

IV. Environmental Impact Analysis

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

1. Introduction

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

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on the *Utility Technical Report for 130 W College Street, Los Angeles, CA* (Utility Report) prepared for the Project by Langan Engineering and Environmental Services, Inc. (Langan) on September 4, 2024, and included in Appendix K of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

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

- Appliance Efficiency Regulations (Title 20)
- California Green Building Standards Code
- California Plumbing Code
- Executive Order B-40-17
- Executive Order N-10-21
- Executive Order N-7-22
- Executive Order N-5-23
- Metropolitan Water District
 - 2020 Urban Water Management Plan
 - 2015 Integrated Resources Plan and 2020 Integrated Resources Plan Update
 - Water Surplus and Drought Management Plan
 - Long-Term Conservation Plan
 - Water Supply Allocation Plan
- Los Angeles Department of Water and Power’s 2020 Urban Water Management Plan
- L.A.’s Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan, including:
 - Framework Element
 - Central City North Community Plan
- Los Angeles Municipal Code (Ordinance Nos. 180,822, 181,480, 181,899, 183,833, 182,849, 184,692, and 184,248)

(1) State

(a) California Urban Water Management Planning Act

The California Urban Water Management Planning Act (Water Code Section 10610, et seq.) addresses several state policies regarding water conservation and the development

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

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

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

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

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;

- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use projects that include one or more of the projects specified above; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project (Water Code Section 912, CEQA Guidelines Section 15155(a)).

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

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

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

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring urban water suppliers to achieve a 20-percent-per-capita water consumption reduction by the year 2020 statewide, as described in the “20 x 2020” State

Water Conservation Plan.¹ As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610

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

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

(d) Sustainable Groundwater Management Act of 2014⁵

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.⁶ The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The SGMA provides 20 years for groundwater sustainability agencies to implement plans, achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees,

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

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

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

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

⁵ *Sustainable Groundwater Management Act [And Related Statutory Provisions from SB1168 (Pavley), AB1739 (Dickinson), and SB1319 (Pavley) as Chaptered]*, 2015 Amendments, effective January 1, 2016.

⁶ California Department of Water Resources, *SGMA Groundwater Management*, <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>, accessed September 23, 2024.

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

(e) California Code of Regulations

(i) Appliance Efficiency Regulations (Title 20)

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable state efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures, such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi) and for lavatory faucets manufactured after July 1, 2016, is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.⁷

(ii) California Green Building Standards Code

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

(iii) California Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The

⁷ *California Code of Regulations, Title 20, Sections 1605.3(h) and 1605.3(i).*

2022 California Plumbing Code, which is based on the 2021 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2023.

(f) Executive Order B-40-17

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

(g) Executive Order N-10-21

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

(h) Executive Order N-7-22

On March 28, 2022, Executive Order N-7-22 was issued to the SWRCB to consider adopting regulations by May 25, 2022, that require urban water suppliers with water shortage contingency plans to implement, at a minimum, shortage response actions for a shortage level of up to 20 percent (a "Level 2" shortage). On May 24, 2022, in response to the executive order, the SWRCB adopted a new emergency water conservation regulation. The new regulation bans irrigating turf at commercial, industrial, and institutional properties, such as grass in front of or next to large industrial or commercial buildings. The ban does not include watering turf that is used for recreation or other community purposes, water used at

residences or water to maintain trees. The regulation also requires all urban water suppliers to implement conservation actions under Level 2 of their water shortage contingency plans.

(i) Executive Order N-5-23

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

(2) Regional

(a) Metropolitan Water District

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

(i) 2020 Urban Water Management Plan

MWD's 2020 Urban Water Management Plan (2020 MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.⁸ Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions (i.e., under the most challenging weather conditions, such as drought and service interruptions caused by natural disasters) is presented in Table 2-5 of the 2020 MWD UWMP.⁹ The analysis in the 2020 MWD UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.¹⁰ In the 2020 MWD UWMP, the projected 2045 water demand during multiple-

⁸ *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021.*

⁹ *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 2-19.*

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

dry year conditions is 1,564,000 AFY, whereas the expected and projected 2045 supply is 2,239,000 AFY based on current programs, for a potential surplus in 2045 of 675,000 AFY.¹¹

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. In addition, MWD is working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Sacramento–San Joaquin Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. Furthermore, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.¹²

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

MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply, such as water quality, climate change, and regulatory and operational changes. The most current IRP (2015 IRP) was adopted in January 2016.¹³ It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

The 2015 IRP reliability targets identify developments in imported and local water supply and in water conservation that, if successful, would provide a future without water shortages and mandatory restrictions under planned conditions. For imported supplies, MWD would make investments to maximize Colorado River Aqueduct deliveries in dry years.

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

¹² *Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. ES-7.*

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

MWD would make ecologically-sound infrastructure investments to the SWP so that the water system can capture sufficient supplies to help meet average year demands and to refill the MWD storage network in above-average and wet years.

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

The 2020 IRP planning process was organized into a Regional Needs Assessment (Phase 1) and an implementation Phase (Phase 2).¹⁵ The 2020 IRP Regional Needs Assessment identifies the uncertain factors that can affect future water supply, such as climate change, economics and demographics, legislations and regulations, federal and state support, technological advances in water, and aging infrastructure. In collaboration with its 26 member agencies, other interested parties, and its Board of Directors, MWD has broadened its perspectives with scenario planning and thoroughly analyzing four potential future scenarios. In the future scenarios, demands on MWD's imported supplies vary due to different weather and demographic patterns, among other factors. Supplies vary as well, due to reasons, such as climate change severity and regulatory impacts. Based on these scenarios, the 2020 IRP Regional Needs Assessment identifies significant threats facing Southern California's water supply reliability through successive qualitative and quantitative analysis steps. The assessment sizes up the scope of reliability challenges and the management solutions that could be in store for the region by the year 2045 under a wide range of conditions.¹⁶

Building upon the foundation of the IRP Regional Needs Assessment, the implementation phase of the IRP will be coordinated through the Climate Adaptation Master Plan for Water (CAMP4W) process. This phase will involve the continuation of extensive collaboration among Metropolitan's Board, Member Agencies, and other interested parties

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

¹⁵ *Metropolitan Water District of Southern California, Climate Adaptation Master Plan for Water (CAMP4W), Working Memorandum 3: IRP 2020 Regional Needs Assessment Summary, August 2023.*

¹⁶ *Metropolitan Water District of Southern California, 2020 Integrated Water Resources Plan (IRP) – Regional Needs Assessment, Adopted April 12, 2022, page 5.*

to develop an adaptive management strategy and decision-making framework. CAMP4W will also establish a process for monitoring key reliability indicators and find joint approaches to the regional problems and resource needs identified in the assessment.¹⁷

(iii) Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.¹⁸

(iv) Long-Term Conservation Plan

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

(v) Water Supply Allocation Plan

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

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

¹⁸ Metropolitan Water District of Southern California, *Water Surplus and Drought Management Plan, Report No. 1150*, August 1999.

MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions, and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.¹⁹ The allocation period covers 12 consecutive months from July of a given year through the following June.

(3) Local

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

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. LADWP adopted the 2020 UWMP on May 25, 2021. The 2020 UWMP complies with the Urban Water Management Planning Act, builds upon the goals and progress made in the 2015 UWMP, and currently serves as the City's master plan for reliable water supply and resource management consistent with the City goals and objectives. The 2020 UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's 2020 UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2050. Long-range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).²⁰ LADWP's water use efficiency goals include reducing per capita water use to 100 gallons per capita per day by 2035 and to maintain this usage through 2050. As provided in the 2020 UWMP, in accordance with SB X7-7, LADWP developed a final reported 2020 target of 142 gallons per capita per day. LADWP's actual gallons per capita per day in 2020 was 106 gallons per capita per day, less than the 2020 target.²¹

¹⁹ *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016, p. 2-21.*

²⁰ *SCAG's 2024–2050 RTP/SCS is now available and will be used as the basis for growth projections in the 2025 UWMP.*

²¹ *Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021 page 1-8.*

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

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAn, which includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.²² The Sustainable City pLAn was intended to be updated every four years.

In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAn, renamed as L.A.'s Green New Deal, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.²³ L.A.'s Green New Deal augments, expands, and elaborates in more detail the City's vision for a sustainable future and includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability.

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.²⁴ The One Water LA Plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.²⁵ Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

²² City of Los Angeles, *Sustainable City pLAn*, 2015.

²³ City of Los Angeles, *L.A.'s Green New Deal*, 2019.

²⁴ City of Los Angeles, *One Water LA 2040 Plan*, April 2018, Volume 1, Summary Report.

²⁵ City of Los Angeles, Office of Mayor Eric Garcetti, *Executive Directive No. 5, Emergency Drought Response—Creating a Water Wise City*, October 14, 2014.

(d) City of Los Angeles General Plan

(i) General Plan Framework Element

The General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.²⁶ The Framework Element sets forth a comprehensive citywide long-range growth strategy and defines citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for City utilities, including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.²⁷ The goals, objectives, and policies are addressed by the City in its ordinances and preparation of its UWMP.

Table IV.K.1-1 on page IV.K.1-15 shows General Plan goals, objectives and policies relate to water supply.

(ii) Community Plan

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

²⁶ *City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, July 27, 1995.*

²⁷ *City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services—Water Supply.*

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

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

The Project Site is located within the Central City North Community Plan area. The Central City North Community Plan does not include objectives or policies related to water supply and infrastructure.²⁸

²⁸ *The Project Site is located with the Downtown Community Plan (DTLA 2040) which became effective on January 27, 2025. Since the application for this Project was filed before DTLA 2040 became effective, the provisions of DTLA 2040 do not apply to this Project. As such, the Central City North Community Plan is still the operative land use document for the Project Site, and therefore, DTLA 2040 is not applicable to the Project or Project Site.*

(e) Los Angeles Municipal Code

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

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

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

As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gpm in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 psi is to remain in the water system with the required gpm flowing. LAMC Section 57.507.3.2 also addresses land use–based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

b. Existing Conditions

(1) Water Supply

LADWP is responsible for providing water within the City of Los Angeles limits and ensuring that the water quality meets applicable California health standards for drinking water. As the Project Site is located within the City, LADWP is the urban water provider for the Project Site. LADWP water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, purchased water from MWD, and recycled water.²⁹ As shown in Table IV.K.1-2 on page IV.K.1-18, in 2022, the most recent year for which data is available, LADWP had an available water supply of 500,743 acre-feet. LADWP water sources are described in further detail below.

(a) Los Angeles Aqueducts

The City receives surface water and groundwater from the Eastern Sierra Nevada Mountains through the Los Angeles Aqueducts. Annual water deliveries from the Los Angeles Aqueducts to the City are impacted by hydrologic variability in the Eastern Sierra Nevada and water set aside for environmental projects. At its peak in the 1983-1984 fiscal year, the Los Angeles Aqueducts delivered 531,729 acre-feet to the City. Concerns over environmental impacts have required the City to reallocate approximately one-half of the Los Angeles Aqueducts water supply to other uses within the Owens Valley and Mono Basin.

Between 1992 and 2020, LADWP reduced deliveries to the City by approximately 177,000 AFY to supply water for a variety of environmental projects throughout the Eastern Sierra Nevada. Environmental enhancement and mitigation projects in the Mono Basin and Owens Valley that utilize water from the Eastern Sierra Nevada include Mono Basin releases,

²⁹ As discussed further below in Section 3.d., *Analysis of Project Impacts*, the Project does not meet any of the thresholds under SB 610 and a WSA is not required. As such, this discussion of existing conditions relies upon LADWP's WSA for the Radford Studio Center project, dated December 7, 2023, which was the most recent WSA approved by LADWP at the time this section was drafted.

**Table IV.K.1-2
LADWP Water Supply**

Fiscal Year Ending	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage^a	Total
2018	307,671	21,760	182,706	9,778	200	522,116^b
2019	312,456	32,233	137,775	7,512	-1,710	488,266
2020	292,095	34,363	152,647	9,641	-1,155	487,591
2021	128,268	51,070	152,647	11,455	938	508,359^b
2022	69,183	53,057	366,690	12,022	208	500,743^b

Units are in acre-feet.

^a *The figures presented account for the transfer, spread, spill, and storage of the water supply as determined by LADWP. It should be noted that the figures presented in parenthesis represent a deficit of water.*

^b *Numbers may not sum due to rounding.*

Source: Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, Table III.

Lower Owens River Project, Owens Lake Dust Mitigation Program, as well as other environmental enhancement and mitigation projects and uses. When considering water allocations for these projects, the expected annual long-term Los Angeles Aqueducts (LAA) delivery from 2020–2045 will range from approximately 184,200 AFY to 192,000 AFY for average years.³⁰

As indicated in Table IV.K.1-2, approximately 69,183 acre-feet of LADWP’s water supplies were from the Los Angeles Aqueducts in 2022. The average deliveries from the Los Angeles Aqueducts from fiscal year-end 2018 through fiscal year-end 2022 were approximately 221,935 acre-feet of water annually.

The sole reliance on Los Angeles Aqueducts supply with impacts due to natural variability and water set aside for environmental projects is not sufficient to meet the City’s annual water demands which are discussed further below in section 2.b.(2). Therefore, as summarized below, LADWP has implemented, and continues to increase, stormwater capture, local groundwater, water conservation, water use efficiency, and water recycling programs to address the reduction of Los Angeles Aqueducts supplies. Additionally, LADWP

³⁰ *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, p. 13.*

can purchase supplemental imported water from MWD to meet the City's remaining water demands.³¹

(b) Local Groundwater Supplies

Local groundwater provided approximately 8 percent of the total water supply for Los Angeles from fiscal year-end 2018 to fiscal year-end 2022. This amount significantly differs from 50 years ago when local groundwater provided up to 23 percent of total supply during extended dry periods. In recent years, contamination issues have impacted LADWP's ability to fully utilize its local groundwater entitlements and provide groundwater supplies to support annual water demands. In response to this issue and to address the hydrologic variability impacts to imported water supplies, LADWP has a focus on the sustainable management of its local groundwater basins. LADWP continues to invest in stormwater recharge projects to restore local groundwater basin levels as well as advanced treatment systems to produce purified recycled water for groundwater replenishment. Furthermore, LADWP has, and will continue to, conjunctively use the large groundwater basin within the City to store wet year annual water demands flows to supply water during dry periods.³²

The City's total adjudicated groundwater rights are approximately 109,809 AFY, which are located within the San Fernando Groundwater Basin, Central Basin, Sylmar Basin, and West Coast Basin.³³ Of these, LADWP pumps groundwater from the San Fernando Groundwater Basin and, to a lesser extent, the Central Basin and Sylmar Basin.

Table IV.K.1-3 on page IV.K.1-20 provides data regarding the groundwater produced for the City during the fiscal years of 2017–2018 through 2021–2022. As shown therein, during the 2021–2022 fiscal year, 48,408 acre-feet were produced from the San Fernando Groundwater Basin, 3,018 acre-feet were produced from the Sylmar Basin, and 4,562 acre-feet were produced from the Central Basin.³⁴

The City plans to continue to develop production from its groundwater basins in the coming years to offset reductions in imported supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection. LADWP's groundwater

³¹ *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, p. 13.*

³² *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, p. 14.*

³³ *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, p. 14.*

³⁴ *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, p. 15.*

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

Fiscal Year (July–June)	San Fernando	Sylmar	Central
2017–2018	22,259	0 ^a	1 ^a
2018–2019	36,870	1 ^a	5 ^a
2019–2020	35,949	2 ^a	10 ^a
2020–2021	53,625	1,368	2,247
2021–2022	48,408	3,018	4,562
<i>Units are in acre-feet.</i> ^a <i>Small quantities pumped from the Sylmar and Central Basins were for water quality testing purposes, not water supply.</i> <i>Source: Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, Table IV.</i>			

pumping practice is based on a “safe yield” operation. Furthermore, basin management is achieved by collective efforts of a court-appointed Watermaster and the Upper Los Angeles River Area (ULARA) Administrative Committee of representatives from five public water supply agencies overlying the ULARA Committee.³⁵ These efforts include the operation of groundwater remediation systems, use of an extensive network of groundwater monitoring wells, routine reporting on groundwater elevation and water quality, management and mitigation of urban runoff water quality, and development of enhanced stormwater recharge and groundwater replenishment.³⁶ There are additional groundwater basins near and within the Los Angeles area where LADWP is considering and exploring opportunities to develop groundwater resources in a manner that is locally sustainable and in cooperation with its regional partners.³⁷

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for domestic and municipal uses in Southern California. As one of the 26 member agencies of MWD, LADWP purchases water from MWD

³⁵ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. 5-4.

³⁶ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. 5-4.

³⁷ Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, p. 16.

to supplement LADWP water supplies from the Los Angeles Aqueducts, local groundwater, and recycled water.³⁸

MWD imports water from two principal sources: northern California via the California aqueduct and the Colorado River via the Colorado River Aqueduct. MWD also manages and owns in-basin surface storage facilities, stores groundwater within the basin via contracts, engages in groundwater storage outside the basin, and conducts water transfers to provide additional supplies for its member agencies. All member agencies have preferential rights to purchase water from MWD, pursuant to Section 135 of the Metropolitan Water District Act.³⁹⁴⁰ As of fiscal year-end 2022, LADWP has a preferential right to purchase 17.69 percent of MWD's total water supply.⁴¹ Between fiscal year 2017–2018 and 2021–2022, LADWP purchased an average of 231,289 AFY from MWD or approximately 46 percent of the City's total water supply.⁴²

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

(i) State Water Project

The SWP is one of MWD's two major sources of water. The SWP is owned by the State and operated by DWR, delivering municipal and industrial water to approximately 27 million of California's residents and 750,000 acres of farmland.⁴³ The SWP watershed encompasses the mountains and waterways around the Feather River in the Sacramento Valley of Northern California. The SWP facilities include a complex system of dams, reservoirs, powerplants, pumping plants, canals and aqueducts to deliver water. Water from rainfall and snowmelt runoff is captured and stored in SWP conservation facilities and then delivered through SWP transportation facilities to water agencies and districts located throughout the Upper Feather River, Bay Area, Central Valley, Central Coast, and Southern

³⁸ Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 21.

³⁹ Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 21.

⁴⁰ *Metropolitan Water District Act, Chapter 2, Section 135*

⁴¹ Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 21.

⁴² Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 21.

⁴³ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, July 20, 2022, Appendix A, p. A-16.*

California. MWD receives water from the SWP through the main stem of the aqueduct system, the California Aqueduct, which is 444 miles long.⁴⁴

MWD is the largest of the 29 SWP contractors, holding a contract for 1.912 million AFY, or 46 percent of the total contracted amount of the 4.173 million acre-feet ultimate delivery capacity of the SWP.⁴⁵ However, in accordance with the State Water Contract with DWR, the contracted amount varies annually due to a number of factors, including existing supplies in storage, forecasted hydrology, water quality, environmental flow obligations, and other operational considerations.⁴⁶ Due to water quality and supply reliability challenges and conflicts due to variable hydrology and environmental standards that limit pumping operations, SWP deliveries in the most critically dry years have declined. From calendar year 2012 through 2021, the amount of water received by MWD from the SWP varied from a low of 588,000 acre-feet in calendar year 2020 to a high of 1,473,000 acre-feet in 2017. In 2021, the DWR's allocation to MWD commenced as 10 percent and then was reduced to 5 percent (95,575 acre-feet).⁴⁷ The DWR's allocation to MWD increased to 40 percent as of April 23, 2024, due to above average snowmelt runoff.⁴⁸

Challenges to State Water Project Supply

Numerous factors have created challenges for the SWP. Based on DWR's 2021 Final State Water Project Delivery Capability Report, all but five of the 29 SWP contractors receive SWP deliveries by diversions from the Sacramento River Delta (Delta). These diversion facilities are regulated by several state and federal agencies that maintain and enhance the Delta's long-term sustainability. Ongoing regulatory restrictions, such as those aimed at protecting the Delta estuary's resident and migratory fish species, are challenges to a reliable and sustainable water delivery capability for the SWP. In particular, a substantial decrease in SWP Delta exports occurred with new regulations that culminated in the federal Biological Opinions that went into effect in 2008–2009. Complications induced by climate change also pose a threat of increased variability in the frequency and magnitude of both floods and droughts in the Delta. In addition, the projected sea level rise caused by the increase in average temperature also complicates efforts to manage salinity levels in the channels

⁴⁴ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, July 20, 2022, Appendix A, p. A-53.*

⁴⁵ *Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 7, 2023, p. 21.*

⁴⁶ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, July 20, 2022, Appendix A, p. A-17.*

⁴⁷ *Metropolitan Water District of Southern California, Water Revenue Refunding Bonds, 2022 Series B, July 20, 2022, Appendix A, p. A-16.*

⁴⁸ *California Department of Water Resources, State Water Project Increases Projected Water Supply Allocation, <https://water.ca.gov/News/News-Releases/2024/Apr-24/State-Water-Project-Increases-Projected-Water-Supply-Allocation>, accessed September 25, 2024.*

affected by tides in the Delta. Furthermore, higher ocean levels could also result in more frequent water quality degradation in the Delta channels, requiring additional Delta outflow to maintain water quality objectives. Other challenges include the continued subsidence of Delta islands, many of which are already below sea level and supported by relatively unstable levee systems.⁴⁹ In addition to challenges within the Delta, as discussed in detail in Appendix A to the 2020 MWD UWMP, various agreements and litigation regarding the State Water Contract have affected water supplies from the SWP.⁵⁰

(ii) The Colorado River

The Colorado River was MWD's original source of water after MWD's establishment in 1928. MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the Secretary of the Interior. Water from the Colorado River and its tributaries is also available to other users in California, as well as users in the states of Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming, resulting in both competition and the need for cooperation among these holders of Colorado River entitlements.⁵¹

Construction of the Colorado River Aqueduct was undertaken by MWD to provide for the transportation of its Colorado River water entitlement to its service area. The Colorado River Aqueduct originates at Lake Havasu on the Colorado River and extends approximately 242 miles through a series of pump stations and reservoirs to its terminus at Lake Mathews in Riverside County.⁵² MWD holds the fourth and fifth priority rights to the Colorado River water supplies. Thus, water diverted by MWD is dependent on unused apportionment from other users.⁵³ Up to 1.25 million acre-feet of water per year may be conveyed through the Colorado River Aqueduct to MWD's member agencies, subject to availability of Colorado River water for delivery to MWD.⁵⁴ Since 2003, MWD's net diversions of Colorado River water have ranged from a low of 537,607 acre-feet in 2019 to a high of approximately 1,179,000 acre-feet in 2015. Preliminary average annual net diversions for 2011 through 2020 were 871,947 acre-feet, with annual volumes dependent primarily on programs to

⁴⁹ California Department of Water Resources, *The State Water Project Final State Water Project Delivery Capability Report 2021*, September 2022.

⁵⁰ Metropolitan Water District of Southern California, *Water Revenue Refunding Bonds, 2022 Series B*, July 20, 2022, Appendix A, pp. A-13-21 and A-31-34.

⁵¹ Metropolitan Water District of Southern California, *Water Revenue Refunding Bonds, 2022 Series B*, July 20, 2022, Appendix A, p. A-24.

⁵² Metropolitan Water District of Southern California, *Water Revenue Refunding Bonds, 2022 Series B*, July 20, 2022, Appendix A, p. A-24.

⁵³ Metropolitan Water District of Southern California, *Water Revenue Refunding Bonds, 2022 Series B*, July 20, 2022, Appendix A, p. A-24.

⁵⁴ Metropolitan Water District of Southern California, *Water Revenue Refunding Bonds, 2022 Series B*, July 20, 2022, Appendix A, p. A-24.

augment supplies, including transfers of conserved water from agriculture. In 2020, the preliminary total available Colorado River supply to MWD was just over one million acre-feet. A portion of the available supply that was not diverted was stored in Lake Mead for future usage.⁵⁵

As discussed in detail in Appendix A to the 2020 MWD UWMP, conveyance from the Colorado River has also experienced many challenges including persistent drought conditions, litigation, and the presence of endangered species.

(iii) Additional MWD Actions to Address Supply

As summarized above in Subsection 2.a, Regulatory Framework, MWD has been developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. These plans include MWD's IRP, UWMP, WSDM Plan, LTCP, and the WSAP. These long-term plans have been developed to meet MWD's member agencies' growing reliability needs through improvements to the SWP, conjunctive management efforts on the Colorado River, water transfer programs, outdoor conservation measures, and development of additional local resources, such as recycling, brackish water desalination, and seawater desalination.

Additionally, MWD has planned and prepared for dry conditions by investing in vital infrastructure to increase its storage capacity. MWD's storage as of January 1, 2021, is estimated to be 3.91 million acre-feet.⁵⁶

(d) Precipitation Conditions

As of October 2025, most of Southern California is classified as either abnormally dry, moderate drought, severe drought, or extreme drought, with all of Los Angeles County classified as moderate drought.⁵⁷ An extended drought period is also ongoing in the Colorado River Basin, which is another source of water for Southern California as described above.⁵⁸

⁵⁵ Metropolitan Water District of Southern California, *Water Revenue Refunding Bonds, 2022 Series B*, July 20, 2022, Appendix A, p. A-25.

⁵⁶ Metropolitan Water District of Southern California, *2020 Regional Urban Water Management Plan*, May 2021.

⁵⁷ National Drought Mitigation Center, *U.S. Drought Monitor, West*, Data valid: October 21, 2025, <https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?West>, accessed October 28, 2025.

⁵⁸ Metropolitan Water District of Southern California, *Water Revenue Refunding Bonds, 2022 Series B*, July 20, 2022, Appendix A, p. A-10.

The City of Los Angeles receives an average of 13.59 inches of precipitation per year according to the National Weather Service.⁵⁹ In 2024, Downtown Los Angeles received 19.13 inches of precipitation, compared with 29.44 inches in 2023, 7.18 inches in 2022, 14.27 inches in 2021, and 9.81 inches in 2020.⁶⁰

(e) Global Warming and Climate Change

As discussed in LADWP's 2020 UWMP, water supplies that are dependent on natural hydrology, such as LADWP's imported supplies and local groundwater, are susceptible to climate risks. Imported sources that originate from mountain snowpack are particularly sensitive to changes in temperatures as small increases in temperature can significantly influence the melting of snowpack. In addition to water supply impacts, shifts in weather conditions can influence water demands by approximately 5 percent when compared to average conditions. LADWP continues to monitor the latest developments to advance the accuracy of hydrologic forecasts and projections to improve resources planning efforts that better respond to natural hydrologic variability and other potential future climate risks.⁶¹

MWD and DWR also continue to study climate change and address the implications of climate change on water supplies. MWD has established a technical process to identify key vulnerabilities from various sources, including climate change, in order to provide comprehensive analyses within its IRP-, described above.⁶²

In addition, DWR addresses climate change impacts on water supply in its California Water Plan Updates, which also account for uncertainty, risk, and sustainability in planning for the future. California Water Plan Update 2023 promotes climate resilience across regions and water sectors with a statewide vision, clear goals, watershed planning framework and toolkit, and progress-tracking dashboard of indicators.⁶³ DWR completed its Climate Action Plan in 2020.⁶⁴ Phases I and II of the Climate Action Plan include the guidance of DWR in reducing greenhouse gas emissions and the expertise of a climate change technical advisory group formed in 2012, respectively. As part of Phase I, DWR's Greenhouse Gas Emissions

⁵⁹ National Weather Service, *Monthly Summarized Precipitation for Los Angeles Downtown Area, CA 2000–2025*, www.weather.gov/wrh/Climate?wfo=lox, accessed August 19, 2025.

⁶⁰ National Weather Service, *Monthly Summarized Precipitation for Los Angeles Downtown Area, CA 2000–2025*, www.weather.gov/wrh/Climate?wfo=lox, accessed August 19, 2025.

⁶¹ Los Angeles Department of Water and Power, *2020 Urban Water Management Plan*, May 2021, p. 12-1.

⁶² Metropolitan Water District of Southern California, *Water Revenue Refunding Bonds, 2022 Series B*, July 20, 2022, Appendix A, p. A-9.

⁶³ California Department of Water Resources, *Update 2023*, <https://water.ca.gov/Programs/California-Water-Plan/Update-2023>, accessed September 23, 2024.

⁶⁴ California Department of Water Resources, *DWR Climate Action Plan*, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed September 23, 2024.

Reduction Plan was completed in 2012 and updated in 2020. As part of Phase II, DWR completed a Climate Change Analysis Guidance in 2018. Phase III of the Climate Action Plan was completed in 2020 with a Climate Change Vulnerability Assessment in 2019 and Climate Change Adaption Plan in 2020 regarding DWR assets and activities, as related to the projected changes in temperature, wildfire, sea level rise, hydrology, and water supply.⁶⁵ As such, climate change and its impacts on water supplies are key factors of new water supply regulations and UWMPs.

(f) Water Conservation and Recycling

LADWP has developed many progressive water conservation and use efficiency programs in conjunction with state and local conservation ordinances and plumbing codes to achieve water conservation throughout its service area and customer classes (refer to Subsection 2.a, Regulatory Framework, above for a summary of these plans and regulations). Specifically, to meet multiple water conservation goals established in the Sustainable City pLAn (now L.A.'s Green New Deal)⁶⁶ and the Water Conservation Act of 2009, LADWP's 2020 UWMP aims to reduce per capita potable water use by 22.5 percent by 2025 and by 25 percent by 2035.⁶⁷ LADWP will also comply with the State's water use requirements of AB 1668 (2018) and SB 606 (2018). Following the target reduction of potable water use per capita by 25 percent by 2035, L.A.'s Green New Deal adds an additional target for the City to maintain or reduce 2035 per capita water use through 2050.⁶⁸ The L.A.'s Green New Deal also has a target to recycle 100 percent of all wastewater for beneficial reuse by 2035.⁶⁹ Beneficial reuse includes, but is not limited to, non-potable reuse, groundwater recharge, and supporting environmental and recreational uses such as those in the Los Angeles River.

Since the inception of LADWP's conservation programs, the estimated cumulative annual active savings is over 150,000 AFY.^{70,71} In addition, LADWP completed a Stormwater Capture Master Plan in 2015 to comprehensively evaluate stormwater capture potential

⁶⁵ California Department of Water Resources, *DWR Climate Action Plan*, www.water.ca.gov/Programs/All-Programs/Climate-Change-Program/Climate-Action-Plan, accessed September 23, 2024.

⁶⁶ In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAn, which has been renamed as L.A.'s Green New Deal I Sustainability Plan 2019, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.

⁶⁷ Los Angeles Department of Water and Power, *2020 Urban Water Management Plan*, May 2021, p. 1-8.

⁶⁸ City of Los Angeles, *L.A.'s Green New Deal*, 2019.

⁶⁹ Baseline from LASAN: In Fiscal Year 2017–2018, 27 percent of wastewater was recycled.

⁷⁰ Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 17.

⁷¹ Los Angeles Department of Water and Power, *2020 Urban Water Management Plan*, May 2021, p. ES-12.

within the City. Stormwater capture can be achieved by increasing infiltration into groundwater basins and by on-site capture and reuse of stormwater for landscape irrigation (i.e., direct use). The total baseline amount of stormwater captured is 64,000 acre-feet.⁷² The implementation of additional centralized and distributed stormwater capture projects and programs, in development and in construction, could provide for increased groundwater recharge in the amount of 66,000 AFY and increased direct use in the amount of 2,000 AFY.⁷³ Under LADWP's current implementation strategy, the total estimated stormwater capture capacity is projected to be 155,000 AFY by 2035.⁷⁴ LADWP also has numerous programs and strategies in place to recycle water, including the existing production of recycled water for irrigation totaling 37,060 AFY in fiscal year-end 2021, and coordination with Los Angeles Bureau of Sanitation (LASAN) to develop non-potable water reuse projects.^{75,76}

In addition, the City is pursuing a groundwater replenishment project to replenish the San Fernando Groundwater Basin with highly treated recycled water. LADWP's recycled water use is projected to reach 50,900 AFY by fiscal year ending 2025 by adding 8,000 AFY of planned municipal/industrial use and 7,000 AFY of indirect potable reuse (groundwater replenishment), and further increase to 67,600 AFY through fiscal year ending 2045.⁷⁷ Environmental reuse is expected to remain relatively constant at approximately 26,600 AFY.⁷⁸

(2) Water Demand

(a) Regional Water Demand

LADWP's 2020 UWMP provides water demand and supply projections in five-year increments to 2045, based on projected population estimates provided by the SCAG in its 2020–2045 RTP/SCS. Table IV.K.1-4 on page IV.K.1-28 shows LADWP's water demand

⁷² Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 18.

⁷³ Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 18.

⁷⁴ Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 18.

⁷⁵ The 37,060 AFY of recycled water was used for municipal, industrial and environmental uses.

⁷⁶ Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 20.

⁷⁷ Los Angeles Department of Water and Power, *Water Supply Assessment for the Radford Studio Center Project*, adopted December 7, 2023, p. 20.

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

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

Hydrologic Conditions	Year (acre-feet)				
	2025	2030	2035	2040	2045
Demand^a					
Average Year	642,600	660,200	678,800	697,800	710,500
Single-Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year ^b	657,900	675,800	694,900	714,400	727,400
Supply					
Average Year	642,600	660,200	678,800	697,800	710,500
Single-Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year ^b	657,900	675,800	694,900	714,400	727,400
^a Note that this total demand number is conservative as it only includes passive conservation prior to fiscal year-end 2014. ^b First year of multi-dry year. Source: Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, Exhibits 11E, 11F, and 11G, May 2021.					

and supply projections from 2025 through 2045 for the City. In 2045, during average year hydrological conditions, the City's water demand is forecasted to be approximately 710,500 AFY (with existing water conservation).^{79,80}

As shown in Table IV.K.1-4, LADWP's water supply would be equal to the water demand within LADWP's service area during average, single-dry, and multi-dry years from 2025 through at least 2045.⁸¹ LADWP's 2020 UWMP, therefore, concludes that adequate water supplies would be available to meet the projected demands within the LADWP service area under average, single-dry, and multi-dry year conditions through 2045.⁸² Therefore, the City's water supply projections in LADWP's 2020 UWMP are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the 2020–2045 RTP/SCS adopted by SCAG.⁸³

⁷⁹ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

⁸⁰ Los Angeles Department of Water and Power, Water Supply Assessment for the Radford Studio Center Project, adopted December 11, 2023, p. 22.

⁸¹ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

⁸² Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, p. ES-28.

⁸³ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021, pp. 11–19.

(b) On-Site Water Demand

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site. Therefore, as provided in the Utility Report prepared for the Project included as Appendix K of this Draft EIR, there is no existing water demand associated with the current uses on the Project Site.

(3) Water Infrastructure

Water infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that, as of 2024, includes 117 tanks and reservoirs, 85 pump stations, nine ammonization stations, 19 chlorination stations, 354 regulator and relief stations, 7,341 miles of distribution mains and trunk lines, and 61,122 fire hydrants within the City, with a total storage capacity of 323,545 acre-feet according to the estimates for fiscal year 2023–2024.⁸⁴

Water service is available to the Project Site via LADWP water lines within the adjacent streets. According to the Utility Report included in Appendix K of this Draft EIR, there is a 36-inch diameter water main in Alameda Street, a 10-inch diameter water main in north Main Street, a 6-inch diameter water main that extends approximately 180 feet from the northeast corner of the Project Site towards the northwestern corner of the Project Site in College Street, and a 2-inch diameter water line that extends approximately 140 feet from the southeast corner of the Project Site towards the southwest corner of the Project Site in Bruno Street. In addition, there are four existing fire hydrants surrounding the Project Site, with two hydrants located on the east side of Alameda Street and two hydrants located on the east side of North Main Street.

3. Project Impacts**a. Thresholds of Significance**

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

Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power,

⁸⁴ Los Angeles Department of Water and Power, 2023–2024 Briefing Book, 2024.

***natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.*⁸⁵**

Threshold (b): Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

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

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

b. Methodology

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

The analysis with regard to water infrastructure is based on the Utility Report prepared for the Project by Langan, which is included in Appendix K of this Draft EIR. As part of the Utility Report, LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. LADWP's approach consists of analyzing their water system model near the Project Site. Based on

⁸⁵ Refer to Section IV.K.2, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas infrastructure impacts. Refer to Section VI, Other CEQA Considerations, of this Draft EIR and the Initial Study included in Appendix A of this Draft EIR for a discussion of wastewater, stormwater, and telecommunications facility impacts.

the results, LADWP determines whether they can meet the Project's fire hydrant flow needs with the existing infrastructure. The results of the Information of Fire Flow Availability (IFFAR) are summarized in the analysis of Threshold (a) below and provided in Appendix A of the Utility Report. In addition, LADWP performed a hydraulic analysis to determine if adequate water supply exists for future development of the Project as part of the Service Advisory Request (SAR). LADWP's hydraulic analysis provides flow and pressure data for the approximate connection locations. Based on the results, LADWP determines whether they can meet the projected needs based on the existing infrastructure. The results of the SAR are summarized in the analysis of Threshold (a) below and provided in Appendix B of the Utility Report.

c. Project Design Features

No specific project design features related to water supply and infrastructure are proposed as part of the Project.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Project construction activities would require water for dust control, cleaning of construction equipment, grading, excavation/export, and re-compaction of soil. As provided in the Utility Report included as Appendix K of this Draft EIR, based on a review of other construction projects of similar size, a conservative estimate of construction water use ranges from approximately 1,000 to 2,000 gallons per day (gpd).

There are two existing water meters located on Bruno Street and Main Street. However, as noted above and in the Utility Report, there is no water usage on the Project Site. The approved SARs allow a proposed 8-inch connection off the 20-inch main in Alameda Street, which will have a flow of up to 2500 gpm at a pressure of 48 psi. In addition, a proposed 8-inch connection off of the 10-inch main in Main Street will have a flow of up to 2500 gpm at a pressure of 42 psi. A temporary water service would be required for Project construction. According to the results from the SARs, the capacity of the existing water infrastructure is sufficient to serve the Project's construction activities.

The Project will require construction of new, on-site water laterals to serve the new building. Construction impacts associated with the installation of new water laterals would primarily involve trenching in order to place the on-site water distribution lines below surface and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid existing water lines and disruption of water service. In addition, a Construction Traffic Management Plan (CTMP) would be prepared pursuant to Project Design Feature TR-PDF-1 to reduce any temporary pedestrian and traffic impacts. The contractor would implement the CTMP, which would ensure access and safety for pedestrians and vehicles.

Therefore, construction activities associated with the Project would not require or result in the relocation or construction of new water facilities or expansion of existing facilities that could cause a significant environmental effect. As such, construction-related impacts to water infrastructure would be less than significant.

(b) Operation

When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor of water consumption, fire flow demands have a much greater instantaneous impact on infrastructure. Therefore, fire flow demands are the primary means for analyzing infrastructure capacity. Nevertheless, conservative analyses for both fire suppression and domestic water flows have been completed by LADWP for the Project. These analyses are summarized below and described in more detail in the Utility Report included as Appendix K of this Draft EIR.

Fire flow for the Project would be required to comply with LAMC Section 57.507.3.1, which establishes fire flow standards by development type. Based on the fire flow standards set forth by LAMC Section 57.507.3.1 and by LAFD in its April 23, 2024, letter included as Appendix IS-4 of the Initial Study included as Appendix A of this Draft EIR, the Project falls within the industrial and commercial category, which has a required flow of 6,000 to 9,000 gpm from four adjacent hydrants flowing simultaneously with a residual pressure of 20 psi. As part of the Utility Report included as Appendix K of this Draft EIR, an IFFAR was submitted to LADWP to determine available fire hydrant flow from the existing public fire hydrant adjacent to the Project Site. As discussed in the Utility Report, the Project would be required to install a new fire hydrant on the west side of North Main Street, north of the Bruno Street centerline to meet the fire flow required by LAMC Section 57.507.3.1. Compliance with LAMC Section 57.507.3.1 and the installation of a new fire hydrant would be required by the City during the Project's plan check and permitting process. Based on the completed IFFAR (see Exhibit A of Appendix K of this Draft EIR), all four of the existing fire hydrants, as well as the

proposed fire hydrant flowing simultaneously, can deliver a combined flow of 7,500 gpm with a residual pressure of 20 psi, which meets the required fire flow established for the Project. Therefore, based on the IFFAR and following the installation of the new hydrant, there would be adequate fire flow available to demonstrate compliance with LAMC Section 57.507.

Furthermore, the Project would incorporate a fire sprinkler suppression system to reduce the public hydrant demands, which would be subject to LAFD review and approval during design and permitting of the Project. As set forth by LAMC Section 94.2020.0, which adopts by reference NFPA 14-2019, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As previously noted, as part of the SAR, LADWP performed a hydraulic analysis to determine if adequate water supply exists for future development of the Project. Based on the result of the SAR (see exhibit B of Appendix K of this Draft EIR), a proposed 8-inch connection off of the existing 20-inch main in Alameda Street will have a flow of up to 2,500 gpm at a pressure of 48 psi to meet maximum allowable flow pressure per LAMC Section 94.2020.0. In addition, a proposed 8-inch connection off of the existing 10-inch main in Main Street will have a flow of up to 2,500 gpm at a pressure of 42 psi to meet maximum allowable flow pressure per LAMC Section 94.2020.0. Compliance with LAMC Section 94.2020.0 and the Project's requirement to connect to the existing 20-inch and 10-inch mains would be required by the City during the plan check and permitting process. Accordingly, as concluded in the Utility Report, based on the result of the SAR, the existing water infrastructure would be able to provide the necessary flow and pressure to serve the Project's fire flow demands. As such, the existing water infrastructure would also be able to provide the necessary flow and pressure to serve the Project's domestic water demands (i.e., 31,135 gpd as discussed under Threshold (b), below) because as noted above fire flow demands have a much greater instantaneous impact on infrastructure.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

As previously discussed, Project construction activities would require water for dust control, cleaning of equipment, excavation/export, and grading/re-compaction. These activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. As provided in the Utility Report, included in Appendix K of this Draft EIR, based on a review of construction projects of similar size, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd. Given the temporary nature of construction activities and the short-term and intermittent water use during construction of the Project, the anticipated water demand during construction would be less than the new water consumption of the Project at buildout (see Table IV.K.1-5 on page IV.K.1-35), which, as discussed below can be accommodated by the existing supply. Furthermore, as concluded in LADWP's 2020 UWMP, projected water demand for the City would be met by the available supplies during all hydrologic conditions (i.e., average year, single-dry year, and multiple-dry year) in each year from 2025 through 2045, in addition to the existing and planned future water demands within LADWP's service area through the year 2045. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction.

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

(b) Operation

As discussed in Section II, Project Description, of this Draft EIR, the Project would redevelop the surface level parking lot with approximately 232,802 square feet of new uses,

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

Facility	No. of Units/ Floor Area	Sewer Generation Rate (gpd/unit)^a	Demand (gpd)
Existing to Be Removed			
Surface Parking Lot	0 sf		0
Total Existing			0
Proposed			
General Office	224,597 sf	0.12 gpd/sf	26,952
Restaurant	136 seats	30 gpd/seat	4,080
Retail	4,110 sf	0.025 gpd/sf	103
Total Project Water Demand			31,135
<i>sf = square feet</i> <i>gpd = gallons per day</i> ^a LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012. Source: Langan, Utility Technical Report for 130 W College Street, July 11, 2023. Refer to Appendix K of this Draft EIR.			

comprised of 224,597 square feet of office uses, 5,894 square feet of restaurant uses, and 4,110 square feet of retail uses.⁸⁶ As such, development of the Project would result in an increase in long-term water demand on the Project Site. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation factors established by LASAN, which also serve to estimate water demand for the proposed uses.

As shown in Table IV.K.1-5, assuming constant water use throughout the year, the Project would result in an increase of approximately 31,135 gpd, or approximately 35 AFY. However, this estimate is conservative because it does not include required ordinance savings (for example, the Project would be required to reduce indoor water use by at least 20 percent in accordance with the City of Los Angeles Green Building Code). The Project

⁸⁶ As discussed in Section II, Project Description, of this Draft EIR, the Project would include approximately 1,799 square feet of outdoor uncovered dining area adjacent to the ground floor restaurant, which is not considered "Floor Area" as defined in the LAMC, but is nevertheless counted towards the Project's restaurant area for purposes of this environmental analysis. As such, for the purpose of this environmental analysis, the Project would include 5,894 square feet of ground floor restaurant space.

was not required to prepare a WSA because the Project's estimated water demand does not meet any of the criteria set forth in SB 610 for a WSA.⁸⁷

Based on the projected water demand estimates for LADWP's service area from the 2020 UWMP identified previously in Table IV.K.1-4 on page IV.K.1-28, the Project's estimated net operational domestic water demand of 31,135 gpd (35 AFY) would represent approximately 0.0053 percent, 0.0050 percent, and 0.0052 percent of LADWP's projected 2030 average, single-dry, and multi-dry year water demand and supply, respectively.⁸⁸ Hence, the Project's domestic operational water demand would represent a nominal proportion of LADWP's projected water demand and supply in 2025.

As outlined in its 2020 UWMP and discussed above, LADWP is committed to providing a reliable water supply for the City. The 2020 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2020 LADWP UWMP also furthers the goals of L.A.'s Green New Deal (also discussed above), addresses the current and future SWP supply shortages, and concludes that MWD's actions in response to the threats to the SWP would ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, as reaffirmed in L.A.'s Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.^{89,90}

Based on the above, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry,

⁸⁷ The 232,802-square-foot commercial office Project is not (1) a residential development of more than 500 dwelling units; (a) shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space; (3) a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; (4) a hotel, motel, or both, having more than 500 rooms; (5) an 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; (6) a mixed-use project that include one or more of the aforementioned projects; or (7) a project that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project.

⁸⁸ The Project is compared to LADWP's projected 2030 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2028. $(35 \div 660,200) * 100 \approx 0.0053$ percent; $(35 \div 693,200) * 100 \approx 0.0050$ percent; and $(35 \div 675,800) * 100 \approx 0.0052$ percent.

⁸⁹ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

⁹⁰ City of Los Angeles, L.A.'s Green New Deal, 2019.

and multiple dry years. Therefore, the Project's operation-related impacts on water supply would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

(a) *Water Infrastructure*

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and the related projects within this geographic area would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of a SAR, IFFAR, and a WSA, where applicable) to ensure that the existing water infrastructure is adequate to meet the domestic and fire water demands of each related project and would be required to provide water infrastructure improvements if existing infrastructure is determined to be inadequate. In addition, to ensure its infrastructure is sufficient to meet ongoing demand, LADWP will continue to implement and update its Water Infrastructure Plan, with the most recent (2023–2024) plan which describes infrastructure accomplishments and goals that are a part of LADWP's \$6.3 billion five-year water system capital plan.⁹¹ In addition, in accordance with City requirements, prior to ground disturbance, related projects would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects.

⁹¹ Los Angeles Department of Water and Power, 2023–2024 Water Infrastructure Plan.

As with the Project, off-site connection activities and infrastructure improvements associated with the related projects could temporarily affect access in adjacent rights-of-way. However, as with the Project, related projects would implement a construction management plan to ensure that adequate and safe access remains available within and near the related project sites during construction activities. As part of the construction management plan, appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the related project sites and traffic flow is maintained on adjacent rights-of-way.

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

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

(b) Water Supply

The geographic context for the cumulative impact analysis of water supply is the LADWP service area. As discussed previously, LADWP, as a public water service provider, is required to prepare and periodically update its UWMP to plan and provide for the water supplies required to serve existing and projected demands within its service area. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045.⁹²

As identified in Section III, Environmental Setting, of this Draft EIR, there are 19 related projects located in the vicinity of the Project Site that would generate ongoing water demand, all of which are located within the LADWP service area.⁹³ The estimated water demand of the related projects is shown in Table IV.K.1-6 on page IV.K.1-39. As provided therein, the related projects would generate a total estimated water demand of approximately 1,100,931 gpd (1,233 AFY). Together with the estimated 31,135 gpd (35 AFY) of total water demand from the Project, the total cumulative water demand would be 1,132,066 gpd (1,268 AFY). These estimates are conservative because they do not take into account code-required water conservation measures or additional water conservation

⁹² Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

⁹³ The related projects list also includes Related Project No. 20, Los Angeles State Historic Park Pedestrian Bridge and Related Project No. 21, Los Angeles Aerial Rapid Transit (LA ART). These are infrastructure projects that would not generate ongoing water demand and are therefore not included in this analysis.

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

No.	Project^a	Land Use	Size	Generation Factor^{b,c}	Total Daily Water Demand (gpd)
1	1101 N. Main Street	Condominiums	318 du	190 gpd/du	60,420
2	511 N. Grand Avenue	Apartments	299 du	190 gpd/du	56,810
		Retail	8,000 sf	0.025 gpd/sf	200
3	708 N. Hill Street	Apartments	162 du	190 gpd/du	30,780
		Retail	5,000 sf	0.025 gpd/sf	125
4	211 W Alpine Street	Apartments	170 du	190 gpd/du	32,300
		Retail	2,499 sf	0.025 gpd/sf	62
5	129 W College Street, 924 N. Spring Street	Apartments	725 du	190 gpd/du	137,750
		Commercial	51,600 sf	0.05 gpd/sf	2,580
6	1201 N. Broadway	Apartments	118 du	190 gpd/du	22,420
		Office/Commercial	8,800 sf	0.12 gpd/sf	1,056
7	708 S. New Depot Street	Apartments	33 du	190 gpd/du	6,270
8	643–655 N. Spring Street	Apartments	294 du	190 gpd/du	55,860
		Hotel	149 rm	120 gpd/rm	17,880
		Commercial	10,664 sf	0.05 gpd/sf	533
9	900 N. Alameda Street	Data Center	179,900 sf	0.12 gpd/sf	21,588
10	942 N. Broadway	Apartments (market rate)	169 du	190 gpd/du	32,110
		Apartments (affordable)	9 du	190 gpd/du	1,710
		Commercial Restaurant/Office	35,805 sf (1,194 seats)	30 gpd/seat	35,820
11	843 N. Spring Street	Commercial Office/Restaurant	100,517 sf (3,351 seats)	0.12 gpd/sf	100,530
12	1457 N. Main Street	Apartments	376 du	190 gpd/du	71,440
		Retail	6,448 sf	0.025 gpd/sf	161
13	959 E. Stadium Way	Apartments	151 du	190 gpd/du	28,690

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

No.	Project^a	Land Use	Size	Generation Factor^{b,c}	Total Daily Water Demand (gpd)
14	995 N. Broadway	Hotel	111,751 sf (343 rm)	120 gpd/rm	41,160
		Restaurant	6,211 sf (207 seats)	30 gpd/seat	6,210
15	1011 N. Broadway	Hotel	114 rm	120 gpd/rm	13,680
		Restaurant/Retail	2,700 sf (90 seats)	30 gpd/seat	2,700
16	1635 N. Main Street	Office	147,601 sf	0.12 gpd/sf	17,712
17	717 N. Hill St	Apartments (39 Affordable)	411 du	190 gpd/du	78,090
		Retail	17,140 sf	0.025 gpd/sf	429
18	1030 N. Broadway	Apartments	986 du	190 gpd/du	187,340
		Retail	15,000 sf	0.025 gpd/sf	375
		Restaurant	23,800 sf (793 seats)	30 gpd/seat	23,790
19	950 E. Stadium Wy	Apartments (8 Affordable)	65 du	190 gpd/du	12,350
Related Total Water Demand					1,100,931
Project Total Water Demand					31,135
Related + Project Total					1,132,066
ac = acre du = dwelling units rm = rooms sf = square feet ^a The related projects list also includes Related Project No. 20, Los Angeles State Historic Park Pedestrian Bridge and Related Project No. 21, Los Angeles Aerial Rapid Transit (LA ART). These are infrastructure projects that would not generate ongoing water demand and are therefore not included in this analysis.					

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

No.	Project ^a	Land Use	Size	Generation Factor ^{b,c}	Total Daily Water Demand (gpd)
^b This analysis is based on sewage generation rates provided by LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012. ^c This analysis conservatively assumes that all dwelling units are 3-bedroom units, 1 one seat per 30 square feet for restaurants, and 325 square feet per hotel room. If both retail and restaurant uses are included as a single line item, this analysis assumes 100% of those uses would be restaurant because they result in a higher daily water demand. Source: Eyestone Environmental, 2025.					

measures proposed by each related project. Additionally, the estimates do not account for the removal of existing uses and, thus, represent total water demand rather than the net increase over existing conditions.

Based on the projected water demand and supply estimates for LADWP's service area from the 2020 UWMP, identified previously in Table IV.K.1-4, total water demand of the Project and related projects of approximately 1,132,066 gpd (1,268 AFY) would represent approximately 0.19 percent, 0.18 percent, and 0.19 percent of LADWP's 2030 water demand and supply during average, single-dry, and multi-dry years, respectively.⁹⁴ Hence the water demand of the Project, together with the related projects would represent a very small proportion of the LADWP's total 2030 water demand and supply, with the Project's share representing an even smaller proportion.

As previously stated, based on water demand projections in its 2020 UWMP, LADWP has determined that it will be able to reliably provide water to meet the existing and forecasted future demand through the year 2045. In addition, the Project and the related projects would comply with the numerous regulatory requirements that promote water conservation described in Subsection 2.a above, which would reduce water demand on a cumulative basis. For example, certain related projects would be subject to the City's Green Building Code requirement to reduce indoor water use by at least 20 percent, and all related projects would be required to use fixtures that conserve water. In addition, certain large, related projects meeting the thresholds under SB 610 would be required to prepare and receive LADWP approval of a WSA that demonstrates how the project's water demand would be met.

Overall, as discussed above, LADWP's 2020 UWMP demonstrates that the City will meet all existing and projected future water demand through 2045 during average, single-dry, and multi-dry years. The 2020 UWMP specifically outlined the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP's 2020 UWMP also incorporates the goals of L.A.'s Green New Deal. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high-efficiency water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, LADWP will continue to update its UWMP every five years to ensure that sufficient water supply continues to be available.

⁹⁴ *The Project and Related Projects are compared to LADWP's projected 2030 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2028. Average: 1,268 AFY / 660,200 AFY = 0.19%; Single-Dry: 1,268 AFY / 693,200 AFY = 0.18%; Multi-Dry: 1,268 AFY / 675,800 AFY = 0.19%*

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

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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