Appendix J

Water Supply Assessment

Burbank Media District Specific Plan Update

Water Supply Assessment

prepared by

City of Burbank
Community Development Department: Planning Division
150 North Third Street
Burbank, California 91502
Contact: Amanda Landry, AICP, Principal Planner

prepared with the assistance of

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012

February 2026

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

Table of Contents

Tables

Figures

1 Introduction

A Water Supply Assessment (WSA) has been prepared for the City of Burbank's proposed update to the Media District Specific Plan (MDSP) ("proposed Project"). The City is the Lead Agency pursuant to CEQA for the proposed Project. Components of the proposed Project are described in Section 2, *Project Description*. The MDSP was adopted by the City in 1991. For the purposes of this WSA and to provide clarity between existing conditions and the proposed Project, the existing MDSP is referred to as the "1991 Media District Specific Plan." The proposed Project would establish updated objective development standards to facilitate additional development needed to accommodate projections prepared by the Southern California Association of Governments (SCAG). The proposed Project was developed in coordination between the City and SCAG.

In accordance with California Water Code (CWC), as amended in 2001 by Senate Bill (SB) 610 and SB 221, a WSA is required for any proposed project that is subject to the California Environmental Quality Act (CEQA), would rely on groundwater for some or all of its water supply, and would meet the definition of "project" under SB 610. The definition of "project" provided by SB 610 includes any proposed development that would introduce a water demand equivalent to or greater than that of a 500- unit residential project. The proposed Project is a Specific Plan update that would facilitate more than 500 new residential units, in addition to other land uses and mixed-use development areas that meet the SB 610 definition of "project." Therefore, the MSDP Update is considered subject to SB 610 and this WSA has been prepared for consistency with SB 610. The proposed Project is not subject to SB 221, which addresses proposed subdivision(s) of residential property which are not included in the proposed Project scope.

The primary purpose of SB 610 is to promote collaborative planning between local water supply and land use decisionmakers. The WSA will be used to inform the CEQA analysis for the proposed Project and will be considered by the Lead Agency during the development approval process for the proposed Project.

2 Project Description

The 1991 Media District Specific Plan was developed to achieve several goals, including to ensure sufficient infrastructure and public services are available to accommodate any new future development that would be proposed in the Specific Plan Area while protecting the character of the residential neighborhoods. The proposed Project would build upon the 1991 Media District Specific Plan's goals and policies by updating and implementing policies and programs to remove barriers to housing production, streamline the permitting process, and create objective development standards that would make Media District a place to live, work, and play for the Burbank community. The proposed residential and non-residential growth projected by the proposed Project are detailed in Section 2.3, *proposed Project Characteristics.*

2.1 Project Location

The MDSP area is approximately 544 acres ("Plan Area"), located in the southwest region of Burbank. Other urbanized areas with a mix of land uses, including residential, commercial, industrial, community services, and open space, surround the Plan Area.

Figure 1 and Figure 2, on the following pages, illustrate the location of the Plan Area in a regional and local context. The Plan Area is generally bounded by the Magnolia Park neighborhood to the north, South Keystone Street east, the Los Angeles River to the south, and the Toluca Lake and Toluca woods neighborhoods to the west. The Plan Area is bisected by State Route 134 (SR 134). Figure 3 shows the boundaries of the San Fernando Valley Groundwater Basin, which underlies the Plan Area.

2.2 Existing Site Characteristics

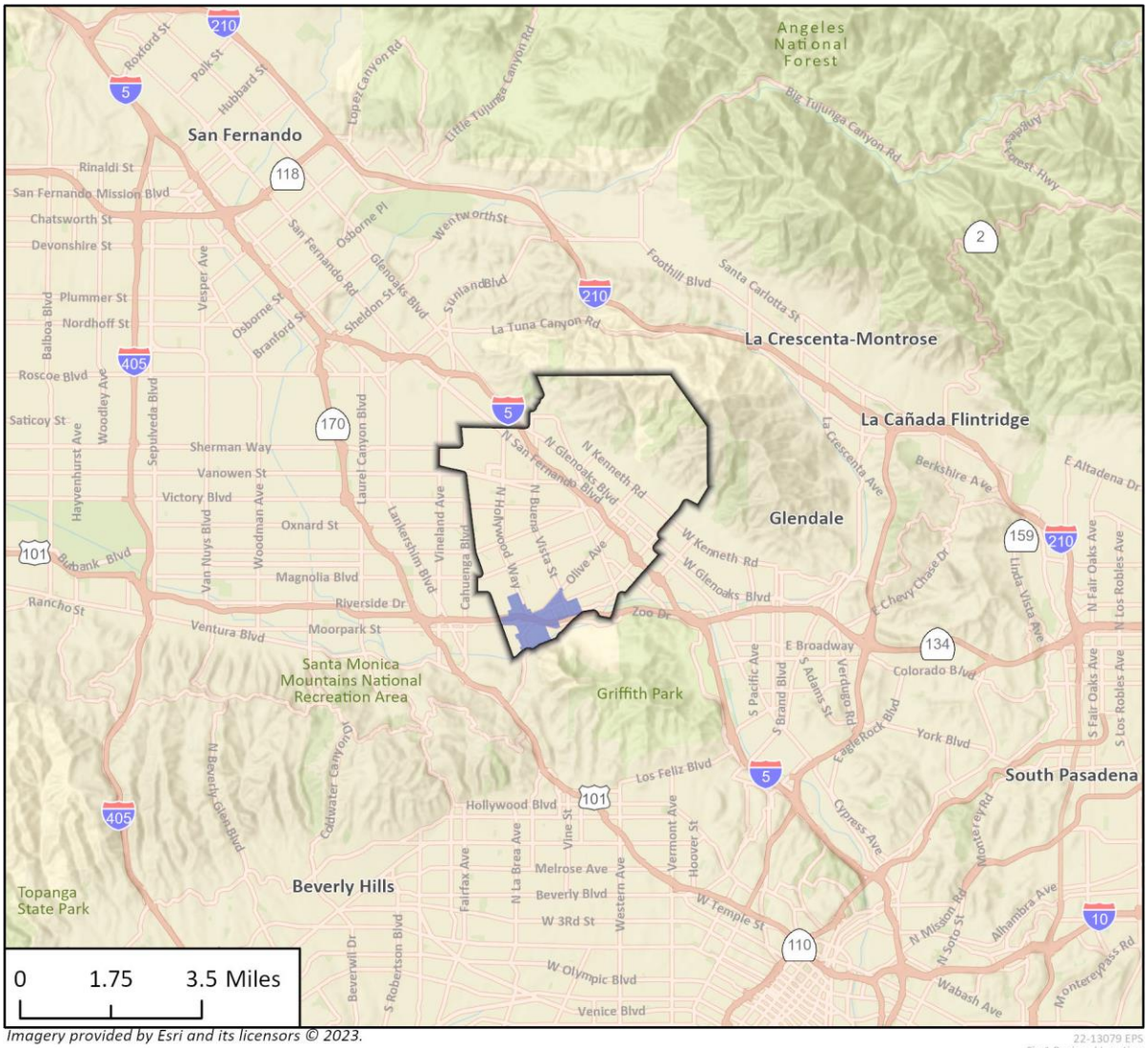
2.2.1 Current Land Use Designation and Zoning

The 1991 Specific Plan Chapter 2 (Land Use Plan) describes the three land use areas of the District: Industrial, Multi-family, and Commercial. The 1991 Specific Plan also created zones that correspond to these land uses, including Media District Industrial Zone (MDM-1), Media District Limited Commercial (MDC-2), Media District General Business (MDC-3), Media District Commercial/Media Production (MDC-4), Media District Medium Density Residential (MDR-3), and Media District High Density Residential (MDR-4)..

2.2.2 Surrounding Land Uses

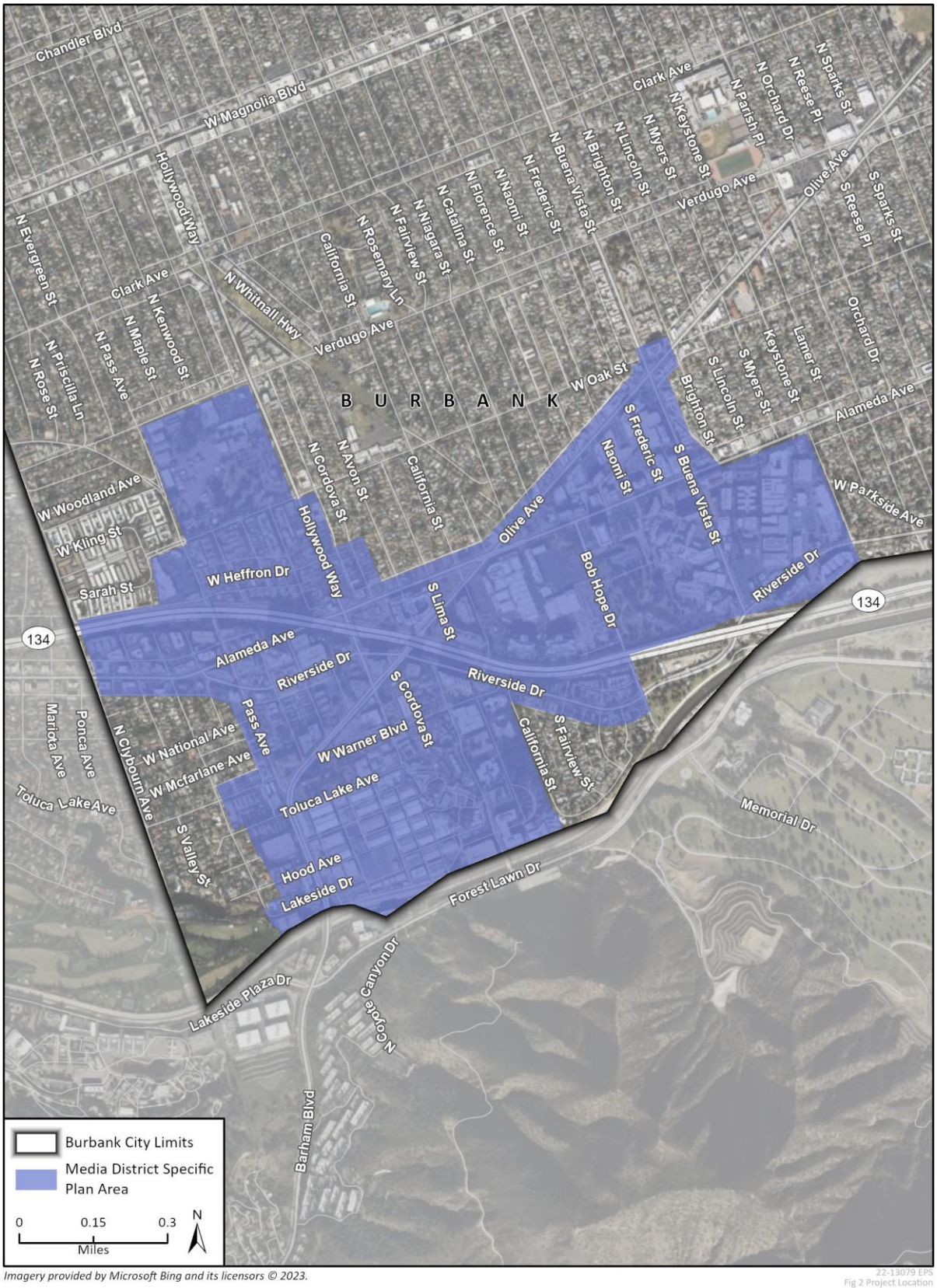
Other urbanized areas with a mix of land uses, including residential, commercial, industrial, community services, and open space, surround the Plan Area.

Figure 1 Regional Location



22-13079 EPS
Fig 1 Regional Location

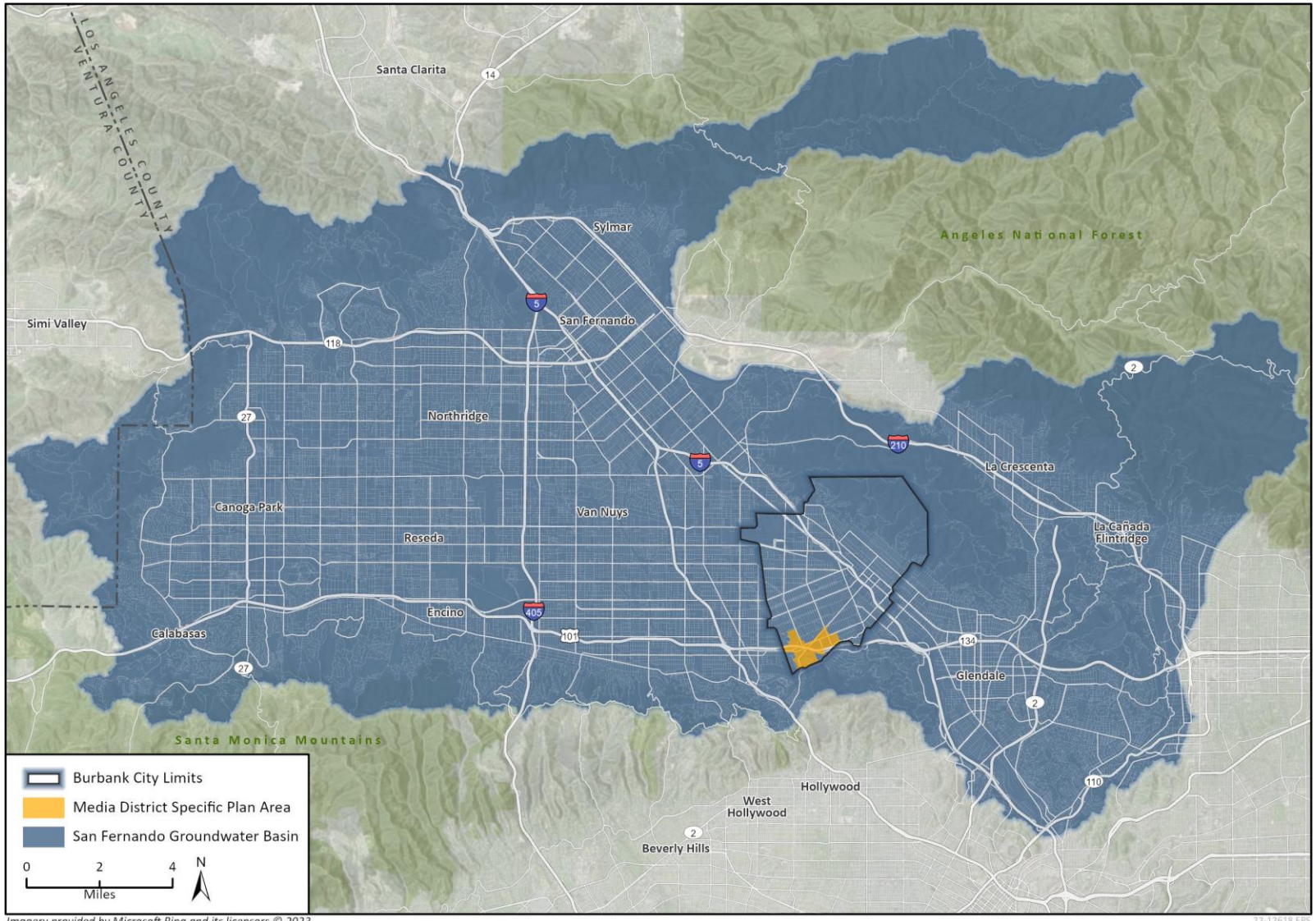
Figure 2 Proposed Specific Plan Area



Imagery provided by Microsoft Bing and its licensors © 2023.

22-13079 EPS
Fig 2 Project Location

Figure 3 San Fernando Valley Groundwater Basin



Imagery provided by Microsoft Bing and its licensors © 2023.
Groundwater Basin data provided by NHD, WBDHU10, 2023.

22-12618 EPS
Fig 3 Groundwater Basin

2.3 Proposed Project Characteristics

The proposed Project would implement revisions to development standards and policies in the 1991 Specific Plan Area. In doing so, the proposed Project would facilitate additional medium and high density residential, mixed-use residential with commercial developments, and hotel rooms in addition to what is already allowed under the current zoning and land use regulations provided by the 1991 Specific Plan.

Table 1, below, provides an overview of development that would be facilitated by the proposed Project, as well as development associated with the 1991 Specific Plan, which represents existing conditions, and total development potential under the proposed Project and the existing 1991 Specific Plan. The differentiation between development associated with the 1991 Specific Plan and the proposed Project is further discussed in Section 3.4, which addresses how the City's Urban Water Management Plan (UWMP) accounts for water demands within Burbank Water and Power (BWP)'s service area, including the Plan Area.

Table 1 Existing and Proposed Development Potential – Proposed Project

Land Use	Proposed Project	1991 Specific Plan (existing) [1]	Net (proposed + existing)
Multi-Family Residential	9,702 units	520 units	10,222 units
Mixed Use / Commercial	3,986,207 square feet	3,505 square feet	3,989,712 square feet
Hotel	400 rooms	200 rooms	600 rooms

1. The 1991 Specific Plan did not explicitly state the maximum amount of development that would occur in each land use category (City of Burbank 1991). The development quantified here for "1991 Specific Plan" reflects existing conditions.

The development numbers presented above for the proposed Project account for City-identified groupings of underutilized sites within the Plan Area as opportunities for infill and adaptive reuse; these are referred to as "opportunity sites" and would assist in meeting the City's goals for affordable and workforce housing, infill development, and economic development in proximity to existing employment centers and envisioned transit centers and corridors.

2.4 Increased Growth Alternative

In addition to the proposed Project, this WSA assesses the Increased Growth Alternative, which is an alternative growth scenario that would allow for greater density on certain opportunity sites. As with the proposed Project and existing conditions under the 1991 Specific Plan, all development associated with the Increased Growth Alternative would occur within the Plan Area.

Table 2, below, provides an overview of development facilitated by the Increased Growth Alternative, as well as development associated with the previously approved 1991 Specific Plan, and total development potential including the Increased Growth Alternative and the 1991 Specific Plan. As mentioned above for the proposed Project, the differentiation between existing (1991 Specific Plan) and potential (Increased Growth Alternative) conditions is further discussed below in Section 3.4, which addresses how water demands were accounted for in the City's UWMP.

Table 2 Existing and Alternative Development Potential - Increased Growth Alternative

Land Use	Increased Growth Alternative (proposed alt)	1991 Specific Plan (existing)	Net (proposed alt + existing)
Multi-Family Residential	13,821 units	520 units	14,341 units
Mixed Use / Commercial	7,116,274 square feet	3,505 square feet	7,119,779 square feet
Hotel	400 rooms	200 rooms	600 rooms

1. The 1991 Specific Plan did not explicitly state the maximum amount of development that would occur in each land use category (City of Burbank 1991). The development quantified here for "1991 Specific Plan" reflects existing conditions.

2.5 Water Demands

This section provides an overview of estimated water demands associated with the proposed Project (proposed Project) and the Increased Growth Alternative. **Error! Reference source not found.**, below, presents estimated water demands for proposed land uses associated with the proposed Project and the Increased Growth Alternative.

Table 3 Water Demands for Proposed Land Uses

Land Use	Demand Factor[1]	Buildout	Water Demand (GPD)	Water Demand (AFY)
Proposed Project				
Multi-Family Residential	0.20 AFY/unit	9,702 units	1,732,277	1,940
Mixed Use/Commercial	0.06 GPD/sf	3,986,207 sf	239,172	268
Hotel	133.63 GPD/room	400 rooms	53,452	60
		Total Water Demand:	**2,024,902 GPD**	**2,268 AFY**
Increased Growth Alternative				
Multi-Family Residential	0.20 AFY/unit	13,821 units	2,467,719	2,764
Mixed Use/Commercial	0.06 GPD/sf	7,116,274 sf	426,976	478
Hotel	133.63 GPD/room	400 rooms	53,344	60
		Total Water Demand:	**2,948,147 GPD**	**3,302 AFY**

AFY = acre-feet per year; GPD = gallons per day; sf = square feet

1. Water demand factors for Multi-Family Residential and Mixed Use/Commercial land uses are based upon Burbank's 2020 Urban Water Management Plan (BWP 2021) and the Environmental Impact Report for the City of Burbank's General Plan, *Burbank2035* (City of Burbank 2013). Water demand factors for Hotel land uses are based upon rates reported by Los Angeles Department of Water and Power (LADWP 2012).
2. Water demands were converted to AFY by multiplying GPD by 365 days per year and dividing by 325,851 gallons per acre-foot.

The table above shows that water demand associated with the proposed Project would be approximately 2,268 AFY, increasing to approximately 3,302 AFY for the Increased Growth Alternative.

In accordance with BWP policy, non-potable water needs would be met with recycled water as treated wastewater from the BWRP. All development within the MDSP would be designed as "recycled water ready" to connect to BWP's recycled water system once the distribution facilities are available. Where

applicable, existing non-potable water connections would be converted to recycled water when the recycled transmission main fronting the respective parcel is put in service (BWP 2021, pg. 32).

Cumulative Considerations

In addition to the proposed Project, the City is also considering approval of the proposed Downtown Burbank Transit Oriented Development (TOD) Specific Plan, and the Golden State Specific Plan (GSSP), both of which are being reviewed for SB 610 compliance in separate WSAs.

Table 4 below, provides an overview of cumulative water demands associated with development under the proposed Downtown Burbank TOD Specific Plan, GSSP, and proposed Project.

Table 4 Cumulative Water Demands of Specific Plan Proposals

Specific Plan	Proposed Project		Increased Growth Alternative	
	GPD	AFY	GPD	AFY
TOD SP	2,747,918	3,078	4,205,067	4,710
GSSP	2,794,284	3,130	3,251,368	3,642
Cumulative Projects Total	**5,542,202**	**6,208**	**7,456,436**	**8,352**
Proposed Project	2,024,902	2,268	2,948,147	3,302
Cumulative Scenario Total	**7,567,104**	**8,476**	**10,404,583**	**11,654**

TOD SP = Burbank Downtown Transit Oriented Development Specific Plan; GSSP = Golden State Specific Plan; Proposed Project = Media District Specific Plan Update; GPD = gallons per day; AFY = acre-feet per year

Table 4 shows that the projected water demands of the two other Specific Plans representing cumulative projects total 6,208 AFY for the preferred proposals and 8,352 AFY for the increased growth proposal. Including the proposed Project, the projected water demands for all three Specific Plans in the cumulative scenario, including the proposed Project, total approximately 8,476 AFY for the preferred proposals and 11,654 AFY for the increased growth proposals.

3 Senate Bill 610 Applicability

Pursuant to SB 610, this regulatory setting is specific to the assessment of water supply availability. SB 610 was passed by the California Senate on January 1, 2002, amending CWC to require detailed analysis of water supply availability for certain types of development projects. The purpose of SB 610 is to improve the linkage between water and land use planning by ensuring greater communication between water providers and local planning agencies and ensuring that land use decisions for certain large development projects are fully informed as to whether sufficient water supplies are available to meet project demands.

SB 610 requires the preparation of a WSA for a project that is subject to CEQA and that meets certain requirements, each of which is discussed in detail in this chapter.

CWC, as amended by SB 610, requires a WSA to address the following questions:

- Is there a public water system that will service the proposed project? (see Section 3.3)
- Is there a current Urban Water Management Plan (UWMP) that accounts for the project demand? (see Section 3.4)
- Is groundwater a component of the supplies for the project? (see Section 3.5)
- Are there sufficient supplies to serve the project over the next twenty years? (see Section 3.6)

The primary question to be answered in a WSA is:

> *Will the total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection meet the projected water demand of the proposed project, in addition to existing and planned future uses of the identified water supplies, including agricultural and manufacturing uses?*

Water requirements associated with the proposed Project are described in Section 0. The SB 610 WSA questions as they relate to the proposed Project are addressed below.

3.1 Is the proposed Project Subject to CEQA?

CWC Section 10910(a) states that any city or county that determines a project (as defined in Section 10912) is subject to CEQA shall comply with CWC Section 10910. The proposed Project requires multiple discretionary approvals from the Burbank City Council including approval of the proposed Project and certification of a Program Environmental Impact Report (EIR). Therefore, the proposed Project is subject to CEQA.

3.2 Is the proposed Project a "Project" Under SB 610?

CWC Section 10912(a) states that any proposed action, which meets the definition of "project" under SB 610 is required to prepare a WSA to demonstrate whether sufficient water supplies are available to meet requirements of the proposed Project under normal and drought conditions. SB 610 defines a "project" as any one of five different development types. The proposed Project meets four of the five criteria discussed below.

Residential Development

A proposed residential development of more than 500 dwelling units is defined as a "project" under SB 610. Full buildout of the proposed Project would exceed this development threshold; therefore, the proposed Project is an SB 610 "project."

Shopping Center or Business Establishment

A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space is defined as a "project" under SB 610. Full buildout of the proposed Project would exceed this development threshold; therefore, the proposed Project is an SB 610 "project."

Commercial Office Building

A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of space for commercial office uses is defined as a "project" under SB 610. Full buildout of the proposed Project would exceed this development threshold; therefore, the proposed Project is an SB 610 "project."

Hotel or Motel

A proposed hotel or motel, or both, having more than 500 rooms is defined as a "project" under SB 610. The proposed Project includes approximately 400 hotel "rooms".

Therefore, the proposed Project would not meet or exceed the criteria set forth in CWC Section 10912(a) which define an SB 610 "project."

Industrial, Manufacturing, or Processing Plant or Industrial Park

A proposed industrial, manufacturing or processing plant, or industrial park 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 is defined as a "project" under SB 610. The proposed Project does not include industrial, manufacturing, or processing plant or industrial park uses.

As discussed above, the proposed Project would accommodate development that meets or exceeds the criteria set forth in CWC Section 10912(a) which define an SB 610 "project."

3.3 Is There a Public Water System that Will Serve the proposed Project?

CWC Section 10912(c) defines a "public water system" as a system that has 3,000 or more service connections and provides piped water to the public for human consumption. The City of Burbank is served by BWP, which has more than 3,000 connections, and is therefore a public water system. The Plan Area lies within the City of Burbank and receives its water entirely from BWP.

Because water for the Plan Area would be provided through a public water system, it is the responsibility of BWP as the public water system owner and operator to confirm water supply sufficiency for the Plan Area. This WSA is being prepared on behalf of BWP as the public water supplier and will be attached to the Program EIR for the proposed Project, for consideration during the CEQA Lead Agency's consideration of project approval.

3.4 Is There a Current UWMP that Accounts for the Project Demand?

Yes, there is a current UWMP that accounts for the proposed Project's demand.

UWMPs are prepared by California's urban water suppliers to support long-term resource planning and ensure adequate water supplies. Every urban water supplier, either publicly or privately owned, that either delivers more than 3,000 AFY of water annually or serves more than 3,000 connections is required to prepare a UWMP. UWMPs serve as long-range water planning documents that assess, among other metrics, the reliability of the supplier's water sources over a 20-year period under normal-, single-dry, and multiple-dry year scenarios. These are the same requirements of a WSA, as specified by SB 610. UWMPs must be updated and submitted to DWR every five years for review and approval.

The Plan Area is located within the service territory of BWP. Water demands associated with development within BWP's service territory are accounted for in its 2020 UWMP (BWP 2021), which will be updated in accordance with the California Department of Water Resources (DWR) 2025 UWMP Guidebook (not yet released) and submitted to DWR for review by July 1, 2026. The 2025 UWMP is not yet available at the time of preparation of this WSA, which is therefore informed by BWP's 2020 UWMP.

UWMP projections of water supply availability and reliability rely upon land use and population projections provided in applicable General Plans. The City of Burbank's General Plan, *Burbank2035*, was adopted in February 2013, and the 2021-2029 Housing Element Update for *Burbank2035* was adopted in September 2022 (City of Burbank 2022). The Housing Element was in the process of being updated at the time of preparation of the 2020 UWMP; therefore, preparers of the 2020 UWMP (BWP staff) and the Housing Element Update (City of Burbank Community Development Department staff) coordinated to inform the 2020 UWMP with information related to expected changes to housing growth (BWP 2021, pg. 5). The 2020 UWMP assumed that the Housing Element Update would provide for 12,000 new residential units through 2035 (BWP 2021, pg. 5). This was consistent with the Housing Element Update as adopted in 2022, which stated that the Housing Element would lay the foundation for achievement of the City's goal to facilitate the development of 12,000 new housing units through 2035 (City of Burbank 2022, pg. 1-4).

Proposed Project Demand

Development associated with the 1991 Specific Plan represented existing conditions at the time of preparation of the 2020 UWMP. The proposed Project, which would update the 1991 Specific Plan as assessed herein, had not yet been developed at the time of preparation of the 2020 UWMP or the 2022 Housing Element Update; therefore, water demands associated with development under the proposed Project were not explicitly identified in the 2020 UWMP. However, the City was aware that the 1991 Specific Plan would be updated and would accommodate SCAG growth projections, and the 2020 UWMP included separate categories of water demand projections for SCAG growth and for Housing Element goals. As discussed following Table 5, below, the proposed Project is considered accounted for in the development projections associated with the SCAG 2020-2045 RTP/SCS forecast, including for residential and non-residential uses, while cumulative projects defined by the proposed Downtown Burbank TOD Specific Plan and the proposed GSSP are considered accounted for in the 2022 Housing Element Update. The 2022 Housing Element Update also acknowledged that the City

would pursue funding through SCAG's Sustainably Communities Program to update the 1991 Specific Plan (with the now-proposed Project) (City of Burbank 2022, pg. 1-50).

Table 5 provides an overview of housing and employment projections from the City's 2020 UWMP, which were used to inform water demand and supply availability projections presented in Section 5, *Water Supply Availability*.

Table 5 Housing and Employment Growth Projections

	2025	2030	2035	2040	2045
SCAG Housing Projections					
Single Family Housing Units	21,490	21,697	21,678	21,822	21,842
Multi-Family Housing Units	22,554	23,552	24,723	25,678	26,830
Housing Element Goals					
New Housing Units	4,000	10,088	12,000	12,000	12,000
Total Housing Units	48,044	55,337	58,401	59,500	60,672
SCAG Employment Projections	122,652	128,544	134,669	137,027	138,614

Source: BWP 2021, pg. 6

Table 1, *Existing and Proposed Development Potential – Proposed Project*, shows that the proposed Project would facilitate the introduction of up to 9,702 new multi-family residential units; as shown in Table 5, above, the 2020 UWMP forecasted a total housing supply in Burbank of 58,401 units by the proposed Project's horizon year of 2035. The addition of 9,702 new housing units under the proposed Project would increase the City's total housing units from 46,457 units in 2024 to 56,159 units in 2035 (California Department of Finance [DOF] 2024). Therefore, the City's forecasted 56,159 housing units in 2035 under the proposed Project would be within the UWMP's forecasted 58,401 units in Burbank in 2035. Development associated with the proposed Project can be accommodated within the SCAG growth projections used for the Plan Area. As such, the 2020 UWMP accounts for water demands associated with future development under the proposed Project in its analysis of SCAG projections.

The proposed Project would also facilitate the introduction of approximately 3,986,207 new square feet of Mixed Use / Commercial space and 400 hotel rooms (see Table 1), and would increase the number of jobs in the project area by approximately 0.7 percent (932 jobs) above the SCAG 2020-2045 RTP/SCS forecast of 134,669 jobs by 2035 (Table 5). With the proposed Project's expanded commercial uses, full buildout would generate up to 135,601 jobs in 2035 (DOF 2024). As presented above for Table 3, the water demand factors used to estimate water use rates for Burbank's 2020 UWMP are based upon land use area, with a demand factor of 0.06 gallons per day (GPD) per square foot of Mixed Use/Commercial development, and 133.63 GPD per unit of Hotel development (LADWP 2012). These estimates account for all activities associated with the respective land uses, thereby indirectly accounting for the jobs that would be filled to accommodate the area of each land use. Therefore, water demands associated with additional jobs under the proposed Project are accounted for in projections of water demands associated with Mixed Use/Commercial and Hotel land uses discussed in Section 2.5, *Water Demands.* While development under the proposed Project would exceed the SCAG 2020-2045 RTP/SCS forecast for number of jobs, the proposed Project would remain consistent with the RTP/SCS strategies to provide transit-oriented development, infill development, and reduced vehicle miles traveled. The water demand projections in the City's 2020 UWMP account

for future water demands associated with both residential and non-residential land uses facilitated by the proposed Project.

In addition, as presented in Section 2.5, *Water Demands*, under "Cumulative Considerations," this WSA considers the water demands associated with development facilitated by two other Specific Plan proposals, including the proposed Downtown Burbank TOD Specific Plan and the proposed GSSP. Both proposed Specific Plans were included in the Housing Element Update, which stated that the City's goal of 12,000 new housing units, as shown in Table 5, would be met through future development within the proposed TOD Specific Plan and the proposed GSSP areas (City of Burbank 2022, pg. 1-4). As noted above, BWP staff and City staff coordinated to inform the 2020 UWMP with growth projections from the 2022 Housing Element Update, which are separate and in addition to the SCAG Housing projections shown in Table 5. Therefore, the 2020 UWMP accounts for water demands associated with growth resulting from buildout of cumulative projects consisting of the TOD Specific Plan and the proposed GSSP in its analysis of the City's Housing Element goals.

Water demands associated with development under the proposed Project and both other Specific Plans in the cumulative scenario are accounted for in the City's 2020 UWMP. See Section 5.1, *BWP Water Supply Projections*, for water supply availability and reliability projections.

Increased Growth Alternative Demand

Table 2, *Existing and Proposed Development Potential – Increased Growth Alternative*, shows that the Increased Growth Alternative would facilitate the introduction of up to 14,341 residential units; as shown in Table 5, above, the 2020 UWMP forecasted a total housing supply in Burbank of 58,401 units by the Increased Growth Alternative's horizon year of 2035. The addition of 14,341 new housing units under the proposed Project would increase the City's total housing units from 46,457 units in 2024 to 60,798 units in 2035 (DOF 2024). Therefore, the City's forecasted 60,798 housing units in 2035 under the Increased Growth Alternative would exceed the UWMP's forecasted 58,401 units in Burbank in 2035. Development associated with the Increased Growth Alternative would not be accommodated within the SCAG growth projections used for the Plan Area. As such, the 2020 UWMP does not account for water demands associated with future development under the Increased Growth Alternative in its analysis of SCAG projections.

The Increased Growth Alternative would also facilitate the introduction of approximately 7,119,779 new square feet of Mixed Use / Commercial space and 600 hotel rooms (see Table 1), and would increase the number of jobs in the project area by approximately 5.5 percent (7,350 jobs) above the SCAG 2020-2045 RTP/SCS forecast of 134,669 jobs by 2035 (Table 5). With the Increased Growth Alternative's expanded commercial uses, full buildout would generate up to 14,219 jobs in 2035 (DOF 2024). Therefore, the water demand projections in the City's 2020 UWMP do not account for future water demands associated with non-residential land uses facilitated by the Increased Growth Alternative.

3.5 Is Groundwater a Component of the Supplies for the Project?

Yes, groundwater is a component of water supply for the proposed Project. All water supply service in the Plan Area is provided by BWP, which delivers local groundwater, imported surface water, and recycled water. The groundwater basin contributing water supply to the BWP is the San Fernando Valley Groundwater Basin (SFVGB). As shown previously in Figure 3, the Plan Area lies completely

within SFVGB. The SFVGB has been adjudicated since 1979; please see Section 4.1.1, *Local Groundwater*, for discussion of the SFVGB 's Court-ordered Adjudication Judgement and Watermaster, which administers the Adjudication Judgment.

Water used from the SFVGB is subject to compliance with the Adjudication Judgement as administered by a Court-appointed Watermaster (see Section 4.1.1). An Adjudication Judgment accomplishes the same purpose of a WSA, which is to consider water supply conditions when making land use decisions, to avoid approving projects that would lead to unsustainable groundwater conditions. Any use of SFVGB water would occur in compliance with the Adjudication Judgment and overall sustainability of the SFVGB.

3.6 Are There Sufficient Supplies to Serve the Project Over the Next Twenty Years?

The sufficiency of water supplies to support the growth facilitated by the proposed Project is assessed in Sections 4 and 5, and conclusions are provided in Section 6.

4 Water Supply Overview

SB 610 requires a WSA to characterize water supply availability over a 20-year projection. BWP relies on local groundwater, imported surface water, and recycled water to meet the needs of the City's residents. As discussed in Section 3.4, the water supply availability projections used to inform this WSA are drawn from BWP's 2020 UWMP, which is informed by the City's General Plan and 2022 Housing Element Update and covers the 2020-2045 planning period. The UWMP will be updated in 2025 as required by the Urban Water Management Planning Act and will account for the water demands of development projects approved since adoption of the 2020 UWMP.

The City of Burbank relies on three water supply sources to meet its demands: local groundwater, imported surface water purchased from Metropolitan Water District of Southern California (Metropolitan), and recycled water. In 2020, the BWP provided a total of 19,463 AF of water, consisting of 9,997 AF of groundwater, 3,149 AF of recycled water, 6,165 AF of imported potable water from Metropolitan, and 152 AF of imported raw (untreated) water from Metropolitan for groundwater replenishment (BWP 2021).

To maximize the use of treated wastewater for non-potable uses, as a matter of policy, all new developments must be designed as "recycled water ready" to connect to BWP's recycled water system once the distribution facilities are available, if not already present. BWP also requires conversion to recycled water when the recycled transmission main fronting the parcel is put in service (BWP 2021, pg. 32).

4.1 Local Groundwater

The SFVGB is the primary source of groundwater for the City, comprising approximately 51.4 percent of the City's total deliveries in 2020, and is part of the Upper Los Angeles River Area (ULARA). DWR's *California Groundwater (Bulletin 118)* defines the boundaries of the SFVGB, which is comprised of several subbasins including the Sylmar, Verdugo, and Eagle Rock subbasins. Burbank lies near the middle of the SFVGB, as shown on Figure 3. The SFVGB is bounded on the north and northwest by the Santa Susana Mountains, the north and northeast by the San Gabriel Mountains, the east by the San Rafael Hills, the south by the Santa Monica Mountains and Chalk Hills, and the west by the Simi Hills. The valley of the SFVGB is drained by the Los Angeles River and its tributaries (DWR 2004). Precipitation in the SFVGB ranges from 15 to 23 inches per year, and averages 17 inches per year. Groundwater levels have remained stable since the basin's 1979 adjudication, discussed below (DWR 2004).

Adjudication Judgement

The Court-appointed Watermaster responsible for administration of the Adjudication Judgement is the ULARA Watermaster. Under the 1979 Adjudication Judgment, the City of Los Angeles holds all rights to the groundwater in the SFVGB except in the Sylmar and Verdugo subbasins. The City of Burbank (BWP) is not party to the Adjudication Judgment, meaning it does not hold water rights for use of water from the adjudicated SFVGB; however, Burbank is one of five public agencies comprising the ULARA Watermaster Administrative Committee, in addition to the City of Glendale, City of Los Angeles, City of San Fernando, and Crescenta Valley Water District.

Rights to Physical Solution Water were determined based upon investment in groundwater infrastructure made by the City of Burbank and other entities prior to the Adjudication Judgement. Physical Solution Water rights define a quantity of "credits" that may be purchased from the City of Los Angeles at the discretion of the purchasing party on an annual basis. The City of Burbank is entitled to purchase 4,200 AFY of Physical Solution water from the SFVGB.

In addition to defining Physical Solution Water rights, the Adjudication Judgment also stipulates that BWP is entitled to an Import Return Credit (IRC) of 20 percent of all water consumed in Burbank, including recycled water. The IRC was developed to address the infiltration of water imported by BWP from outside the ULARA (Adjudication Area) that percolates into the SFVGB to become part of the groundwater supply; i.e., BWP's use of imported water within the Adjudication Area contributes recharge to the SFVGB, which is effectively returned to BWP through the IRC. (BWP 2021)

Groundwater Replenishment

Separate from the IRC, BWP is also entitled to import surface water for the explicit purpose of conducting groundwater recharge within the ULARA, which is accomplished by applying the imported water to spreading grounds for infiltration. This creates additional groundwater supply and retaining the right to pump and consume that water. In 2010, BWP completed a Metropolitan connection to deliver untreated imported water to existing spreading grounds (Pacoima and Lopez) in the north San Fernando Valley. Between 2018 and 2020, BWP purchased and spread 18,751 AF to those spreading grounds using the B-6 connection. Additional improvements to the spreading grounds were constructed by Los Angeles County in 2020, which limited the amount of replenishment conducted by BWP to 152 AF; however, BWP anticipates increasing groundwater replenishment to 6,800 AF by 2025. BWP is entitled to accumulate or store groundwater credits that are unused in the year they are earned or created. (BWP 2021, pg. 16)

To maintain and optimize groundwater pumping, BWP needs to acquire about 7,000 AFY of groundwater through replenishment or a combination of replenishment and purchases of Physical Solution Water (up to the Adjudication Judgment limit of 4,200 AFY). The City plans to maintain a reserve of 10,000 AF in groundwater credits earned through replenishment of surplus surface water. This would allow BWP to continue normal rates of groundwater extractions for about three years without replenishment, assuming the purchase of 4,200 AFY of Physical Solution Water from LADWP. After three years without contributing to groundwater replenishment, assuming the groundwater basin still held sufficient water to accommodate additional purchases, BWP would have to negotiate the purchase of additional groundwater from LADWP. (BWP 2021, pg. 35)

The City's ability to accumulate and maintain groundwater credits is limited by the availability of surplus imported water, as extended drought periods reduce or eliminate the amount of surplus supply available from Metropolitan. In addition, increased evaporation rates during extended drought reduce the amount of water applied to spreading grounds that effectively replenishes the groundwater basin.

Groundwater Quality and Treatment

The City of Los Angeles, or Los Angeles Department of Water and Power (LADWP), holds all rights to the SFVGB water; however, LADWP has been unable to fully produce its annual entitlement due to groundwater contamination. In the 1980s, the SFVGB was found to be heavily contaminated with Volatile Organic Compounds (VOCs) from multiple sources, including industrial sources such as Lockheed-Martin's historical manufacturing presence in Los Angeles. Multiple areas in the SFVGB were designated as Superfund sites, and cleanup was conducted with the assistance of the U.S.

Environmental Protection Agency (USEPA). Primary pollutants of concern include trichloroethylene (TCE) and perchloroethylene (PCE). In the 1990s, further contaminants were discovered including nitrates and chromium, leading to the aquifer's classification in 1997 as an "Extremely Impaired Source." (BWP 2021)

The Burbank Operable Unit (BOU) is a USEPA-led project designed to clean up the groundwater contaminated by historical industrial releases, primarily by Lockheed-Martin. The BOU came online in 1996, consisting of a system of eight extraction wells to remove contaminated groundwater from the SFVGB, and the Valley Treatment Plant, a new water quality treatment facility equipped with Best Available Technology (Air Stripping Towers and Granular Activated Carbon Filters) to remove and stabilize VOC plumes. The BOU wells and Valley Treatment Plant were operated by Lockheed-Martin until 2001, when the City of Burbank assumed operation of all BOU facilities. The BOU's Valley Pumping Plant design capacity is 9,000 gallons per minute (GPM). If the BOU were to operate at 85 percent of its 9,000-GPM design capacity, annual production of treated groundwater would be approximately 12,336 AFY. (BWP 2021, pg. 18)

In a 2015 technical memorandum to the USEPA, Lockheed Martin used groundwater modeling and empirical data to demonstrate that hydraulic containment (of contaminated groundwater) can be maintained at the reduced treatment rates correlated with BWP demands. This memorandum reported that BWP's demand for BOU water averaged approximately 6,000 GPM between 1996 and 2014, equating to approximately 9,685 AFY, or approximately 67 percent of the BOU's design capacity for up to 9,000 GPM (12,336 AFY). In a 2016 letter responding to Lockheed Martin's request to reduce the BOU production rate to match BWP's demand, the USEPA countered that the average sustained extraction rate be increased to 9,000 GPM, matching the BOU's design capacity. (USEPA 2017)

The USEPA's recommendation for a minimum production rate of 9,000 GPM referenced a planned interconnection pipeline between BWP and the LADWP that would allow the transfer of some water produced in excess of current BWP demands to the LADWP via the interconnection (USEPA 2017). LADWP and BWP have established the Los Angeles-Burbank Interim Connection, which connects the BWP and LADWP systems, allowing BWP to transfer up to 3,200 GPM of potable water into LADWP's system, in exchange for increased credits for SFVGB water from LADWP to BWP (LADWP 2020). The interim Connection is mutually beneficial by maximizing the removal of contaminants from the SFVGB underlying the City of Burbank, while maximizing the beneficial use of water treated as a requirement of the BOU (LADWP 2020).

Between 2015 and 2019, production of treated blended water from the BOU was only 9,900 acre-feet total, or approximately 1,980 AFY over five years, assuming consistent rate of production across all years (BWP 2021, pg. 18). This rate represents approximately 13.63 percent of the BOU's total capacity for production, resulting from the demands of regular maintenance and regulated blending requirements (to reduce nitrate and chromium concentrations) as well as lower system demand to accept the BOU's blended water. To meet the minimum flows required for treatment during low-demand periods, BWP re-circulates treated groundwater through the Valley Pumping Plant to reach the USEPA-required minimum flow rate of 9,000 GPM and sends the balance of treated water to LADWP. BWP and LADWP have a transfer agreement which stipulates LADWP will directly reimburse Metropolitan for the water used to blend and will reimburse BWP the costs related to operation and maintenance of the distribution and treatment systems. (BWP 2021, pg. 19-20)

4.2 Recycled Water

Recycled water is produced at the Burbank Water Reclamation Plant (BWRP), which was constructed in 1966 and has been upgraded four times, operated by the Burbank Public Works Department. Recycled water from the BWRP is used in one of three general categories within the City: power production, landscape irrigation, and evaporative cooling. Burbank's recycled water is approved for all uses including full body contact, except human consumption (BWP 2021, pg. 28).

In accordance with guidelines established by the California Department of Public Health and the Los Angeles Regional Water Quality Control Board (RWQCB), the BWRP conducts tertiary-level treatment of effluent to reach water quality standards sufficient for discharge into the Los Angeles River. The BWRP is permitted by the Los Angeles RWQCB to discharge to the Los Angeles River pursuant to Order No. R4-2012-0059, and discharges at a single point (Discharge Point 002) into the concrete-lined Burbank Western Channel, over two miles from its confluence with the Los Angeles River. (SWRCB 2017)

During normal operation in 2015-2016, approximately 25 percent of BWRP's tertiary-treated water was put to beneficial uses (2,705 AF), consisting of landscape irrigation and industrial uses, while the remainder (5,376 AF) was discharged into the Burbank Western Channel (SWRCB 2017). In 2020, approximately 3,105 AF of tertiary-treated water was recycled for beneficial uses, representing approximately 45 percent of the total amount of wastewater treated (6,940 AF), with approximately 3,790 AF of treated wastewater discharged to the Los Angeles River (BWP 2021, pg. 28). Although the 2020 beneficial use rate increased compared to 2015-2016, up to 10,000 AFY of recycled water is available for reuse, and additional recycled water customers are therefore necessary to maximize beneficial use of recycled water (BWP 2021, pg. 28).

To increase its use of recycled water, in 2017 Burbank proposed to gradually increase its use of recycled water and reduce its discharge of treated wastewater into the Burbank Western Channel over ten years from 5,376 AF to approximately 3,766 AF (SWRCB 2017). To accommodate this increased recycled water use, Burbank requested from the SWRCB a change in Place of Use from its 1993 Place of Use to an expanded Place of Use that includes the entire City of Burbank as well as portions of the City of Los Angeles. The SWRCB approved BWP's request to change the place of use of treated wastewater in 2018, authorizing a reduction in the quantity of treated wastewater discharged to the Burbank Western Channel by a maximum monthly rate of up to 2.97 MGD, for a total annual reduction of 1,610 AFY (SWRCB 2018).

Based on known and potential recycled water users, recycled water demand is projected to increase by approximately 200 AFY within the BWP service area (BWP 2021, pg. ES-3). BWP will also continue to identify potential sites for non-potable use, as well as other potential uses such as groundwater recharge or direct potable use. Potential areas for expansion of the existing recycled water have been identified as use in heating, ventilation, and air conditioning (HVAC) cooling towers, as well as for vehicle washing, decorative fountains, dust control, street sweeping, and sewer cleaning.

Up to 200 AFY of potential new usage has been identified. It is the parcel owner's responsibility to perform all onsite retrofits necessary to use recycled water on the property, and BWP completes all work up to the meter at no charge to the property owner. As a policy, BWP requires that all new developments are designed as "recycled water ready" to connect to BWP's recycled water system once the distribution facilities are available. BWP also requires conversion to recycled water when the recycled transmission main fronting requires conversion to recycled water when the recycled

transmission main fronting the parcel is put in service; this policy has been critical in facilitating recycled water conversions (BWP 2021, pg. 32).

4.3 Imported Surface Water

BWP purchases imported surface water from Metropolitan, which provides a blend of water from the State Water Project (SWP) and the Colorado River, to supplement its local groundwater and recycled water supplies (BWP 2021). BWP historically was much more reliant on Metropolitan water due to contamination of the local groundwater, but that reliance has reduced steadily since treatment began for the contaminated aquifers. In 2020, BWP purchased 6,317 AF of imported water from Metropolitan, accounting for approximately 32.4 percent of the City's total water supply. As discussed in Section 4.1, *Local Groundwater*, under "Groundwater Replenishment," imported water from Metropolitan includes untreated water that is used to accumulate groundwater credits through replenishment conducted via spreading. In 2020, the amount of water contributed to groundwater credits was low (152 AF) due to planned improvements to the spreading facilities that inhibited their use for replenishment; this amount is anticipated to increase to 6,800 AF by 2025. BWP expects to be purchasing 18,110 AFY from Metropolitan by 2045, including 6,800 AFY for groundwater replenishment (BWP 2021).

BWP receives water from Metropolitan through five connections to the Metropolitan distribution system. Currently these connections are incapable of receiving the maximum water flow deliverable by Metropolitan. BWP receives untreated water through a sixth connection which delivers water directly to the spreading grounds for groundwater replenishment. Metropolitan's imported water sources are discussed below.

4.3.1 State Water Project

DWR operates and maintains the SWP, which imports water supplies from the Feather River watershed in Northern California through the San Francisco-Sacramento-San Joaquin Bay Delta to Southern California via the California Aqueduct. The amount of flow entering the SWP system depends upon the volume of snowpack, which varies depending upon climatic variations and drought conditions. DWR holds long-term water supply contracts with each of the 29 agencies contracted to receive SWP water, referred to as "SWP Contractors," to provide annual delivery of SWP water in amounts up to each contractor's "Table A" allocation.

The SWP water supply contracts (which expire in 2035) set forth the maximum amount of SWP water a contractor may request annually (DWR 2023). Each year, SWP contractors submit to DWR a request for all or a portion of their Table A allocation (contractors typically request 100 percent of their allocation); DWR then determines the percentage of requested Table A amounts that may be delivered for the given year, depending upon variables including climatic and hydrologic conditions affecting the availability of surface water within the system. The original Table A allocations for all 29 SWP contractors is presented in Table 6, below.

Table 6 Maximum Table A Allocation per SWP Contractor

Region	SWP Contractor	Table A Maximum (AFY)
Feather River	County of Butte	2,700
	Plumas County FC&WCD[1]	2,700
	City of Yuba City	9,600
North Bay	Napa County FC&WCD	29,025
	Solano County Water Agency	47,756
South Bay	Alameda County FC&WCD, Zone 7	80,619
	Alameda County Water District	42,000
	Santa Clara Valley Water District	100,000
San Joaquin Valley	Oak Flat Water District	5,700
	County of Kings	9,305
	Dudley Ridge Water District	41,350
	Empire West Side Irrigation District	3,000
	Kern County Water District	982,730
	Tulare Lake Basin Water Storage District	87,471
Central Coastal	San Luis Obispo County FC&WCD	25,000
	Santa Barbara County FC&WCD	45,486
Southern California[2] (including Los Angeles and Colorado River Regions)	Antelope Valley-East Kern Water Agency	144,844
	Santa Clarita Valley Water Agency	95,200
	Coachella Valley Water District	138,350
	Crestline-Lake Arrowhead Water Agency	5,800
	Desert Water Agency	55,750
	Littlerock Creek Irrigation District	2,300
	Metropolitan Water District of Southern California[3]	**1,911,500**
	Mojave Water Agency	89,800
	Palmdale Water District	21,300
	San Bernardino Valley Municipal Water District	102,600
	San Gabriel Valley Municipal Water District	28,800
	San Gorgonio Pass Water Agency	17,300
	Ventura County Watershed Protection District	20,000
TOTAL		4,147,986

a. FC&WCD = Flood Control and Water Conservation District

b. Southern California Region includes the Los Angeles Basin and Colorado River Basin

c. Metropolitan's member agencies receive SWP from Metropolitan's total Table A allocation; member agencies do not have separate SWP allocations.

Source: DWR 2023

As shown Table 6, Metropolitan's original SWP allocation was 1.911 million acre-feet per year (MAFY). However, variations in hydrology from year to year, increasing environmental standards that limit pumping operations, and lawsuits have resulted in reduced water quantities delivered from the SWP to Metropolitan. Furthermore, the ultimate source of these waters is snowpack that is expected to continue to decrease due to the effects of climate change. SWP Contractors regularly adjust local operations in response to anticipated delivery amounts, which are shared by DWR with SWP Contractors throughout the year.

Since 1996, DWR has issued a Notice to Contractors (NTC) to all SWP Contractors at least once per year, and more frequently depending upon real-time water availability issues, to announce availability of SWP water as a percentage of the original Table A allocations. Records of historic SWP allocations

for water years 1996 through 2023 indicate that SWP deliveries have ranged from zero to 100 percent of each SWP contractor's Table A amounts depending on the water year (DWR 2023). Water year 2023 was particularly wet, with large storm events and high volumes of runoff, allowing many reservoirs to recover from depressed storage levels; in April 2023, DWR announced that SWP deliveries would increase to 100 percent of all SWP Contractors' Table A amounts (DWR 2023b).

4.3.2 Colorado River

U.S. Bureau of Reclamation (USBR) operates and maintains the Colorado River for water supply, diverting water in the form of snowmelt from headwaters in the Rocky Mountains in Colorado and Wyoming, along with portions of Utah, Nevada, New Mexico, and Arizona. USBR conveys Colorado River water to entitlement holders in the Upper Basin and Lower Basin of the Colorado River watershed and adjacent areas. Legal apportionments of Colorado River water were established by Congress in the Boulder Canyon Project Act (BCPA) of 1928 and are fulfilled by the Secretary's water delivery contracts under the BCPA. The Colorado River is operated under the "Law of the River," which refers to the suite of legal actions and agreements related to Colorado River water and its distribution across the Upper and Lower Basins.

The Colorado River enters California at Lake Havasu, formed by Parker Dam at the border of California and Arizona, and is conveyed to Southern California via Metropolitan's Colorado River Aqueduct for 242 miles to Lake Matthews near Riverside. Colorado River water is also conveyed from Imperial Diversion Dam just northeast of Yuma, Arizona to non-Metropolitan California users through the 80-mile All-American Canal and 124-mile Coachella Canal. The All-American Canal was authorized by the 1928 BCPA and was built in the 1930s; construction of the Coachella Canal also began in the 1930s but was delayed by World War II and was eventually completed in 1949.

The Lower Basin states, including California, have a total allocation of 7.5 MAFY, of which the State of California holds a 4.4 MAFY normal apportionment. As such, California holds rights to roughly 59 percent of the Lower Basin states' total apportionment of 7.5 MAFY. This distribution is due to California holding the oldest legal rights to the river through the "Seven-Party Agreement" outlined below. The Seven-Party Agreement of 1931 established the relative priority uses of new Colorado River water by seven California entities, including: Palo Verde Irrigation District (PVID), Imperial Irrigation District (IID), Coachella Valley Water District (CVWD), Metropolitan, City of Los Angeles, City of San Diego, and County of San Diego. The Seven-Party Agreement allowed the California DWR to divide its total allotment of 4.4 MAFY of Colorado River water among the seven parties to the Agreement (Metropolitan et al. 1931). Table 7 lists all Southern California entitlements to Colorado River water in order of priority ranking.

Table 7 Colorado River Water Entitlements in California

Contractor or Decree Name	Diversion (AFY)
Federal	
Chemehuevi Indian Reservation	11,340
Fort Yuma Indian Reservation	71,616
Colorado River Indian Reservation (Nov 22, 1873)	10,745
Colorado River Indian Reservation (Nov 16, 1874)	40,241
Colorado River Indian Reservation (May 15, 1876)	5,860
Fort Mojave Indian Reservation	16,720
Present Perfected Rights (PPRs)[a]	

Contractor or Decree Name	Diversion (AFY)
PPRs consist of 59 agencies and private entities listed in Article II(B)(3) of the 1964 Supreme Court Decree (*Arizona v. California*) that settled disputes raised in 1952 over claims to Colorado River water in the Lower Basin (USBR 2023). Under this decree, during any year when less than 7.5 MAF are available to fulfill the Lower Basin states' (California, Nevada, Arizona) total allocations, the Secretary of the Interior must provide supply to the PPRs in order of priority, regardless of state lines. The remaining amount of Lower Basin states' allocation is distributed to the Lower Basin states only after PPR water supplies are met. Finally, surplus water contracts are fulfilled only after the Lower Basin states' allocations are delivered.	3,824
Seven-Party Agreement[b]	
1. Palo Verde Irrigation District (104,500 acres)	3,850,000
2. Yuma Project (25,000 acres)	
3(a). IID and lands in Imperial and Coachella Valleys to be served by the AAC	
3(b). Palo Verde Irrigation District (16,000 acres of mesa lands)	
4. Metropolitan and/or City of Los Angeles and/or others on coastal plain	**550,000**
5(a). Metropolitan and/or City of Los Angeles and/or others on coastal plain	**550,000**
5(b). City and/or County of San Diego	112,000
6(a). IID and lands in Imperial and Coachella Valleys to be served by the AAC5	300,000
6(b). Palo Verde Irrigation District (16,000 acres of mesa lands)	
7. All remaining water available for use in California for agricultural uses	-
TOTAL acre-feet of the 1931 Seven Party Agreement (USBR 2021a)[c]	**5,362,000**
Surplus Water Contracts	
Bureau of Land Management (BLM)	1,000
BLM (in lieu of water pumped from Lower Colorado Water Supply Project [LCWSP] facilities or in the event the LCWSP is non-functional)	1,150
Coachella Valley Water District	100,000
Department of the Navy	25
Needles, City of	10,000
Metropolitan Water District of Southern California	**180,000**

Notes:

a. PCRs include the following 59 agencies and entities, listed in order of priority ranking: Yuma Associates Ltd. And Winterhaven Water District; Wavers; Stephenson (PPR No. 30); Campbell, Terry E. and Carol J.; Maureen E. and Robert M. Buncati; Bruncati Family Trust 12/19/02; Sunrise Management LLC; Gary J. George; Robert L. & Christine M.; Lake enterprises of California, LLC; Gowan, Sonny (Grannis); Morgan; Milpitas (PPR No. 34); Simons; Colorado River Sportsmen's League; Milpitas (PPR No. 37); Andrade (PPR No. 38); Reynolds; Cooper; Chagnon; Lawrence; Needles, City of (PPR No. 43); Needles, City of (PPR No. 44); Conger; G. Draper; McDonough; Faubion; Dudley; Douglas; Beauchamp; Clark; Lawrence; J. Graham; Geiger; Schneider; Martinez; Earle; Diehl; Reid; Graham; Cate; McGee; Stallard (PCR No. 64); Randolph; Stallard (PCR No. 66); Keefe; C. Ferguson; W. Ferguson; Vaulin; Salisbury; Hadlock; Streeter; J. Draper; Fitz; Williams; Estrada; Whittle; Corrington; Tolliver

b. The Seven-Party Agreement of 1931 (Metropolitan et al. 1931) details these original allocations of Colorado River water. California later reduced its use of Colorado River water to 4.4 MAFY under the 2003 Quantification Settlement Agreement (USDOI 2003), which set aside decades-old disputes and facilitated water transfers from farms to cities, funded linking the All-American and Coachella Canals, and led to new agricultural conservation in California and partnership with Metropolitan (Metropolitan 2023d).

c. During the term that the Colorado River Water Delivery Agreement (Federal Quantification Settlement Agreement) dated October 10, 2003, remains in effect, the delivery of Colorado River water will be in accordance with the terms as set forth in that agreement, including Exhibit B which identifies specific entitlements during the time the agreement is in effect (USDOI 2003).

Source: USBR 2021; USDOI 2003

As shown in Table 7, California's Colorado River water apportionment is 4.4 MAFY, of which Metropolitan holds a fourth-priority right to 550,000 AFY. Metropolitan also holds Surplus Water Contracts amounting to 180,000 AFY.

Similar to the effects of drought on SWP availability, surface water flows in the Colorado River and storage in key reservoirs are reduced in extended drought conditions. Since 2000, historically dry conditions have stressed Colorado River resources, increasing the risk of reaching critically low elevations at Lake Powell (Upper Basin) and Lake Mead (Lower Basin) (NIDIS 2023). In the early 2000s, California was required to reduce its use of the river when other Lower Basin states began drawing their full allocations; cooperation among urban and agricultural agencies and the State was facilitated through a program known as the 2003 Quantification Settlement Agreement (QSA) (PPIC 2018). QSA programs make water available for transfers by lining earthen canals and improving irrigation efficiency, along with some land fallowing. Under the QSA, the state of California also became responsible for funding and implementing projects to mitigate the ecological and public health impacts of a shrinking Salton Sea, which was affected by QSA programs that reduced irrigation runoff from Imperial Valley farms (PPIC 2018).

Responding to historic drought conditions between 2000 and 2007, the 2007 *Lower Basin Interim Guidelines* (Interim Guidelines), which are in place through 2025, direct the management of Lake Powell and Lake Mead under drought and low reservoir conditions (USBR 2007). Deliveries of Colorado River water to Southern California continue throughout implementation of the Interim Guidelines through senior water rights established in the 1931 Seven-Party Agreement. To reduce the risk of Lake Powell and Lake Mead declining to critically low levels, in December 2017, the Interior called on the Basin States to put drought contingency plans in place. In 2019, all seven Basin States (Wyoming, Colorado, Utah, New Mexico, Arizona, California, and Nevada) collectively submitted the *Colorado River Drought Contingency Plan* to Congress, and the Colorado River Drought Contingency Plan Authorization Act was signed into law (NIDIS 2023). Each year, Upper and Lower Basin states develop respective *Drought Response Operations Plans* for the respective year, designed to comply with applicable Records of Decision and Biological Opinions, as well as applicable laws, rules, and regulations (USBR 2023c).

5 Water Supply Availability

Water supply reliability in the context of fluctuating hydrological conditions is an important component of long-range planning. The 1979 Adjudication Judgment for the SFVGB provides supply reliability for the local groundwater basin, due to its purpose being to manage the basin sustainability in perpetuity. BWP also relies on imported surface water purchased from Metropolitan for its supply, which it stored in the SFVGB for later use or blended with treated groundwater and traded to LADWP for additional groundwater credits from the ULARA adjudication area, including the underlying SJVGB.

This section provides an overview of BWP's supply and demand projections (Section 5.1), as well as an overview of Metropolitan's core water supplies (Section 5.2), a discussion of supply reliability plans and policies (Section 5.3), and additional future water supply (Section 5.4).

5.1 BWP Water Supply Projections

As discussed in Section 3.4, , water demands associated with the proposed Project are accounted for in BWP's 2020 UWMP. The 2020 UWMP includes projected development forecasted by SCAG and the City's 2022 Housing Element Update, which together constitute water demands in excess of those associated with the proposed Project. Water demands associated with development under the proposed Downtown Burbank TOD Specific Plan and the proposed GSSP are also accounted for in BWP's 2020 UWMP, which includes these Specific Plans in its analysis of the City's Housing Element goals.

Table 8 through Table 14, below, provide an overview of BWP's anticipated water demands and supplies over the planning horizon in average, single dry, and multiple dry year conditions as reported in its 2020 UWMP.

Table 8 Normal Year Supply and Demand Comparison

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
Supply Total	18,062	20,380	21,386	21,712	22,010
Demand Total	18,062	20,380	21,386	21,712	22,010
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

Source: BWP 2021, pg. 37

Table 9 Single Dry Year Supply and Demand Comparison

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*7,334*	*9,640*	*10,628*	*10,925*	*11,222*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	17,989	20,298	21,300	21,625	21,922
Demand Total	17,989	20,298	21,300	21,625	21,922
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021, pg. 38

Table 10 Multiple Dry Year Supply and Demand Comparison – Year 1

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*7,559*	*10,072*	*11,021*	*11,411*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	18,214	20,730	21,693	22,111	22,406
Demand Total	18,214	20,730	21,693	22,111	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021, pg. 38, 39

Table 11 Multiple Dry Year Supply and Demand Comparison – Year 2

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*7,945*	*10,277*	*11,021*	*11,472*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	18,600	20,935	21,693	22,172	22,406
Demand Total	18,600	20,935	21,693	22,172	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021, pg. 38, 39

Table 12 Multiple Dry Year Supply and Demand Comparison – Year 3

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*8,331*	*10,481*	*11,021*	*11,532*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	18,986	21,139	21,693	22,232	22,406
Demand Total	18,986	21,139	21,693	22,232	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021, pg. 39, 40

Table 13 Multiple Dry Year Supply and Demand Comparison – Year 4

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*8,718*	*10,686*	*11,219*	*11,593*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	19,373	21,344	21,891	22,293	22,406
Demand Total	19,373	21,344	21,891	22,293	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021, pg. 39, 40

Table 14 Multiple Dry Year Supply and Demand Comparison – Year 5

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*9,104*	*10,891*	*11,286*	*11,654*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	19,759	21,549	21,958	22,354	22,406
Demand Total	19,759	21,549	21,958	22,354	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021, pg. 39, 40

Table 8 through Table 14 above show that BWP can adequately meet water demands within its service area with identified supplies over a 20-year planning horizon under normal-year, single dry-year, and multiple dry-year conditions. As discussed in Section 3.4, BWP's 2020 UWMP accounts for the water demands associated with development under the proposed Project in its analysis of SCAG projections. Therefore, because water demands of the proposed Project are accounted for in the 2020 UWMP, and the 2020 UWMP forecasts no supply shortages through 2045, BWP has sufficient water supply

available to meet the potential demands of the proposed Project under normal year, single dry year, and multiple dry year conditions.

The water demand projections in BWP's 2020 UWMP also informed Metropolitan's 2020 UWMP. As demonstrated in the tables above, BWP relies on Metropolitan to meet its water supply needs and provide supply reliability during dry year conditions. Therefore, discussion of Metropolitan's water supply planning and availability projections is provided below.

5.2 Metropolitan Core Water Supplies

BWP relies on Metropolitan for imported surface water supplies to supplement its local adjudicated groundwater resources and recycled water. Metropolitan states in its Water Shortage Contingency Plan (WSCP) that "core supplies" refer to the water anticipated to be received from the Colorado River and the SWP for the current year, as influenced by annual weather and hydrology, as well as demand by other higher priority users and operational and regulatory factors (Metropolitan 2021b). Metropolitan's core water supplies are used every year and are therefore differentiated from the WSCP's shortage response actions for supply augmentation (Metropolitan 2021b). Table 15, below, provides an overview of how Metropolitan maximizes the availability of its core supplies through participation in projects and programs to reliably meet service area water demands under variable supply availability conditions.

Table 15 Core Water Supplies

Core Supply	Overview
State Water Project	
Metropolitan SWP Table A	Metropolitan's Table A contract amount is for 1,911,500 AFY. Metropolitan uses a forecasting method for SWP deliveries based on historical patterns of precipitation, runoff and actual deliveries of water. Annual SWP allocations have ranged from five to 100 percent of the Table A contract amounts.
SWP Article 21 Interruptible Supplies	SWP Article 21 supplies are made available on an intermittent basis. Storm flows can occasionally make water supplies available that are in excess of the Table A allocation. Historically, Article 21 interruptible supplies have ranged from zero to 240,000 AFY.
SWP Port Hueneme Lease of Ventura Table A	Metropolitan has a right to up to 1,850 AFY of Table A supply from the Ventura County Watershed Protection District (Ventura) via a sublease agreement with Port Hueneme (Port Hueneme Water Agency). This water supply is in addition to Metropolitan's Table A, and the amount available each year is determined by the SWP allocation, with 1,850 AF available at a 100 percent allocation.
DWA/CVWD/Metropolitan Water Exchange and Advance Delivery Programs	Desert Water Agency (DWA) and Coachella Valley Water District (CVWD) receive their respective Table A allocations through an exchange agreement with Metropolitan due to their lack of physical connection to SWP facilities. Metropolitan provides Colorado River water in amounts equal to DWA's and CVWD's SWP allocations, in exchange for SWP water which Metropolitan retains in its system.
San Gabriel Valley Municipal Water District (SGVMWD) Program	Metropolitan delivers water to the City of Sierra Madre, a SGVMWD member agency, in exchange for replenishment of the Main San Gabriel Basin. For every one AF provided by Metropolitan to Sierra Madre, the SGVMWD returns two AF to Metropolitan in the Main San Gabriel Basin, for totals up to 5,000 AF.

Core Supply	Overview
Colorado River	
Colorado River Basic Apportionment	Metropolitan built, owns, and operates the 242-mile Colorado River Aqueduct (CRA), which conveys Colorado River water from Lake Havasu on the Colorado River to Lake Mathews in Riverside County. The CRA has a full delivery capacity of about 1.25 million AFY (MAFY), of which California holds a 4.4-MAFY normal apportionment to Colorado River water.
Higher Priority Water Use Adjustment to CR Basic Apportionment	Entitlements to use Colorado River water in California are fulfilled in order of Priority, with Priorities 1, 2, and 3 collectively accounting for 3.85 MAFY, of which Priority 3(a), held by IID and CVWD, accounts for 3.43 MAFY. The remaining 420,000 AFY is available for use under Priorities 1, 2, and 3(b) held by PVID and the Yuma Project lands within California.
IID / Metropolitan Conservation Program	Since 1988, Metropolitan has funded water conservation programs within IID's service area, under which the amount of water conserved from these programs is transferred to Metropolitan. Conservation approaches include distribution system improvements such as canal lining to reduce water losses to infiltration. This program provides 105,000 AFY to Metropolitan.
PVID Fallowing Program	In 2005, Metropolitan entered a 35-year program with PVID, under which participating farmers are paid to reduce their water use by leaving acreage unirrigated. The fallowing reduces consumptive use and increases the availability of Colorado River water to Metropolitan. This program provides between 33,000 and 133,000 AFY to Metropolitan.
Bard Water District ("Bard") Seasonal Fallowing Program	This seven-year seasonal fallowing program is authorized through 2027. Participating farmers in Bard are paid to reduce their water use by fallowing a portion of their land. This program provides up to 6,000 AFY to Metropolitan.
Lower Colorado River Water Supply Project	Groundwater is pumped from near the All-American Canal and discharged into the canal for conveyance into Imperial Valley, in exchange for IID reducing its net diversions of Colorado River water in amounts equal to the amount of water released into the canal. IID's unused Colorado River water is made available to entities that do not have Colorado River rights or have insufficient rights to meet their demands.
Exchange with San Diego County Water Authority (SDCWA)	SDCWA conserves Colorado River water through a transfer agreement with IID under which the stabilized annual transfer volume of 200,000 AFY is generated from conservation of water through on-farm efficiency conservation arrangements made by IID with its customers and other system efficiency measures. Conservation is also achieved through lining of the All-American and Coachella canals.
Exchange with the United States	The U.S. provides 16,000 AFY allocated to the San Luis Rey Settlement Parties from the All-American and Coachella canal lining projects to Metropolitan in exchange for an equal amount of water from Metropolitan's blended supplies to SDCWA. By separate agreement, SDCWA conveys the water to the San Luis Rey Settlement Parties.

Source: Metropolitan 2021b, A.4-12 – A.4-15

Table 15 demonstrates that Metropolitan is actively engaged in multiple projects and programs designed to maximize use of existing sources and provide operational flexibility to adjust to supply shortages when needed to provide reliable supplies to its member agencies.

Metropolitan projects water supply availability for its service area based in part on growth projections established by SCAG and the San Diego Association of Governments (SANDAG). The SCAG and SANDAG regional growth forecasts are the core assumptions for municipal and industrial demand forecasts used to inform UWMP projections, which inform the estimating equations of the retail demand forecasting in Metropolitan's Econometric Demand Model (MWD-EDM) (Metropolitan 2021a). Findings of Metropolitan's 2020 UWMP, which accounts for water demands of the SCAG 2020-2040 growth projections including for the City of Burbank and growth that would be accommodated by the proposed Project, are summarized below (Metropolitan 2021a, pg. ES-7).

- Metropolitan has completed its water service reliability assessment and determined that it has supply capabilities sufficient to meet expected demands from 2025 through 2045 under normal water year hydrologic conditions, a single dry-year condition, and a period of drought lasting five consecutive water years.
- Metropolitan has evaluated its water shortage risk and determined that it has supply capabilities sufficient for a drought period that lasts five consecutive water years based on the driest five-year historic sequence for Metropolitan's water supply.
- Metropolitan has plans for supply implementation and continued development of a diversified resource portfolio including programs in the Colorado River, SWP, Central Valley storage and transfers programs, local resource projects, and in-region storage that enables the region to meet its water supply needs.
- Metropolitan has developed comprehensive plans for stages of actions it would undertake to address frequent and severe periods of droughts; six standard water shortage levels corresponding to progressive ranges of up to 10, 20, 30, 40, and 50 percent shortages and greater than 50 percent shortage; and a catastrophic interruption in water supplies through its Water Shortage Contingency Plan, Water Surplus and Drought Management Plan (WSDM Plan), and Water Supply Allocation Plan (WSAP), discussed below in Section 5.3,
- Metropolitan continues to invest in measures that will help improve the region's water use efficiency over time.
- Metropolitan continues to plan for emergency and catastrophic scenarios, maintaining an Emergency Storage Objective to manage against potential interruption in water supplies from catastrophic seismic occurrences within the Southern California region and along the SWP.
- Metropolitan has and will continue to regard water quality with paramount importance to water supply reliability and actively supports improved watershed protection programs for its source waters in the Colorado River and State Water Project.

In summary, Metropolitan forecasts having sufficient supplies to meet all anticipated demands within its service area based on current growth projections.

5.3 Supply Reliability Plans and Policy Guidance

BWP does not expect critical shortages during the 25-year planning period, though shortage response actions described in its WSCP will be implemented as appropriate (BWP 2021, pg. 37). BWP's WSCP lays out various methods for mitigating the effects of water shortages of increasing intensity, defining five stages of shortage severity and corresponding actions. The WSCP includes voluntary and mandatory water use restrictions designed to reduce flexible water use depending on the cause, severity, and anticipated duration of the supply shortage. The WSCP details the protocols and procedures that BWP will implement at each stage of a declared water shortage to help water users comply with the shortage response actions. (BWP 2021)

In addition, Metropolitan's Integrated Resources Plan (IRP) is an evolving long-term plan to assure adequate water supplies for Southern California that anticipates how much water the region can expect from its imported and local supplies, and forecasts regional water demands (Metropolitan 2023). The IRP is used by Metropolitan and its member agencies to set the targets to maintain reliability and make well-informed decisions regarding how to best manage water supply, and adjust operations as needed to provide that all needs are met with available resources. The IRP was updated in 2020 to include an adaptive management strategy with a series of performance measures to help

inform Metropolitan and member agencies on what plausible future scenario will occur so that plans can be adjusted as needed (Metropolitan 2023).

While the IRP coordinates regional supply planning and includes input from local agencies, Metropolitan's member agencies also conduct their own planning and develop projects independently of Metropolitan. Table 16, below, provides an overview of other key plans and programs developed and implemented by Metropolitan to plan for water supply reliability, including how and when to adjust operations due to imported water supply availability.

Table 16 Supply Reliability Plans and Policy Guidance

Document	Overview
Water Surplus and Drought Management (WSDM) Plan	The WSDM Plan (1999) provides policy guidance for managing regional water supplies during surplus and shortage conditions. It provides an overall vision for operational supply management and characterizes a flexible sequence of actions to minimize the probability of severe shortages and reduce the likelihood of extreme shortages (Metropolitan 1999). Data collection, continual analysis, and monthly reporting for WSDM Plan implementation form the basis for Metropolitan's Annual Water Supply Demand Assessment. In accordance with CWC Section 10632, Metropolitan and all other urban water suppliers with more than 3,000 connections will provide these annual assessments to DWR beginning in July 2022.
Water Supply Allocation Plan (WSAP)	The WSAP is Metropolitan's mechanism for equitably allocating available water supplies to member agencies during extreme water shortages, when Metropolitan determines it is unable to meet all of its demands. The WSAP includes the specific formulas for calculating member agency supply allocations and the key implementation elements needed for administering an allocation should a shortage be declared. It is also the foundation for the urban water shortage contingency analysis required under Water Code Section 10632. The WSAP is included as Attachment B to Metropolitan's WSCP, described below. (Metropolitan 2021b, Attachment B [PDF pg. 95])
Water Shortage and Contingency Plan (WSCP)	Similar in concept to the WSDM Plan, the WSCP is a guide for Metropolitan's intended actions during water shortage conditions, designed to improve preparedness for droughts and other impacts on water supplies by describing the process used to address varying degrees of water shortages (Metropolitan 2021b). Throughout the year, Metropolitan evaluates its member agency demands, available water supplies, and existing water storage levels on a monthly basis. When a shortage is identified, the WSCP is used to determine the appropriate actions to implement from the WSDM Plan.
Emergency Storage Objective	The Emergency Storage Objective is the regional planning estimate for emergency storage, which represents the amount of water that Metropolitan would need in storage for the region, should a catastrophic earthquake damage the California Aqueduct (SWP), the Colorado River Aqueduct, or the Los Angeles Aqueduct (Owens Lake) such that they would be unable to operate. In 2019, Metropolitan and its member agencies identified 750,000 AF as the necessary level of storage to prevent severe water shortages to the region (Metropolitan 2021b, pg. A.4-28). Metropolitan's strategy for catastrophic water shortage conditions is further discussed in Appendix 8 to its 2020 UWMP (Metropolitan 2021a).

As summarized above, Metropolitan and its member agencies conduct and participate in a variety of supply reliability plans to adjust to dry and drought-year conditions with operational flexibility that facilitates the meeting of regional demands with available supplies.

5.4 Additional Future Supply

Table 17 provides an overview of BWP water supply projects.

Table 17 BWP Supply Projects

Project or Program	Overview	Expected Supply
Expanded water recycling	When feasible, BWP will extend water distribution mainlines to potential users.	Up to 200 AFY
North Hollywood Operable Unit (NHOU) wells treated at BOU	Lockheed-Martin is leading the effort to pipe nearby NHOU off-line wells to the BOU to receive VOC removal treatment	TBD
Indirect potable reuse (IPR) / direct potable reuse (DPR) feasibility study	As State Regulators wrestle with approval, Burbank's future water supply may be sustained by IPR/DPR technologies	Up to 5,000 AFY

Source: BWP 2021, pg. 24

BWP's planned projects involve recycled water and the continued treatment and reuse of contaminated groundwater. BWP has an agreement with LADWP to exchange recycled water produced at the BWRP for in-kind groundwater credits from the ULARA adjudication area. LADWP and the City of Los Angeles is continuing to convert their customers to recycled water in their North Hollywood service area and, while IPR and DPR are not economically feasible at present, it may be possible to reuse all BWRP effluent in future years, for up to 5,000 AFY of additional recycled water use (BWP 2021).

5.4.1 Regional Recycled Water

Recycled water is currently being used for irrigation, environmental, and power supply or cooling uses throughout the city. Total recycled water utilized in 2020 was 3,149 AFY, which is expected to increase to 3,540 AFY by 2025, with those levels remaining consistent through 2045 (BWP 2021). BWP's local recycled water system is discussed in Section 4.2, *Recycled Water*, including as relevant to expansion and policies requiring that existing and new developments are designed for connections to the recycled water system.

In addition to BWP's local improvements, LADWP is also planning a large increase in its own recycling ability for direct potable reuse. Metropolitan and LADWP both anticipate a large portion of LADWP's potable water supply in the future coming from currently non-potable recycled water supplies and increases in capacity. Increasing the use of recycled water will allow LADWP to reduce its dependency on water purchased from Metropolitan (LADWP 2020, Metropolitan 2021a), and increased treatment capacity will allow BWP to negotiate future transfer agreements modeled upon BWP and LADWP's current co-operative frameworks for recycled water usage (BWP 2021).

LADWP's increased recycling capability will reduce Metropolitan's need to maintain supplies to LADWP in case of severe drought, increasing Metropolitan's reliability to its other customers including BWP. In addition, BWP has identified that, with investments and technological improvements such as those currently being explored by LADWP, up to an additional 5,000 AFY could be generated in recycled water usage by 2040, as noted above in Table 17 (BWP 2021).

5.4.2 Operation NEXT

The City of Los Angeles, which owns the rights to groundwater in the SFVGB, developed an initiative called Operation NEXT in 2019 to support efforts at water supply sustainability in the Los Angeles Basin (BWP 2021). Operation NEXT is an initiative to recycle 100 percent of treated wastewater produced by the Hyperion Water Reclamation Plant ("Hyperion"). LADWP is working in partnership with City of Los Angeles Sanitation and Environment (LASAN) to retrofit Hyperion to an advanced water purification facility (AWPF), enabling it to produce up to 170 MGD, or approximately 190,000 AFY, of purified recycled water (LADWP 2024a, 2024b). Water produced through Operation NEXT would be a "drought proof" supply, as the wastewater inflow to Hyperion would be consistent, tied to population. This water will offset LADWP's need to purchase imported water from Metropolitan and be less dependent on Owens Valley water and local groundwater.

In addition to converting Hyperion to an AWPF, Operation NEXT comprises four key concepts to maximize beneficial use of the new supply, particularly by leveraging groundwater storage; those concepts are listed below (LADWP 2024a, 2024b).

1) LADWP and the Water Replenishment District of Southern California (WRD), Watermaster of the West Coast and Central Groundwater Basins, are collaborating on a Joint Basin Master Plan to identify optimal locations to convey Hyperion water for recharge into underlying aquifers.
2) LADWP will extract and treat the groundwater for distribution into the potable water system.
3) LADWP will convey Hyperion water to replenish the San Fernando Groundwater Basin and provide raw water augmentation at the Los Angeles Aqueduct Filtration Plant, the main water treatment plant at the northern end of the City.
4) LADWP will potentially convey Hyperion water to the Jensen Water Filtration Plant and Metropolitan's Regional Recycled Water Program Backbone System, another regional direct potable reuse project in Southern California.

Under current conditions, the composition of LADWP's supply portfolio includes 41 percent imported supply from Metropolitan, and 59 percent local sources including Owens Valley water, recycled water, and groundwater. In the future, LADWP's supply portfolio would consist of 30 percent imported water with Operation NEXT. This reduced reliance on imported water increases operational flexibility and water supply availability for BWP which purchases groundwater credits from LADWP for resources within the ULARA adjudication area.

5.4.3 Conjunctive Use

Conjunctive use is the management of water supplies through groundwater storage. As noted in Table 17, IPR/DPR is identified as potential future potable supply by BWP; IPR is a form of conjunctive use when used for groundwater replenishment, which is also a strong component of Metropolitan's water supply portfolio. As a member agency to Metropolitan, BWP also receives the supply reliability benefits of Metropolitan's conjunctive use and groundwater storage programs.

Metropolitan's IRP (see Section 5.3) established the strategy to store imported water that is available during wet years in surface reservoirs or groundwater aquifers for later use during droughts and emergencies (Metropolitan 2021a). This allows Metropolitan to reduce its reliance on direct deliveries from the SWP and the Colorado River during dry years when competing demands by other users and risks to the watershed ecosystems are greatest (Metropolitan 2021a).

Table 18, below, provides an overview of Metropolitan's current in-region groundwater storage programs, as detailed in its 2020 UWMP (Metropolitan 2021a).

Table 18 Metropolitan's In-Region Groundwater Storage Programs

Program	Partner Agencies	Program Term	Max Storage (AF)	Dry-Year Yield (AFY)	SCH No. and CEQA approval
Long Beach Conjunctive Use Storage Project (Central Basin)	Long Beach	June 2002 – 2027	13,000	4,300	2005079041 (NOD 7/15/2005)
Foothill Area Groundwater Storage Program (Monkhill / Raymond Basin)	Foothill MWD	February 2003 – 2028	9,000	3,000	2006068035 (NOE 6/6/2006)
Orange County Groundwater Conjunctive Use Program	MWDOC; OCWD	June 2003 – 2028	66,000+	22,000	2002061034 (NOD 4/11/2003)
Chino Basin Conjunctive Use Programs	IEUA; TVMWD; Watermaster	June 2003 – 2028	110,000	33,000	2021090310 (NOD 5/20/2022)
Live Oak Basin Conjunctive Use Project (Six Basins)	TVMWD; City of La Verne	October 2002 – 2027	3,000	1,000	2002029007 (NOD 2/6/2002)
City of Compton Conjunctive Use Project (Central Basin)	Compton	February 2005 – 2030	2,289	763	Environmental documentation certified by the City of Compton in December 2004
Long Beach Conjunctive Use Program Expansion in Lakewood (Central Basin)	Long Beach	July 2005 – 2030	3,600	1,200	2005079041 (NOD 7/15/2005)
Upper Claremont Basin Groundwater Storage Program (Six Basins)	TVMWD	September 2005 - 2030	3,000	1,000	Environmental documentation certified by Three Valleys MWD in July 2005
Elsinore Basin Conjunctive Use Storage Program	Western MWD; Elsinore Valley MWD	May 2008 - 2033	12,000	4,000	Environmental documentation certified by Elsinore Valley MWD in Feb 2004
Total			211,889	70,263	

Foothill MWD = Foothill Municipal Water District; IEUA = Inland Empire Utilities Agency; MWDOC = Municipal Water District of Orange County; OCWD = Orange County Water District; SCH = State Clearinghouse; TVMWD = Three Valleys Municipal Water District
Source: Metropolitan 2021a, pg. A.3-55, A.3-56

As shown, Metropolitan's current in-region groundwater storage programs provide a maximum storage benefit of 211,889 AF total, and a total dry-year yield of 70,263 AFY. This is water that was previously available as surplus supply and was put into storage for future beneficial use, demonstrating how Metropolitan and other Southern California water agencies maximize use of their

water supply allocations, including by taking their full allocations even during wet years when there is not demand for their full allocations.

5.4.4 Stormwater Capture and Reuse

BWP and LADWP work cooperatively to manage local supply availability, including through LADWP's role as the ULARA Watermaster, and BWP's ability to trade blended treated groundwater to LADWP in exchange for increased ULARA groundwater credits. LADWP's operational flexibility with respect to water supply increases as its reliance on imported water from the Owens Valley and Metropolitan decrease; part of this increased local reliance is provided through stormwater capture and reuse.

Local stormwater capture projects involve a collaborative effort between multiple agencies including: LADWP, the Los Angeles County Flood Control District (LACFCD), LASAN, Los Angeles Bureau of Street Services (LABSS), Los Angeles Bureau of Engineering (LABOE), and U.S. Army Corps of Engineers (USACE). LADWP's strategy to maximize benefit of its stormwater capture and reuse efforts focuses on increasing groundwater recharge by retrofitting the Big Tujunga Dam; reconstructing Hansen, Tujunga, and Pacoima Spreading Grounds and other large-scale projects; and working with other City departments on smaller-scale projects, anticipated to provide up to 20,000 AFY of stormwater capture (LADWP 2024c).

LADWP's Stormwater Capture Master Plan (SCMP) provided data and analysis to determine that, in addition to existing capture rates, an additional 68,000 to 114,000 AFY of water supply could be developed through implementation of a suite of projects, programs, and policies over the next 20 years (LADWP 2015). Between 2015 and 2024, LADWP's total stormwater capture capacity increased from about 64,000 AFY to over 82,600 AFY; this is more than 55 percent of the way to achieving the City's goal of achieving capacity to capture 150,000 AFY (48.9 billion gallons) of stormwater runoff by 2035 (LADWP 2024c).

6 Conclusions

A WSA was prepared to assesses potential water demands of development associated with the proposed Project, and compares those demands with BWP's estimated water supplies available over a 20-year projection, to assess water supply availability and reliability for compliance with CWC as amended by SB 610. Varying drought conditions and ongoing long-term supply management activities were also considered in supply availability discussions. Water supply sources managed by the local purveyor, BWP, as well as Metropolitan as BWP's provider of imported surface water supplies, were considered.

In Section 2.5 (*Water Demands)*, the proposed Project would facilitate development with an associated water demand of approximately 2,689 AFY. In Section 3.4 (*Is there a Current UWMP That Accounts for the Project Demand?)*, the City's 2020 UWMP accounts for growth-related water demands within BWP's service area, potential development associated with the proposed Project is accounted for in the analysis of SCAG growth projections included in BWP's 2020 UWMP. As presented in Section 5.1, *BWP Supply Projections*, the 2020 UWMP determined that BWP would have sufficient supply available to meet all anticipated demands through 2045, including those associated with SCAG growth projections.

In Section 2.5 (*Water Demands)*, the Increased Growth Alternative would facilitate development with an associated water demand of approximately 3,302 AFY. In Section 3.4 (*Is there a Current UWMP That Accounts for the Project Demand?)*, the City's 2020 UWMP accounts for growth-related water demands within BWP's service area, but potential development associated with the Increased Growth Alternative is not fully accounted for in the analysis of SCAG growth projections included in BWP's 2020 UWMP.

Furthermore, in Section 2.5 (Cumulative Considerations), other Specific Plans under consideration for approval by the City include the proposed Downtown Burbank TOD Specific Plan and the proposed GSSP, which would facilitate development with water demands up to approximately 6,208 AFY for the preferred proposals and 8,352 AFY for the increased growth proposals. As discussed in Section 3.4, the City's 2020 UWMP accounts for these water demands in its analysis of Housing Element goals, based upon the 2022 Housing Element Update which informed the 2020 UWMP through collaboration between BWP staff and City Community Development Department staff. As presented in Section 5.1, *BWP Supply Projections*, the 2020 UWMP determined that BWP would have sufficient supply available to meet all anticipated demands through 2045, including those associated with the City's Housing Element goals which include the proposed TOD Specific Plan and the proposed GSSP.

In addition, Metropolitan also determined that it would have sufficient supply availability and reliability to meet all regional demands through 2045 and with consideration to varying climatic (drought) conditions, including for the City of Burbank based upon the City's 2020 UWMP forecast. This sufficiency of supply relies in part upon supply development and conservation efforts discussed in the respective BWP WSCP and Metropolitan WSCP, as well as the additional future supply projects discussed in Section 5.4, *Additional Future Supply*. BWP is continuing to increase local supply reliability, including but not limited to the expansion of its recycled water system and development of additional supply projects.

Based upon data and analysis presented in this WSA, there is sufficient water supply available to reliability meet the demands of development facilitated by the proposed Project over a 20-year planning horizon and with consideration to varying climatic (drought) conditions.

7 References

Burbank, City of. 2013. Environmental Impact Report: Burbank2035. Adopted February 19. https://www.burbankca.gov/documents/173607/0/Planning_2021_Burbank2035+DEIR.pdf/7b9f4666-6b6e-915e-a2fd-785535462c67?t=1638490370426 (Accessed June 2025).

_____. 2022. Burbank 2021-2029 Housing Element. https://www.burbankca.gov/documents/173607/0/2022_Adopted_Burbank+Housing_Element_clean.pdf/45316c52-6ee9-4729-4313-fe78af914e01?t=1666395779153 (Accessed May 2025).

_____. 1991. The Burbank Media District Specific Plan. Adopted January 8. https://www.burbankca.gov/documents/173607/0/Media+District+Specific+Plan.pdf/458f28af-9c2d-c4dc-1669-df19a6f52856?t=1612453794603 (Accessed May 2025).

BWP (Burbank Water and Power). 2021. 2020 Urban Water Management Plan. July 2021. https://www.burbankwaterandpower.com/images/administrative/downloads/BWP_2020UWMP_Final.pdf (Accessed November 2023).

DWR (Department of Water Resources). 2023. SWP Water Contractors. https://water.ca.gov/Programs/State-Water-Project/Management/SWP-Water-Contractors (Accessed August 2024).

_____. 2023b. Notice to State Water Project Contractors Number 23-08. Increase of State Water Project 2023 Allocation to 100 Percent. April 20. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/State-Water-Project/Management/SWP-Water-Contractors/Files/2308-2023-SWP-allocation-increase--100-dist-final-042023a.pdf (Accessed August 2024).

_____. 2004. California's Groundwater Bulletin 118. South Coast Hydrologic Region – San Fernando Valley Groundwater Basin. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_012_SanFernandoValley.pdf (Accessed August 2024).

LADWP (Los Angeles Department of Water and Power). 2024a. Operation NEXT. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-operationnext?_afrLoop=14907695106594&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D14907695106594%26_afrWindowMode%3D0%26_adf.ctrl-state%3Db3luffrhv_22 (Accessed August 2024).

_____. 2024b. Operation NEXT – LA's New Water Supply Program. Article by Sarah Mouakkad. https://www.cwea.org/news/operation-next-las-new-water-supply-program/ (Accessed August 2024).

_____. 2024c. Developing a Local Water Supply. https://ladwp.com/ladwp/faces/ladwp/aboutus/a-inourcommunity/a-ioc-goinggreen/a-ioc-gg-developingalocalwatersupply?_adf.ctrl-state=xd1a05j14_4&_ad))))&_afrLoop=1022350330290907&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D1022350330290907%26_ad%2529%2529%2529%2529%3D%26_afrWindowMode%3D0%26_adf.ctrl-state%3Ddgu7urirq_4 (Accessed August 2024).

_____. 2015. Stormwater Capture Master Plan. August. https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB421767&RevisionSelectionMethod=LatestReleased (Accessed August 2024).

_____. 2012. Sewerage Facilities Charge; Sewage Generation Factor for Residential and Commercial Categories. https://engpermitmanual.lacity.org/sites/default/files/documents/Sewage%20Generation%20Factors%20Chart.pdf (Accessed December 2023).

_____. 2020. 2020 Urban Water Management Plan. https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf (Accessed November 2023).

Leadership Committee of the GLAC (Greater Los Angeles County) IRWMP (Integrated Regional Water Management Plan). 2014. The Greater Los Angeles County Integrated Regional Water Management Plan. 2013 Update (approved February 2014). https://pw.lacounty.gov/wmd/irwmp/FileList.aspx?path=docs\2014%20Public%20IRWMP%20Update (Accessed November 2023).

Metropolitan (Metropolitan Water District of Southern California). 2023. The Integrated Water Resources Plan. https://www.mwdh2o.com/how-we-plan/integrated-resource-plan/ (August 2024).

_____. 2021a. 2020 Urban Water Management Plan. June 2021. https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf (Accessed August 2024).

_____. 2021b. Water Shortage Contingency Plan. March. https://www.mwdh2o.com/media/18237/draft_metropolitan_wscp_march_2021.pdf (Accessed September 2023).

_____. 2019. Letter from William Hasencamp, Metropolitan Manager of Colorado River Resources, to Steven Hvinden, USBR Office Chief of the Boulder Canyon Operations Office. Metropolitan's 2019 Plan for the Creation of Extraordinary Conservation Intentionally Created Surplus. https://www.usbr.gov/lc/region/g4000/4200Rpts/DecreeRpt/2019/27.pdf (Accessed October 2023).

Metropolitan et al. 1931. Seven-Party Water Agreement. August 18. https://www.mwdh2o.com/media/16984/1931-seven-party-agreement.pdf (Accessed September 2023).

NIDIS (National Irrigated Drought Information System). 2023. Colorado River Drought Contingency Plan. https://www.drought.gov/colorado-river-drought-contingency-plan (Accessed September 2023).

PPIC (Public Policy Institute of California). 2018. The Colorado River is a major source of water for California. https://www.ppic.org/wp-content/uploads/californias-water-the-colorado-river-november-2018.pdf (Accessed September 2023).

SWRCB (State Water Resources Control Board). 2023. Frequently Asked Questions: Proposed Maximum Contaminated Level (MCL) for Hexavalent Chromium. June. https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/docs/2023/cr6-mcl-faq-eng.pdf (Accessed November 2023).

_____. 2018. Order Approving Change in Place of Use, Purpose of Use, and Quantity of Discharge. https://www.waterboards.ca.gov/waterrights/water_issues/programs/applications/wastewater_petition_orders/docs/ww0091_order.pdf (Accessed June 2025).

_____. 2017. Attachment A: City of Burbank's Wastewater Change Petition and Environmental Information for Petition. https://www.waterboards.ca.gov/waterrights/water_issues/programs/applications/petitions/2017/ww0091_att.pdf (Accessed June 2025).

ULARA (Upper Los Angeles River Area) Watermaster. 2023. History of ULARA Adjudication. http://ularawatermaster.com/about (Accessed December 2023).

USBR (U.S. Bureau of Reclamation). 2023a. Draft Environmental Impact Statement. Near-term Colorado River Operations. April. https://cawaterlibrary.net/document/near-term-colorado-river-operations-draft-supplemental-environmental-impact-statement/ (Accessed December 2023).

_____. 2023b. Seven Basin States agree to the submission of a Lower Basin, consensus-based system conservation proposal to protect the Colorado River Basin. https://www.usbr.gov/ColoradoRiverBasin/interimguidelines/seis/index.html (Accessed December 2023).

_____. 2023c. 2023 Drought Response Operations Plan. https://www.usbr.gov/dcp/docs/DROA/20230517-2023DROAPlan-508-UCRO.pdf (Accessed September 2023).

_____. 2021. Listing of Individual Colorado River Water Entitlements in the State of California. https://www.usbr.gov/lc/region/g4000/contracts/entitlements/Entitlements_State_of_CA.pdf (Accessed August 2024).

_____. Final Environmental Impact Statement. Executive Summary. Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead. November. https://www.usbr.gov/lc/region/programs/strategies/FEIS/ExecSumm.pdf (Accessed October 2023).

USDOI (U.S. Department of the Interior). 2003. Colorado River Water Delivery Agreement: Federal Quantification Settlement Agreement. Interim Surplus Guidelines. October 10. Available: https://lhc.ca.gov/sites/lhc.ca.gov/files/Reports/228/WrittenTestimony/Exhibit3.pdf (Accessed October 2003).

USEPA (U.S. Environmental Protection Agency). 2017. Administrative Settlement Agreement and Order on Consent for Focused Feasibility Study. CERCLA Docket No. 2017-08. https://semspub.epa.gov/work/09/100029667.pdf (Accessed June 2025).