin Delta. Local ground water has been a reliable water source, providing an average of 12% of the total water supply, but there have been concerns in recent years due to declining groundwater level and contamination issues. Lastly, the City’s recycled water supply is limited to specific projects within the City at this time.⁶⁰

3.1.2. LOCAL

The Project Site is currently developed with commercial buildings along Wilshire Boulevard and surface parking areas to the south of these buildings. The existing buildings are connected and range from one to two stories and include approximately 48,229 square feet commercial uses. Vehicular access to the Project Site is provided via two driveways on Cloverdale Avenue and a dead end 20-foot alley that is accessed from Detroit Street and terminates at the middle of the Site. Pedestrian access to the Project Site is located along Wilshire Boulevard, Detroit Street, and Cloverdale Avenue.

LADWP maintains water infrastructure to the Project Site. The following information is based on water service maps provided by LADWP:

- 8-inch water main along Wilshire Boulevard:
 - 1 Fire Hydrant
 - 1 Fire Department Connection
 - (4) 1-inch Water Meters, (2) 1.5-inch Water Meters, and (1) 2-inch Water Meter servicing different buildings along the Southern side of Wilshire Blvd.
- 6-inch water main along Cloverdale Avenue:
 - 1 Water Meter
- 6-inch water main along Detroit Street:
 - 2 Fire Hydrants
 - (1) 1.5-inch Water Meter along the Western side of Detroit St.
- 12-inch water main along 8th Street
 - 2 Fire Hydrants

Water consumption estimates have been prepared based on LADWP billing data from May 2018 to April 2023 and are summarized in the Table below.

Table 1 – Estimated Existing Water Consumption

⁶⁰ City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan.

Existing Use to be Removed	Quantity (sf)	Water Demand (GPD)
Retail ^a	20,001	
Restaurant ^a	18,870	
Office ^a	9,358	
<i>Existing Total Water Consumption</i>	48,229	172
The existing water demand is based on the LADWP billing data from May 2018 to April 2023. The existing buildings will be removed partially and partially retained and reconfigured. For a conservative water demand estimate, all existing plumbing fixtures are assumed to be removed as part of this project. Sf = square feet GPD = gallons per day		

Based on a water service map provided by the City of Los Angeles, there are several existing public fire hydrants in the immediate vicinity of the Project Site. The existing public fire hydrants are located at the following locations: the south west corner of Wilshire Boulevard and Cloverdale Avenue, south east corner of Wilshire Boulevard and Detroit Street, mid-block on the east side of Detroit Street between Wilshire Boulevard and Eighth Street, south east corner of Eighth Street and Detroit Street, and south west corner of Cloverdale Avenue and Eighth Street.

3.2. WASTEWATER

3.2.1. REGIONAL

LASAN operates and maintains the wastewater treatment, reclamation and collection facilities serving most of the City of Los Angeles incorporated areas as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. The collection infrastructure consists of over 6,700 miles of local, trunk, mainline and major interceptor sewers, five major outfall sewers, and 46 pumping plants. The wastewater generated by the Project ultimately flows to the Hyperion Water Reclamation Plant (HWRP) System. The existing design capacity of the Hyperion Service Area is approximately 450 million gallons per day (MGD) and the existing average daily flow for the system is approximately 300 MGD.⁶¹

3.2.2. LOCAL

Sanitary sewer is provided by the LASAN. It appears that there are 9 existing sewer laterals serving the existing buildings. Please see Exhibit 7 for existing sewer lines and their size, direction of flow and slope.

⁶¹ City of Los Angeles Sanitation and Environment, Sewer System Management Plan, January 2019.

There is an existing 18-inch concrete sewer line in Wilshire Boulevard, an existing 8-inch Vitrified Concrete Pipe (VCP) sewer line in Cloverdale Avenue, and an 8-inch concrete sewer line in Detroit Alley, running east toward through the site before turning South onto Detroit Avenue. Based on LA Bureau of Engineering's online Navigate LA database, the above mentioned sewer lines along Wilshire Boulevard, Cloverdale Avenue, and Detroit Street have capacities of 4.13828 cubic feet per second (CFS) (2,674,640 gallons per day (GPD)), 0.70968 CFS (458,678 GPD), and 1.41935 CFS (917,350 GPD), respectively.⁶²

The City sewer network ultimately conveys wastewater to the HWRP.

Wastewater generation is conservatively assumed to be equal to the existing water demand. Existing water demand is based on LADWP billing data from May 2018 to April 2023 and are summarized in Table 2 below.

Table 2 – Estimated Existing Wastewater Consumption		
Existing Use to be Removed	Quantity (sf)	Wastewater Generation (GPD)
Retail	20,001	
Restaurant	18,870	
Office	9,358	
<i>Existing Total Water Consumption</i>	48,229	172
The existing wastewater demand is based on the LADWP billing data from May 2018 to April 2023. The existing buildings will be removed partially and partially retained and reconfigured. For a conservative water demand estimate, all existing plumbing fixtures are assumed to be removed as part of this project. Sf = square feet GPD = gallons per day		

3.3. ENERGY

3.3.1. ELECTRICITY

LADWP is responsible for providing power supply to the City while complying with County, State, and Federal regulations.

3.3.1.1. REGIONAL

LADWP's Power system is the nation's largest municipal electric utility and serves a 465-square-mile area in Los Angeles. The system supplies more than 23 million megawatt-hours (MWh) of electricity a year for the City of Los Angeles' 1.5 million residential and

⁶² City of Los Angeles Bureau of Engineering, Department of Public Works, Navigate LA GIS System, <https://navigatela.lacity.org/navigatela/>, Accessed June 17, 2026.

business customers including customers in the Owens Valley. LADWP has over 7,531 megawatts (MW) of generation capacity from a diverse mix of energy sources including renewable energy, natural gas, nuclear, large hydro, coal, and other sources. The distribution network includes 6,752 miles of overhead distribution lines and 3,626 miles of underground distribution cables.⁶³

3.3.1.2. LOCAL

LADWP maintains existing infrastructure within the Project vicinity that is readily available to serve the site. Based on available substructure maps, there are underground power lines within Wilshire Boulevard right-of-way as well as Detroit Street right-of-way.

Electricity demand estimates have been prepared based on the existing building program using CalEEMod by California Air Pollution Officers Association (CAPCOA) and are summarized in Table 3 below:

Table 3 – Estimated Existing Electricity Demand	
Land Uses	Quantity (kWh/yr)
Strip Mall	199,131
High Turnover (Sit Down Restaurant)	615,575
General Office Building	149,730
Parking Lot	24,750
<i>Existing Total Energy Use</i>	989,185
kWh = kilowatt-hour yr = year	

3.3.2. NATURAL GAS

SoCal Gas is responsible for providing natural gas supply to the City and is regulated by the California Public Utilities Commission and other state and federal agencies.

3.3.2.1. REGIONAL

SoCalGas is the principal distributor of natural gas in Southern California, providing retail and wholesale customers with transportation, exchange and storage services and also procurement services to most retail core customers. SoCalGas is a gas-only utility and, in addition to serving the residential, commercial, and industrial markets, provides gas for enhanced oil recovery (EOR) and electric generation (EG) customers in Southern California. SoCalGas' natural gas system is the nation's largest natural gas distribution utility, and serves a 20,000 square-mile area in Central and Southern California. The

⁶³ City of Los Angeles, Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017.

system supplies natural gas to 21.1 million customers through 5.9 million meters in more than 500 communities.⁶⁴

3.3.2.2. LOCAL

SoCal Gas maintains existing infrastructure within the Project vicinity that is readily available to serve the site. Based on available substructure maps, there are underground gas lines within Cloverdale Avenue, Wilshire Boulevard, and Detroit Street public right-of-way.

Natural gas demand estimates have been prepared based on the existing building program using CalEEMod by CAPCOA and are summarized in Table 4 below:

Table 4 – Estimated Existing Natural Gas Demand		
Land Uses	Quantity (kBTU/yr)	Quantity (cu ft/yr)
Strip Mall	98,483	93,793
High Turnover (Sit Down Restaurant)	1,790,390	1,705,133
General Office Building	188,863	179,870
Parking Lot	0	0
<i>Existing Total Natural Gas Use</i>	2,077,736	1,978,797
kWh = kilo British thermal unit yr = year cu ft = cubic feet		

4. SIGNIFICANCE THRESHOLDS

4.1. WATER

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

- 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; or
- Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

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

⁶⁴ SoCal Gas Company Profile, <https://www.socalgas.com/about-us/company-profile>, Accessed June 17, 2026.

The 2006 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate water supply and infrastructure impacts:

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

4.2. WASTEWATER

In accordance with Appendix G, the Project would have a significant impact related to wastewater if it would:

- Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction, or relocation of which could cause significant environmental effects; or
- Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

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

The 2006 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate wastewater:

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

4.3. ENERGY

Appendix F of the CEQA Guidelines states that the potentially significant energy implications of a project should be considered in an EIR. Environmental impacts, as noted

in Appendix F, may include:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance and/or removal. if appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources;
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In the context of the above thresholds, the 2006 L.A. CEQA Thresholds Guide states that a determination of significance shall be made on a case-by case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

5. METHODOLOGY

5.1. WATER

The methodology for determining the significance of a project as it relates to a project's impact on water supply and distribution infrastructure is based on the 2006 L.A. CEQA Thresholds Guide. This methodology involves a review of the project's environmental setting, project impacts, cumulative impacts, and mitigation measures (if required). The following has been considered as part of the determination for this Project:

Environmental Setting

- Description of major water infrastructure serving the Project site, including the type of facilities, location and sizes, and any planned improvements.

- Description of the water conditions for the Project area and known improvement plans.

Project Impacts

- Evaluate the Project's water demand, taking into account design or operational features that would reduce or offset water demand.
- Determine what improvements would be needed, if any, to adequately serve the Project.
- Describe the degree to which presently scheduled off-site improvements offset impacts.

This report analyzes the potential impacts of the Project on the existing public water infrastructure by comparing the estimated Project demand with the calculated available capacity of the existing facilities.

The existing and proposed water demand is based upon available site and occupancy information and LADWP's billing data from May 2018 to April 2023.

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. LADWP's approach consists of analyzing their water system model near the Project Site. Based on the results, LADWP determines whether they can meet the project fire hydrant flow needs based on existing infrastructure. See Exhibit 4 for the results of the Information of Fire Flow Availability Request (IFFAR). In addition, LADWP performed a flow test to determine if available water conveyance exists for future development. LADWP's approach consists of data ranging from available static pressure (meaning how much pressure is available at the source before applying the project's demand), to the available pressure at the maximum demand needed for the project. Based on the results, LADWP determines whether they can meet the project needs based on existing infrastructure. See Exhibit 1 for the results of the Service Advisory Request (SAR).

Project water demand estimates incorporate proposed water conservation measures identified later in this report under Section 6: Project Characteristics.

5.2. WASTEWATER

The methodology for determining the significance of a project as it relates to a project's impact on wastewater collection and treatment infrastructure is based on the 2006 L.A. CEQA Thresholds Guide. This methodology involves a review of the project's environmental setting, project impacts, cumulative impacts, and mitigation measures (if required). The following has been considered as part of the determination for this Project:

Environmental Setting

- Location of the Project and appropriate points of connection to the wastewater collection system on the pertinent Wye Map;
- Description of the existing wastewater system which would serve the Project, including its capacity and current flows.
- Summary of adopted wastewater-related plans and policies that are relevant to the Project area.

Project Impacts

- Evaluate the Project wastewater needs (anticipated daily average wastewater flow), taking into account design or operational features that would reduce or offset service impacts;
- Compare the Project's wastewater needs to the appropriate sewer's capacity and/or the wastewater flows anticipated in the Wastewater Facilities Plan or General Plan.

This report analyzes the potential impacts of the Project on the existing public sewer infrastructure by comparing the estimated Project wastewater generation with the calculated available capacity of the existing facilities.

The existing and proposed wastewater demand is based upon available site and occupancy information and LADWP's billing data from May 2018 to April 2023. Pursuant to LAMC Section 64.15, LASAN Wastewater Engineering Division made a preliminary analysis of the local and regional sewer conditions to determine if available wastewater conveyance and treatment capacity exists for future development of the Project Site. LASAN's approach consisted of the study of a worst-case scenario which envisions peak demands from the relevant facilities occurring simultaneously on the wastewater system. A combination of flow gauging data and computed results from the City's hydrodynamic model were used to project current and future impacts due to additional sewer discharge. The data used in this report are based on the findings of the LASAN preliminary analysis.

5.3. ENERGY

The methodology for determining the significance of a project as it relates to a project's impact on wastewater collection and treatment infrastructure is based on the 2006 L.A. CEQA Thresholds Guide. This methodology involves a review of the project's environmental setting, project impacts, cumulative impacts, and mitigation measures as required. The following has been considered as part of the determination for this Project:

Environmental Setting

- Description of the electricity and natural gas supply and distribution infrastructure serving the project site. Include plans for new transmission facilities or expansion of existing facilities; and
- Summary of adopted energy conservation plans and policies relevant to the

project

Project Impacts

- Evaluation of the new energy supply and distribution systems which the project would require.
- Describe the energy conservation features that would be incorporated into project design and/or operation that go beyond City requirements, or that would reduce the energy demand typically expected for the type of project proposed.
- Consult with LADWP or SoCalGas, if necessary to gauge the anticipated supply and demand conditions at project buildout.

This report analyzes the potential impacts of the Project on existing energy infrastructure by comparing the estimated Project energy demand with the available capacity. Will-serve letters from LADWP and SoCalGas (Exhibits 5 and 6) demonstrate the availability of sufficient energy resources to supply the Project's demand.

In addition, potential energy impacts were analyzed by evaluating the energy demand and energy conserving features of the Project to determine whether the Project would involve the wasteful, inefficient, and unnecessary use of energy resources.

6. PROJECT CHARACTERISTICS

6.1. WATER

The existing commercial buildings to remain will be serviced by the existing laterals along Wilshire Boulevard. It is anticipated that new domestic water laterals along Cloverdale Ave. and Detroit St. are required to service the proposed residential tower. Water laterals are to connect to the existing 6" mains that run parallel to Cloverdale and Detroit. Furthermore, the Project is expected to reduce outdoor potable water use by a minimum of 20 percent compared to baseline water consumption pursuant to the City of Los Angeles Ordinance No 184,248, 2022 California Plumbing Code, 2022 CALGreen, 2023 Los Angeles Plumbing Code, and 2023 Los Angeles Green Building Code. In addition to Title 24 requirements, such as water conserving water closets, urinals and showerheads, reductions in water consumption would be achieved through:

Fixtures

- High Efficiency Toilets with flush volume of 1.0 gallons per flush (gpf), or less
- Showerheads with a flow rate of 1.5 GPM, 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)

Utilities

- Individual metering and billing for water use for every commercial unit

New connections to meet all LAFD and Department of Building and Safety regulations would be provided to serve the new development.

6.1.1. WASTEWATER

The proposed development is anticipated to require new laterals in Wilshire Boulevard, to serve the proposed buildings. Both of the sanitary sewer connections for the proposed is expected to connect to the existing 18-inch sewer main along Wilshire Boulevard that flows toward Curson Avenue with a capacity of 12.94 CFS (8,363,450 GPD). Refer to Exhibit 7 and 8 for a diagrammatical representation of existing and proposed sewer lateral locations.⁶⁵

7. PROJECT IMPACTS

7.1. CONSTRUCTION

7.1.1. WATER

Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 GPD. Per Table 5, the Estimated Proposed Water demand for the site totals 124,635 GPD before accounting for existing uses to be removed and additional water conservation—as approved in the WSA. It can be assumed that temporary construction water use would be substantially less than the proposed water consumption at the Project. It is anticipated that if the existing water infrastructure can meet the demands of the proposed 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.

The Project will require construction of new, on-site water distribution lines to serve the new residential tower. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface. Specifically, trenching in Cloverdale Avenue will be required to replace the water main and reconnect it to the existing. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities

⁶⁵ City of Los Angeles Bureau of Engineering, Department of Public Works, Navigate LA GIS System, <https://navigatela.lacity.org/navigatela/>, Accessed June 17, 2026.

to avoid water lines and disruption of water service.

Additionally, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Traffic Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Overall, when considering impacts resulting from the installation of any required water infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, Project impacts on water infrastructure associated with construction activities would be less than significant.

7.1.2. WASTEWATER

Construction activities for the Project would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, Project impacts associated with construction-period wastewater generation would be less than significant.

The Project will require construction of new on-site infrastructure to serve the new residential tower. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for connections to public infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. No upgrades to the public main are anticipated.

A Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, Project impacts on wastewater associated with construction activities would be less than significant.

7.1.3. ENERGY

Electrical power would be consumed to construct the proposed residential tower. Typical uses include temporary power for lighting, equipment, construction trailers, etc. Overall, demolition and construction activities would require minimal electricity consumption and would not be expected to have any adverse impact on available electricity supplies and infrastructure. Electricity impacts are based on the CalEEMod default electricity usage rates. As provided in Exhibit 10, the total construction electricity usage during construction is estimated to be 26,199 kilowatt-hour (kWh). This is less than the existing energy consumption of the current project site of 989,185 kWh. Therefore, impacts on electricity supply associated with short-term construction activities would be less than significant.

No natural gas usage is expected to occur during construction. Therefore, impacts on natural gas supply associated with short-term construction activities would be less than significant.

Construction impacts associated with the Project's electrical and gas infrastructure upgrades would primarily be confined to trenching. Infrastructure improvements will comply with all applicable LADWP, SoCalGas, and City of Los Angeles requirements, which are expected to and would in fact mitigate impact to existing energy systems and adjacent properties. As stated above, to reduce any temporary pedestrian access and traffic impacts during any necessary off-site energy infrastructure improvements, a Construction Management Plan would be implemented to ensure safe pedestrian and vehicular travel. Therefore, Project impacts on energy infrastructure associated with construction activities would be less than significant.

7.2. OPERATION

7.2.1. WATER

7.2.1.1. INFRASTRUCTURE CAPACITY

When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Nevertheless, conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project. See Exhibit 4 and Exhibit 1 for the results of the IFFAR and SAR, respectively, which together demonstrate that adequate water infrastructure capacity exists.

7.2.1.2. FIRE WATER DEMAND

Based on fire flow standards set forth in Section 57.507.3 of the LAMC, the Project falls within the industrial and commercial category, which has a required fire flow of 6,000 to 9,000 GPM from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 PSI. Furthermore, LAFD issued a letter responding to a Request for Fire Protection Services Information, dated on June 16, 2023 requiring the fire-flow for this Project to be set at 12,000 GPM from six to eight fire hydrants flowing simultaneously—see attached Exhibit 11 for reference. There are five existing hydrants adjacent to the Project Site as mentioned in Section 3.1 above. Three additional hydrants are required and are to flow at 1500 GPM simultaneously: one new hydrant along Wilshire Boulevard, one new hydrant along Cloverdale Avenue, and one new hydrant along 8th Street. The completed IFFAR, attached as Exhibit 4, shows eight nearby hydrants flowing simultaneously for a combined 12,000 GPM with a residual pressure of 20 PSI. Approximately 685 feet of the existing six inch water main along Detroit Avenue must be upsized to eight inches in order to accommodate the additional flow of the added fire hydrants. Thus, as shown by the IFFAR, the Project Site has adequate fire flow available to demonstrate compliance with Section 57.507.3 of the LAMC under the Project.

Furthermore, LAMC Section 57.513, Supplemental Fire Protection, states that:

Where the Chief determines that any or all of the supplemental fire protection equipment or systems described in this section may be substituted in lieu of the requirements of this chapter with respect to any facility, structure, group of structures or premises, the person owning or having control thereof shall either conform to the requirements of this chapter or shall install such supplemental equipment or systems. Where the Chief determines that any or all of such equipment or systems is necessary in addition to the requirements of this chapter as to any facility, structure, group of structures or premises, the owner thereof shall install such required equipment or systems.

The Project will incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which will be subject to Fire Department review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 GPM. As noted, a SAR was submitted to LADWP to determine if the existing public water infrastructure could meet the demands of the Project. The approved SAR, attached as Exhibit 1, shows static pressures of 82 to 84 PSI and flows of 500 to 1400 GPM can be delivered to the Project Site with a residual pressure of 48 to 63 PSI, which exceeds the 20 PSI requirement for the surrounding public hydrants. As shown by the SAR, and through compliance with LAFD and LADWP requirements, the Project's fire flow impacts to water infrastructure would be less than significant.

7.2.1.3. DOMESTIC WATER DEMAND

Water consumption estimates have been prepared based on 2012 City of Los Angeles Bureau of Sanitation sewer generation rates, CCR Title 23 Division 2 Chapter 2.7 Model Water Efficient Landscape Ordinance, and other assumptions as listed in the WSA, and are summarized in Table 5 below. As mentioned, the approved SAR and WSA which is inclusive of anticipated domestic water demands shows that the existing infrastructure is sufficient to meet the water demand of the Project. Therefore, the Project's impact on water supply would be less than significant.

Table 5 – Estimated Proposed Water Demand^a			
Type of Use^b	No. of Units/Floor Area	Water Use Factor (GPD/unit)^c	Proposed Water Demand (GPD)
Residential: Apt - 1 BDR	206 DU	110/1 DU	22,660
Residential: Apt - 2 BDR	208 DU	150/1 DU	31,200
Residential Apartment Penthouse: 3 or 4 bdr ^g	5 DU	230/1 DU	1,150

Base Demand Adjustment (Residential Units) ^c			6,285
Residential Units Total	419 DU		61,295
Fitness	4,304 sf	0.65	2,798
Lounges ^h	8,216 sf	0.05	411
Barbeque Area	459 sf	0.13	59
Leasing Office	386 sf	0.12	46
Restaurant	2,449 seat	30	73,470
Office	8,000 sf	0.12	960
Base Demand Adjustment (Non-Residential) ^c			90
Landscaping, Pool/Hot Tub ⁱ	8,210 sf		889
Covered Parking ^j	257,961 sf	0.02	170
Cooling Tower ^k	690 ton		27,786
Proposed Subtotal Water Demand			167,974
Less Required Ordinances Water Savings			-43,339
Project Water Demand			124,635
Less Existing to be Removed ^d			-172
Less Additional Conservation ^f			-2,147
Net Additional Project Water Demand^l			122,317
^a Proposed water demand information based on WSA results generated by LAWDP found on exhibit 9. WSA results were used in lieu of the SCAR results because the WSA is calculated at a higher certainty. ^b Provided by the City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter and scope confirmation email. ^c Base demand adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates. ^d The existing water demand is based on the 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 this project. ^e Indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart. ^f The proposed development land uses will conform to City of Los Angeles Ordinance No. 186488, 184248, 2020 Los Angeles Plumbing Code, and the 2020 Los Angeles Green Building Code. Since the plumbing fixture quantities are not available yet, Ordinance water savings for only residential units and hotel rooms estimated. The applicant has agreed to additional water conservation, with a combination of some or all of the measures listed in the water conservation commitment letter (see appendix B of the WSA (Exhibit 9)).			

^g The sewer generation rate for a 4 bedroom dwelling unit is applied for a conservative water demand estimate.

^h The proposed lounges will not serve food or drinks.

ⁱ Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.

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

^k The cooling water chiller capacity, hours of operation (16 hours/day, 322 days/year on average), and the cooling tower make-up water supply is required to come from non-potable water sources. The applicant proposes to use graywater collection to meet 100 percent of the cooling tower make-up water requirements.

^l Total may not add up exactly due to rounding.

7.2.2. WASTEWATER

7.2.2.1. SEWER GENERATION

The Project will generate approximately an additional 94,930 GPD of wastewater. Wastewater generation estimates have been prepared based on the existing and proposed wastewater demand.

Table 6 – Estimated Proposed Wastewater Demand^a

Type of Use ^b	No. of Units/Floor Area	Water Use Factor (GPD/unit) ^e	Proposed Water Demand (GPD)
Residential: Apt - 1 BDR	206 DU	110/1 DU	22,660
Residential: Apt - 2 BDR	208 DU	150/1 DU	31,200
Residential Apartment Penthouse: 3 or 4 bdr ^g	5 DU	230/1 DU	1,150
Base Demand Adjustment (Residential Units) ^c			6,285
Residential Units Total	419 DU		61,295
Fitness	4,304 sf	0.65	2,798
Lounges ^h	8,216 sf	0.05	411
Barbeque Area	459 sf	0.13	59
Leasing Office	386 sf	0.12	46
Restaurant	2,449 seat	30	73,470

Office with Cooling Tower ^l	8,000 sf	0.17	1,360
Base Demand Adjustment (Non-Residential) ^c			90
Residential Amenities and Commercial Total			78,234
Landscaping, Pool/Hot Tub	8,210 sf		889
Covered Parking^j	257,961 sf	0.02	170
Proposed Subtotal			140,588
Less Required Ordinances Water Savings			-43,339
Proposed Wastewater Generation			97,249
Less Existing to be Removed ^d			-172
Less Additional Conservation ^f			-2,147
Net Additional Wastewater Generation			94,930
Maximum Wastewater Generation Approved by SCAR			191,051

^a Proposed wastewater demand information based on WSA results generated by LAWDP found on exhibit 9. WSA results were used in lieu of the SCAR results because the WSA is calculated at a higher certainty.

^b Provided by the City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter and scope confirmation email.

^c Base demand adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.

^d The existing wastewater demand is based on the LADWP billing data from May 2018 to April 2023. The existing buildings will be partially removed and partially retained and reconfigured. For a conservative wastewater demand estimate, all existing plumbing fixtures are assumed to be removed as part of this project.

^e Indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at <https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart>.

^f The proposed development land uses will conform to City of Los Angeles Ordinance No. 186488, 184248, 2020 Los Angeles Plumbing Code, and the 2020 Los Angeles Green Building Code. Since the plumbing fixture quantities are not available yet, Ordinance water savings for only residential units and hotel rooms estimated. The applicant has agreed to additional water conservation, with a combination of some or all of the measures listed in the water conservation commitment letter (see appendix B of the WSA (exhibit 9)).

^g The sewer generation rate for a 4 bedroom dwelling unit is applied for a conservative water demand estimate.

^h The proposed lounges will not serve food or drinks.

ⁱ Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.

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

^k The average daily flow calculation above does not include the infrequent occurrence of the pool and spa being emptied and refilled. These numbers have been omitted to give a more accurate average daily flow over the life of the project. Per the SCAR, the pool flow was noted to be 61,411 GPD. This assumes that the pool shall be drained in one day.

^l Wastewater generation compared to water demand for cooling towers is minimal, and to provide for a more accurate projection of wastewater generation, the wastewater generation rate for office uses the sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012) for office with cooling tower of 170 gallons per square foot per day rather than the cooling tower water demand included in the approved WSA.

A SCAR was submitted to see whether the existing public infrastructure can accommodate the Project. LASAN has analyzed the Project's wastewater generation in conjunction with existing conditions and forecasted growth, and has approved the maximum allowable capacity of 191,051 GPD. See Exhibit 3 for the approved SCAR.

Current City of Los Angeles methodology requires the listing of the total volume of pools, spas, and water features in the case of draining for maintenance. It is not anticipated that these volumes would be drained daily. The greatest of the pool and spa was considered for the wastewater demand. Given necessary maintenance, either the pool or spa would be shut down and drained at one given time.

With respect to wastewater treatment capacity, as indicated previously, the existing design capacity of the Hyperion Service Area is approximately 450 MGD, while the existing average daily flow treated by the System is approximately 350 MGD.⁶⁶ The Project's estimated net increase in wastewater generation of approximately 94,930 GPD would be far less than one percent of the HWRP's remaining available capacity. Consequently, adequate wastewater treatment capacity exists to serve the Project, and Project impacts on wastewater treatment capacity would be less than significant.

7.2.3. ENERGY

7.2.3.1. ELECTRICITY

Based on available substructure maps from the City Bureau of Engineering's online Navigate LA database, the existing LADWP power infrastructure around the Project Site includes underground conduits in Wilshire Boulevard and Detroit Street. Electricity demand estimates have been prepared based on the existing building program using CalEEMod by CAPCOA.

The Project will increase the demand for electricity resources. Electricity estimates are based on CalEEMod default electricity usage rates and account for compliance with applicable CALGreen requirements and GHG-PDF 1. As provided in Exhibit 10, the

⁶⁶ City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=oeplwklld_4&_afLoop=28344654751341747#!, Accessed June 17, 2026.

existing electricity total is 1,049,692 kWh/year. The estimated projected electricity total for Buildout is 5,154,271 kWh/year, thus the net difference is an increase of 4,104,579 kWh/year. The Project applicant is voluntarily including Project Design Feature GHG-PDF-1 which prohibits the use of natural gas within the building envelope during Project operations, excluding restaurant cooking equipment. This PDF further supports compliance with SCAQMD Rule 1146.2 which requires zero emission units to reduce NO_x emissions from large natural gas-fired water heaters, boilers, pool heaters, and process heaters as defined in this rule. This rule is applicable to the Project based on the size of the proposed heating units and buildout date (compliance date of January 1, 2028). All Project-related heating and hot water boilers will meet 96 percent thermal efficiency (2022 Title 24 standard is 80 percent) and pool water heater boilers will meet 93 percent thermal efficiency (2022 Title 24 standard is 82 percent). The Applicant will also provide natural gas uses as electric-ready (wiring installed for future electric applications), which is consistent with 2022 Title 24 goals.

A will serve letter was sent to LADWP to determine if there is sufficient capacity to serve the Project. Based on the response from LADWP (see Exhibit 5), electrical service is available and can be served to the Project. Therefore, impacts related to electricity demand are less than significant.

7.2.3.2. NATURAL GAS

Based on substructure maps provided by the City's Navigate LA database, there appears to be an existing 3" SoCalGas gas line in Cloverdale Avenue, an existing 6" and 8" SCG gas line in Wilshire Boulevard, and an existing 6", 16" and 3" SoCalGas gas line in Detroit Street. Table 4 shows the estimated existing natural gas demand for the Project Site.

The Project will increase the demand for natural gas resources. Natural gas estimates are based on CalEEMod default natural gas usage rates and account for compliance with applicable CALGreen requirements, Project Design Feature GHG-PDF-1 and SCAQMD Rule 1146.2. As provided in Exhibit 10, the existing natural gas total is 1,978,797 cu-ft/year. The estimated projected natural gas total for Buildout is 2,893,525 cu-ft/yr, thus the net difference is an increase of 914,728 cu-ft/yr.

A will serve letter was sent to SoCalGas to determine if there is sufficient capacity to serve the Project. Based on the response from SoCalGas (see Exhibit 6), gas service is available and can be served to the Project. Therefore, impacts related to gas demand are less than significant.

7.3. CUMULATIVE IMPACTS

7.3.1. WATER

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City). LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for water supplies to serve

existing and Projected demands. The 2020 UWMP prepared by LADWP accounts for existing development within the City, as well as Projected growth through the year 2045.

Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "Project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The types of Projects that are subject to the requirements of SB 610 tend to be larger Projects that may or may not have been included within the growth Projections of the 2020 UWMP. The WSA for Projects would evaluate the quality and reliability of existing and Projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed. As stated above, the Project and related Projects would be required to meet Green Building Code, which requires all Projects to reduce the overall potable water use by 20 percent. The baseline used for the 20 percent reduction is the maximum allowable water use per the Plumbing Code.

Furthermore, through LADWP's 2020 UWMP process and the City's Securing L.A.'s Water Supply, the City will meet all new demand for water due to Projected population growth to the year of 2045, through a combination of water conservation and water recycling. These plans outline the creation of sustainable sources of water for the City of Los Angeles to reduce dependence on imported supplies. LADWP is planning to achieve these goals by expanding its 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. Related projects connecting to the same water system are required to obtain a water connection permit and submit a Service Advisory Report to LADWP as part of the related project's development review. Impact determination will be provided following the completion of the SAR analysis. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LADWP to construct the necessary improvements.

Based on the above, it is anticipated that LADWP would be able to supply the water demands of the Project as well as support future growth. Therefore, cumulative impacts on water supply would be less than significant.

7.3.2 WASTEWATER

The Proposed Project will result in the additional generation of sewer flow. However, as discussed above the Bureau of Sanitation will conduct an analysis of existing and planned capacity and will determine that adequate capacity exists to serve the Project. Related projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a SCAR to the Bureau of Sanitation as part of the related project's development review. Impact determination will be provided following the completion of the SCAR analysis. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and the Bureau of Sanitation to construct the necessary improvements.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. As previously stated, based on information from the Bureau of Sanitation, the existing design capacity of the Hyperion Service Area is approximately 450 MGD and the existing average daily flow for the system is approximately 350 MGD. The estimated wastewater generation of the Project is 140,588 GPD.

Based on these forecasts the Project's increase in wastewater generation would be adequately accommodated within the Hyperion Service Area. In addition, the City Bureau of Sanitation's analysis confirms that the HWRP has sufficient capacity and regulatory allotment for the Proposed Project. Thus, operation of the Project would have a less than significant impact on wastewater treatment facilities.

7.3.3 ENERGY

The geographic context for the cumulative analysis of electricity is LADWP's service area and the geographic context for the cumulative analysis of natural gas is SoCalGas' service area. The geographic context for transportation energy use is the City of Los Angeles. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Buildout of the Project, the related projects, and additional growth forecasted to occur in the City would increase electricity consumption during project construction and operation and, thus, cumulatively increase the need for energy supplies and infrastructure capacity, such as new or expanded energy facilities. LADWP forecasts that its net energy for load in the 2028 fiscal year will be 24,768 GWhr of electricity.⁶⁷ Related projects connecting to the same power service are required to obtain a will serve letter from LADWP as part of the related project's development review. Impact determination will be provided following the confirmation from LADWP. If system upgrades are required as a result of a given project's power usage, arrangements would be made between the related project and LADWP to construct the necessary improvements.

The estimated net increase in energy demand resulting from the build-out of related projects combined with the proposed project, would represent a small percentage of the LADWP's forecast for the net energy load in the fiscal year 2025. Based on the Project's estimated net new all electrical consumption of 4,104,579 kWh/year, and 26,199 kWh of temporary power which will be utilized during construction, the Project would account for approximately 0.015 percent of LADWP's Projected sales for the Project's build-out year.. Although future development would result in the irreversible use of renewable and non-renewable electricity resources during project construction and operation which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP's service area. Furthermore, like the Project, during construction and operation, other future development projects would be

⁶⁷ City of Los Angeles, Department of Water and Power, 2022 Power Strategic Long-Term Resource Plan, Appendix A, Page A-6.

expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project's contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable and, thus, would be less than significant.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2022 Power Strategic Long-Term Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Integrated Resource Plan incorporates the estimated electricity requirement for the Project. The Power Integrated Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and, thus, would be less than significant.

Buildout of the Project and related projects in SoCalGas' service area is expected to increase natural gas consumption during project construction and operation and, thus, cumulatively increase the need for natural gas supplies and infrastructure capacity. Based on the 2024 California Gas Report, the California Energy Commission estimates natural gas availability within SoCalGas' planning area will be approximately 2,528 million cubic feet/day in 2028.⁶⁸ Accounting for Project Design Feature GHG-PDF-1 and SCAQMD Rule 1146.2, the Project results in 914,728 cubic feet/year and would account for approximately 0.036 percent of the 2028 forecasted capacity in SoCalGas's planning area. Related projects connecting to the same power service are required to obtain a will serve letter from SoCalGas as part of the related project's development review. Impact determination will be provided following the confirmation from SoCalGas. If system upgrades are required as a result of a given project's power usage, arrangements would be made between the related project and SoCalGas to construct the necessary improvements. Based on SoCalGas' projected 2,513 million cubic feet capacity in 2029 the Project would account for a small percentage of SoCalGas projected additional capacity for the Project's build-out year.

Although future development projects would result in the irreversible use of natural gas resources which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations

⁶⁸ California Gas and Electric Utilities, 2024 California Gas Report, p. 157.

for SoCalGas' service area. Furthermore, like the Project, during project construction and operation other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project's contribution to cumulative impacts related to natural gas consumption would not be cumulatively considerable and, thus, would be less than significant.

Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed. It is expected that SoCalGas would continue to expand delivery capacity if necessary, to meet demand increases within its service area. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. As such, cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and, thus, would be less than significant.

8. LEVEL OF SIGNIFICANCE

Based on the analysis contained in this report no significant impacts have been identified for water, wastewater, or energy for this Project.

EXHIBITS



City of Los Angeles

Los Angeles Department of Water and Power - Water System



SAR NUMBER 100055

Fire Service Pressure Flow Report

SERVICE NUMBER 640421

For: 708 S CLOVERDALE AVE Approved Date: **10-5-2022**Proposed Service 6 INCH off of the6 inch main in CLOVERDALE AVE on the EAST side approximately267 feet SOUTH of SOUTH of WILSHIRE BLVD The System maximum pressure is83 psi based on street curb elevation of 195 feet above sea level at this location.The distance from the DWP street main to the property line is 33 feet

System maximum pressure should be used only for determining class of piping and fittings.

Residual Flow/Pressure Table for water system street main at this location

Flow (gpm)	Press. (psi)	Flow (gpm)	Press. (psi)	Flow (gpm)	Press. (psi)
0	66	1400	48		
295	65				
425	64				
530	63				
620	62				
700	61				
775	60				
840	59				
905	58				
965	57				
1020	56				
1075	55				
1125	54				
1175	53				
1220	52				
1270	51				
1315	50				
1355	49				

Meter Assembly Capacities

Domestic Meters	
1 inch =	56 gpm
1-1/2 inch =	96 gpm
2 inch =	160 gpm
3 inch =	220 gpm
4 inch =	400 gpm
6 inch =	700 gpm
8 inch =	1500 gpm
10 inch =	2500 gpm

Fire Service	
2 inch =	250 gpm
4 inch =	600 gpm
6 inch =	1400 gpm
8 inch =	2500 gpm
10 inch =	5000 gpm

FM Services	
8 inch =	2500 gpm
10 inch =	5000 gpm

These values are subject to change due to changes in system facilities or demands.

Notes: With 700 gpm simultaneous flow.

This information will be sent to the Department of Building and Safety for plan checking.

This SAR is valid for one year from 10-05-22. Once the SAR expires, the applicant needs to re-apply and pay applicable processing fee.

For additional information contact the Water Distribution Services Section **WESTERN (213) 367-1225****MARK PATTERSON**

Prepared by

MARK PATTERSON

Approved by

134-183

Water Service Map



City of Los Angeles

Los Angeles Department of Water and Power - Water System



SAR NUMBER 100072

Fire Service Pressure Flow ReportSERVICE NUMBER **640422**For: **5350 WILSHIRE BLVD** Approved Date: **10-7-2022**Proposed Service **6 INCH** off of the**6** inch main in **DETROIT ST** on the **WEST** side approximately**260** feet **SOUTH** of **SOUTH** of **WILSHIRE BLVD** The System maximum pressure is**173** psi based on street curb elevation of **192** feet above sea level at this location.The distance from the DWP street main to the property line is **35** feet

System maximum pressure should be used only for determining class of piping and fittings.

Residual Flow/Pressure Table for water system street main at this location

Flow (gpm)	Press. (psi)	Flow (gpm)	Press. (psi)	Flow (gpm)	Press. (psi)
0	66	1400	48		
295	65				
425	64				
530	63				
620	62				
700	61				
775	60				
840	59				
905	58				
965	57				
1020	56				
1075	55				
1125	54				
1175	53				
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1270	51				
1315	50				
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2 inch =	250 gpm
4 inch =	600 gpm
6 inch =	1400 gpm
8 inch =	2500 gpm
10 inch =	5000 gpm

FM Services	
8 inch =	2500 gpm
10 inch =	5000 gpm

These values are subject to change due to changes in system facilities or demands.

Notes: With 700 gpm simultaneous flow.

This information will be sent to the Department of Building and Safety for plan checking.

This SAR is valid for one year from 10-07-22. Once the SAR expires, the applicant needs to re-apply and pay applicable processing fee.

For additional information contact the Water Distribution Services Section **WESTERN (213) 367-1225****MARK PATTERSON**

Prepared by

MARK PATTERSON

Approved by

134-183

Water Service Map

PROJECT INFORMATION

Site Address: 706 - 716 Cloverdale Ave, 5350 - 5376 Wilshire Blvd, 721 & 725 Detroit St, Los Angeles

OWNERSHIP ARCHITECT LANDSCAPE

ONNI GROUP 1031 S Broadway, St 400, Los Angeles, CA 90015 Contact: Mark Spector Phone: 213.629.2041	MVE+PARTNERS 888 S. Figueroa St, Suite 21 Los Angeles, CA 90017 Contact: Sherwin Pineda, Phone: 213.805.7600	LOCI DESIGN 1738 Kingsway, Vancouver Vancouver, BC V5N 2S3 Contact: Mike Enns Phone: 604.694.0053
--	---	--

PROJECT DESCRIPTION

THE PROJECT IS A (4)3 STORY HIGH-RISE, TYPE I-A CONSTRUCTION, (38) LEVELS OF RESIDENTIAL UNITS AND AMENITIES WITH (1) LEVEL OF GROUND FLOOR RESTAURANT AND LOBBY, (4) ABOVE GRADE PARKING LEVELS, AND (4) LEVELS OF UNDERGROUND BASEMENT PARKING.

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF LOS ANGELES, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL 1: LOTS 2 AND 3 OF TRACT NO. 4642, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 50, PAGES 42 AND 43 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY

PARCEL 2: LOTS 1 AND 2 OF TRACT 5691, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 62 PAGE 65 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 5089-002-002, 5089-002-003, 5089-002-004, 5089-002-005

REAL PROPERTY IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

PARCEL A: LOT 1, TRACT 4642, IN THE CITY OF AND COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 50, PAGES 42 AND 43 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PARCEL B: LOTS 79 AND 80 OF TRACT NO. 3821, IN THE CITY OF LOS ANGLS, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 42 PAGE 15 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY

ZONE

ZI - 1117 MTA RIGHT-OF-WAY (ROW) PROJECT AREA

ZI - 2452 TRANSIT PRIORITY AREA

ZI - 2336 COMMUNITY DESIGN OVERLAY : MIRACLE MILE

APN	ZONING	GENERAL PLAN DESIGNATION
5089-002-002 5089-002-003 5089-002-025 5089-002-026 Alley (north one-half)	[Q]C4-2-CDO	REGIONAL CENTER COMMERCIAL
5089-002-004 5089-002-019 Alley (south one-half)	[Q]C2-1-CDO	
5089-002-005	[Q]R4-1	HIGH MEDIUM RESIDENTIAL

LOT AREA :

Land Area with Alley (ALTA/NSPS):

C4 Lots - 36,218.00 sf	(35,720.00 sf after Dedication)
C2 Lots - 16,248.00 sf	(15,888.31 sf after Dedication)
R4 Lot - 6,702.00 sf	(4,162.00 sf after R4 Setbacks)
Total - 59,168.00 sf	(55,770.31 sf after Ded. & Setbacks)

Land Area without Alley (ALTA/NSPS): **56,366.00 sf**

SETBACKS

REQUIRED (As a Through Lot Per LA MUNICIPAL ZONING CODE CP-7150 and maximum reductions per TOC Incentives)

Side Setback (North Existing Buildings to Remain):	N/A
Front Setback (East/Detroit)	C Zone: 0' - 0"
Setback (East/Detroit)	R4 Zone: 15' - 0"
Side Setback (South)	RAS3 Zone: 5' - 0"
Setback (South)	R4 Zone*: 10' - 4 13/16**
Front Setback (West/ Cloverdale)	C Zone: 0' - 0"

PROVIDED

Side Setback (North Existing Buildings to Remain):	N/A
Front Setback (East/Detroit)	C Zone: 0' - 0"
Setback (East/Detroit)	R4 Zone: 15' - 0"
Side Setback (South)	RAS3 Zone: 5' - 0"
Setback (South)	R4 Zone*: 10' - 4 13/16**
Front Setback (West/ Cloverdale)	C Zone: 0' - 0"

* TOC PERMITS A SIDE YARD 35% REDUCTION OF REQUIRED (16'-0" X 65% = 10'-4 13/16")

FLOOR AREA

BASED ON LOT AREA W/ ALLEY POST DEDICATION AND R4 SETBACKS

Base Allowable Floor Area	Allowable Floor Area with TOC Increase 55%
C4 Lots (6.0 : 1 FAR) 214,320.00 sf	C4 Lots (9.30 : 1 FAR) 332,196.00 sf
C2 Lots (1.5 : 1 FAR) 23,832.47 sf	C2 Lots (4.25 : 1 FAR) 67,525.32 sf
R4 Lot (3.0 : 1 FAR) 12,486.00 sf	R4 Lot (4.65 : 1 FAR) 19,353.30 sf
Total Base Allowable: 250,638.47 sf	Allowable w/ TOC Incentive: 419,074.62 sf

Proposed Floor Area

Existing Commercial Area to remain	42,092.40 sf
Proposed New Commercial Area	2,645.00 sf
Proposed New Residential Area	374,337.00 sf
Total Area Proposed:	419,074.40 sf

HEIGHT

Max. Height Allowed for C & R4 Zone:	No Limit
Proposed Building Height:	530'- 0"

TOC ADDITIONAL INCENTIVES

INCENTIVE #1 - Setback reductions: RAS3 setbacks of 5-foot side yards

INCENTIVE #2 - Density to be calculated based on Lot Area prior to dedications including the area of the alley to be vacated.

INCENTIVE #3 - Averaging of FAR, Density, Parking or Open Space, and permitting Vehicle Access/Parking Access

RESIDENTIAL DENSITY

Allowable Unit #:	PER ADDITIONAL TOC INCENTIVE #2 - BASED ON LOT AREA PRIOR DEDICATIONS
200 sf/unit per C4 Zone per LAMC 12.22 (A)18	36,218.00 sf / 200 = 182 units
400 sf/unit per C2-1 Zone	16,248.00 sf / 400 = 41 units
800 sf/unit per R4 Zone	6,702.00 sf / 800 = 9 units
Total Base Allowable:	232 units

Allowable Unit # with TOC Increase 80%:

200 sf/unit per C4 Zone	182 units x 1.8 = 328 units
400 sf/unit per C2-1 Zone	41 units x 1.8 = 74 units
800 sf/unit per R4 Zone	9 units x 1.8 = 17 units
Proposed # of Units:	419 units

DWELLING UNITS

1 Bedroom	206 Units
2 Bedroom	208 Units
Penthouse	5 Units
Total	419 Units

PARKING

RESIDENTIAL

Residential - Minimum Allowed

Required after TOC Tier 4 incentive= 0 stalls per dwelling unit

419 units x 0.0 stall/unit = **0 Spaces**

Proposed Residential Stalls

Prime Standard Spaces	132 Spaces
Prime Compact Spaces	225 Spaces
Tandem Spaces	23 Spaces
Proposed Total # of Residential Spaces	377 Spaces

COMMERCIAL / RESTAURANT

Existing Commercial Parking Provided	82 Spaces
Proposed Restaurant - Minimum Required	2,645 sf x 1/100 sf = 27 Spaces
Sub Total # of Existing and Provided Non-Residential Spaces	109 Spaces
Required after TOC Tier 4 incentive - 40% Reduction	109 x 60% = 65.4~ 66 Spaces
Proposed Total # of Restaurant Spaces	66 Spaces

BICYCLE PARKING

REQUIRED

Residential	Short Term	Long Term
1-25 (25 Units)	2.5	25
26-100 (75 Units)	5.0	50
101-200 (100 Units)	5.0	50
201+ (219 Units)	5.5	55
Subtotal	18	180

Commercial	Short Term	Long Term
2,645 SF Restaurant	1.3 ~ 2	1.3 ~ 2
Subtotal	2	2
Total	20	182

PROPOSED

Residential	18	180
Commercial / Restaurant	2	2
Total	20	182

OPEN SPACE

REQUIRED (Per LAMC 12.21-G)	UNIT COUNT	OPEN SPACE
Units with Less than 3 Habitable Rooms (100 sf. per Unit)	206 Units	20,600 sf
Units with 3 Habitable Rooms - (4 Habitable Rooms require 125 sf. per Unit)	208 Units	26,000 sf
Units with more than 3 Habitable Rooms - (More than 4 Habitable Rooms require 175 sf. per Unit)	5 Units	875 sf
Total Open Space Required	419 Units	47,475 sf

PROPOSED

Common Outdoor Open Space - Pool Deck Courtyard

14,716 sf

Common Indoor Open Space - Lounge, Amenity, Clubroom & Fitness, Sky Lounge

(Max 25% of total required allowed = 11,869 sf)

11,868 sf

Private Balconies & Decks (Max 50% of total required allowed = 23,912 sf)

20,950 sf

Total Proposed Open Space

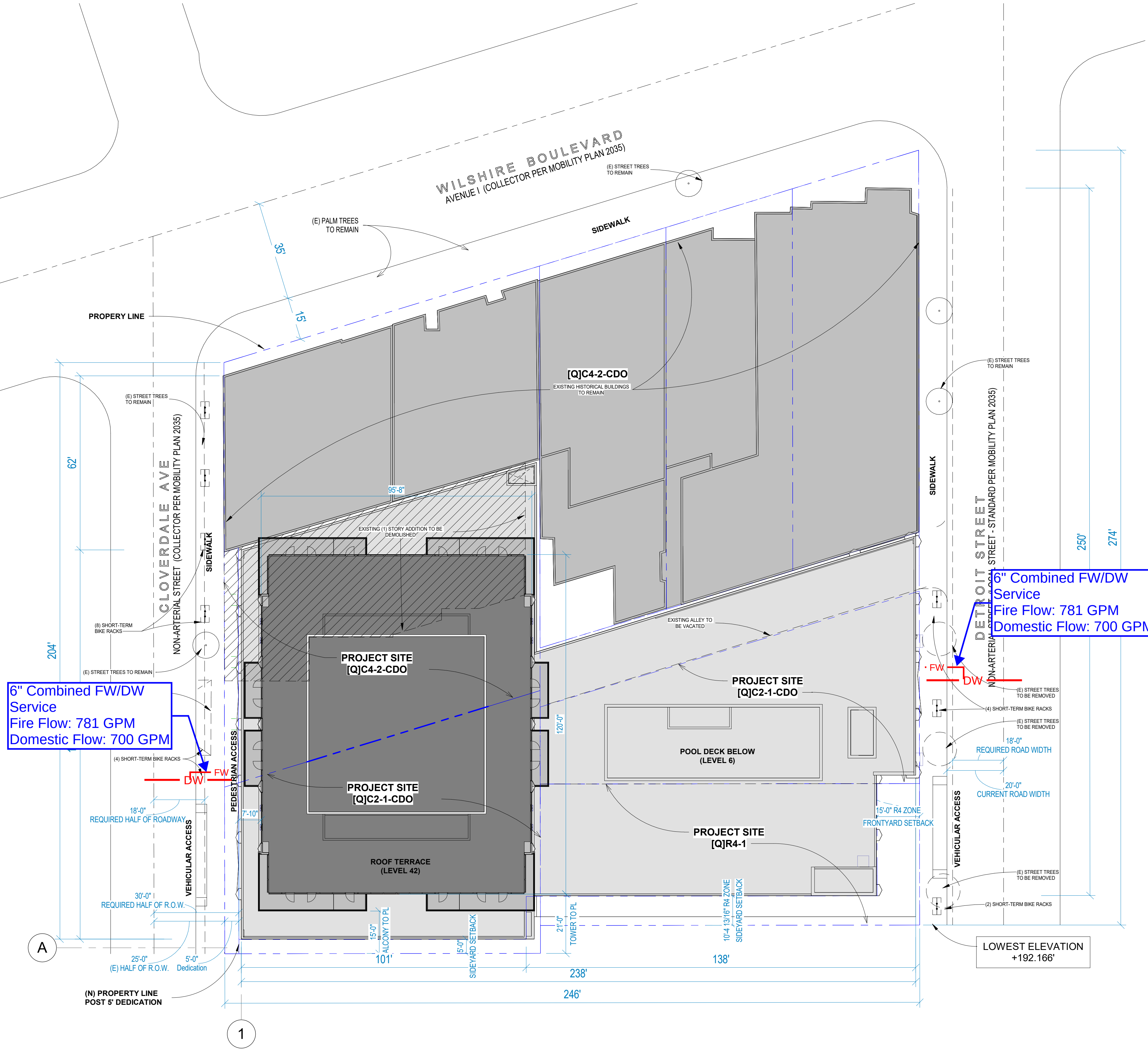
47,533 sf

Total Planted Area (25% of Outdoor Common Open Space)

3,679 sf

TREES

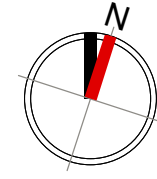
REQUIRED (1 per 4 Units)	105 Trees
PROPOSED	105 Trees



Plot Plan 1" = 20'-0"

PROJECT DATA & PLOT PLAN

0' 20' 40' 60'



PROJECT #2021-10241

08/08/2022

**BOARD OF PUBLIC WORKS
MEMBERS**

AURA GARCIA
PRESIDENT

M. TERESA VILLEGAS
VICE PRESIDENT

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**CITY OF LOS ANGELES
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JOSE P. GARCIA
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ASSISTANT DIRECTORS

TIMEYIN DAFETA
HYPERION EXECUTIVE PLANT MANAGER

**WASTEWATER ENGINEERING
SERVICES DIVISION**
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
FAX: (323) 342-6210
WWW.LACITYSAN.ORG

September 2, 2022

Mr. David Raymond, Project Engineer
KPF Consulting Engineers
700 South Flower Street, Suite 2100
Los Angeles, CA 90017

Dear Mr. Raymond,

708 S CLOVERDALE - REQUEST FOR WASTEWATER SERVICE INFORMATION

This is in response to your June 21, 2022 letter requesting a review of your proposed mixed-use project located at 706-716 Cloverdale Avenue, Los Angeles, CA 90036. The project will consist of residential, restaurants, and retail. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<i>Proposed</i>			
Residential Apt:1-BDRM	110 GPD/1 DU	206 DU	22,660
Residential Apt:2-BDRM	150 GPD/1 DU	208 DU	31,200
Residential Apt:3-BDRM	190 GPD/1 DU	5 DU	950

zero waste • zero wasted water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

File Location: CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\708 Cloverdale - Request for WWSI.docx

Retail	25 GPD/1000 SQ.FT	42,092 SQ.FT	1,052
Restaurant	30 GPD/ 1 Seat	177 Seats	5,310
Restaurant	30 GPD/ 1 Seat	1,111 Seats	33,330
Pool	7.48 GPD/1 CU.FT	11,250 CU.FT	84,150
Total			178,652 GPD

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes a two existing 8-inch lines on Cloverdale Ave and Detroit St. The sewage from the two existing 8-inch lines feeds into a 12-inch line on La Brea Ave then into a 24-inch line into a Venice Blvd before discharging into a 84-inch sewer line on Genesee Ave. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch lines cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Cloverdale Ave.	*	229,323 GPD
8	Detroit St.	*	229,323 GPD
8	La Brea Ave.	24	229,323 GPD
8	La Brea Ave.	19	229,323 GPD
12	La Brea Ave.	32	676,120 GPD
24	Venice Blvd.	26	4.65 MGD
24	Venice Blvd.	53	4.65 MGD
84	Genesee Ave.	45	101.43 MGD

* No gauging available

Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

All sanitary wastewater ejectors and fire tank overflow ejectors shall be designed, operated, and maintained as separate systems. All sanitary wastewater ejectors with ejection rates greater than 30 GPM shall be reviewed and must be approved by LASAN WESD staff prior to other City plan check approvals. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org.

STORMWATER REQUIREMENTS

LA Sanitation, Stormwater Program is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI, Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (also known as Low Impact Development [LID] Ordinance). Prior to issuance of grading or building permits, the applicant shall submit a LID Plan to the City of Los Angeles, Public Works, LA Sanitation, Stormwater Program for review and approval. The LID Plan shall be prepared consistent with the requirements of the Planning and Land Development Handbook for Low Impact Development.

Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lacitysan.org. It is advised that input regarding LID requirements be received in the preliminary design phases of the project from plan-checking staff. Additional information regarding LID requirements can be found at: www.lacitysan.org or by visiting the stormwater public counter at 201 N. Figueroa, 2nd Fl, Suite 280.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local groundwater basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. Green Street standard plans can be found at: <https://eng2.lacity.org/techdocs/stdplans/index.htm>

CONSTRUCTION REQUIREMENTS

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

If there are questions regarding the stormwater requirements, please call WPP's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 2nd Fl, Suite 280.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated,

and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers a Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of \$1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from the Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

Sincerely,

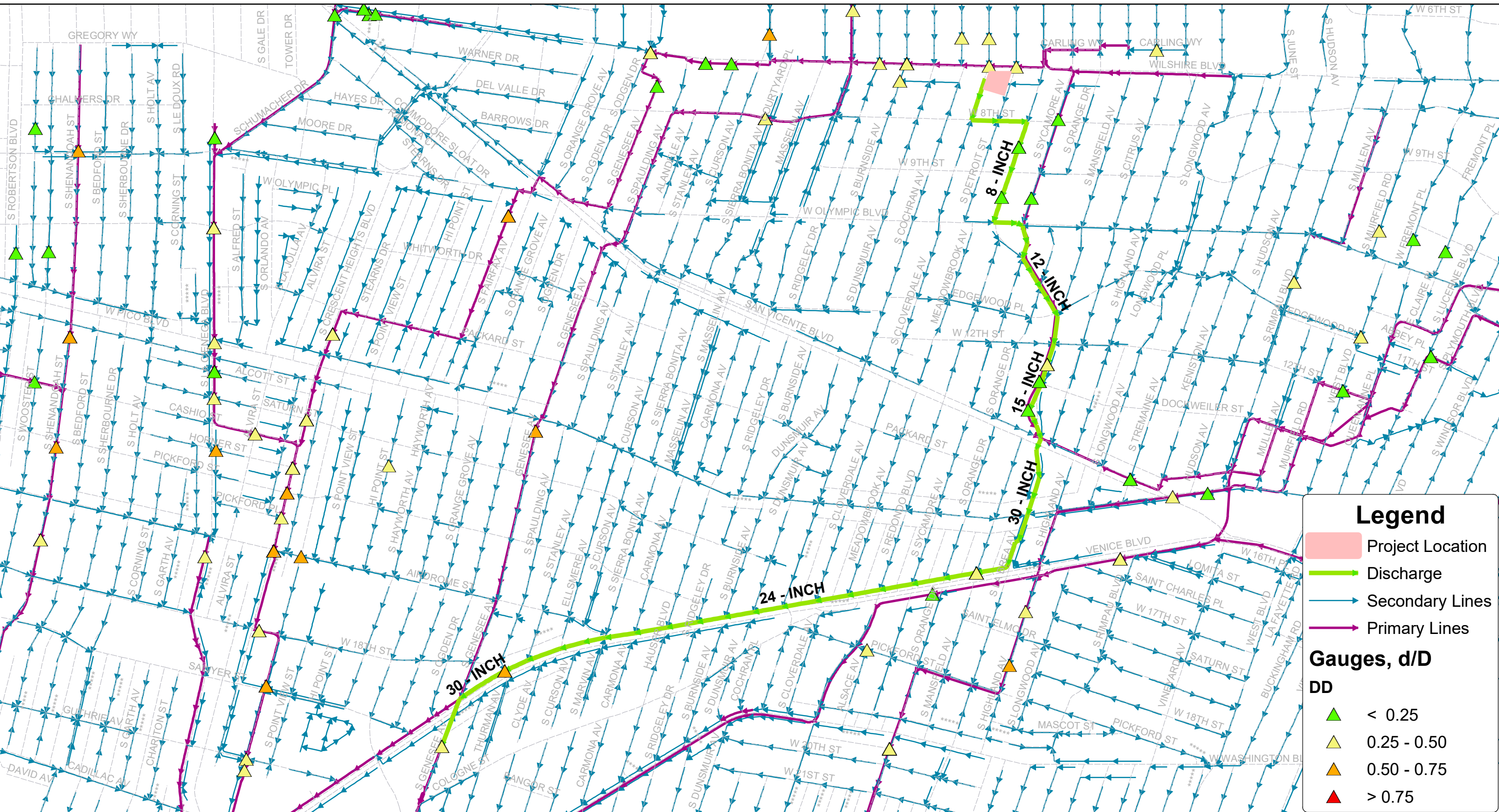
A handwritten signature in black ink, appearing to be 'W' followed by a large loop and a horizontal stroke.

Rowena Lau, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

RL/CD: sa

Attachment: Figure 1 - Sewer Map

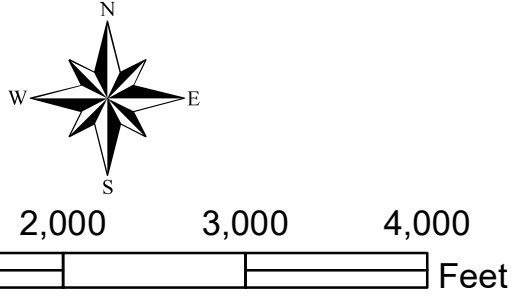
c: Julie Allen, LASAN
Michael Scaduto, LASAN
Christine Sotelo, LASAN
Christopher DeMonbrun, LASAN



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles



Figure 1
708 Cloverdale
Sewer Map



Thomas Brother Data reproduced with permission granted by THOMAS BROS MAP

City of Los Angeles
Bureau of Engineering**Sewer Capacity Availability Request (SCAR)**

To: Bureau of Sanitation

The following request is submitted to you on behalf of the applicant requesting to connect to the public sewer system. Please verify that the capacity exists at the requested location for the proposed developments shown below. The results are good for 180 days from the date the sewer capacity approval from the Bureau of Sanitation. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480. **If not listed in the Proposed Facility Description section of the SCAR, sewer ejector use is prohibited.**

Job Address:	708 S Cloverdale Ave	Sanitation Scar ID:	
Date Submitted	09/20/2022	Request Will Serve Letter?	Yes
BOE District:	Central District		
Applicant:	David Raymond		
Address:	700 S Flower Street, Suite 2100	City :	Los Angeles
State:	CA	Zip:	90017
Phone:	213-418-7962	Fax:	
Email:	david.raymond@kpff.com	BPA No.	
S-Map:	S-518, S-492	Wye Map:	5123-3

SIMM Map - Maintenance Hole Locations

No.	Street Name	U/S MH	D/S MH	Diam. (in)	Approved Flow %	Notes
1	Cloverdale Ave	51804007	51804021	8	80.00	
2	Detroit St	51804009	51804022	8	20.00	

Proposed Facility Description

No.	Proposed Use Description	Sewage Generation (GPD)	Unit	Qty	GPD
1	RESIDENTIAL: APT - 1 BDRM. *6	110	DU	206	22,660
2	RESIDENTIAL: APT - 2 BDRMS *6	150	DU	208	31,200
3	RESIDENTIAL: APT - 3 BDRMS *6	190	DU	5	950
4	RETAIL AREA (LESS THAN 100,000 SF)	25	KGSF	42,092	1,052
5	RESTAURANT: FULL SERVICE INDOOR SEAT	30	SEAT	1,111	33,330
6	RESTAURANT: FULL SERVICE OUTDOOR SEAT	30	SEAT	177	5,310
7	SWIMMING POOL (COMMERCIAL WITH BACKWASH FILTERS)		GPD	84,150	84,150

Proposed Total Flow (gpd): 178,652

Remarks

Note: Results are good for 180 days from the date of approval by the Bureau of Sanitation

Date Processed:

Expires On:

Processed by: Bureau of Sanitation
Phone: 323-342-6207

Reviewed by:
on

Submitted by: **Cindy Qi**
Bureau of Engineering
Central District
Phone: 213-482-7030

Fees Collected	No	SCAR FEE (W:37 / QC:706)	\$2,282.50
Date Collected		SCAR Status:	Pending

SEWER CAPACITY AVAILABILITY REVIEW FEE (SCARF) - Frequently Asked Questions

SCAR stands for Sewer Capacity Availability Review that is performed by the Department of Public Works, Bureau of Sanitation. This review evaluates the existing sewer system to determine if there is adequate capacity to safely convey sewage from proposed development projects, proposed construction projects, proposed groundwater dewatering projects and proposed increases of sewage from existing facilities. The SCAR Fee (SCARF) recovers the cost, incurred by the City, in performing the review for any SCAR request that is expected to generate 10,000 gallons per day (gpd) of sewage.

The SCARF is based on the effort required to perform data collection and engineering analysis in completing a SCAR. A brief summary of that effort includes, but is not limited to, the following:

1. Research and trace sewer flow levels upstream and downstream of the point of connection.
2. Conduct field surveys to observe and record flow levels. Coordinate with maintenance staff to inspect sewer maintenance holes and conduct smoke and dye testing if necessary.
3. Review recent gauging data and in some cases closed circuit TV inspection (CCTV) videos.
4. Perform gauging and CCTV inspection if recent data is not available.
5. Research the project location area for other recently approved SCARs to evaluate the cumulated impact of all known SCARs on the sewer system.
6. Calculate the impact of the proposed additional sewage discharge on the existing sewer system as it will be impacted from the approved SCARs from Item 6 above. This includes tracing the cumulative impacts of all known SCARs, along with the subject SCAR, downstream to insure sufficient capacity exist throughout the system.
7. Correspond with the applicant for additional information and project and clarification as necessary.
8. Work with the applicant to find alternative sewer connection points and solutions if sufficient capacity does not exist at the desired point of connection.

Questions and Answers:

1. When is the SCARF applied, or charged?

It applies to all applicants seeking a Sewer Capacity Availability Review (SCAR). SCARs are generally required for Sewer Facility Certificate applications exceeding 10,000 gpd, or request from a property owner seeking to increase their discharge thru their existing connection by 10,000 gpd or more, or any groundwater related project that discharges 10,000 gpd or more, or any proposed or future development for a project that could result in a discharge of 10,000 gpd.

2. Why is the SCARF being charged now when it has not been in the past?

The City has seen a dramatic increase in the number of SCARs over 10,000 gpd in the last few years and has needed to increase its resources, i.e., staff and gauging efforts, to respond to them. The funds collected thru SCARF will help the City pay for these additional resources and will be paid by developers and property owners that receive the benefit from the SCAR effort.

3. Where does the SCARF get paid?

The Department of Public Works, Bureau of Engineering (BOE) collects the fee at its public counters. Once the fee is paid then BOE prepares a SCAR request and forwards it to the BOS where it is reviewed and then returned to BOE. BOE then informs the applicant of the result. In some cases, BOS works directly with the applicant during the review of the SCAR to seek additional information and work out alternative solutions



City of Los Angeles

Los Angeles Department of Water and Power - Water System

1 of 2

INFORMATION OF FIRE FLOW AVAILABILITY

6,000 TO 9,000 GPM FROM
4 TO 6 FIRE HYDRANTS FLOWING

Water Service Map No.: W134-180/183

LAFD Fire Flow Requirement: SIMULTANEOUSLY LAFD Signature: _____
Date Signed: _____

Applicant: David Raymond

Company Name: KPFF CONSULTING ENGINEERS

Address: 700 SOUTH FLOWER SUITE 2100

Telephone: 213-418-7962

Email Address: david.raymond@kpff.com

	F- 39959	F- 34183	F- 34184
Location:	S/S Wilshire Blvd, W/O Cloverdale Ave	N/S Wilshire Blvd., E/O Cloverdale Ave	N/S Wilshire Blvd., E/O Detroit Ave
Distance from Nearest Pipe Location (feet):	33	27	27
Hydrant Size:	2.5 x 4D	2.5 x 4D	2.5 x 4D
Water Main Size (in):	8	8	8
Static Pressure (psi):	82	82	83
Residual Pressure (psi):	69	69	69
Flow at 20 psi (gpm):	1,500	1,500	1,500

KATHRINE CRUZ
AUG 23 2022

NOTE: Data obtained from hydraulic analysis using peak hour.

Remarks:

ECMR No. W20220824016

Maximum flow of 6 hydrants running simultaneously is 7,500GPM.

See other form for additional hydrants.

Water Purveyor: Los Angeles Department of Water & Power

Date: 9/15/2022

Signature: Oscar E. Tupul

Title: Civil Engineering Associate

Requests must be made by submitting this completed application, along with a \$271.00 check payable to:

"Los Angeles Department of Water and Power", and mailed to:

Los Angeles Department of Water and Power

Distribution Engineering Section - Water

Attn: Business Arrangements

111 North Hoe Street - Room 1425

Los Angeles, CA 90012

* If you have any questions, please contact us at (213) 367-2WNB or visit our web site at <http://www.ladwp.com>.

Project Site Address: 708 S. Cloverdale Ave., Los Angeles, CA 90036

Please run all 6 hydrants simultaneously. See application #2 for additional hydrant numbers.



City of Los Angeles

Los Angeles Department of Water and Power - Water System

2 of 2

INFORMATION OF FIRE FLOW AVAILABILITY

6,000 TO 9,000 GPM FROM
4 TO 6 FIRE HYDRANTS FLOWING

LAFD Fire Flow Requirement: SIMUTANEOUSLY

Water Service Map No.: W134-180/183

LAFD Signature: _____

Date Signed: _____

Applicant: David Raymond

Company Name: KPFF CONSULTING ENGINEERS

Address: 700 SOUTH FLOWER SUITE 2100

Telephone: 213-418-7962

Email Address: david.raymond@kpff.com

KATHRINE CRUZ

AUG 23 2022

	F- 39957	F- 39958	F- 42569
Location:	N/S Wilshire Blvd., W/O La Brea Ave	S/S Wilshire Blvd., E/O Detroit St.	E/S Detroit St., Btwn 8th St and Wilshire Blvd.
Distance from Nearest Pipe Location (feet):	27	22	25
Hydrant Size:	2.5 x 4D	2.5 x 4D	2.5 x 4D
Water Main Size (in):	8	6	6
Static Pressure (psi):	82	82	84
Residual Pressure (psi):	69	69	70
Flow at 20 psi (gpm):	500	1,000	1,500

NOTE: Data obtained from hydraulic analysis using peak hour.

Remarks:

ECMR No.

W20220824016

Maximum flow of 6 hydrants running simultaneously is 7,500GPM.
See other form for additional hydrants.

Water Purveyor: Los Angeles Department of Water & Power

Date: 9/15/2022

Signature: Oscar E. Tupul

Title: Civil Engineering Associate

Requests must be made by submitting this completed application, along with a \$271.00 check payable to:

"Los Angeles Department of Water and Power", and mailed to:

Los Angeles Department of Water and Power

Distribution Engineering Section - Water

Attn: Business Arrangements

111 North Hoe Street - Room 1425

Los Angeles, CA 90012

* If you have any questions, please contact us at (213) 367-2WNB or visit our web site at <http://www.ladwp.com>.

Project Site Address: 708 S. Cloverdale Ave., Los Angeles, CA 90036
Please run all 6 hydrants simultaneously.





BUILDING A STRONGER L.A.

Eric Garcetti, Mayor

Board of Commissioners
Cynthia McClain-Hill, President
Cynthia M. Ruiz, Vice President
Jill Banks Barad-Hopkins
Mia Lehrer
Nicole Neeman Brady
Chante L. Mitchell, Secretary

Martin L. Adams, General Manager and Chief Engineer

September 22, 2022

Mr. David Raymond
KPFF
700 S Flower St, Suite 2100
Los Angeles, CA 90018

Dear Mr. Raymond:

Subject: Will Serve
708 S Cloverdale Ave - Mixed-Use Building

This is in response to your letter dated on August 16, 2022 regarding electric service for the proposed project at the above address.

Electric service is available and will be provided in accordance with the Department of Water and Power Rules and Regulations. The estimated power requirement for this proposed project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the power system.

If you have any questions regarding this matter, please call Mr. Victor Perez, at (213) 367-6231.

Sincerely,

Marco Maldonado/KV

Marco Maldonado
District Engineer, Metro West Service Planning

c: Victor Perez



701 N. Bullis Rd.
Compton, CA 90224-9099

August 24, 2022

Kpff
700 S. Flower St. Suite 2100
Los Angeles, CA 90017
Attn: David Raymond

Subject: Will Serve - 708 S. Cloverdale Ave. Los Angeles, CA

Thank you for inquiring about the availability of natural gas service for your project. We are pleased to inform you that Southern California Gas Company (SoCalGas) has facilities in the area where the above named project is being proposed. The service would be in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual arrangements are made.

This letter should not be considered a contractual commitment to serve the proposed project, and is only provided for informational purposes only. The availability of natural gas service is based upon natural gas supply conditions and is subject to changes in law or regulation. As a public utility, SoCalGas is under the jurisdiction of the Commission and certain federal regulatory agencies, and gas service will be provided in accordance with the rules and regulations in effect at the time service is provided. Natural gas service is also subject to environmental regulations, which could affect the construction of a main or service line extension (for example, if hazardous wastes were encountered in the process of installing the line). Applicable regulations will be determined once a contract with SoCalGas is executed.

If you need assistance choosing the appropriate gas equipment for your project, or would like to discuss the most effective applications of energy efficiency techniques, please contact our area Service Center at 800-427-2200.

Thank you again for choosing clean, reliable, and safe natural gas, your best energy value.

Sincerely,

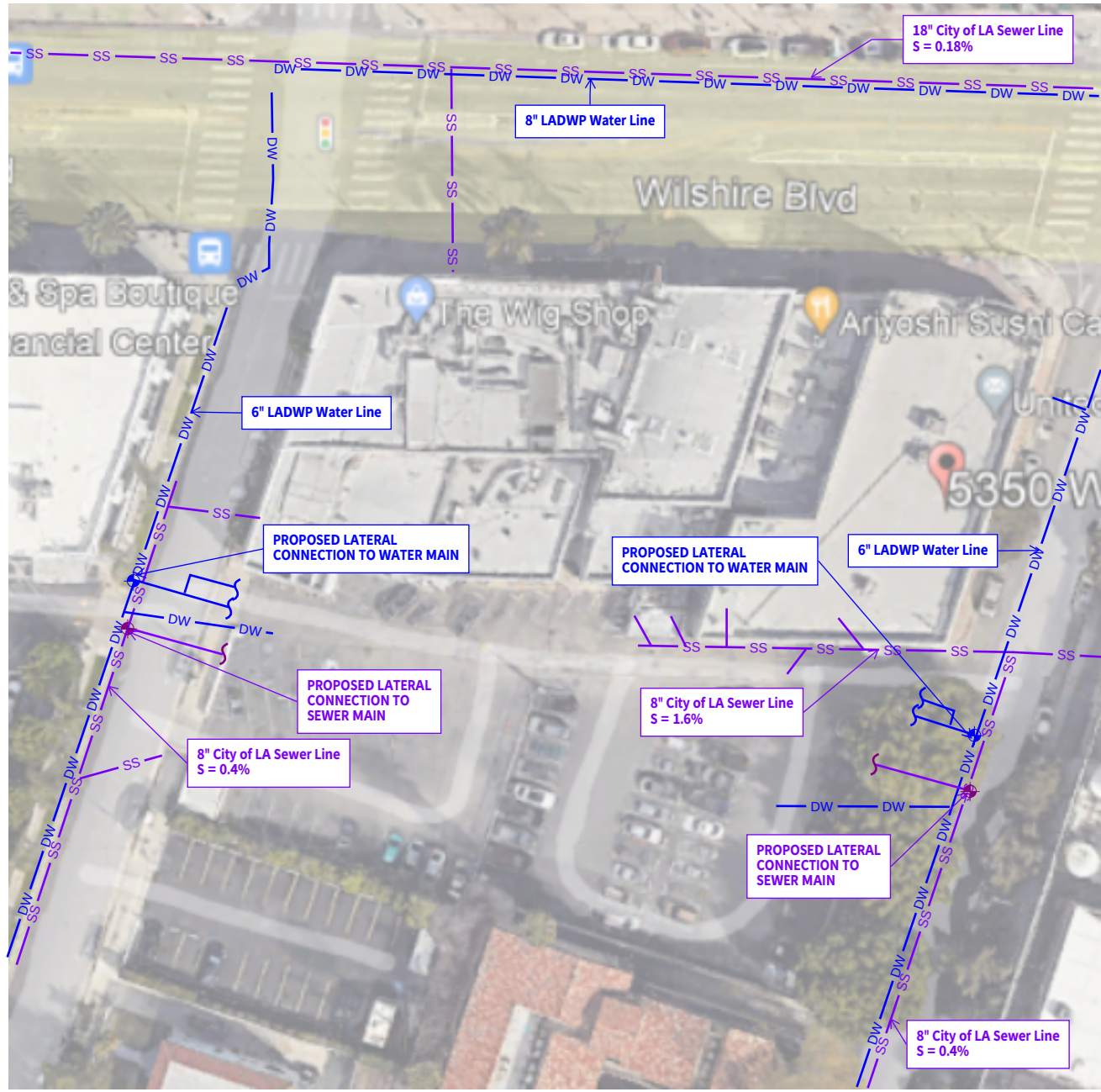
A handwritten signature in black ink that reads "J. Sum". The signature is written in a cursive, flowing style.

Jason Sum
Planning Associate
SoCalGas - Compton HQ

Exhibit 7 - Existing Water and Wastewater Infrastructure Exhibit



Exhibit 8 - Proposed Water and Wastewater Infrastructure Exhibit





WATER SUPPLY ASSESSMENT FOR THE WILSHIRE AND CLOVERDALE PROJECT

Prepared by:

Water Resources Division

Prepared on

August 10, 2023

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References

1. California Department of Water Resources California's Groundwater Bulletin 118 (Update 2003)
2. Upper Los Angeles River Area Watermaster Report for 2017/2018 (Update December 2019)
3. Los Angeles Department of Water and Power's 2020 Urban Water Management Plan
4. Metropolitan Water District of Southern California's 2020 Urban Water Management Water Plan
5. California Code of Regulations Title 23. Waters, Division 2. Department of Water Resources, Chapter 2.7. Model Water Efficient Landscape Ordinance
6. City of Los Angeles' Department of Public Works Bureau of Sanitation (LASAN) Sewer Generation Rates Table (Updated 2012)

Appendices

- A. City of Los Angeles Department of City Planning letter, Request for Water Supply Assessment, received on May 24, 2023, and Scope Confirmation e-mail received on July 9, 2023
- B. Water Conservation Commitment Letter
- C. Project Location Map
- D. Adjudicated Groundwater Basin Judgments

Introduction

Proposed major projects subject to certain requirements in the California Water Code Sections 10910-10915 require that a city or county identify any public water system that may supply water to the Wilshire and Cloverdale Project (Project) and request the public water system provide a Water Supply Assessment (WSA). The WSA is a determination by the water supplier that the demands associated with the Project were included in its most recently adopted 2020 Urban Water Management Plan (UWMP) showing that there is an adequate 20-year water supply. The Los Angeles Department of Water and Power's (LADWP) 2020 UWMP serves as the City of Los Angeles' (City) master plan for reliable water supply and resources management consistent with the LADWP's goals and policy objectives.

The City of Los Angeles Department of City Planning (Planning Department), serving as the lead agency as prescribed by the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.), for the Project, has identified LADWP as the public water system that will supply water to the Project site. In response to Planning Department's request for a WSA on May 24, 2023, LADWP has performed the assessment contained herein.

The WSA is prepared to meet the applicable requirements of state law as set forth in California State Water Code Sections 10910-10915. Significant references and data for this WSA are from LADWP's 2020 UWMP, adopted by the Board of Water and Power Commissioners (Board) on May 25, 2021. LADWP's 2020 UWMP is incorporated by reference and is available through LADWP's website, www.ladwp.com/uwmp.

LADWP's 2020 UWMP details LADWP's plans to meet all of the City's current and future water needs. Faced with increasing water demands and extended dry periods, LADWP is addressing the challenge of providing a reliable water supply for a growing population by expanding local water supply programs and reducing demands on purchased imported water. LADWP continues to make significant investments in local groundwater, recycled water, stormwater capture, and water conservation and use efficiency to diversify its water supply portfolio. In April 2019, LADWP, in conjunction with the City, developed short-term and long-term sustainability targets through LA's Green New Deal (Green New Deal), to form a more reliable and resilient water supply. For more information on the Green New Deal, it is available for download at http://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf.

Findings

The Project is estimated to increase the total net water demand within the site by 137 acre-feet (AF) annually based on review of information submitted by Planning Department. The total net water demand included water use efficiency measures that the Onni Group (Applicant) has committed to include in the Project. LADWP finds adequate water supplies will be available to meet the total additional water demand of 137 AF annually for the Project. LADWP anticipates the projected water demand from the Project can be met during normal, single-dry, and multiple-dry water years, in addition to the existing and planned future demands on LADWP.

The basis for approving WSAs for projects is LADWP's most recently adopted UWMP. LADWP's water demand forecast, as contained in LADWP's 2020 UWMP, uses long-term demographic projections for population, housing, and employment. The California Urban Water Management Planning Act requires water suppliers to develop a UWMP every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years. If the projected water demand associated with the Project was not accounted for in the most recently adopted LADWP 2020 UWMP, the WSA must include a discussion with regard to whether LADWP's total projected water supplies available during normal, single-dry, and multiple-dry water years during a 20-year projection will meet the projected water demand associated with the Project, in addition to LADWP's existing and planned future uses.

The City's water demand projection in LADWP's 2020 UWMP was developed based on the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) demographic projection by the Southern California Association of Governments (SCAG). The demographic projection was provided to LADWP from the Metropolitan Water District of Southern California (MWD), who collaborates with SCAG to aggregate demographic data for each of its 26 member agencies. LADWP's 2020 UWMP identified water supplies to meet projected water demands through 2045. 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 RTP/SCS by SCAG.

The Planning Department has indicated that the Project generally conforms with the use and intensity of development permitted by the City's General Plan. The Planning Department has also determined that the Project is consistent with the demographic projections for the City from the 2020 RTP/SCS. Based on the information provided by Planning Department, the anticipated water demand for the Project is within LADWP's 2020 UWMP projected water supplies for normal, single-dry, and multiple-dry years through the year 2045 and is also within the LADWP 2020 UWMP 25-year water demand growth projection. This WSA can be approved based on the fact that the Project's water demand falls within the LADWP 2020 UWMP projected increase in LADWP's service area water demands. Additionally, LADWP's 2020 UWMP contains a water shortage contingency plan (WSCP) that was adopted in May 2021. The WSCP complies with the California Water Code and is based on the City's Emergency Water Conservation Plan. The WSCP establishes six standard water supply shortage levels and corresponding shortage response actions, which the City can take in the event of a water supply shortage. Furthermore, the City has utilized ordinances as a tool to reduce water demand since 1988. See section 3.0 Water Conservation for more information on the City's water conservation efforts.

This WSA approval addresses the City's long-term water supply and demand forecasts to accommodate the Project. It is not an approval for a water service connection. A separate request shall be made to LADWP requesting an evaluation of water service connection for the Project. Also, this WSA is an informational document required to be prepared for use in the Planning Department's environmental review of the Project under CEQA, and it assesses the adequacy of water supplies to serve the Project and cumulative demand. Approval of this WSA is not equivalent to approval of the Project.

The Wilshire and Cloverdale Project Description

The following project information was obtained from Planning Department's WSA Request Letter and the scope confirmation e-mail (Appendix A):

Project Name: Wilshire and Cloverdale Project

Lead Agency: Planning Department

Community Plan: Wilshire Community Plan

The Project's scope of work includes redevelopment of approximately 1.36-acre site of commercial land use within the Wilshire Community Plan area of the City for residential and commercial land use. The Project site is generally bounded by Wilshire Boulevard to the north, Detroit Street to the east, residential uses to the south, and Cloverdale Avenue to the west.

The Project site currently contains four commercial buildings, with approximately 48,229 square feet (sf) of commercial uses. As part of the project, the existing buildings will be partially demolished. The remaining building will be reconfigured. The existing water demand for the site is less than one acre-foot per year (AFY).

The Project includes the development of a mixed-use residential and commercial building. The Project consists of 419 residential units with amenities, 8,000 sf of office, and 36,737 sf of restaurant. The total floor area is 420,201 sf of floor area. The residential amenities will include approximately 4,304 sf of fitness, 8,216 sf of lounges, 459 sf of barbeque area, and 386 sf of leasing office. The Project will also include covered parking, landscaping, swimming pools, hot tubs, and a cooling tower.

LADWP staff performed the water demand analysis and determined the net increase in water demand for the Project is 137 AFY.

A subsequent revised WSA may be required if one or more of the following occurs:

1. Changes in the Project result in a substantial increase in water demand for the Project
2. Changes in the circumstances or conditions substantially affecting the ability of LADWP to provide a sufficient supply of water for the Project
3. Significant new information becomes available which was not known and could not have been known at the time when WSA was prepared.

If deemed necessary, the Applicant may request a revised WSA through the Planning Department.

The Wilshire and Cloverdale Project Water Demand Estimate

The projected total net water demand increase for the Project is estimated to be 137 AF annually. This amount took account of savings due to water conservation ordinances which are approximately 49 AFY, and savings due to voluntary conservation measures which are approximately 2 AFY.

In evaluating the Project's water demand, the Sewer Generation Factors (SGF), published by the City of Los Angeles Department of Public Works Bureau of Sanitation (LASAN) in 2012, are applied to the Project scope for calculating indoor water use. SGFs are factors of how much wastewater is generated (gallons per day) per unit (per sf, per dwelling unit, per seat, etc.). LASAN publishes a list of SGFs for approximately 175 different building use types in the City, and updates factors to make necessary adjustments due to water conservation efforts and increased efficiencies in new appliances and plumbing fixtures. Outdoor landscape water demand is estimated per California Code of Regulations Title 23 Division 2 Chapter 2.7 Model Water Efficient Landscape Ordinance. Historical billing records maybe used to estimate the existing baseline water demand on the property. LADWP also encouraged the Project to implement water conservation measures above and beyond the current water conservation ordinance requirements in order to reduce the Project's total proposed water demand.

The net increase in water demand, which is the projected water demand of the Project, is calculated by subtracting the existing baseline water demand and water saving amount from the total proposed water demand.

Table I shows a breakdown of the existing and proposed new types of uses for the Project, and the corresponding estimated volume of water usage with the implementation of the required and voluntary conservation measures for this project. Types of use were derived from the WSA Request Letter and the scope confirmation e-mail in Appendix A.

Table II shows an estimation of the total volume of water conservation based on conservation measures the Applicant has committed for the Project (Appendix B).

TABLE I Wilshire and Cloverdale Project Calculated Total Water Demand							
Existing Use to be Removed¹		Quantity	Unit			Existing Water Use to be Removed (gpd) (af/y)	
Retail		20,001	sf				
Restaurant		18,870	sf				
Office		9,358	sf				
Existing to be Removed Total²						172	0.19
Proposed Use¹		Quantity	Unit	Water Use Factor³ (gpd/unit)	Base Demand (gpd)	Required Ordinances Water Savings⁴ (gpd)	Proposed Water Demand (gpd) (af/y)
Residential Apartment: 1 bdr		206	du	110.00	22,660		
Residential Apartment: 2 bdr		208	du	150.00	31,200		
Residential Apartment Penthouse: 3 or 4 bdr⁵		5	du	230.00	1,150		
Base Demand Adjustment (Residential Units)⁶					6,285		
Residential Units Total		419	du		61,295	12,113	49,182 55.09
Fitness		4,304	sf	0.65	2,798		
Lounges⁷		8,216	sf	0.05	411		
Barbeque Area		459	sf	0.13	59		
Leasing Office		386	sf	0.12	46		
Restaurant (36,737 sf)		2,449	seat	30.00	73,470		
Office		8,000	sf	0.12	960		
Base Demand Adjustment (Non-Residential)⁶					90		
Residential Amenities and Commercial Total					77,834	3,073	74,761 83.75
Landscaping, Pool/Hot Tub⁸		8,210	sf		889	367	523 0.59
Covered Parking⁹		257,961	sf	0.02	170	0	170 0.19
Cooling Tower¹⁰		690	ton		27,786	27,786	0 0.00
Proposed Subtotal					167,974	43,339	124,636 140
Less Existing to be Removed Total						-172	-0.19
Less Additional Conservation¹¹						-2,147	-2.40
Net Water Demand						122,317 gpd	137 af/y

¹ Provided by City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter and Scope Confirmation e-mail. See Appendix A. Existing and proposed uses that do not have a water demand are not shown here.

² The existing water demand is based on the 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 this project.

³ Indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at <https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart>

⁴ The proposed development land uses will conform to City of Los Angeles Ordinance No. 186488, 184248, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code. Since the plumbing fixture quantities are not available yet, Ordinance water savings for only residential units and hotel rooms were estimated.

⁵ The Sewer Generation Rate for a 4 bedroom dwelling unit is applied for a conservative water demand estimate.

⁶ Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.

⁷ The proposed lounges will not serve food or drinks.

⁸ Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.

⁹ Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.

¹⁰ 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 estimate were provided by the Applicant. This project proposes a 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 graywater collection to meet 100 percent of the cooling tower make-up water requirements.

¹¹ The Applicant has agreed to additional water conservation, with a combination of some or all of the measures listed in the water conservation commitment letter (See Appendix B of the Water Supply Assessment).

Abbreviations:

sf - square feet bdr - bedroom du - dwelling unit gpd - gallons per day af/y - acre feet per year

TABLE II
Wilshire and Cloverdale Project
Estimated Additional Water Conservation

Conservation Measures ¹	Quantity ²	Units	Water Saving Factor ³	Water Saved	
			(gpd/unit)	(gpd)	(af/y)
Toilet - Apartment: 1 bdr - 1.0 gpf	206	du	1.54	317	
Toilet - Apartment: 2 bdr - 1.0 gpf	208	du	3.85	801	
Toilet - Apartment Penthouse: 3 or 4 bdr - 1.0 gpf	5	du	6.16	31	
Dishwasher - 3.4 gallons per cycle	419	du	0.06	25	
Residential Clothes Washer - ENERGY STAR, Front-Loading, 4.5 cf, IWF 2.9	419	du	1.35	566	
Residential Unit Conservation Total				1,740.0	1.95
Toilet - 1.0 gpf	42	ea	6.09	256	
Dishwasher - 3.4 gallons per cycle	4	ea	0.10	0.4	
Residential Amenities and Commercial Conservation Total				256.4	0.29
Landscaping Total Conservation⁴				150.5	0.17
Total Additional Water Conserved =				2,147	2.40

¹ Water conservation measures agreed to by the Applicant. See Appendix B.

² Plumbing fixture quantities were provided by the Applicant.

³ Based on LADWP estimates.

⁴ Landscaping water conservation is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.

Abbreviations: af/y - acre feet per year bdr- bedroom cf - cubic feet du - dwelling unit ea – each
gpd - gallons per day gpf - gallons per flush IWF - Integrated Water Factor

Los Angeles Department of Water and Power – 2020 UWMP

The California Urban Water Management Planning Act (first effective on January 1, 1984) requires every urban water supplier prepare and adopt a UWMP every five years in compliance with state guidelines and requirements. The main goals of UWMPs are to forecast future water demands and water supplies under average and dry hydrologic conditions, identify future water supply projects, and provide a reliability assessment under average, single dry year, and multi-dry years, and assess near term drought risk management.¹

¹ *City of Los Angeles Department of Water and Power 2020 Urban Water Management Plan*, at ES-2.

Water Supplies

The Los Angeles Aqueducts (LAA), local groundwater, purchased water from MWD, and recycled water are the primary sources of water supplies for the City. Table III shows LADWP water supplies from FYE 2018 to FYE 2022 from these sources.

TABLE III
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

Note: Units are in AF.

1.0 Los Angeles Aqueduct

The City receives surface water and groundwater from the Eastern Sierra Nevada Mountains through the Los Angeles Aqueduct (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 775 cfs. The value of the City's historical investment in the LAA system is substantial because the City has benefited from the LAA's delivery of high-quality, cost-effective water supplies from the Eastern Sierra for over a century.

The City's water rights in the Eastern Sierra Nevada are comprised of riparian rights, pre-1914 appropriations, and post-1914 appropriation licenses held on various streams in the Mono Basin and Owens Valley. The most significant basis for export of surface water from the Eastern Sierra Nevada is an appropriation claim in 1905 to divert up to 50,000 miner's inches (1,250 cfs) from the Owens River. Up to 16,000 AFY can be supplied from Mono Basin, which is permitted by the 1994 Mono Lake Basin Water Right Decision 1631. Decision 1631 set a limit on LADWP water exports from the Mono Basin, which were set to a range of 0 to 16,000 AFY based on Mono Lake's water elevation. Aside from the primary surface water rights, the groundwater right in the Owens Valley is managed under the 1991 Long Term Water Agreement (LTWA) and uses vegetation water demand and available soil moisture to determine whether groundwater

wells can be pumped. Since 1991, the average annual pumping from Owens Valley wellfields has been less than 75,000 AF compared to 107,000 AF from 1974 to 1990.

Annual water deliveries from the LAA to the City are impacted by hydrologic variability in the Eastern Sierra Nevada and water set aside for environmental projects. At its peak in fiscal year ending (FYE) 1984, the LAA delivered 531,729 AF to the City. Concerns over environmental impacts have required the City to reallocate approximately one-half of the LAA water supply to other uses within the Owens Valley and Mono Basin. Between 1992 and 2020, LADWP reduced deliveries to the City by approximately 177,000 AF to supply water for a variety of environmental projects throughout the Eastern Sierra. Environmental enhancement and mitigation projects in the Mono Basin and Owens Valley that utilize water from the Eastern Sierra include Mono Basin releases, Lower Owens River Project, Owens Lake Dust Mitigation Program, as well as other environmental enhancement and mitigation projects and uses. The expected annual long term LAA delivery from 2020 to 2045 will range from approximately 184,200 AFY to 192,000 AFY for average years.

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.

For additional information, refer to Chapter 4 "Los Angeles Aqueduct System" of LADWP's 2020 UWMP.

2.0 Local Groundwater Supplies

Local groundwater provided approximately 8 percent of LA's total water supply, from FYE 2018 to FYE 2022. This amount significantly differs from fifty 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. In response to this issue and to address the hydrologic variability impacts to imported water supplies, LADWP has a focus on sustainable management of its local groundwater basins. 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.

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

The SFB is the primary source of local groundwater for the City. It is located in the Upper Los Angeles River Area (ULARA) and spans 112,000 acres. The ULARA encompasses the San Fernando and Sylmar Basin. It is managed by a court-appointed Watermaster and administrative committee that oversees the operation of GW system and report the groundwater elevations and water quality. The average SFB groundwater rights is approximately 87,000 AFY. LADWP is implementing its SFB Groundwater Remediation Program to help restore the capacity of SFB as a drinking water source and groundwater storage. LADWP is implementing the following groundwater remediation facilities:

1. North Hollywood West Response Action is expected to be operational in late 2023.
2. Tujunga Response Action is expected to be operational in early 2024.
3. North Hollywood Central Response Action is expected to be operational in early 2024.

LADWP 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. The blended water consists of SFB groundwater treated at the Burbank Operable Unit and Metropolitan Water District of Southern California imported water supply. This connection began service in August 2019 and will operate for five years.

The Central Basin is another source of groundwater supply for the City. The Central Basin Watermaster oversees this area that is located in the southeastern part of the Los Angeles Coastal Plan in Los Angeles County. The City has approximately 17,236 AFY of groundwater rights in this basin. With additional carryover and storage of unused water rights, the City has accrued a total of 22,943 AF of stored water as of FYE 2020. LADWP has completed the Manhattan Wells Improvement Project and it began

operation in March 2022. LADWP is also implementing the 99th St. Filtration Plant Project to address several issues such as water quality matters, deteriorating groundwater pumps, and necessary upgrades. This project is expected to be completed in 2025.

Besides the SFB and Central Basin, the City holds water rights in the following local groundwater basins:

1. The Sylmar and Eagle Rock basins are adjudicated basins, managed by the ULARA, that provides 3,570 AF and 500 AF, respectively. 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 underwent continued improvements since the early 2000's to replace the existing deteriorated facilities and restore Sylmar Basin groundwater production capacity. The facility has been in operation since early 2022. And, although the City has the right to produce groundwater from Eagle Rock Basin, there are no current plans to establish groundwater production facilities here.
2. 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. In 2014, the West Coast Basin Judgment was amended to increase certain parties', like LADWP's, pumping capacity to 5,000 AFY of unused West Coast Basin rights out of the Central Basin. This basin has groundwater quality problems related to TDS, chloride, and hydrocarbon pollutants; therefore, LADWP has discontinued use of West Coast Basin facilities in 1980 until further studies are completed to restore groundwater pumping.

Groundwater produced by the City from the San Fernando, Sylmar, and Central Basins for the last available five years are shown in Table IV.

Table IV
Historical Local Groundwater Production by Basin

Fiscal Year (July-June)	San Fernando (AF)	Sylmar (AF)	Central (AF)
2017-2018	22,259	0*	1*
2018-2019	36,870	1*	5*
2019-2020	35,949	2*	10*
2020-2021	53,625	1,368*	2,247
2021-2022	48,408	3,018	4,562

*Small quantities pumped from Sylmar and Central Basin were for water quality testing purposes, not water supply

LADWP also has groundwater rights outside the of City. There are 3,975 AF of groundwater rights in the Antelope Valley Groundwater Basin. This basin only allows the native water rights to be used locally; 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.

The Central and West Los Angeles areas of the City overlie the unadjudicated groundwater basins from Hollywood Basin, Santa Monica Basin, and the northerly area of Central Basin located outside of the adjudicated Central Basin boundary. LADWP is considering and exploring opportunities to develop groundwater resources in these manners that is locally sustainable and in cooperation with its regional partners to increase the City's use of local resources. Since the Sustainable Groundwater Management Act (SGMA) took effect on January 1, 2015, LADWP had been working with regional partners towards implementing a SGMA Groundwater Sustainability Plan (GSP) for the Santa Monica Basin. In September 2017, Department of Water Resources (DWR) approved the formation of the Santa Monica Basin Groundwater Sustainability Agency (SMGSA), which consisted of LADWP and four other local agencies. The SMGSA submitted the final GSP to DWR in January 2022.

For additional information, refer to Chapter 5 "Local Groundwater" of LADWP's 2020 UWMP.

3.0 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. Also, LADWP will comply with the State's water use requirements of Assembly Bill 1668 (2018) and Senate Bill 606 (2018) once finalized and adopted.

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.

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 current Los Angeles Green Building Code and Los Angeles Plumbing Code includes the latest ordinance to require water efficiency standards in buildings. The 2016 Emergency Water Conservation Plan (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. For a full list of Conservation Ordinance prohibited water uses for various phases, please refer to LADWP's 2020 UWMP.

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. 184130) 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. LADWP has recently launched or is currently developing the following programs:

- CalConserve Loan Program
- Flume Direct Distribution program for Single-Family Residential Customers
- Home Water Use Reports all Single-Family Residential Customers Real-Time Monitoring Devices for Customers

LADWP will continue to actively monitor the per capita water use, particularly in the context of all existing and new standards to ensure that target reductions are met in the future. Additional information on water conservation programs can be found in Chapter 3 “Water Conservation” of LADWP’s 2020 UWMP and at www.ladwp.com/uwmp.

4.0 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 1930’s, 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 Basin (SFB). The 2020

UWMP projects that by 2045 there will be a minimum of 15,000 AFY of increased groundwater pumping in the SFB 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 SFB 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 SFB. 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 management 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.

For additional information, refer to Chapter 6 "Watershed Management" of LADWP's 2020 UWMP.

5.0 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 environmental beneficial 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. For more information on the latest LADWP's existing and planned recycled water pipelines and projects, please see Recycled Water Annual Report available at the following link: www.ladwp.com/recycledwaterreport.

For additional information, refer to Chapter 7 "Recycled Water" of LADWP's 2020 UWMP.

6.0 Metropolitan Water District of Southern California

MWD is the largest water wholesaler for supplemental domestic and municipal water uses in California. As one of the twenty-six member agencies of MWD, the City, through LADWP, purchases water from MWD to supplement its water supplies from the 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.

MWD imports water from two principal sources: northern California via the California Aqueduct and the Colorado River via 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 MWD Act. As of FYE 2022, LADWP has a preferential right to purchase 17.69 percent of MWD's total water supply.

MWD is a contractor for water from Northern California through the State Water Project's (SWP) California Aqueduct. MWD holds a contract for 1.912 million acre-feet (MAF) per year, or 46 percent of the total contracted amount of the 4.173 MAF ultimate delivery capacity of the SWP. However, this amount varies annually due to many factors. DWR annually approves the amount of contract allocations SWP receives, which is shown in DWR's "Table A."

MWD owns and operates the CRA. Since 1942, the CRA has delivered water from the Colorado River to Southern California. The Colorado River supplies come from watersheds of the Upper Colorado River Basin in the states of Colorado, Utah, and Wyoming. Under a permanent service contract with the U.S. Secretary of the Interior, MWD is entitled to receive water from the Colorado River and its tributaries. California is apportioned 4.4 MAF, annually, plus one-half of any surplus that may be available for use, collectively, in Arizona, California, and Nevada. Of the California apportionment, MWD holds the fourth priority right to 550,000 AFY under the 1931 priority system governing allotments to California. Beyond the basic apportionment, MWD holds a fifth priority right to 662,000 AF of water.

MWD has been developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of these water resource development plans. MWD's actions have been focused on the following: continuing water conservation, developing water supply management programs outside of the region, developing storage programs related to the SWP and the Colorado River, developing storage and groundwater management programs within the Southern California region, increasing water recycling, groundwater recovery, stormwater, and seawater desalination and pursuing long-term solutions for the ecosystem, regulatory and water supply issues in the California Bay-Delta.

MWD's water reliability assessments are presented in MWD's 2020 UWMP, which can be found at the following link: <http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents>

7.0 Summary of Water Demand and Supply Projections for 20 years

LADWP's 2020 UWMP projects yearly water demand to reach 710,500 AF by FYE 2045 with existing water conservation prior to FYE 2014 already subtracted from projected demands, and with new water conservation savings achieved included as a supply source. Demographic data from 2020 SCAG RTP/SCS for LADWP's service area, as well as billing data for each major customer class, price of water, median household income, household size, economy, and dry period conservation effect were factors used in forecasting future water demand growth. Further details on LADWP's water demand forecast methodology can be found in Chapter 2 "Water Demand" of LADWP's 2020 UWMP. Table V tabulates the service reliability assessment for average weather year.

Table V
Service Area Reliability Assessment for Average Weather Year

Demand and Supply Projections (in acre-feet)	Average Year Fiscal Year Ending (FYE) on June 30				
	2025	2030	2035	2040	2045
Total Water Demand¹	642,600	660,200	678,800	697,800	710,500
Post-Conservation Demand	509,500	526,700	536,100	554,500	565,800
Existing / Planned Supplies					
Conservation (Additional Active ² and Passive ³ after FYE 14)	133,100	133,500	142,700	143,300	144,700
Los Angeles Aqueduct ⁴	190,400	188,900	187,300	185,800	184,200
Groundwater					
- Entitlements ⁵	109,400	109,400	109,400	108,800	108,800
- Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
- Stormwater Recharge (Increased Pumping)	4,000	8,000	15,000	15,000	15,000
Recycled Water- Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
Subtotal	461,200	480,000	495,100	493,700	493,700
MWD Water Purchases					
With Existing/Planned Supplies	181,400	180,200	183,700	204,100	216,800
Total Supplies	642,600	660,200	678,800	697,800	710,500

¹ Total Demand with existing passive conservation prior to FYE 14

² Cumulative hardware savings since late 1980s reached 110,822 AFY by FYE 14

³ Additional non-hardware conservation inclusive of retained passive savings from the dry period ending in 2017

⁴ Los Angeles Aqueduct supply is estimated to decrease 0.1652 percent per year due to climate impacts.

⁵ LADWP Groundwater Remediation projects in the San Fernando Basin are expected to be in operation by FYE 2023. Sylmar Basin production will increase to 4,170 AFY from FYE 2021 to 2036 to avoid the expiration of stored water credits, then revert to entitlement amounts of 3,570 AFY in 2037.

Service area reliability assessments for single-dry year and multiple-dry year conditions are shown in LADWP 2020 UWMP Exhibits 11F through 11G. Demands are met by the available supplies under all scenarios.

Water System Financing Program

Capital costs to finance facilities for the delivery of water supply to LADWP's service area are supported through customer-billed water rates. The Board sets rates subject to approval of City Council by ordinance. The Board is obligated by City Charter to establish water rates and collect charges in an amount sufficient to service the water system indebtedness and to meet its expenses for operation and maintenance.

The current water rates and its structures provide for modest rate increases each year over a five-year period for infrastructure improvements, meeting regulatory water quality requirements, and expanding the local water supply, which includes recycled water, stormwater capture, conservation, water efficiency, and groundwater remediation. LADWP's water rates incorporate and further reinforce foundational water conservation, water use efficiency, and financial principles. For example, the current water rate structure contains four tiers for single-family residential customers. The four tiers build on the previous two tier structure, providing a first-tier indoor water use base allocation, a second-tier allocation based on California Friendly Landscaping efficient outdoor use, a third-tier allocation capturing high outdoor water use, and a fourth-tier allocation for excessive use. In keeping with cost of service principles, the incremental pricing for the tiers is based on the cost of water supply.

In addition, LADWP will utilize a combination of the following funding sources:

- MWD – Currently provides funding through their Local Resources Program for the development of water recycling, groundwater recovery and seawater desalination.
- Grants and loans – LADWP continues to proactively seek government funding to offset potential impacts to ratepayers. Local funds, such as Measure W's "Safe, Clean Water Program," provide funding for stormwater capture projects. State funds, such as Propositions 1, 50, and 84, provide funding for recycling, groundwater, conservation and stormwater capture projects. And Federal funds, such as the Water Resource Development Act and the US Bureau of Reclamation's Title XVI program, provide funding for water recycling projects.

Conclusion

The Project is estimated to increase the total water demand within the site by 137 AF annually. This additional water demand for the Project site has been accounted for in the City's overall total demand projections in the LADWP's 2020 UWMP using a service area-wide approach that does not rely on individual development demand. The LADWP's 2020 UWMP utilized SCAG's 2020 RTP/SCS data that provide for more reliable water demand forecasts, considering changes in population, housing units, and employment.

Based on the Planning Department's determination that the Project is consistent with the demographic forecasts for the City from the SCAG's 2020 RTP/SCS, LADWP has determined that the Project's water demand is included in the LADWP's 2020 UWMP, which forecasts adequate water supplies to meet all projected water demands in the City through the year 2045. LADWP concludes that the projected 137 AFY increase in the total water demand for this Project is accounted for in the LADWP's 2020 UWMP 25-year water demand projections. LADWP has determined that it will be able to meet the proposed water demand of the Project as well as existing and planned future water demands of its service area.