IV. Environmental Impact Analysis

K. Utilities and Service Systems

1. Water Supply

1. Introduction

This section analyzes the potential impacts the Proposed Project would have on water infrastructure and the demand on water supplies. Specifically, this section quantifies the anticipated operational water demand for the proposed development and identifies applicable water efficient strategies that are required by California State Water Code, the California Building Code (CBC), the California Green Building Code (CALGreen), the City of Los Angeles Green Building Code (LA Green Building Code), and the City of Los Angeles Department of Water and Power's (LADWP) 2015 Urban Water Management Plan (UWMP). Additionally, this section relies on the information contained in the service request response letter provided by the LADWP, dated April 24, 2019 (included in Appendix J.1 to this EIR) and the Fire Service Pressure Flow Report provided by the LADWP, dated February 26, 2018 (Appendix J.2. to this Draft EIR).

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) California Code of Regulations

The California Code of Regulations (CCR), is the official compilation and publication of regulations that have been adopted, amended or repealed by state agencies. The following provisions of the CCR pertain to water regulations.

(i) Title 20

Title 20, Chapter 4, Article 4, Section 1605.3 establishes water efficiency standards (i.e., maximum flow rates, maximum gallons per flush) for all new plumbing fittings and fixtures (e.g., showerheads, sink faucets, water closets, urinals). Among the standards, the maximum flow rate for showerheads and lavatory faucets manufactured after July 1, 2018

are 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi) with an optional temporary flow of 2.2 gpm at 60 psi for kitchen faucets and aerators. The standard for public lavatory faucets and aerators is 0.5 gpm at 60 psi. The standard for water closets and urinals is 1.28 gallons per flush. In addition, Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

(ii) Title 24, Part 11

Part 11 of Title 24 establishes the CALGreen building code. The purpose of CALGreen 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 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. CALGreen 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 voluntary measures can be adopted by local jurisdictions for greater efficiency.

(i) Title 24, Part, 5

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 2016 California Plumbing Code, which is based on the 2015 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2017.

(b) California Water Code

(i) Urban Water Management Planning Act

The State of California's Urban Water Management Planning Act of 1984 requires all public water suppliers that provide municipal and industrial water to more than 3,000 customers or supply more than 3,000 acre feet per year (AFY) of water to prepare a UWMP to assess the reliability of its water sources over a 25-year planning horizon and report its progress on 20 percent reduction in per-capita urban water consumption by the year 2020 (as required in the Water Conservation Bill of 2009 SBX7-7). The UWMP must be prepared every 5 years and identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years, and must be submitted to the California Department of Water Resources (DWR).

(ii) Emergency Declaration and Executive Orders B-29-15, B-36-15, B-37-16, and B-40-17

In response to California's drought conditions, on January 17, 2014, Governor Jerry Brown declared a State of Drought Emergency and directed state officials to take numerous necessary actions with local Urban Water Suppliers and municipalities to reduce the impacts of the ongoing drought conditions that had been occurring in California since approximately 2009.[1] Subsequently, four Executive Orders were issued between April 2015 to April 2017 to address changing drought conditions and provide guidance for addressing the drought conditions.

Executive Order B-29-15 (April 2015) imposed a mandatory 25 percent statewide water reduction on potable water use by Urban Water Suppliers. It prioritized water infrastructure projects, incentivized water efficiencies, and streamlined permitting with new approval processes for water transfers and emergency drinking water projects. Executive Order B-36-15 (November 2015) called for additional actions to build on the state's response to record dry conditions and assisted recovery efforts from devastating wildfires; and Executive Order B-37-16 (May 2016) continued water use restrictions from Executive Order B-29-15 as drought conditions continued to persist. Executive Order B-37-16 called for long-term improvements to local drought preparation across the state, and directed the California State Water Resources Control Board (SWRCB) to develop proposed emergency water restrictions for 2017 if the drought persists.[2]

In May 2016, SWRCB adopted a revised emergency water conservation regulation, effective June 2016 through at least February 2017, which rescinded numeric reduction targets for Urban Water Suppliers, instead requiring locally developed conservation standards based upon each agency's specific circumstances.[3]

The regulatory requirements resulting from these Executive Orders were codified in Article 22.5, Drought Emergency Water Conservation of the CCR.

Finally, 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. The order also rescinded two drought-related emergency proclamations and four drought-related executive orders. In response to Executive Order B-40-17, on April 26, 2017, the SWRCB partially repealed the emergency regulation in

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[1] *State of California, Office of Governor Edmund G. Brown, Jr., Governor Brown Declares Drought State of Emergency, January 17, 2014, https://wayback.archive-it.org/5763/20181212005409/https://www.gov.ca.gov/2014/01/17/news18368/, accessed January 2020.*

[2] *State of California, Office of Governor Edmund G. Brown, Jr., Governor Brown Issues Order to Continue Water Savings as Drought Persists, May 9, 2016, https://wayback.archive-it.org/5763/20181219215604/https://www.gov.ca.gov/2016/05/09/news19408/.*

[3] *State of California Office of Administrative Law, Notice of Approval of Emergency Regulatory Action, State Water Resources Control Board, Title 23, May 31, 2016.*

regard to water supply stress test requirements and remaining mandatory conservation standards for urban water suppliers.[4,5] 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.

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

Senate Bills SB 610 and SB 221 became effective January 1, 2002, amending Sections 10910-10915 of the State Water Code, by requiring that counties and cities consider the availability of adequate water supplies for certain new large developments projects and obtain written verification of sufficient water supply from the local water supplier to serve proposed large development projects in their jurisdiction.

Pursuant to SB 610, projects are required to obtain Water Supply Assessments (WSA) include the following:

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;
- a proposed commercial office building of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- a proposed hotel or motel of more than 500 rooms;
- a proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- a mixed-use project that falls in one or more of the above-identified categories; or
- a project not falling in one of the above-identified categories but that would demand water equal or greater than the amount required by a 500-dwelling unit project.

SB 221 also addresses water supply in the land use planning process for large subdivision projects that, opposite to SB 610 WSAs which are prepared at the beginning of a planning process, require a Water Supply Verification (WSV) at the end of the planning process

[4] *California State Water Resources Control Board, Emergency Conservation Regulation, 2017, https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/emergency_regulation.html.*

[5] *State Water Resources Control Board, Resolution No. 2017-0024, https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/rs2017_0024.pdf.*

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 shall make a specified 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. In addition, 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 221 is codified in Sections 11010, 65867.5, 66455.3 and 66473.7 of the Government Code.

Senate Bill 7 (SB-7), which was part of the Seventh Extraordinary Session of 2009 and referred to as SB X7-7, was enacted on November 10, 2009. SB 7 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.[6] 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 Water Supply Assessments (WSA) under SB 610.

(c) California Water Plan

The California Water Plan is the state's strategic plan for managing and developing water resources statewide for current and future generations. In 2014, DWR released up-to-date climate change information, including hydrologic impacts and projections at the statewide and regional levels and adaptation strategies, in the California Water Plan Update 2013 (California Water Plan).[7] It provides a collaborative planning framework for elected officials, agencies, tribes, water and resource managers, businesses, academia, stakeholders, and the public to develop findings and recommendations and make informed decisions for California's water future. The plan, updated every five years, presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The Water Plan also evaluates different combinations of regional and statewide resource management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. The evaluations and assessments performed

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

[7] *California Department of Water Resources, California Water Plan, Update 2013, October 2014.*

for the plan help identify effective actions and policies for meeting California's resource management objectives in the near term and for several decades to come.

In July 2019, DWR released the Final 2018 Update to the California Water Plan.[8] The document provides recommended actions, funding scenarios, and an investment strategy to bolster efforts by water and resource managers, planners, and decision-makers to overcome the State's most pressing water resource challenges. It reaffirms State government's role and commitment to sustainable, equitable, long-term water resource management; and introduces implementation tools to inform decision-making. The 2018 Update recommends additional investment in infrastructure and ecosystem improvements to overcome challenges to sustainability; and it recommends actions to resolve systemic and institutional issues that contribute to many of the state's water challenges.[9]

(d) California Water Action Plan

The California Water Action Plan is a roadmap for the State's journey towards sustainable water management. The first California Water Action Plan was released in January 2014 under Governor Jerry Brown's administration.[10] The California Water Action Plan discusses the challenges to water in California: uncertain water supplies, water scarcity/drought, declining groundwater supplies, poor water quality, declining native fish species and loss of wildlife habitat, floods, supply disruptions, and population growth and climate change further increasing the severity of these risks. Ten actions are listed in the California Water Action Plan to address the pressing water issues that California faces while laying groundwork for a sustainable water future:[11]

1. Make conservation a California way of life;
2. Increase regional self-reliance and integrated water management across all levels of government;
3. Achieve the co-equal goals for the Delta;
4. Protect and restore important ecosystems;

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[8] *California Department of Water Resources, https://water.ca.gov/News/News-Releases/2019/July-19/Final-Water-Plan-Update-2018.*

[9] *California Department of Water Resources, California Water Plan Update 2018, Executive Summary, https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/California-Water-Plan/Docs/Update2018/Final/California-Water-Plan-Update-2018.pdf#page=23.*

[10] *California Natural Resources Agency, California Water Action Plan, https://resources.ca.gov/CNRALegacyFiles/docs/california_water_action_plan/2014_California_Water_Action_Plan.pdf, accessed March 2020.*

[11] *California Natural Resources Agency, California Water Action Plan 2016 Update, http://resources.ca.gov/docs/california_water_action_plan/Final_California_Water_Action_Plan.pdf, accessed March 2020.*

5. Manage and prepare for dry periods;
6. Expand water storage capacity and improve groundwater management;
7. Provide safe water for all communities;
8. Increase flood protection;
9. Increase operational and regulatory efficiency;
10. Identify sustainable and integrated financing opportunities.

(2) Regional

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.

(a) MWD's 2015 Urban Water Management Plan

The MWD's 2015 Regional UWMP (RUWMP) addresses the future of MWD's water supplies and demand through the year 2040.[12] 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 2-4 of the 2015 RUWMP.[13] The analysis in the 2015 RUWMP concluded that reliable water resources would be available to continuously meet demand through 2040.[14] In the 2015 RUWMP, the projected 2040 demand water is 2,201,000 AFY, whereas the expected and projected 2040 supply is 2,941,000 AFY based on current programs, and an additional

[12] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016, http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf., accessed March 2020.*

[13] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016, http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf., accessed March 2020.*

[14] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016, http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf., accessed March 2020.*

398,000 AFY is expected to become available under programs under development for a potential surplus in 2040 of 1,138,000 AFY.[15]

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. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct (CRA), SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs. As set forth in their 2015 UWMP, MWD will also continue investments in water use efficiency measures to help the region achieve the 20 percent per person potable water use reduction by 2020.

(b) MWD's 2015 Integrated Resources Plan

The MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply such as water quality, climate change, and regulatory and operational changes. The most recent IRP (2015 IRP) was adopted in January 2016.[16] 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. Specifically, the 2015 IRP includes the following strategies to meet future water demand:[17]

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[15] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, page 2-15, http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf.*

[16] *Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2015 Update, Report No. 1518, January 2016,* http://www.mwdh2o.com/PDF_About_Your_Water/2015%20IRP%20Update%20Report%20(web).pdf.

[17] *Metropolitan Water District of Southern California, Integrated Water Resources Plan 2015 Update, Report 1518, page 6.5,*

- Stabilizing and maintaining imported supplies;
- Meeting future growth through increase water conservation and the development of new – and protection of existing – local supplies;
- Pursuing a comprehensive transfers and exchanges strategy;
- Building storage in wet and normal years to manage risk and drought; and
- Preparing for climate change with Future Supply Actions – recycled water, seawater desalination, stormwater capture, and groundwater cleanup.

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

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. 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 2015 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.[18]

(c) MWD's 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

http://www.mwdh2o.com/PDF_About_Your_Water/2015%20IRP%20Update%20Report%20(web).pdf , accessed January 2020

[18] *Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2015 Update, Report 1518, page VIII, http://www.mwdh2o.com/PDF_About_Your_Water/ 2015%20IRP%20Update%20Report%20(web).pdf, accessed January 2020.*

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.[19]

(d) MWD's 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), which has since been implemented three times, most recently in April 2015. The WSAP includes a formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.[20] The allocation period covers 12 consecutive months from July of a given year through the following June.

[19] *Water Surplus and Drought Management Plan, Report No. 1150. August 1999, http://www.mwdh2o.com/PDF_About_Your_Water/2.4_Water_Supply_Drought_Management_Plan.pdf.*

[20] *Metropolitan Water District, 2015 Urban Water Management Plan, page 2-21, http://www.mwdh2o.com/PDF_About_Your_Water/2.4.2_Regional_Urban_Water_Management_Plan.pdf, accessed January 2020.*

(3) Local

The Los Angeles Department of Water and Power (LADWP) currently supplies water to the Project Site. The LADWP is responsible for ensuring that water demands within the City are met.

(a) LADWP's 2015 Urban Water Management Plan

In June 2016, the City adopted the 2015 Urban Water Management Plan (2015 UWMP). LADWP's 2015 UWMP serves two purposes: (1) it provides a master plan for water supply and resources management consistent with the City's goals and policy objectives; and (2) it provides full compliance with requirements of California's Urban Water Management Planning Act.[21] The 2015 UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's 2015 UWMP used a service area-wide method in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2040. The driving factors for this growth are demographics, weather, and conservation. LADWP used anticipated growth in the various customer class sectors as provided by MWD who received projected demographic data from the Southern California Association of Governments (SCAG). The 2015 UWMP is based on projections in the in the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

LADWP's 2015 UWMP addresses water demand drivers and forecasts through 2040. The 2015 UWMP includes a new water demand forecast called a modified unit use approach for the major categories of demand, namely, demographics, socioeconomics, conservation, weather, and non-revenue water. This forecast will allow the City to better understand water-use trends and develop effective conservation programs.

LADWP's 2015 UWMP also defines an evolving water supply portfolio that includes significant increases in both water conservation and local water supplies. It addresses confidence in the water supply by analyzing the uncertainties associated with climate change and integrating this analysis into water supply plans. Finally, it reinforces the need to address the water/energy nexus and continuing efforts to reduce carbon footprint. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP has available supplies to meet all demands under all three hydrologic scenarios through the 25-year planning period covered by the 2015 UWMP.

[21] *City of Los Angeles, Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, 2016.*

(i) Supply Reliability Assessment

To demonstrate LADWP's water supply reliability, Table IV.K-1 summarizes the water demands and supplies from the 2015 UWMP for single dry year conditions through FY 2039-2040, which represents the City's planned supply portfolio to meet projected water demands under the most critical hydrologic conditions. The projected supply portfolio under multiple dry year conditions, summarized in Table IV.K-2, is almost identical to that under single dry year conditions. Table IV.K-3 summarizes the water demands and supplies for average year conditions, which has the highest probability of occurring.

Tables IV.K-1 through IV.K-3 show that the City's locally-developed supplies will increase from the current 14 percent to 49 in dry years, or to 47 percent in average years. These local supplies are not influenced by variability in hydrology and will become the cornerstone of LA's future water supplies. As a result, the City's combined imported supplies will decrease significantly from the current 86 percent to 51 percent in dry years, or to 53 percent in average years.

As for the breakdown of the City's imported supplies, it is still highly influenced by hydrology. The Los Angeles Aqueduct (LAA) system has limited storage capacity and is therefore subject to the variability of hydrology while MWD (with its ample storage) is capable of providing supplemental water supply to the City with less variability due to hydrologic conditions. By FY 2039/40 LAA deliveries are projected at 7 percent in dry years and 42 percent in average years, MWD will make up the remaining 44 percent in dry years or 11 percent in average years to meet the City's need for supplemental water.

(b) Los Angeles Municipal Code

The City has adopted several regulations and ordinances in the Los Angeles Municipal Code (LAMC) in an effort to reduce water consumption within the City. Chapter XII of the LAMC establishes the Water Conservation Plan for the City of Los Angeles, and Chapter IX, Building Regulations, Article 9 (LA Green Building Code) establishes water reduction measures to reduce the City's water consumption in residential and non-residential development.

(i) Ordinance No. 180,822: Water Efficiency Requirements Ordinance

The Water Efficiency Requirements Ordinance, City Ordinance No. 180,822, effective December 1, 2009, established water efficiency requirements for new development and renovation of existing buildings, mandating installation of high-efficiency plumbing fixtures in residential and commercial buildings.

Table IV.K-1
Service Area Reliability Assessment for Single Dry Year

Demand and Supply Projections (AF)	Single Dry Year (FY 2014-2015)				
	2020	2025	2030	2035	2040
Total Water Demand [a]	**642,400**	**676,900**	**685,500**	**694,900**	**709,500**
pLAn Water Demand Target	**485,600**	**533,000**	**540,100**	**551,100**	**565,600**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14/15	156,700	143,700	145,100	143,500	143,500
Los Angeles Aqueduct [d]	32,200	51,900	51,400	51,000	50,600
Groundwater [e] (Net)	112,670	110,670	106,670	114,670	114,070
Recycled Water					
-Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
-Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
-Stormwater Reuse (Harvesting)	100	200	300	300	400
-Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	323,470	369,470	380,470	396,670	398,970
MWD Water Purchases					
With Existing/Planned Supplies	318,930	307,430	305,030	298,230	310,530
Total Supplies	**642,400**	**676,900**	**685,500**	**694,900**	**709,500**
Potential Supplies					
Water Transfers [f]	40,000	40,000	40,000	40,000	40,000
MWD Water Purchases					
With Existing/Planned/Potential Supplies	278,930	267,430	265,030	258,230	270,530
Total Supplies	**642,400**	**676,900**	**685,500**	**694,900**	**709,500**

[a] *Total Demand with existing passive conservation.*

[b] *Cumulative hardware savings since late 1980s reached 188,034 AFY by 2014-15.*

[c] *Additional non-hardware conservation required to meet water use goals set in the Sustainable City pLAn 2015.*

[d] *LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles supply is estimated to decrease 0.1652% per year due to climate change impact.*

[e] *Net groundwater excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.*

[f] *Potential water transfer occurs in dry years with stored water acquired in average and wet years.*

Source: LADWP, 2015 Urban Water Management Plan, Exhibit 11F at page 11-11.

Table IV.K-2
Service Area Reliability Assessment for Multiple Dry Years (2011-2015)

Demand and Supply Projections (AF)	Multiple Dry Years (FY 2012-13 to FY 2014-15) Fiscal Year Ending on June 30				
	2020	**2025**	**2030**	**2035**	**2040**
Total Water Demand [a]	**642,400**	**676,900**	**685,500**	**694,900**	**709,500**
pLAn Water Demand Target	**485,600**	**533,000**	**540,100**	**551,100**	**565,600**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14/15	156,700	143,700	145,100	143,500	143,500
Los Angeles Aqueduct [d]	33,500	53,200	52,800	52,400	51,900
Groundwater [e] (Net)	112,670	110,670	106,670	114,670	114,070
Recycled Water					
-Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
-Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
-Stormwater Reuse (Harvesting)	100	200	300	300	400
-Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	324,770	370,770	381,870	398,070	400,270
MWD Water Purchases					
With Existing/Planned Supplies	317,630	306,130	303,630	298,830	309,230
Total Supplies	**642,400**	**676,900**	**685,500**	**694,900**	**709,500**
Potential Supplies					
Water Transfers [f]	40,000	40,000	40,000	40,000	40,000
MWD Water Purchases					
With Existing/Planned/Potential Supplies	277,630	266,130	265,630	256,830	269,230
Total Supplies	**642,400**	**676,900**	**685,500**	**694,900**	**709,500**

[a] *Total Demand with existing passive conservation.*

[b] *Cumulative hardware savings since late 1980s reached 188,034 AFY by 2014-15.*

[c] *Additional non-hardware conservation required to meet water use goals set in the Sustainable City pLAn 2015.*

[d] *LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles supply is estimated to decrease 0.1652% per year due to climate change impact.*

[e] *Net groundwater excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.*

[f] *Potential water transfer occurs in dry years with stored water acquired in average and wet years.*

Source: LADWP, 2015 Urban Water Management Plan, Exhibit 11G at page 11-12.

Table IV.K-3
Service Area Reliability Assessment for Average Weather Year

Demand and Supply Projections (AF)	Average Weather Conditions (FY 1961-1962 to 2010-2011)				
	2020	2025	2030	2035	2040
Total Water Demand [a]	**611,800**	**644,700**	**652,900**	**661,800**	**675,700**
pLAn Water Demand Target	**485,600**	**533,000**	**540,100**	**551,100**	**565,600**
Existing/Planned Supplies					
Conservation (Additional Active[b] and Passive[c] after FY 14/15	125,800	110,900	111,600	109,100	108,100
Los Angeles Aqueduct [d]	275,700	293,400	291,000	288,600	286,200
Groundwater [e] (Net)	112,670	110,670	106,670	114,670	114,070
Recycled Water					
-Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
-Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
-Stormwater Reuse (Harvesting)	400	800	1,200	1,600	2,000
-Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	536,370	578,770	587,470	601,170	600,770
MWD Water Purchases With Existing/Planned Supplies	75,430	65,930	65,430	60,630	74,930
Total Supplies	**611,800**	**644,700**	**652,900**	**661,800**	**675,700**
Potential Supplies					
Water Transfers [f]	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
MWD Water Purchases With Existing/Planned/Potential Supplies	35,430	25,930	25,430	20,630	34,930
Total Supplies	**611,800**	**644,700**	**652,900**	**661,800**	**675,700**

[a] *Total Demand with existing passive conservation.*

[b] *Cumulative hardware savings since late 1980s reached 188,034 AFY by 2014-15.*

[c] *Additional non-hardware conservation required to meet water use goals set in the Sustainable City pLAn 2015.*

[d] *LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles supply is estimated to decrease 0.1652% per year due to climate change impact.*

[e] *Net groundwater excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.*

[f] *Potential water transfer occurs in dry years with stored water acquired in average and wet years.*

Source: LADWP, 2015 Urban Water Management Plan, Exhibit 11H at page 11-13.

(ii) Ordinance Nos. 181,480, 182,849, 182,248, and 184,692: Los Angeles Green Building Code

The City's LA Green Building Code, Ordinance No. 181,480, subsequently amended by Ordinance No. 182,849, creates a set of development standards and guidelines to further energy efficiency and the reduction of greenhouse gas emissions. It builds upon and sets higher standards than those incorporated in the CALGreen Code. Amongst its provisions are efficiency standards regarding water consumption fixtures and appliances in new buildings. Additionally, the LA Green Building Code sets further restrictive water efficiency standards for plumbing fixtures. The LA Green Building Code is implemented through the building permit review process, during which projects are evaluated for compliance with the required water conservation features.

Ordinance No. 184,248 (effective June 2016) amended provisions of Articles 4 and 9 of Chapter IX of the LAMC to establish citywide water efficiency standards and require water-saving systems and technologies in buildings and landscapes to conserve and reduce water usage.

Indoor Water Use. Pursuant to Section 99.04.303.4 of the LAMC, a 20% reduction in the overall use of potable water within a building shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fittings as required by the Los Angeles Building Standards. The 20% reduction in potable water use shall be demonstrated by a Performance Method. A calculation demonstrating a 20% reduction in the building "water use baseline," as established in Table IV.K-4, below, shall be provided. Table IV.K-5 shows the maximum allowable flow rate in building additions and alterations.

Outdoor Water Use. Pursuant to Section 99.04.304.1, a water budget shall be developed for landscape irrigation use that conforms to the local water efficient landscape ordinance or to the California Department of Water Resources' Model Water Efficient Landscape Ordinance, whichever is more stringent. Additionally, in new residential construction or building addition or alteration over 500 square feet of cumulative landscaped area, install irrigation controllers and sensors which include the criteria specified in Section 99.04.304.2 and meet manufacturer's recommendations. Furthermore, outdoor water metering, swimming pool covers, and exterior faucets are regulated under the LAMC Section 99.04.304 for outdoor water usage.

Table IV.K-4
Water Use Baseline[3]

Fixture Type	Baseline Flow Rate	Duration	Daily Uses	Occupants
Showerheads	2.0 gpm @ 80 psi	8 min	1	X [2a]
Lavatory Faucets, Residential	1.5 gpm @ 60 psi	0.25 min	3	X
Lavatory Faucets, Common/Public Uses	0.5 gpm @ 60 psi	0.25 min	3	X
Kitchen Faucets	1.8 gpm @ 60 psi	4 min	1	X [2b]
Metering Faucets	0.25 gallons/cycle	--	3	X
Water Closets	1.28 gallons/flush	1 flush	1 male[1], 3 female	X
Urinals	0.125 gallons/flush	1 flush	2 male	X

A. Effective July 1, 2016, the maximum flow rate for residential lavatory faucets will be 1.2 gpm at 60 psi in accordance with Title 24 of the California Code of Regulations.
B. Fixture "Water Use" = Flow Rate x Duration x Occupants x Daily Uses.
1. The daily use number shall be increased to three if urinals are not installed in the room.
2. Refer to Table A, Chapter 4 of the Los Angeles Plumbing Code, for occupant load factors.
a. Shower use by occupants depends on the type of use of a building or portion of a building. For example, the total occupant load for a health club, but only a fraction of the occupants in an office building as determined by the anticipated number of users.
b. Kitchen faucet use is determined by the occupant load of the area served by the fixture.
3. Use Worksheet WS-1 of the 2013 CALGreen Code to calculate baseline water.

Source: City of Los Angeles, Ordinance 184,248, effective June 6, 2016.

Table IV.K-5
Water Reduction Fixture Flow Rates

Fixture Type	Maximum Allowable Flow Rate
Lavatory Faucets, Residential	1.2 gpm @ 60 psi
Kitchen Faucets [a]	1.5 gpm @ 60 psi
Metering Faucets	0.2 gallons/cycle
Showerheads	1.8 gpm @ 80 psi
Clothes Washers	ENERGY-STAR certified
Dishwashers	ENERGY-STAR certified

Notes:
[a] Kitchen faucets may temporarily increase the flow to 2.2 gallons per minute (gpm) at 60 pounds force per square inch (psi), and must default to 1.5 gpm at 60 psi. This requirement does not apply to a faucet in commercial kitchens or in buildings that have water closets with a maximum flush rate of 1.06 gallons per flush (gpf) installed throughout.
Source: City of Los Angeles, Ordinance 184,248, effective June 6, 2016.

(iii) Ordinance No. 170, 978: Landscape Ordinance

In 1996, Ordinance No. 170,978 amended LAMC Sections 12.40 through 12.43 to establish consistent landscape requirements for new projects within the City. This ordinance requires numerous water conservation measures in landscape, installation, and maintenance including but not limited to the use of drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray; setting automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation; and watering less in the cooler months and during the rainy season. The ordinance also provides guidance intended to increase the "residence time of precipitation" within a given watershed.

(iv) Ordinance Nos. 181,999 and 183,833: Low Impact Development

In 2011, the City adopted the Citywide Low Impact Development (LID) Ordinance (LID Ordinance). LID is a stormwater management strategy with the goal of mitigating the impacts of increased runoff and stormwater pollution as close to its source as possible. Among other provisions regarding drainage, the LID Ordinance promotes the collection and use of on-site stormwater for irrigation of landscaping and recharge to the groundwater table where/if appropriate. A related ordinance, Ordinance No. 183,833, the Stormwater and Urban Runoff Pollution Control Ordinance, establishes City requirements to meet its obligation under its Municipal Separate Storm Sewer System (MS4) Permit. The ordinance further delineates implementation procedures for meeting the City's LID requirements.

(v) Ordinance Nos. 166,080, 136,608, and 184,250: Emergency Water Conservation Plan

The City's Emergency Water Conservation Plan was most recently updated on June 9, 2015, superseding Ordinance No. 181,288. The purpose of this Ordinance is to provide mandatory water consumption practices during times when the supply of water available for use is reduced due to such factors as weather conditions, groundwater levels, etc. The Ordinance establishes varied water consumption limitations arranged by Phases, whereby the level of restriction for each Phase is tied to the level of water conservation required, whereby each successive phase creates additional restrictions on water use to address increasingly severe water shortage emergencies. Water conservation measures include such restrictions as limited watering of hard surfaces and automobiles, and rationed watering of landscaping. The most recent update to the Ordinance added an additional phase to allow for outdoor watering two days a week, and to clarify other prohibited uses for other phases. The Los Angeles City Council previously implemented

Phase III restrictions of the Ordinance and the LADWP Board of Water and Power Commissioners adopted Shortage Year Rates as well in 2009.[22] Phase II restrictions were implemented in August 2010 and remain in effect today.

On January 20, 2014, LADWP issued a Statement Regarding Statewide Drought conditions.[23] The statement said that Los Angeles has prepared for the approximately five-year drought, pointing out Angelinos use less water per capita than residents of any major U.S. city with a population over 1 million. According to the statement, LADWP and other Southern California water agencies have invested in water storage over the past decade; and together with a strong conservation program, these investments will allow the City to weather the current shortage. The statement asked residents to look for more ways to reduce their water use and take advantage of money saving rebates offered by LADWP, including rebates for the use of water efficient appliances and devices and replacement of water-thirsty lawns with California Friendly landscape. LADWP also expanded its public outreach and education efforts to raise awareness about the dry year conditions and users' responsibility to use water wisely and in accordance with the City's Water Conservation Ordinance.

On October 14, 2014, Mayor Eric Garcetti issued Executive Directive 5 (ED5), which directed that the City achieve the following goals: a 20 percent reduction in per capita potable water consumption by 2017; a reduction in LADWP purchase of imported potable water by 50 percent by 2024; and creation of an integrated strategy that increases local water supplies and improves water security in the context of climate change and seismic vulnerability.[24] The 2015 UWMP includes existing plans by LADWP to develop local water supplies to reduce reliance on purchased water in the future. These goals include increased stormwater capture, groundwater clean-up, recycled water, and conservation.

On July 21, 2015, the Board of Water and Power Commissioners adopted a Resolution recommending the Mayor and City Council consider a transition from Phase II to Phase III of City Ordinance No. 183,608's water conservation measures if either the Mayoral or SWRCB conservation mandates are not met on a monthly basis. In addition to the requirements of Phase I and II, Phase III would limit outdoor irrigation to no more than two days a week. As of January, 2016, Phase III had not been implemented. On February

[22] *Los Angeles Department of Water and Power, Emergency Water Conservation Ordinance – Council meeting July 14, 2009, September 15, 2009, http://clkrep.lacity.org/onlinedocs/2009/09-0369-s9_rpt_dwp_9-15-09.pdf.*

[23] *Los Angeles Department of Water and Power, LADWP Statement Regarding Statewide Drought Conditions, January 20, 2014, https://www.ladwpnews.com/ladwp-statement-regarding-statewide-drought-conditions.*

[24] *City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response – Creating a Water Wise City, Issued October 14, 2014, https://www.lamayor.org/sites/g/files/wph446/f/page/file/ED_5_-_Emergency_Drought__Response_-_Creating_a_Water_Wise_City.pdf?1426620015.*

2, 2016, SWRCB, through Resolution No. 2016-0007, amended and extended the emergency regulation to continue the restrictions on water use through October 2016. On February 8, 2017, SWRCB adopted Resolution No. 2017-0004, which further extended the emergency drought regulations through October 2017. However, on April 8, 2017, SWRCB adopted Resolution No. 2017-0024, rescinding the water conservation restrictions, but maintaining the measures' reporting requirements for Urban Water Suppliers. The Final Los Angeles Emergency Water Conservation Plan Ordinance (No. 184250) was signed on April 19, 2016 and continues to be in effect.

(vi) Ordinance No. 184,130: Water Rate Ordinance

The City's Water Rate Ordinance, originally adopted in June 1995 and amended in March 2016 by Ordinance No. 184,130, restructured water rate schedules for single-dwelling units, multi-dwelling units, commercial, industrial, government, and other land uses.[25] The water rate structures provide investments for reliable infrastructure, encourage conservation, expand local water supply projects, reduce reliance on imported purchased water, and meet regulatory mandates concerning drinking water quality. In regard to regulations specific to the provision of water for purposes of fire protection, largely defined by the Fire Code (Chapter V, Article 7 of the LAMC), see Section IV.H.1, Fire Protection, of this Draft EIR.

(c) The Green New Deal Sustainable City pLAn 2019

In 2019, the Mayor's office adopted The Green New Deal Sustainable City pLAn 2019 (L.A.'s Green New Deal) as an update to the 2015 Sustainable City pLAn.[26] L.A.'s Green New Deal 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. To support the Green New Deal vision, L.A.'s Green New Deal establishes a number of Targets to be met:[27]

[25] *City of Los Angeles, Ordinance No. 184,130, http://clkrep.lacity.org/onlinedocs/2015/15-1543_ORD_184130_4-15-16.pdf.*

[26] *Although the Mayor's office adopted The Green New Deal Sustainable City pLAn 2019 (L.A.'s Green New Deal) in January 2019 as an update to the Sustainable City pLAn 2015, the water conservation targets in the 2015 UWMP were based on the Sustainable City pLAn 2015. Therefore, this section appropriately addresses the Sustainable City pLAn 2015 as it relates to the 2015 UWMP and L.A.'s Green New Deal as it pertains to current sustainability goals and policies.*

[27] *City of Los Angeles. LA's Green New Deal, 2019, pages 46 - 49. http://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf.*

- Source 70 percent of Los Angeles water locally (compared to a 15 percent baseline during the July 2013 to June 2014 period) and capture 150,000 AFY of stormwater by 2035;
- Recycle 100 percent of all wastewater for beneficial reuse by 2035 (in contrast to a baseline value of 27 percent in fiscal year 2017-2018);
- Build at least 10 new multi-benefit stormwater capture projects by 2025 to improve local water quality and increase local water supply; 100 by 2035; and 200 by 2050;
- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050; and
- Install or refurbish hydration stations at 200 sites, prioritizing municipally-owned building and public properties such as parks, by 2035.

b) Existing Conditions

(1) Local Infrastructure

The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,337 miles of pipes, approximately 119 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts.[28] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP.

Based on correspondence from the LADWP, the Project Site is currently served by a 12-inch water main in Fairfax Avenue, an 8-inch water line in W. 3rd Street, and an 8-inch water line in a portion of Colgate Avenue and Ogden Drive.[29] LADWP has confirmed that there are no known water service problems/deficiencies in the area.[30]

(2) Fire Flow

The 2017 City of Los Angeles Fire Code establishes different fire flow requirements for different land uses and density. Fire flow requirements ranges from 2,000 gallons per

[28] *LADWP, Water Facts and Figures, website: http://www.ladwp.com, accessed February 2020.*
[29] *City of Los Angeles Department of Water and Power, Correspondence from Charles Holloway, Manager of Environmental Planning and Assessment, to Parker Environmental Consultants, dated April 24, 2019 (see Appendix J.1 to this EIR).*
[30] *Ibid.*

minute (gpm) from three adjacent fire hydrants flowing simultaneously for low density residential land uses to 12,000 gpm for high density industrial and commercial areas (i.e., principal business districts or Centers). Table IV.K-6 below lists the fire flow requirements by type of land use.[31]

Table IV.K-6
Fire Flow by Type of Land Development

Type of Land Development	Fire Flow in Gallons per Minute (gpm)
Low Density Residential	2,000 from three adjacent fire hydrants flowing simultaneously
High Density Residential and Neighborhood Commercial	4,000 from four adjacent fire hydrants flowing simultaneously
Industrial and Commercial	6,000 to 9,000 (from four to six fire hydrants flowing simultaneously)
High Density Industrial and Commercial (Principal Business District and Centers)	12,000 available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required.
Source: City of Los Angeles, Los Angeles Fire Department, 2017 City of Los Angeles Fire Code, Chapter 5, Table 507.3.1, June 2017.	

As noted on the facility service maps provided by the LADWP,[32] there are twelve fire hydrants located near the Project Site. There are three 2 ½" by 4" double hydrants and one 4' double hydrant located at the intersection of W. 3rd Street and Fairfax Avenue; two 2 ½" by 4" double hydrants located just south of Blackburn Avenue and S. Fairfax Avenue; and two 2 ½" by 4" double hydrants located in the vicinity of 4th Street and S. Fairfax Avenue. There are two 2 ½" by 4" double hydrants north of the Project Site midblock between S. Fairfax Avenue and S. Ogden Drive, one 2 ½" by 4" double hydrant located on the southeast corner of S. Ogden Drive and W. 3rd Street; and one 4" double hydrant on the north side of W. 3rd Street east of S. Ogden Drive. These four hydrants are the closest to the Development Site.

To assess the adequacy of the existing fire flow pressure serving the Development Site, the LADWP conducted a Fire Service Pressure Flow Report for the Proposed Project. The Development Site's existing fire flow service is derived from the 6-inch water line off of the 8 inch main on the south side of W. 3rd Street approximately 562 feet east of S. Fairfax Avenue. The distance from the DWP street main to the property line is 49 feet. Based on the LADWP's Fire Service Pressure Flow Report for this water line, the system maximum pressure is 175 psi based on the street curb elevation of 186 feet above mean

[31] *City of Los Angeles, 2017 City of Los Angeles Fire Code, Chapter 5, Table 507.3.1, June 2017.*
[32] *See LADWP correspondence to the Department of City Planning in Appendix J.1 to this Draft EIR.*

sea level at this location.[33] The report notes that the customer requires 1,875 gpm total flow and the maximum available flow is 2,600 gpm combined.

(3) Current Water Demands

The Development Site is currently improved with 151,048 square feet of commercial space. For purposes of assessing the current water demands from the existing land uses on the Development Site, the water demand was based on approximately 151,048 square feet of commercial/retail area.[34] As shown in Table IV.K-7, below, the estimated water demand for the existing uses on the Development Site is 7,552 gallons per day (gpd).

Table IV.K-7
Estimated Existing Water Demand

Land Use	Developed Floor Area (Occupied sf)	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552
		Existing Water Demand:	**7,552**

Notes: gpd = gallons per day; sf = square feet; ksf = one thousand square feet
[a] *As recommended by LADWP, water consumption rates are based on LASAN's, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

(4) Water Supply

(a) Regional Water Supplies

The LADWP currently supplies water to the Development Site. The LADWP is responsible for ensuring that water demands within the City are met and that State and Federal water quality standards are achieved. As discussed above, primary sources of water supplies for the City include the LAA, local groundwater, purchased water from the MWD, and recycled water. The amount of water obtained from these sources varies from year to year and is primarily dependent on weather conditions and demand. In addition, reclamation of wastewater is utilized for certain irrigation purposes. Figure IV.K-1, Main Sources of LADWP's Water Supply, illustrates the sources of water supply that provide potable water to the LADWP service area, including the City of Los Angeles.

As summarized in Table IV.K-1 through Table IV.K-3, above, the 2015 UWMP anticipates a demand of 709,500 acre-feet in 2040 for single dry year and multi-dry years and

[33] *LADWP, Fire Service Pressure Flow Report for 6310 W. 3rd Street, dated February 26, 2018 (See Appendix J.2 to this EIR).*
[34] *Consistent with LADWP's recommendation for estimating the Project's water use (see Appendix J.1) the Proposed Project's water use was based on LASAN's, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

675,700 acre-feet in 2040 for average weather year hydrologic conditions. The 2015 UWMP anticipates adequate water supply to meet projected demands through 2040 under each of these conditions.

(i) Los Angeles Aqueducts

From the early construction of LAA in the early 1900's, LAA has historically provided the vast majority of water for the City. Annual LAA deliveries are dependent on snowfall in the eastern Sierra Nevada and are subject to significant hydrologic variability. Hydrologic impact to LAA water supplies in the Mono Basin and Owens Valley is amplified by the requirements to release water for environmental restoration efforts in the eastern Sierra Nevada. Since 1989, when city water exports were significantly reduced to restore the Mono Basin's ecosystem, LAA deliveries from the Mono Basin and Owens Valley have ranged from a low of 36,000 acre-feet in 2015 to a high of 467,000 acre-feet in 1998. Average LAA deliveries since 1990 have been approximately 240,000 acre-feet, meeting about 40 percent of the LADWP's total water needs.

In recent years, LAA supplies have been less than the historical average due to environmental restoration obligations in Mono and Inyo Counties. Various lawsuits and injunctions, and resulting agreements affect water supplies from the LAA. These include an agreement with the County of Inyo regarding groundwater levels and enhancement and mitigation projects in the Owens Valley, and the imposition of new regulatory requirements by the SWRCB regarding export from Mono Lake and restoration and monitoring programs for the Mono Basin. In addition, in November 2014, an agreement between the City and the Great Basin Unified Air Pollution Control District was reached wherein LADWP will continue to implement measures to address dust emissions at Owens Lake and implement additional water conservation through increasing use of water efficient and waterless dust measures.[35]

[35] *Los Angeles Department of Water and Power, LADWP Newsroom, 2014 Archive, City of Los Angeles and Great Basin Unified Air Pollution Control District Reach Historic Comprehensive Agreement on Owens Lake Dust Mitigation, released November 14, 2014, www.ladwpnews.com/city-of-los-angeles-and-great-basin-unified-air-pollution-control-district-reach-historic-comprehensive-agreement-on-owens-lake-dust-mitigation/.*

Source: 2015 Urban Water Management Plan, LADWP, 2018

Figure IV.K-1
Main Sources of LADWP's Water Supply

Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.[36]

Based on modeling results provided in LADWP's 2015 UWMP, LADWP projects that the average annual long-term LAA delivery between 2015 and 2040 is expected to be approximately 278,000 AFY and gradually decline to 267,000 AFY due to projected climate change impacts.[37] However, with the anticipated completion of the Owens Lake Master Project by 2024, the projected Los Angeles Aqueducts delivery is expected to increase to 286,000 AFY, which would offset most of the anticipated long-term losses due to climate change, should they occur.

(ii) Groundwater

LADWP extracts groundwater from the San Fernando, Sylmar, and Central groundwater basins.[38] LADWP holds adjudicated extraction rights in each of the groundwater basins, meaning the City has been legally allocated quantified annual pumping and groundwater storage rights in the basins determined by judicial decrees. The San Fernando and Sylmar Basins are subject to the judgment in *City of San Fernando vs. City of Los Angeles*, which requires that pumping be reported to the court-appointed Upper Los Angeles River Area (ULARA) Watermaster. The Central Basin is also subject to a court judgment that requires that pumping be reported to the Water Replacement District of Southern California, which acts as the administrative body of the court-appointed basin Watermaster.

The City owns water rights in the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins. The City's combined water rights in these basins are approximately 109,809 AFY, of which approximately 87,000 AFY are located in the San Fernando Basin, 500 AFY in the Eagle Rock Basin, and 3,570 AFY in Sylmar Basin. Central Basin water rights were recently increased from 15,000 AFY to 17,236 AFY as a result of three purchase transactions completed during 2014 and 2016. Water rights in the West Coast

[36] *Los Angeles Department of Water and Power, website: http://www.ladwp.com/, accessed May 2019.*

[37] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

[38] *Currently, LADWP does not exercise its pumping rights at the West Coast Basin due to localized groundwater contamination issues.*

Basin are 1,503 AFY, which the City may produce from the Central Basin per the Third Amended Central Basin Judgment.[39]

Historically, LADWP has operated its groundwater resources conjunctively with surface water supplies by reducing pumping during wet periods when more surface water can be used for municipal supply and increasing pumping during dry periods to compensate for reduced availability of surface water supplies. Taking into account all weather conditions and in response to water savings from the Owens Lake Master Project in 2024, LADWP's projected groundwater supply is expected to increase from a total of 87,045 AFY in 2014-2015, to 112,670 AFY in 2019-2020, and 114,070 AFY in 2039-2040.[40]

(iii) Metropolitan Water District of Southern California

The MWD is the largest water wholesaler for domestic and municipal uses in California and provides water to nearly 19 million people with an average of 1.7 billion gallons of water per day. MWD imports a portion of its water supplies from Northern California through the SWP California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct. The City of Los Angeles purchases water from MWD to supplement its supplies from local groundwater, LAA deliveries, and recycled water. Historically, LADWP has purchased MWD water to make up the difference between demand and City supplies. The City relies more heavily on MWD water during drier years. As a percentage of the City's total yearly water supply, MWD water has historically accounted for a range from 4 percent in fiscal year 1983-84 to 75 percent in fiscal year 2013-2014.[41]

All of MWD's 26-member agencies have preferential rights to purchase water from MWD. As of June 30, 2016, LADWP has a preferential right to purchase 19.94 percent of MWD's total annual water supply. MWD prepares to meet its member agencies' demand for water through assessments of future supply and demand, which are presented in the MWD's RUWMP, prepared under the Urban Water Management Planning Act.

As stated previously, analysis in the 2015 RUWMP concluded that reliable water sources would be available to continuously meet projected demand through 2040. In the 2015 RUWMP, the projected 2040 demand for water is 2,201,000 AFY, whereas the expected

[39] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, p. 6-2, June 2016.*
[40] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, p. 6-24, June 2016.*
[41] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.*

supply is 2,941,000 AFY, and an additional 398,000 AFY is expected to become available under programs under development for a potential surplus of 1,138,000 AFY.[42]

3. Environmental Impacts

a) Thresholds of Significance

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

Threshold a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects;[43] or

Threshold b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions. The thresholds Guide identifies the following criteria to evaluate water supply and infrastructure impacts:

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

[42] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, p. 2-15.*

[43] *This section of the EIR focuses on impacts associated with water demand and infrastructure facilities. With respect to impacts to wastewater facilities, see Section IV.K.2, Wastewater, below. With respect to stormwater drainage impacts, this issue was concluded to be less than significant and dismissed from further analysis in the Initial Study (See Initial Study Checklist Question IX(c) in Appendix A to this Draft EIR and Section VI, Other CEQA Considerations). Impacts related to electric power, natural gas or telecommunications are addressed in Section IV.K.4, Electric Power, Natural Gas, and Telecommunications Infrastructure, below.*

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

b) Methodology

The analysis of the Project's impacts relative to water supply is based on a calculation of the Project's anticipated water demand. The existing demand and Proposed Project's indoor water demand were estimated utilizing the wastewater generation rates provided by the City of Los Angeles Public Works Bureau of Sanitation (LASAN) Sewage Generation Factor for Commercial Categories, effective April 6, 2012. The Proposed Project's outdoor water demand was estimated based on the Maximum Applied Water Allowance water budget equation from the California Department of Water Resources' Model Water Efficient Landscape Ordinance pursuant to the LA Green Building Code (LAMC Sec. 99.04.304). The Project's net water demand is then analyzed relative to LADWP's existing and planned future water supplies in order to determine if LADWP will be able to accommodate the Project's water demands during average year, single-dry year and multiple-dry years hydrologic conditions. At a regional level, the estimated water demand from the Proposed Project was then compared to the growth projections discussed in the 2015 UWMP to determine if regional water supplies are considered reliable. At a local level, the estimated water demand is then compared to the daily maximum water filtration capacity at the LAAFP to assess whether the local treatment plant has adequate water supply for the Proposed Project. Additionally, the local water infrastructure was assessed by the LADWP to determine whether the Proposed Project would have any impacts to the local static water pressure in the Project Site area and if any improvements are required to the local water system infrastructure.

c) Project Design Features

No specific project design features are proposed with regard to water supply and infrastructure.

d) Analysis of Project Impacts

Threshold a) Would the project require or result in the relocation or construction of new or expanded water facilities, the construction of which could cause significant environmental effects?

(1) Impact Analysis

(a) Construction

In reviewing the service demands of the Proposed Project, the LADWP has determined that the area near the Project is currently served by adequate water infrastructure and that there are no known deficiencies in the water supply infrastructure serving the Project Site.[44] Construction of the Proposed Project would require connections to the existing water infrastructure serving the Project Site in order to serve the Project's operational demands. These connections would primarily involve trenching to access and connect to existing water pipes and may require improvements to meet the required operational fire flow demands (as discussed below) .

The existing water pipelines are located below grade within the public right-of-way and beneath adjacent streets and sidewalks. Although new service connections have the potential to result in short-term and temporary interruptions in water services for existing customers, new water service installations are generally connected so as to avoid water service interruption. Based on correspondence from the LADWP, hooking up to existing lines rarely results in disruption in water service. In special instances, where the main may need to be isolated in order to install the service, a typical disruption may last for a few hours. Advisory notices would be distributed to the affected area to inform affected LADWP water customers of any planned disruptions in service. Therefore, if any disruptions in local water service occur during the construction period, any disruptions would be temporary and short in duration. Therefore, construction impacts associated with trenching and connecting to the existing infrastructure would be localized and limited to the Project Site and right-of-way easements surrounding the Project Site.

Further, as discussed in the operations analysis below, there is sufficient flow and pressure available to meet the larger, long-term demands of Project operation. Therefore, the existing services would also be capable of serving the lower water demand associated with Project construction. Overall, demolition and construction activities would require a minimal volume of water, and less than the existing uses require. Therefore, construction of the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction of which could cause significant environmental effects. ***As such, construction would not result in the relocation or construction of new or expanded water facilities, the construction of which could cause significant environmental effects. Construction impacts on water infrastructure would be less than significant.***

[44] *City of Los Angeles Department of Water and Power, Water and Electric Connection Services Request, 3rd and Fairfax Mixed-Use Project, April 24, 2019 (See Appendix J.1 of this Draft EIR).*

(b) Operation

Water service to the Development Site would continue to be supplied by LADWP for domestic and fire protection uses. As described above, there are twelve fire hydrants located in the vicinity of the Project Site, four of which occur within 150 feet of the Development Site. The Project would also incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting of the Project.

While domestic water demand is typically the main contributor to operational water use, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore, are the primary means for analyzing infrastructure capacity. Fire flow to the Project would be required to meet City fire flow requirements. Specifically, the Project would comply with LAMC Section 57.507.3.1, which establishes fire flow standards by land use development type.

The Fire Service Pressure Flow Report provided by the LADWP found that the maximum available fire flow in the nearest hydrant serving the Development Site is 2,600 gpm.[45] If this fire flow pressure is extrapolated to the four fire hydrants located closest to the Development Site, then there would be a combined fire flow of 10,400 gpm available.

In their written correspondence (Appendix G.1 to this Draft EIR), LAFD indicated that the required minimum fire flow for the Proposed Project has been set at 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously with a minimum pressure of 20 psi at full flow.[46] The LAFD has noted that improvements to the water system in this area may be required to provide 6,000 to 9,000 gpm. Although it appears water infrastructure is sufficient for water demand needs and fire flow requirements, it is possible that the applicant would need to install additional hydrants or water infrastructure to service the Project. The new hydrants and/or infrastructure would stem off of the existing water mains located in the streets adjacent to the Development Site. Accordingly, if determined to be necessary during the standard plan check review for the Project, the water system improvements would involve comparatively minor amounts of trenching and water system upgrades (done in conjunction with construction activities for the Project) within the public right-of-way and/or within the Project Site. This level of ancillary construction activity would not trigger additional impacts which could cause an significant environmental effect.

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[45] *The LADWP's Fire Pressure Flow Report for 6310 W. 3rd Street, dated February 26, 2018, is provided in Appendix J.2. to this Draft EIR.*

[46] *LAFD's correspondence letter for the Proposed Project (dated May 22, 2019) is provided as Appendix G.1 to this Draft EIR.*

In addition, the Project would include fire sprinklers. Installation of the proposed automatic fire sprinklers would be subject to LAFD review and approval during LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for the Project, as set forth in LAMC Section 57.118. In addition, as the Proposed Project is consistent with the allowable uses and density under the General Plan and the C2 Zone, the water distribution capacity would be adequate to serve the Proposed Project. Accordingly, the Project would not require or result in the construction or relocation of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. ***Therefore, operation of the Proposed Project would not result in the relocation or construction of new or expanded water facilities, the construction of which could cause significant environmental effects. Operational impacts on water infrastructure would be less than significant.***

(2) Mitigation Measures

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

(3) Level of Impact After Mitigation

Impacts 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

The Proposed Project's construction activities would require the conveyance of water for dust suppression activities during the demolition/grading/excavation phases. The Proposed Project's use of watering the Development Site would generate a total demand of approximately 817,665 gallons of water throughout the demolition and grading/excavation activities or approximately 7,501 gallons per day (gpd) for approximately 109 days (see Appendix D of this Draft EIR). The amount of water used during construction would be slightly less than the current water demand generated by the existing retail/restaurant uses (i.e., 7,552 gpd). Therefore, the Proposed Project's temporary and intermittent demand for water during construction could be similarly met by the City's available supplies during each year of Project construction. Based on the above, LADWP would have sufficient water supplies available to serve the Proposed

Project during normal, dry, and multiple dry years. As such, construction water demand on local water supplies would be less than significant.

(b) Operation

Operation of the Proposed Project would increase water demands within the LADWP service area. For estimating indoor water use, the Proposed Project's water demands were determined based on applicable sewer generation rates provided by LASAN for wastewater generation rates. The Proposed Project would demolish 151,048 square feet of existing commercial buildings on site (including 144,963 square feet of retail and 6,085 square feet of restaurant space), and construct a new eight-story mixed-use building comprised of 331 multi-family residential units and 83,994 square feet of new commercial space (including 76,494 square feet of retail space and approximately 7,500 square feet of restaurant space).

As shown in Table IV.K-8, Estimated Proposed Project Water Demand, the estimated gross water demand for the Proposed Project is approximately 70,574 gpd (approximately 79 AFY). With consideration of the water demand generated by the existing land uses to be demolished, the Project's net increase in water demand would be approximately 63,022 gpd, or approximately 70.6 AFY.

As discussed in the Regulatory Setting subsection above, a WSA is required for projects that include 500 or more dwelling units or generate a water demand equivalent to a project with 500 dwelling units. In determining whether a project would demand an amount of water equivalent to, or greater than the amount of water required by a 500 dwelling unit project, it is generally acknowledged that one acre-foot of water can serve two to three households on an annual basis; therefore one dwelling unit typically consumes 0.3 to 0.5 AFY.[47] Thus, the water demand of a 500 dwelling unit project would be between 150 and 250 AFY.

[47] *California Department of Water Resources, Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001, October 2003.*

Table IV.K-8
Estimated Proposed Project Water Demand

Type of Use	Quantity (Unit)[a]	Water Use (gpd/unit) [b]	Proposed Water Demand (gpd)	(AFY)
Existing Uses to be Demolished				
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552	8.4
		Existing Water Demand:	**7,552**	**8.4**
Proposed Uses				
Residential Uses (331 total du)				
Studio	70 du	75 gpd/du	5,250	6
One Bedroom	162 du	110 gpd/du	17,820	20
Two-Bedroom	66 du	150 gpd/du	9,900	11
Three-Bedroom	33 du	190 gpd/du	6,270	7
Lease Office [c]	4,370 sf	120 gpd/ksf	524	0.6
Fitness [d]	1,963 sf	650 gpd/ksf	1,276	1.4
Amenity Space [e]	2,100 sf	50 gpd/ksf	105	0.1
Club Room [f]	1,577 sf	50 gpd/ksf	79	0.1
Pool	800 sf-	-	21,000	23.5
Spa [g]	128 sf	-	3,360	3.7
Water Feature [h]	16 sf	-	420	0.5
		Residential Total:	***66,004***	***73.9***
New Commercial Uses (83,994 total sf)				
Commercial/Retail	83,994	50 gpd/ksf	4,200	4.7
		Commercial Subtotal:	***4,200***	***4.6***
		Landscaping [i]	***370***	***0.4***
		Total Proposed Project Water Demand:	**70,574**	**79**
		Minus Existing Demand:	*7,552*	*8.4*
		Net Additional Water Demand:	**63,022**	**70.6**

Notes:
[a] *du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day; AFY: acre feet per year.*
[b] *Water consumption rates are based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*
[c] *Lease office is considered as "Office Building" for water generation purposes..*
[d] *Fitness Room is considered as "Health Club/Spa" for water generation purposes.*
[e] *Amenity space is considered as "Lounge" for water generation purposes.*
[f] *Club room is considered as "Lounge" for water generation purposes.*
[g] *Spa is considered as "Swimming Pool" for water generation purposes.*
[h] *Water feature is considered as "Swimming Pool" for water generation purposes.*
[i] *Landscaping water demand is based on the Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304). Per the Landscape Composite Plan the Proposed Project's total landscaping area is 7,896 square feet*
Source: Parker Environmental Consultants.

The Proposed Project includes fewer than 500 dwelling units and therefore does not require a WSA based on dwelling unit count. In addition, the Proposed Project does not generate a water demand equivalent to a 500 dwelling unit project. As shown in Table IV.K-8, above, the projected gross water demand of the Proposed Project is 79 AFY. A

500 dwelling unit equivalent project would require between 150-250 AFY of water supply. Accordingly, the Proposed Project (79 AFY) is well below the projected demand of a 500 dwelling unit project. Therefore, a WSA is not required for the Proposed Project.

In addition, the Proposed Project would include sustainable design to meet all current LA Green Building Code requirements. As such, the development would incorporate water saving and low-flow fixtures and drought tolerant planting to promote water conservation methods.

As indicated above, at the citywide level, the Los Angeles Aqueduct Filtration Plant (LAAFP) has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season. The Proposed Project's 63,022 gpd would be well within the daily capacity of the LAAFP.

Furthermore, in determining whether the projected water demand of the Proposed Project would be within the 25-year water demand growth projected in LADWP's 2015 UWMP, LADWP confirmed that, in general, projects that conform to the demographic projection from the RTP by SCAG and are currently located in the City's service area are considered to have been included in LADWP's water supply planning efforts; therefore projected water supplies would meet projected demands. As discussed in further detail in Section IV.E, Land Use and Planning and Section IV.G, Population and Housing, the Proposed Project is consistent with the existing allowable use and density for the C2 Zone and is consistent with the regional growth projections of SCAG's 2016-2040 RTP/SCS. Hence, the water demand for the Proposed Project is within the LADWP water demand projections for the service area.

As discussed in the water reliability section of the 2015 UWMP, LADWP expects to have a reliable supply of up to 675,700 acre-feet of water in 2040.[48] As further discussed in the UWMP, LADWP expects to maintain a reliable water supply through conservation, increased recycled water use (including both non-potable and potable reuse), increasing the City sources of water and reducing purchases from the MWD.[49] Between 2015 and 2040, the City's locally developed supplies are planned to increase from 14 percent to 49 percent of total water supply usage in dry years, or to 47 percent in average years.[50] The City's imported supplies will decrease significantly from 86 percent to 51 percent of water supply use in dry years, or to 53 percent in average years. With its current water supplies,

[48] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, page ES-23.*
[49] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, page ES-1.*
[50] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, page ES-20.*

planned future water conservation, and planned future water supplies, LADWP has available supplies to meet all demands under all three hydrologic scenarios (normal, dry, and multiple dry years) through the 25-year planning period covered by the 2015 UWMP.

Regarding the MWD's ability to sell water to the LADWP, the MWD's 2015 RUWMP shows that with its investments in storage, water transfers, and improving the reliability of the Delta, critical water shortages are not expected to occur within the next 25 years.[51] As previously stated, both the 2015 RUWMP and 2015 IRP anticipate a surplus of available water to meet projected demand.

Based on the above, the Proposed Project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years and water availability impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Impact After Mitigation

Impacts 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

In accordance with Section 15130(b) of the CEQA Guidelines, an adequate discussion of a project's significant cumulative impact should be based on either, (a) a list of past, present, and probable future projects producing related or cumulative impacts, or (b) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes conditions contributing to the cumulative effect. The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence.

Because the City's future water supply is directly affected by regional growth within the UWMP's service area, the Proposed Project's cumulative impact upon water supply is appropriately based on a plan-based approach. As discussed above, the LADWP's 2015 UWMP provides for the long-term planning and forecast of water supplies within the City of Los Angeles based on regional growth projections by SCAG. Project's that are consistent with SCAG's regional growth projections are thus deemed to be accounted for

[51] *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, page ES-5.*

in the future water demands as projected in the 2015 UWMP. Therefore, the evaluation of the Proposed Project's cumulative impact upon water supply is based on the Project's and related project's consistency with the growth projections contained in the 2015 UWMP; as well as a quantitative assessment of water demand associated with the Proposed Project and related projects.

For purposes of evaluating the Proposed Project's cumulative impacts related to water infrastructure, the analysis below is based on a review of the related projects identified in Section III, Environmental Setting, to determine whether any related projects have the potential to result in cumulative impacts associated with connecting to the local water system infrastructure.

(1) Water Infrastructure

The Proposed Project and related projects have the potential to increase demands upon the local water infrastructure serving the Project Site and surrounding area. As discussed above, the Project Site is currently served by a 12-inch water main in Fairfax Avenue, an 8-inch water line in W. 3rd Street, and an 8-inch water line in a portion of Colgate Avenue and Ogden Drive, and the LADWP has confirmed that there are no deficiencies in the Project area. The Proposed Project would require localized construction activities to connect to the existing water main under W. 3rd Street. Based on a review of the 63 related projects identified in Section III, Environmental Setting, the only projects within the immediate vicinity of the Project Site include Related Project LA41, located 0.25 miles to the west on W. 3rd Street, and LA32, located approximately 0.25 miles north of the Project Site on S. Fairfax Avenue. These are the only related projects that would have the potential to impact the local water lines serving the Project Site. Similar to the Proposed Project, both of these projects would be required to consult with the LADWP to ensure the local infrastructure is adequate to serve their projects. In the event system upgrades are anticipated the construction impacts associated with such upgrades would be localized in nature involving trenching and connections to the existing service lines and would not combine with the Project's construction impacts resulting in significant physical environmental impacts. The increased water demand would also not measurably impact the LAAFP's treatment capacity; therefore, no new or expanded water treatment facilities would be required. ***Thus, cumulative impacts related to connections or improvements to the existing water infrastructure serving the Proposed Project and surrounding area would be less than significant.***

(2) Water Supply

As reported in the 2015 UWMP, the population within LADWP's service area increased from 2.97 million in 1980 to approximately 3.99 million in 2015, representing an average

annual growth rate of approximately 1.0 percent. The total number of housing units increased from 1.10 million in 1980 to approximately 1.39 million in 2015, representing an average annual growth rate of approximately 0.8 percent. The demographic projections for the LADWP service area for the year 2020 through 2040 are summarized in Table IV.K-9, below. As shown below, it is anticipated that the LADWP service area would increase by approximately 141,240 persons, 56,381 housing units, and 44,701 employees between 2020 and 2025. The LADWP service area includes all of the City of Los Angeles and portions of the City of West Hollywood.

The 63 related projects, in combination with the Proposed Project, would result in a total of 2,937 dwelling units, resulting in approximately 7,108 new residents to the LADWP service area.[52] Thus, the cumulative increase in population and housing growth within the City of Los Angeles would be within the LADWP's growth projections between 2020 and 2025. It should further be noted that the Proposed Project is consistent with the General Plan land use designation and allowable residential density permitted within the C2 zone.

Table IV.K-9
Demographic Projections for the LADWP Service Area

Demographic	2020	2025	2030	2035	2040
Population	4,026,891	4,168,131	4,210,042	4,351,408	4,441,545
Housing					
Single-Family	650,746	635,348	652,379	675,540	682,412
Multi-Family	828,744	900,523	940,549	973,978	1,031,239
Total Housing	1,479,490	1,535,871	1,592,928	1,649,518	1,713,651
Employment					
Commercial	1,704,864	1,749,994	1,778,566	1,807,774	1,869,383
Industrial	136,023	135,594	134,061	131,686	131,285
Total Employment	1,840,887	1,885,588	1,922,628	1,939,460	2,000,667

Source: 2015 Urban Water Management Plan; data taken from SCAG Regional Transportation Plan (2012), modified to represent LADWP's service area.

Furthermore, implementation of the Proposed Project in conjunction with cumulative development within the City of Los Angeles and within areas of West Hollywood that fall within the LADWP's service area would further increase cumulative demands for water supplies in the LADWP service area. As identified in Section III, Environmental Setting,

[52] *See Table IV.G-6 Estimated Cumulative Population and Housing Growth in Section IV.H, Population and Housing.*

of this Draft EIR, there are 63 related projects anticipated to be developed in the Project vicinity that are within LADWP's service area.

As shown in Table IV.K-10, below, the related projects that would cumulatively affect LADWP water supplies would generate an average daily water demand of approximately 701,940 gpd (approximately 786 AFY). This estimate is conservative as it does not account for any net reduction in water demand associated with infill related projects that displace existing land uses that currently generate a demand for potable water. The estimated cumulative water demand also does not account for water conservation measures such as the mandatory indoor water reduction rates required by the LA Green Building Code. The Proposed Project in conjunction with the related projects would yield a total average daily water demand of approximately 764,510 gpd (approximately 856 AFY).

Table IV.K-10
Estimated Cumulative Water Demand

Land Use	Quantity	Water Demand Rate (gpd)[a]	Total Water Demand (gpd) [b]
Residential (multi-family)	2,929 du	150/DU	439,350
Residential (single-family)	8 du	185/DU	1,480
Retail	347,184 sf	25/1,000 sf	8,860
Medical Office	160,462 sf	250/1,000 sf	40,116
General Office	232,340 sf	120 /1,000 sf	27,881
Gym/Health Club	14,000 sf	650/1,000 sf	9,100
Grocery/Supermarket	52,685 sf	50/1,000 sf	2,634
Hotel	341 rooms	120/room	40,920
Church/Synagogue	1,105 seats [c]	3/seat	3,315
Hospital/Skilled Nursing/Assisted Living	283 beds	70/bed	19,810
Museum	8,729 sf	30/1,000 sf	262
Restaurant	80,945 sf (3,598 seats) [d]	30/seat	107,940
Total Related Projects Water Demand*:*			***701,448***
Proposed Project Water Demand:			**63,022**
Total Cumulative Water Demand:			**764,510**
Project % of Cumulative			**8%**

Notes:
[a] *du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day.*
[b] *Water demand is based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, as recommended by LADWP in calculating water demand.*
[c] *Estimated water demand for a church use was estimated based on 16,582 sf (1,105 seats approximated based on an average seating capacity of 15 sf per seat.*
[d] *The estimate for restaurant water use assumes all restaurant projects are for indoor dining with two-thirds of the total restaurant space allocated to dining areas and a seating occupancy of 15 sf per seat.*
Source: Parker Environmental Consultants, 2020.

As discussed in the water reliability section of the 2015 UWMP, LADWP expects to have a reliable supply of up to 675,700 acre-feet of water in 2040. In comparison, the cumulative demand of the related projects and the Proposed Project would demand 873 AFY, which is well within the water supply available in the LADWP service area.

Furthermore, in terms of the City's overall water supply, the water demand for projects that are consistent with the allowable land uses, building area, and density contained in the City's General Plan have been taken into account in the planned growth of the water distribution system. Development of each related project would be evaluated on a case-by case basis to determine if they are consistent with the allowable land uses and densities pursuant to the applicable zoning and land use designations. As previously stated, based on water demand projections through 2040 in LADWP's 2015 UWMP, LADWP determined that it will be able to reliably provide water to its customers through the year 2040, as well as the intervening years (including the Project's buildout year), based on the growth projections in SCAG's RTP/SCS.

For projects that meet the requirements established in Sections 10910-10915 of the State Water Code, a WSA report demonstrating sufficient water availability would be required prior to project approval to ensure LADWP has sufficient capacity to serve the project without affecting regional water supplies. This process ensures that cumulative growth in the City would not exceed the LADWP's future water supplies through 2040 and beyond. Further, the Proposed Project and all of the related projects within the City of Los Angeles would further be required to meet the prescriptive water conservation plumbing fixture requirements of Sections 99.04.303 and 99.05.303 of the California Green Building Code, which would decrease the Proposed Project water demand. ***Because the LADWP has determined that it can supply the anticipated growth in the City of Los Angeles through the year 2040 and beyond based on the growth projections of the 2015 UWMP, and the Proposed Project's anticipated water demands are within these growth projections, the Proposed Project's cumulative contribution to impacts upon the City's water resources would be less than significant.***

(3) Mitigation Measures

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

(4) Level of Significance After Mitigation

Impacts 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.

IV. Environmental Impact Analysis

K. Utilities and Service Systems

2. Wastewater

1. Introduction

This section analyzes the Proposed Project's wastewater infrastructure and the associated demands the Proposed Project would place upon regional wastewater treatment facilities that serve the Project area. Specifically, this section quantifies the anticipated operational wastewater generation for the proposed development and identifies applicable water conservation features that are either proposed by design or otherwise regulated by applicable building codes and regulations. Additionally, this section relies on the information contained in the L.A. Sanitation's response letter to the Proposed Project's Notice of Preparation (NOP), dated March 1, 2019, and follow up e-mail correspondences dated October 26, 2020 and October 30, 2020 confirming LASAN's approval of maximum discharge (included in Appendix J.3 to this Draft EIR).

2. Environmental Setting

a) Regulatory Setting

(1) State

(a) California Green Building Code

The California Green Building Standards Code, commonly referred to as the CALGreen Code, is set forth in California Code of Regulations Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all water closets (i.e., flush toilets) are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush. In addition, maximum flow rates for faucets are established at: 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads; 1.2 gpm at 60 psi for residential lavatory faucets; and 1.8 gpm at 60 psi for kitchen faucets.

(2) Local

The City of Los Angeles Department of Public Works, Bureau of Sanitation Division (LASAN) provides sewer conveyance infrastructure and wastewater treatment services to the City of Los Angeles, including the Project Site. The applicable City of Los Angeles plans policies and regulations pertaining to wastewater service and conveyance are discussed below.

(a) City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework guides the updates of the community plans and Citywide elements, thereby providing a Citywide strategy for long-term growth. The Framework Element 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 City's General Plan Framework Element identifies goals, objectives, and policies for utilities in the City. Goal 9A of Chapter 9 is to provide for adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

(b) Los Angeles Integrated Resources Plan

The City's Integrated Resources Plan (IRP) was adopted in November 2006 to provide a collaborative, comprehensive Los Angeles Basin-wide water resources plan.[53] Jointly developed by the City of Los Angeles Department of Public Works (LADPW), the City of Los Angeles Department of Sanitation (LASAN) and the Department of Water and Power (LADWP), the IRP addressed the interrelated management of wastewater, stormwater, and recycled water in the City and surrounding service areas.

Provisions of the IRP were framed by a series of Guiding Principles that included building new wastewater facilities, decreasing dependency on imported water, identifying the best uses for recycled water, such as for industrial, irrigation, and groundwater recharge purposes, reducing runoff inflow into the wastewater system, increasing reuse of dry weather urban runoff, increasing water conservation, planning for the beneficial use of biosolids; and examining low-cost solutions for meeting the City's future wastewater needs.

[53] *City of Los Angeles, Integrated Resources Plan – Planning for Wastewater, Recycled Water and Stormwater Management: A Visionary Strategy for the Right Facilities, in the Right Places, at the Right Time, Executive Summary, December 2006, page 3, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010372.pdf.*

To plan for future wastewater management in particular, the IRP projected future wastewater generation based on population projections from the Southern California Association of Governments (SCAG). The forecasted population for the Hyperion Water Sanitary Sewer System (Hyperion Sanitary Sewer System) service area is shown in Table IV.K-11. The Hyperion Sanitary Sewer System includes the Hyperion Water Reclamation Plant (HWRP) that would serve the Project Site; and which is part of the larger City sanitary sewer system, including other treatment plants (i.e., Donald C. Tillman Water Reclamation Plant (DTWRP), Los Angeles-Glendale Water Reclamation Plant (LAGWRP), Terminal Island Water Reclamation Plant, the City's Regional Sanitary Sewer System, connecting outfalls, and numerous sewer connections and major interceptors.

As indicated in Table IV.K-11, the IRP projected the 2010 population to be approximately 4,485,054 residents, with approximately 4,641,928 residents in 2015, and approximately 4,854,483 residents in 2020.[54] The average dry weather flow projected by the IRP was estimated to be approximately 477.3 million gallons per day (mgd) in 2010;[55] approximately 492.3 mgd in 2015;[56] and approximately 511.5 mgd in 2020,[57] with each amount falling within the system-wide treatment capacity of 550 mgd, at the time the IRP was adopted. As discussed further below, the estimated wastewater flows have been updated over the years, with estimates below those originally identified in the IRP.

[54] *The population projections provided in Table 3-7 of the IRP are based on Southern California Association of Governments (SCAG) 2002 projections. It should be noted that more recent SCAG projections are available in the 2016 Regional Transportation Plan/Sustainable Communities Strategy. However, as the IRP focuses on the population for the wastewater service area more recent data is not available in that respect.*

[55] *City of Los Angeles, Integrated Resources Plan, Volume 1, Wastewater Management, Table 4-11, page 4-16.*

[56] *City of Los Angeles, Integrated Resources Plan, Volume 1, Wastewater Management, Table 4-12, page 4-17.*

[57] *City of Los Angeles, Integrated Resources Plan, Volume 1, Wastewater Management, Table 4-13, page 4-17.*

Table IV.K-11
Population and Average Dry Weather Flow Projections:
Hyperion Sanitary Sewer System Service Area

	2000	2005	2010	2015	2020
SCAG Population	4,138,567	4,331,109	4,485,054	4,641,928	4,854,483
Average Dry Weather Flow (in mgd)	443.1	461.8	477.3	492.3	511.5

Source: Los Angeles Department of Public Works, LA Sanitation, Integrated Resources Plan, Volume 1, Wastewater Management, December 2006, page 3-12.

Despite the then current and future projected availability of system-wide treatment capacity, the IRP included several proposals for improvements, additions, and expansions within the Hyperion Sanitary Sewer System service area to maintain adequate service and expand system capacity over time. Implementation of the IRP included programs to increase the overall capacity of the larger City sanitary sewer system by 20 mgd, for a total of 570 mgd.

Certification of the Final EIR for the IRP included adoption of the "Approved Alternative" (Alternative 4). Components of Alternative 4 included a list of improvement projects to meet future demand for wastewater treatment. The projects were categorized as “Go Projects,” which are projects for which associated demand or regulatory triggers had already been met; and “Go If Triggered Projects,” which are projects to be implemented if or when additional information or circumstances, such as regulatory determinations, population growth or changes in demand for sewage capacity, “trigger” the need to begin design and construction. Adoption of the IRP also included the Adaptive Capital Improvement Program (CIP), which includes the anticipated capital, operation and maintenance, project timing, and implementation strategy for tracking and monitoring triggers for “Go If Triggered Projects”.

In 2012, the City released the IRP 5-Year Review Final Document, a summary compilation of the progress updates between 2007 and 2012 related to new projects and programs, technology, and regulations that could affect the implementation of IRP recommendations.[58] The 5-Year Review reported on near-completion of one “Go Project” (Construction of a 60-million-gallon wastewater storage at the Donald C. Tillman Water Reclamation Plant); moved some of the “Go Projects” to the “Go If Triggered Projects” list to reflect their revised prioritization since 2006; and deferred two other “Go Projects” to

[58] *City of Los Angeles Department of Public Works, Bureau of Sanitation, and Department of Water and Power, Water Integrated Resources Plan 5-Year Review FINAL Documents, June 2012, https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M211.pdf, accessed January 2020.*

beyond the IRP's 2020 horizon date as the associated need is not anticipated. The 5-Year Review also deferred a "Go To If Project" beyond 2020 due to reduction in need.

(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. The new plan builds upon the City's 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 resiliency 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. 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.

(i) Wastewater Facilities Plan

Volume 2 of the One Water LA 2040 Plan consists of the 2018 Wastewater Facilities Plan (WWFP).[59] The purpose of the 2018 WWFP is to guide LASAN with its decision making related to the implementation of system improvements to its wastewater collection and treatment facilities through year 2040. The 2018 WWFP is an update of the Wastewater Facilities Plan that was included in the 2006 IRP and incorporates expansions, upgrades, and enhancements made since 2006 and builds upon the LADWP's 2015 UWMP. The 2018 WWFP provides a comparison of the 2006 IRP projections (2005-2020 planning horizon), the actual annual average wastewater flows (2002-2016), and the One Water LA 2040 Plan flow projections. As summarized in the 2018 WWFP, the 2006 IRP projected approximately 451 mgd of wastewater influent within the Hyperion Service Area (HSA) and Terminal Island Service Area (TISA) boundaries in 2015. The actual annual average wastewater influent flows in 2015 for these service boundaries were significantly lower, totaling approximately 337 mgd. This yields a difference of 114 mgd between the projected and the actual flows. This significant difference of influent flows can largely be attributed to the City's successful water conservation efforts. The One Water LA 2040 Plan wastewater influent projections account for conservation efforts and develop flow projections based on estimated conservation, increased population and expected system

[59] *City of Los Angeles, One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan, April 2018.*

growth. As a result, the 2020 flow projections differ by 131 mgd between the IRP and the One Water LA 2040 Plan projections.

Future wastewater flows are expected to increase due to growth in population as well as commercial, and industrial activity. The 2015 UWMP, in conjunction with SCAG population data, projects a growth of an additional 493,200 people within the City by 2040. The population is expected to continue to grow over the next 25 years at a rate of 0.5 percent annually. This represents a reduction to the historical 1 percent annual growth rate that occurred between 1980 and 2010. Population growth is expected to lead to an increase in commercial and industrial activity, likely resulting in an increase in wastewater flows in the City's service area. In general, the UWMP states that dry weather wastewater influent flow projections for the Water Reclamation Plants (WRP) are expected to increase by 20 percent over the next 25 years. As shown in Table IV.K-12, below, the combined flow of all four wastewater reclamation plants is projected to increase from roughly 328 mgd in 2016 to 376 mgd in 2040, representing an approximate increase in 13 percent by 2040.

Table IV.K-12
Projected Wastewater Flows - Wastewater Facilities Plan
One Water LA 2040 Plan

Water Reclamation Plant (WRP)	Projected Annual Average Wastewater Flows by Year (mgd) [a, b, c]			
	2016	**2020**	**2030**	**2040**
Hyperion	250	256	275	283
Donald C. Tillman	47	46	51	53
Los Angeles - Glendale	17	21	22	22
Terminal Island	14	16	18	18
Total	328	339	366	376

Notes:
[a] *Flows are rounded to the nearest mgd.*
[b] *Low flow diversions are assumed to be implemented starting in year 2030.*
[c] *mgd = million gallons per day.*
Source: One Water LA 2040 Volume 2 – Wastewater Facilities Plan, January 2018, at page ES-8.

(d) L.A.'s Green New Deal Sustainable City pLAn 2019

The City released the first Sustainable City pLAn in April 2015[60], which has been updated in 2019 as the Green New Deal Sustainable City pLAn 2019. The Green New Deal includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and

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

increasing local water supply and availability. Towards that end, the Green New Deal establishes a target of recycling 100 percent of all wastewater for beneficial reuse by 2035, which would be an improvement from the fiscal year 2017-2018, baseline of 27 percent.[61]

Toward this end, the Green New Deal establishes a number of milestones and initiatives:

- 2021: Produce 1.5 mgd of recycled water at HWP for use at LAWA and other local facilities;
- 2025: Recycle 17,000 AFY of water at the Tillman WRP to recharge into groundwater basin;
- 2025/2035: Increase non-potable reuse of recycled water by an additional of 6,000 AFY 2025; and an additional 8,000 AFY by 2035; and
- 2025/2035: Reduce annual sewer spills to fewer than 65 by 2025; and 60 by 2035.

(e) Sewer System Management Plan

The State of California, via the State Water Quality Control Board's May 2, 2006 Statewide General Waste Discharge Requirements (WDRs), requires a Sewer System Management Plan (SSMP) to be prepared for all publicly owned sanitary sewer systems. The plans include measures to control and mitigate sewer spills and must be made available to the public. Accordingly, the City has prepared three SSMPs, one for each of the three separate sanitary sewer systems owned and operated by LA Sanitation: the Hyperion Sanitary Sewer System, which serves the Project Site; City of Los Angeles Regional Sanitary Sewer System; and the Terminal Island Water Reclamation Plant Sanitary Sewer System. The City's SSMPs were last updated in February 2017 as part of a required biennial internal audit.[62] The SMMPs address the proper management, operation, and maintenance of all parts of the systems. The SSMP establishes design and performance standards for the sewer system; provides procedures for evaluating the system and providing capacity assurance; and establishes a performance standard to

[61] *City of Los Angeles. LA's Green New Deal, 2019, page 47. http://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf.*

[62] *City of Los Angeles, Department of Public Works, Department of Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2017, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdey/~edisp/cnt012544.pdf, accessed January 2020.*

identify sewers in need of replacement or relief. The City's SSMP is in full compliance with the WDRs and meets applicable WDR objectives.[63]

(f) City of Los Angeles Municipal Code

Los Angeles Municipal Code (LAMC) Sections 64.11 and 64.12 require approval of a sewer permit prior to connection to the sewer system. New connections to the sewer system are assessed a Sewerage Facilities Charge. Fees paid to the Sewerage Facilities Charge are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when: (1) a sewer permit is required to connect to the City's sewer collection system; (2) proposes additional discharge into an existing public sewer connection; or (3) a future sewer connection or future development that would generate 10,000 gallons or more of sewage per day. A SCAR determines if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

In addition, the City of Los Angeles Bureau of Engineering Special Order No. SO06-0691 sets forth design criteria for sewer systems requiring hat trunk, interceptor, outfall, and relief sewers (i.e. sewers that are 18 inches or greater in diameter) be designed for a planning period of 60 to 100 years, and lateral sewers (sewers that are less than 18 inches in diameter) be designed for a planning period of 100 years. The order also requires that sewers be designed so that the peak dry weather flow depth, during their planning period, shall not exceed 50 percent of the pipe diameter.

b) Existing Conditions

(1) Wastewater Infrastructure

Wastewater in the City is collected and conveyed via one of three sewer systems owned and operated by LA Sanitation. The three collection systems owned and operated by the City of Los Angeles convey wastewater via approximately 6,439 miles of gravity mains, 33 miles of force mains, and 46 pumping plants. Currently, an average wastewater flow

[63] *City of Los Angeles, Department of Public Works, Department of Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2017, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdey/~edisp/cnt012544.pdf, accessed January 2020.*

rate of approximately 272 mgd is generated by the three collection systems. The three collection systems also convey the flows of 29 satellite agencies to plants for treatment.[64]

The primary and largest plant is the HWRP in Playa del Rey. The HWRP has a service area encompassing 600 square miles and approximately four million people, and provides preliminary, primary, and secondary treatment of wastewater; it accepts and treats wastewater flows from the Development Site.

The treatment plants remove pollutants from sewage and provide recycled water, protect the marine and river environments, and protect public health. The plants provide one or more of the following forms of treatment: primary treatment (solids removal and conveyance of the resulting "sludge" to digesters); secondary treatment (aeration with bacteria, decomposition, reduction of nitrogen, and production of activated sludge for further clarification); tertiary treatment (removal of remaining solids); digestion (destruction of pathogens within solids in enclosed anaerobic tanks); and dewatering (separation of effluent from biosolids). Treated effluent is discharged from the HWRP through an outfall pipe located five miles offshore in the Santa Monica Bay. Treated sludge is discharged through a separate outfall pipe located seven miles offshore.[65] Hyperion Water Reclamation Plant effluent is required to meet the Regional Water Quality Control Board (RWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit.

Figure IV.K-2, City of Los Angeles Wastewater Treatment System, depicts the existing wastewater treatment plants and their service areas within the City of Los Angeles. The Project Site is served by the HWRP. The HSA encompasses approximately 328,000 acres, or approximately 515 square miles, of the greater Los Angeles area and serves approximately 4 million people. The HSA also serves 53,000 acres outside the jurisdiction of the City of Los Angeles on a contract basis. The HSA includes approximately 96 percent of the total area served by the LADWP. On average the HWRP treats approximately 275 million gallons of wastewater on a dry weather day. Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd.[66]

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[64] *City of Los Angeles, LA Sanitation & Environment, Sewer System Management Plan, page 3, January 25, 2019.*

[65] *City of Los Angeles Department of Public Works, LA Sanitation, Hyperion Water Reclamation Plant, https://www.lacitysan.org/, website data accessed May 30, 2018.*

[66] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: www.lacitysan.org, accessed May 30, 2018.*

(1) Wastewater Flows

The Development Site is presently served by a network of sewer lines that are located beneath major streets and along property lines around the Development Site. As shown in Figure IV.K-3, the sewer infrastructure in the vicinity includes an existing 10-inch sewer line under W. 3rd Street. The sewage from the existing 10-inch line feeds into a 39-inch line on Crescent Heights Boulevard before discharging into a 63-inch sewer line under S. Fairfax Avenue.[67]

The Development Site is currently improved with 151,048 square feet of commercial/retail area, including 144,963 square feet of retail space and 6,085 square feet of restaurant space. Based on the projections provided in Table IV.K-13, below, the estimated wastewater flows of the existing land uses on the Development Site is approximately 7,552 gpd.[68]

Table IV.K-13
Estimated Existing Wastewater Generation

Land Use	Developed Floor Area (Occupied sf)	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generated (gpd)
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552

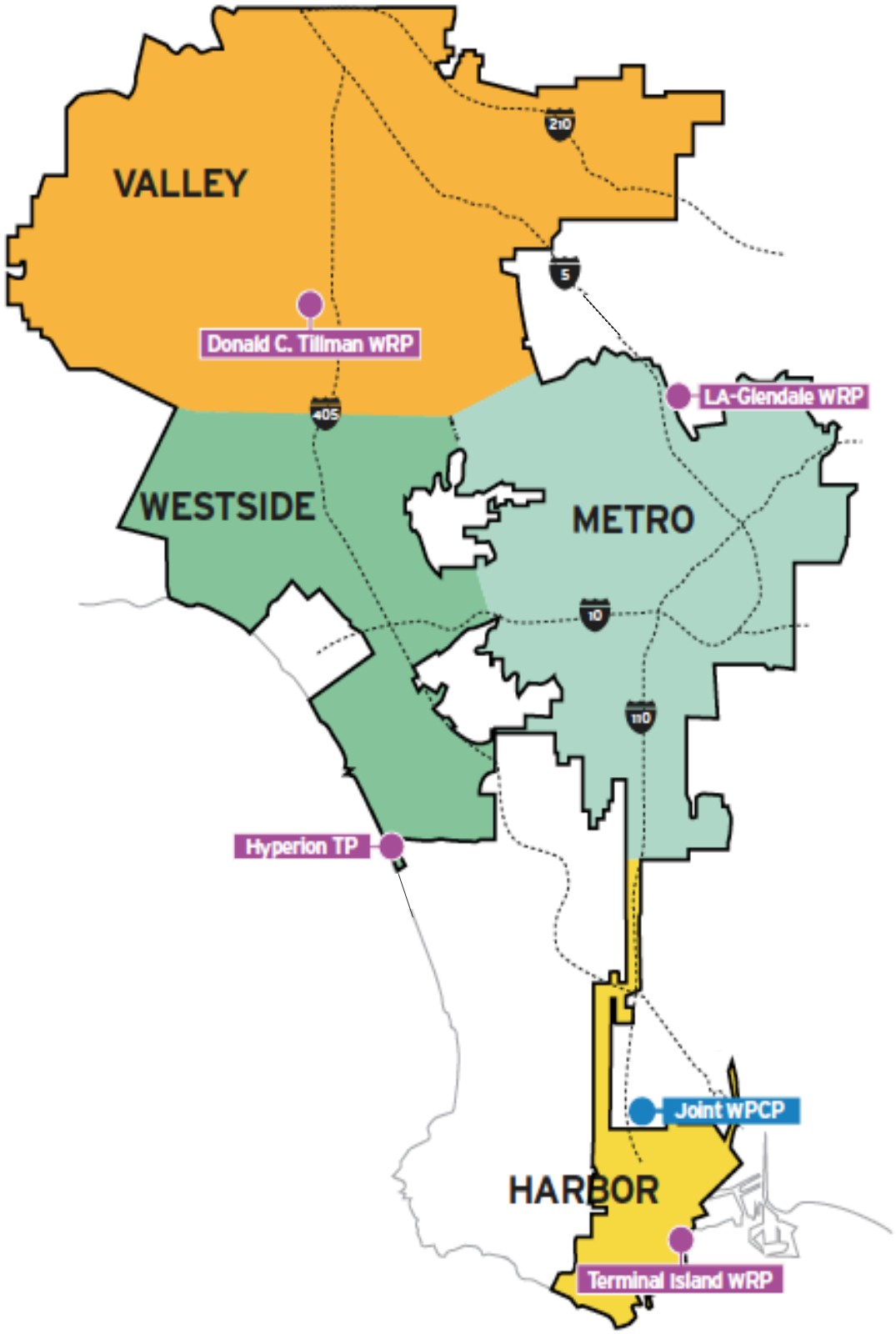
Notes: gpd = gallons per day; sf = square feet

[a] *City of Los Angeles, Bureau of Engineering, Department of Sanitation (LASAN), Wastewater Engineering Services Division, Inter-Departmental Correspondence to the Department of City Planning, 3rd and Fairfax Mixed Use Project – Notice of Preparation of Environmental Impact Report and Public Scoping Meeting, March 1, 2019. See Appendix J.3 to the Draft EIR.*

Source: Parker Environmental Consultants.

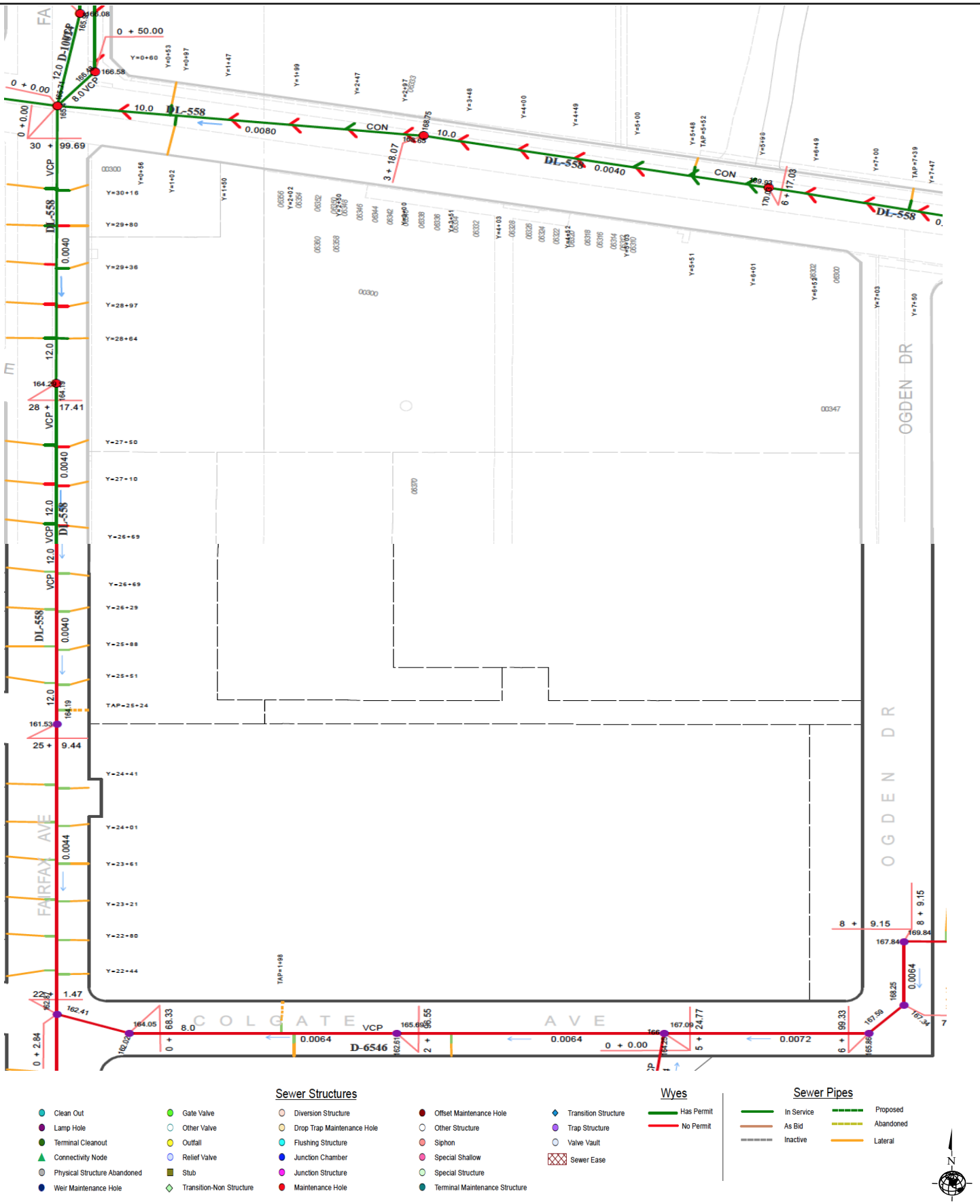
[67] *City of Los Angeles, Bureau of Engineering, Department of Sanitation (LASAN), Wastewater Engineering Services Division, Inter-Departmental Correspondence to the Department of City Planning, 3rd and Fairfax Mixed Use Project – Notice of Preparation of Environmental Impact Report and Public Scoping Meeting, March 1, 2019. See Appendix J.3 to the Draft EIR.*

[68] *Based on LASAN's, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012. City of Los Angeles, Bureau of Engineering, Department of Sanitation (LASAN), Wastewater Engineering Services Division, Inter-Departmental Correspondence to the Department of City Planning, 3rd and Fairfax Mixed Use Project – Notice of Preparation of Environmental Impact Report and Public Scoping Meeting, March 1, 2019. See Appendix J.3 to the Draft EIR.*



Source: 2015 Urban Water Management Plan, LADWP, 2018

Figure IV.K-2
City of Los Angeles Wastewater Treatment System



Source: Navigate LA; Parker Environmental Consultants.

Figure IV.K-3
Sewer Map

3. Environmental Impacts

a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to wastewater systems if it would:

Threshold a) ***Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects;[69] or***

Threshold b) ***Not result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.***

In assessing impacts related to wastewater in this section, the City will use Appendix G as the thresholds of significance. The criteria identified in the L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. In accordance with the *Thresholds Guide*, a project would normally have a significant wastewater impact if:

a) The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

b) The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

b) Methodology

The analysis of impacts on wastewater infrastructure and treatment capacity is based on the anticipated wastewater flows to be generated by the Project using wastewater

[69] *This section of the EIR focuses on impacts associated with wastewater infrastructure. With respect to impacts upon water supply and water conveyance facilities, see Section IV.K.1, Water, above. With respect to stormwater drainage impacts, this issue was concluded to be less than significant and dismissed from further analysis in the Initial Study (See Initial Study Checklist Question X in Appendix A to this Draft EIR and Section VI, Other CEQA Considerations). Impacts related to electric power, natural gas or telecommunications are addressed in Section IV.K.4, Electric Power, Natural Gas and Telecommunications Infrastructure, below.*

generation factors provided by LASAN. Given the existing capacity of the Development Site's sanitary sewer system and the Development Site's future demand, an assessment was made of the impacts to the sanitary sewers and the City's downstream sewers and treatment plants. Data regarding the existing physical features and capacity of the system is based on information provided by LASAN in the WWFP as discussed above.

To evaluate potential impacts relative to wastewater treatment capacity, this analysis evaluates whether there is adequate treatment capacity within the HSA to accommodate the Project based on the estimated wastewater generation from the Project and data from LASAN. Wastewater generation associated with the Proposed Project was calculated using generation factors based on land use, as provided by LASAN. The estimated net increase was analyzed relative to infrastructure and treatment plant capacity. For the assessment of cumulative impacts on wastewater treatment, the projected cumulative wastewater generation is compared to the estimated available capacity of the HSA in 2023, which is the anticipated buildout year for the Proposed Project.

c) Project Design Features

No specific project design features are proposed with regard to wastewater infrastructure.

d) Analysis of Project Impacts

Threshold a) Would the project require or result in the relocation or construction of new or expanded wastewater treatment facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?

(1) Project Impacts

(a) Construction

During construction, no additional wastewater would be generated on the Development Site. The existing restroom facilities within the retail buildings would be demolished and the existing connections to the wastewater system would be temporarily capped. Contractors typically provide portable restrooms provided by a commercial supplier. As such, no new wastewater demands upon existing facilities would be created during construction.

Construction of the Proposed Project would require connecting to the existing 10-inch sewer line located within the public right-of-way beneath W. 3rd Street. Construction activities associated with the installation of new or relocated sewer line connections would be confined to trenching on the Development Site and within the adjacent right-of-way

within W. 3rd Street. Vehicular and pedestrian access within and immediately surrounding the Project Site may be temporarily affected during installation of sewer line connections. However, as discussed in Section IV.I, Transportation, of this Draft EIR, during construction of the Project, a Construction Traffic Control/Management Plan would be implemented during Project construction to reduce impacts to pedestrian and traffic flow from temporary off-site utility work. The Construction Traffic Control/Management Plan would ensure that adequate and safe pedestrian access, vehicle travel, and emergency vehicle access remains available during construction activities. Additionally, any partial street closures would be temporary in nature and would not be anticipated to result in a substantial inconvenience to motorists or pedestrians, who would have additional options for navigating around the construction site. Such impacts would be relatively short-term in duration (i.e., less than 33 months) and would be coordinated through LASAN and DOT through the B-permit process. ***Therefore, temporary construction activities would not require or result in the relocation or construction of new or expanded wastewater treatment facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. As such, construction impacts would be less than significant.***

(b) *Operation*

Additionally, as discussed in more detail below, the Proposed Project would result in a net increase of 63,022 gpd of wastewater, which is well below the capacity at the HWRP. (See LASAN's response letter to the NOP, dated March 1, 2019, and follow up e-mail correspondences dated October 26, 2020 and October 30, 2020 confirming LASAN's approval of maximum discharge in Appendix J.3 to this Draft EIR.) ***Therefore, the operation of the Proposed Project would not result in the relocation or construction of new or expanded wastewater treatment facilities or expansion of existing facilities. As such, the Proposed Project's operation impacts would be less than significant.***

Threshold b) Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

(1) Project Impacts

The Proposed Project would result in the new development of 331 multi-family dwelling units and approximately 83,994 square feet of new commercial space which would generate increased wastewater flows. As shown in Table IV.K-14, Proposed Project Estimated Wastewater Generation, below, the Proposed Project is anticipated to

Table IV.K-14
Proposed Project Estimated Wastewater Generation

Type of Use	Quantity (Unit)[a]	Wastewater Generation Rate (gpd/unit)[b]	Total Wastewater Generation (gpd)
Existing Uses (to be demolished)			
Commercial/Retail	151,048 sf	50 gpd/ksf	7,552
		Existing Wastewater Generation:	**7,552**
Proposed Uses			
Residential Uses (331 total du)			
Studio	70 du	75 gpd/du	5,250
One Bedroom	162 du	110 gpd/du	17,820
Two-Bedroom	66 du	150 gpd/du	9,900
Three-Bedroom	33 du	190 gpd/du	6,270
Lease Office [c]	4,370 sf	120 gpd/ksf	524
Fitness Room [d]	1,963 sf	650 gpd/ksf	1,276
Amenity Space [e]	2,100 sf	50 gpd/ksf	105
Club Room [f]	1,577 sf	50 gpd/ksf	79
Pool	800 sf-	-	21,000
Spa [g]	128 sf	-	3,360
Water Feature [h]	16 sf	-	420
		Residential Total:	***66,004***
New Commercial Uses (83,994 total sf)			
Commercial/Retail	83,994	50 gpd/ksf	4,200
		Commercial Subtotal:	***4,200***
		Landscaping [f:]	***370***
		Total Proposed Project Wastewater Generation:	**70,574**
		Minus Existing Wastewater Generation:	*-7,552*
		Net Additional Wastewater Generation:	**63,022**

Notes:

[a] *du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day;*

[b] *City of Los Angeles, Bureau of Engineering, Department of Sanitation (LASAN), Wastewater Engineering Services Division, Inter-Departmental Correspondence to the Department of City Planning, 3rd and Fairfax Mixed Use Project – Notice of Preparation of Environmental Impact Report and Public Scoping Meeting, March 1, 2019 and follow up e-mail correspondences dated October 26, 2020 and October 30, 2020 confirming LASAN's approval of maximum discharge. See Appendix J.3 to the Draft EIR.*

[c] *Lease office is considered as "Office Building" for wastewater generation purposes.*

[d] *Fitness Room is considered as "Health Club/Spa" for wastewater generation purposes.*

[e] *Amenity space is considered as "Lounge" for wastewater generation purposes.*

[f] *Club space is considered as "Lounge" for wastewater generation purposes.*

[g] *Spa is considered as "Swimming Pool" for wastewater generation purposes.*

[h] *Water feature is considered as "Swimming Pool" for wastewater generation purposes.*

[i] *Landscaping water demand is based on the Model Water Efficient Landscape Ordinance for estimating the Maximum Applied Water Allowance (LA Green Building Code Sec. 99.04.304). Per the Landscape Composite Plan the Proposed Project's total landscaping area is 7,896 square feet*

Source: Parker Environmental Consultants, 2020.

generate approximately 70,574 gpd of wastewater. When considering the removal of the existing uses on-site, the Proposed Project would result in a net increase of 63,022 gpd of wastewater. It should be noted that the Project's wastewater generation estimate is conservative and does not factor in water conservation efforts that would result from the Proposed Project's mandatory compliance with the LA Green Building Code.

As noted in their response letter to the NOP, LASAN has made the determination that the existing sewer line under W. 3rd Street can accommodate 100 percent of the Project's wastewater flow (see Appendix J.3 to this EIR) in addition to serving the existing demands on the wastewater infrastructure. In addition, further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted as part of the normal permitting process to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LA Sanitation and California Plumbing Code standards. Furthermore, in accordance with LAMC Sections 64.11 and 64.16.1, the Project would pay the required sewer connection fees to help offset the Project's contribution to the City's wastewater collection infrastructure needs and would require approval of a sewer permit prior to connection to the sewer system.

Sewage generated by the Proposed Project would be conveyed and treated at the HWRP. As discussed above, the HWRP has a design capacity to treat 450 mgd and, as of 2016, is treating approximately 250 mgd (see Table IV.K-12, above). Based on the projected wastewater flows in the One Water 2040 Plan, and regional growth projections in the 2015 UWMP[70], the HWRP is projected to treat an average annual flow of 283 mgd by 2040. As discussed above, future wastewater flows are expected to increase due to increased population, commercial, and industrial activity. The City's Wastewater Facilities Plan is based on LADWP's 2015 UWMP, in conjunction with SCAG population data, which projects a growth of an additional 493,200 people within the City by 2040.[71] Projects that are consistent with SCAG's regional growth projections are thus deemed to be accounted for in the future wastewater projections in the Wastewater Facilities Plan.

As noted in Section IV.G, Population and Housing, the Proposed Project would be consistent with SCAG's growth projections through the Project's buildout year (2023). Therefore, the HWRP, which would receive sewage flow from the Proposed Project, would have adequate capacity to serve the regional growth through the year 2040. Further, as noted in the LASAN's correspondences, sewage flows will be conveyed to the

[70] *The 2015 UWMP is based on projections in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS).*

[71] *City of Los Angeles, One Water LA 2040 Plan – Volume 2, Wastewater Facilities Plan, January 2018 (at page 2-4).*

HWRP, which has sufficient capacity for the Proposed Project (see Appendix J.3, Will-Serve Letters, to the Draft EIR).

In addition, the Proposed Project would result in a net increase of 63,022 gpd of wastewater generation over existing conditions. The HWRP has capacity to treat 450 mgd of wastewater. As shown in Table IV.K-12, above, the HWRP is expected to have an average annual dry weather flow of 275 mgd by 2030 and 283 mgd through 2040, which is well within the HWRP's treatment capacity of 450 mgd. The proposed increase of 63,022 gpd from the Proposed Project is approximately 0.06 mgd, which equals 0.036 percent of HWRP's remaining capacity in 2030 and 0.038 percent of HWRP's remaining capacity in 2040, respectively. Thus, the volume of wastewater generated by the Proposed Project is well with the wastewater treatment capacity of the HWRP at the build out year for the Proposed Project and through the planning horizon of One Water LA 2040. ***Therefore, the Project would not result in a determination by the wastewater treatment provider that it does not have adequate treatment capacity to serve the project's projected demand in addition to the provider's existing commitments. As such, impacts with respect to wastewater treatment capacity and infrastructure would be less than significant.***

(2) Mitigation Measures

No mitigation measures are required.

(3) Level of Impact After Mitigation

Impacts 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

In accordance with Section 15130(b)(1)(A)(B) of the CEQA Guidelines, an adequate discussion of a project's significant cumulative impact, in combination with other related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes conditions contributing to the cumulative effect. The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. For purposes of assessing the Proposed Project's cumulative impact with respect to impacts upon wastewater treatment and infrastructure, the analysis below is appropriately based on a combination of the plan-based approach and the list-based approach to determine the

Proposed Project's contributing effect on potential cumulative impacts on water resources.

Implementation of the Proposed Project in conjunction with the related projects identified in Section III, Environmental Setting, would further increase cumulative demands for wastewater treatment within the HWRP service area. As identified in Section III, Environmental Setting, there are 41 related projects within the City of Los Angeles and 22 related projects located within the City of West Hollywood, all of which are within the service area of the HWRP. As shown in Table IV.K-15, Estimated Cumulative Wastewater Generation, below, the Proposed Project, in conjunction with the related projects would generate approximately 764,510 gpd of wastewater, or approximately 0.76 mgd. Similar to the calculations for water demand, this estimate is conservative as it does not account for the net reduction in wastewater generated by infill developments that are displacing current land use that generate wastewater flows and water conservation measures such as the mandatory indoor water reduction rates required by the LA Green Building Code in new development projects.

As discussed above, the HWRP has a design capacity to treat 450 mgd and has a projected wastewater treatment flow of 283 mgd through the year 2040. The Proposed Project is within the forecasted growth projections as anticipated in SCAG's RTP/SCS, which formed the basis for the HWRP's projected treatment flow in 2040, and, the HWRP would have ample capacity to serve the cumulative wastewater generated by the Proposed Project in conjunction with the related projects with the unused treatment capacity through the 2040 planning horizon. Based on the HWRP's estimated future capacity through the year 2040 (i.e., 167 mgd), the HWRP would have adequate capacity to accommodate the cumulative wastewater flow of approximately 0.77 mgd from the Project and related projects.

In addition, similar to the process for the Proposed Project, and in accordance with LAMC Section 64.15, a Sewer Capacity Availability Report (SCAR) analysis will be conducted for each related project at the time of construction to determine if there is adequate capacity existing in the local sewer collection system to convey the newly generated sewage to the appropriate sewage treatment plant, and LAMC Sections 64.11.2 and 64.16.1 will require approval of a sewer permit prior to connection to the sewer system. Through this process, the City would evaluate each related project on a case-by-case basis to ensure the local conveyance system is adequately serviced and maintained to accommodate sewer flows commensurate with new development. ***Therefore, the Proposed Project in combination with the related projects would not require the construction of new wastewater treatment facilities or the expansion of existing wastewater treatment facilities and impacts on wastewater services would be less than significant.***

Table IV.K-15
Estimated Cumulative Wastewater Generation

Land Use	Size [a]	Wastewater Generation Rate (gpd)[b]	Total Wastewater Generation (gpd)
Residential (multi-family)	2,929 du	150/DU	439,350
Residential (single-family)	8 du	185/DU	1,480
Retail	347,184 sf	25/1,000 sf	8,860
Medical Office	160,462 sf	250/1,000 sf	40,116
General Office	232,340 sf	120 /1,000 sf	27,881
Gym/Health Club	14,000 sf	650/1,000 sf	9,100
Grocery/Supermarket	52,685 sf	50/1,000 sf	2,634
Hotel	341 rooms	120/room	40,920
Church/Synagogue	1,105 seats [c]	3/seat	3,315
Hospital/Skilled Nursing/Assisted Living	283 beds	70/bed	19,810
Museum	8,729 sf	30/1,000 sf	262
Restaurant	80,945 sf (3,598 seats)	30/seat	107,940
Total Related Projects Wastewater Generation*:*			***701,448***
Proposed Project Wastewater Generation:			**63,022**
Total Cumulative Wastewater Generation:			**764,510**
Project % of Cumulative			**8%**

Notes:
[a] *du: dwelling unit, sf: square feet, ksf: one thousand square feet, gpd: gallons per day.*
[b] *Wastewater is based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*
[c] *Estimated wastewater demand for a church use was estimated based on 16,582 sf (1,105 seats approximated based on an average seating capacity of 15 sf per seat.*
[d] *The estimated wastewater for restaurants assumes all restaurant projects are indoor dining with two-thirds of the total restaurant space allocated to dining areas and a seating occupancy of 15 sf per seat.*
Source: Parker Environmental Consultants, 2020.

(1) Mitigation Measures

No mitigation measures are required.

(2) Level of Significance After Mitigation

Impacts 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.

IV. Environmental Impact Analysis

K. Utilities and Service Systems

3. Solid Waste

1. Introduction

This section analyzes the Proposed Project's construction and operational solid waste generation and the associated demands the Proposed Project would place upon regional landfills that serve the area. Specifically, this section quantifies construction and operational solid waste generation and identifies applicable solid waste reduction strategies that are required by regulations, including The California Integrated Waste Management Act of 1989 (AB 939), the California Green Building Standards Code, the Countywide Integrated Waste Management Plan, the City of Los Angeles Solid Waste Integrated Resources Plan, and applicable sections of the City of Los Angeles General Plan and Municipal Code pertaining to solid waste. Information pertaining to the estimated remaining capacity at regional landfills serving the Project Site was based on The Countywide Integrated Waste Management Plan 2018 Annual Report.[72]

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) Assembly Bill 939 – California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939) was the first recycling legislation in the country to mandate recycling diversion goals. AB 939 required all California cities, counties and approved regional solid waste management agencies responsible to enact plans and programs to reduce waste disposal. Jurisdictions were required to meet diversion goals of 50% by the year 2000. AB 939 also established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. California has successfully used AB 939 to motivate cities

[72] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019.*

and counties to reduce reliance on landfill disposal and increase waste diversion through recycling, composting, and source reduction.

AB 939 further requires each city and county to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would reach the required diversion goals. The SRRE contains diversion programs and policies and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to the California Integrated Waste Management Board (CIWMB), now known as CalRecycle, to update their progress toward the AB 939 goals (i.e., source reduction, recycling and composting, and environmentally safe land disposal).[73]

(b) Assembly Bill 1327 – California Solid Waste Reuse and Recycling Access Act of 1991

The California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327) required CalRecycle to develop a model ordinance for adoption of recyclable materials in development projects by March 1, 1993. Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. In response to this legislation, the City of Los Angeles passed the Recycling Space Allocation Ordinance (Ord No. 171,687), discussed below.

(c) Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements

Senate Bill 1374 was signed into law in 2002 to assist jurisdictions with diverting their construction and demolition (C&D) waste material. SB 1374 requires that the CIWMB (now CalRecycle) complete five items in regards to the diversion of construction and demolition waste: (1) adopt a model ordinance for diverting 50 percent to 75 percent of all C&D debris from landfills; (2) consult with multiple regulators and waste entities (e.g., California State Association of Counties, private and public waste services, building construction materials industry, etc.) during the development of the model ordinance; (3) compile a report on programs that can be implemented to increase diversion of C&D debris; (4) post a report on the agency's website for general contractors on methods that contractors can use to increase diversion of C&D waste materials; (5) post on the agency's website a report for local governments with suggestions on programs to

[73] *California Public Resources Code, §40050 et seq.*

increase diversion of C&D waste materials. Under SB 1374, jurisdictions must also include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The model ordinance was adopted by CalRecycle on March 16, 2004.[74]

(d) Assembly Bill 1826 – Organic Recycling

Assembly Bill 1826 (AB 1826) requires businesses that generate more than four cubic yards of organic waste (food, green and non-hazardous wood waste) per week, and multi-family properties with five units or more, to provide separate recycling bins for organic waste, and requires that local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses. Under AB 1826, all businesses that generate four cubic yards of organic waste or commercial solid waste per week shall arrange for organic waste recycling services. Effective January 1, 2020, if statewide disposal of organic waste has not been reduced to 50 percent of the level of disposal during 2014, all businesses that generate two cubic yards or more of commercial solid waste per week will be required to arrange for organic waste recycling services.

AB 1826 also requires each local jurisdiction, on and after January 1, 2016, to implement an organic waste recycling program to divert organic waste from the subject businesses, except as specified for rural jurisdictions. Each jurisdiction is required to report to CalRecycle on the progress made in implementing an organic waste recycling program, and CalRecycle is required to assess each jurisdiction's compliance with the AB 1826 requirements. Furthermore, AB 1826 authorizes jurisdictions to charge and collect a fee from organic waste generators to recover the costs incurred in providing organic waste recycling programs

(e) Assembly Bill 341

AB 939 was amended in 2012 by Assembly Bill 341 (AB 341), which requires jurisdictions to meet a solid waste diversion goal of 75 percent by the year 2020, and requires commercial enterprises and public entities that generate four or more cubic yards (cy) per week of solid waste, and multi-family housing complexes with five or more units, to adopt recycling practices that achieve a 75 percent reduction in their waste streams. Such business/residential development must: (1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables; and (2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.

[74] *CalRecycle, Senate Bill 1374 (2002), August 24, 2018 Board Meeting, Agenda Item No. 13, https://www2.calrecycle.ca.gov/Docs/CIWMBMeeting/Agenda/821 accessed July 2019.*

(f) California Green Building Standards Code

The California Green Building Standards (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, sets standards for new structures to minimize the state's carbon output. California requires that new buildings reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The most recent update to the CALGreen Code went into effect on January 1, 2020. The 2019 CALGreen Code has revised provisions that require new buildings to reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.[75] Each local jurisdiction still retains the administrative authority to exceed the new CALGreen standards. The City of Los Angeles Green Building Ordinance is consistent with the CALGreen Code.[76]

(2) Regional

(a) Los Angeles County Integrated Waste Management Plan

AB 939 mandates jurisdictions to meet a diversion goal of 50 percent by the year 2000, and thereafter. In addition, each county is also required to prepare and administer a Countywide Integrated Waste Management Plan (CIWMP). This plan is comprised of the County's and the cities' solid waste reduction planning documents, an Integrated Waste Management Summary Plan (Summary Plan), and a Countywide Siting Element (CSE). In order to assess compliance with AB 939, the Disposal Reporting System (DRS) was established to measure the amount of disposal from each jurisdiction. Comparing current disposal rates to base-year solid waste generation determines whether each jurisdiction complies with the diversion mandate.

(3) Local

(a) City of Los Angeles Waste Management Policy and Source Reduction and Recycling Element

In 1993, the City adopted the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) that provides long-range policy direction for solid waste management and served as an umbrella document for the City's SRRE. The SRRE describes the Source Reduction and Recycling Program for waste collected by the City of Los Angeles

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[75] *California Energy Commission, 2019 Building Energy Efficiency Standards, December 2018,https://ww2.energy.ca.gov/publications/displayOneReport_cms.php?pubNum=CEC-400-2018-020-CMF, accessed December 2020.*

[76] *CalRecycle, CALGreen Construction Waste Management Requirements, website: https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/newstructures, accessed February 2020.*

Department of Public Works, LASAN (formerly known as Bureau of Sanitation) in conformance with the requirements of AB 939. Specifically, Volume IV of the SRRE presents strategies for targeted waste generators such as hotels, restaurants, and hospitals; targeted materials such as construction and demolition debris, green waste, and direct mail; and government departments. Pursuant to AB 939, the objective of the City Solid Waste Management Policy Plan and the SRRE is to promote source reduction or recycling to achieve a minimum diversion of 50 percent of the City's waste by 2000 through the disposal of the remaining waste in local and possibly remote landfills. The City has surpassed this requirement, with a 76.4% diversion rate as of 2013.[77] The responsibility for documenting waste diversion efforts for the City lies with LASAN. As set forth below, more recent plans have been adopted by the City to further its waste reduction and recycling goals.

(b) City of Los Angeles Solid Waste Integrated Resources Plan

Under the City's Solid Waste Integrated Resources Plan (SWIRP), the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030.[78] The SWIRP is a long-range plan for the City's solid waste management needs through 2030. The goals of the SWIRP are to eliminate the City's use of urban landfills, develop alternative technologies for long term waste disposal, increase recycling and resource recovery and to convert the entire Sanitation fleet to clean fuel Liquid Natural Gas vehicles with the ultimate goal of leading Los Angeles towards being a "zero waste" City by 2030.[79]

Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that would aid the City in meeting its diversion goals by, among other things: (i) requiring franchises to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which would enable required reporting and monitoring of state mandated commercial and multifamily

[77] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Bureau of Contract Administration, Joint Board Report No 1, September 26, 2016, p. 5.*

[78] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste Progress Report, March, 2013.*

[79] *The term "zero waste" refers to maximizing recycling, minimizing waste, reducing consumption, and encouraging the use of products with recycled/reused materials. As noted by the City, "zero waste" is a goal and not a categorical imperative; the City is simply seeking to come as close to "zero waste" as possible.*

recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

As reported by LASAN, the City's solid waste diversion rate for the 2013 fiscal year was 76.4 percent. The City is exceeding the state-mandated diversion goal of 50% by 2000 set by the California Integrated Waste Management Act (AB 939) of 1989.[80] The City's Sustainable City pLAn recently updated in 2019 and retitled the L.A. Green New Deal calls for achieving 90 percent diversion by 2025 and 95 percent diversion by 2035 through on-going development of waste management infrastructure and innovative source reduction, reuse, recycling and composting programs. These programs include Green Mulching and Composting workshops, black yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals.

(c) L.A.'s Green New Deal Sustainable City pLAn 2019

In 2019, the Mayor's office released The Green New Deal Sustainable City pLAn 2019 (L.A.'s Green New Deal) as an update to the 2015 Sustainable City pLAn. L.A.'s Green New Deal Sustainable City pLAn 2019[81] establishes short-term and long-term sustainability targets for the City over the next 20 years in 14 categories to strengthen and promote sustainability of the environment, economy, and equity in Los Angeles. The Sustainable City pLAn establishes the following targets pertaining to solid waste:

- Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050;
- Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028;
- Eliminate organic waste going to landfill by 2028; and
- Increase proportion of waste products and recyclables productively reused and/or repurposed within L.A. County to at least 25% by 2025; and 50% by 2035.

[80] *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June, 14 2005.*
[81] *City of Los Angeles, L.A.'s Green New Deal Sustainable City pLAn 2019, January 2019.*

(d) RENEW LA Plan

RENEW LA was adopted by the City Council in February 2006 for the purpose of facilitating a shift from solid waste disposal to resource recovery. This shift is predicted to result in "zero waste" and an overall diversion level of 90 percent by 2025 and becoming a zero-waste city by 2030. The plan focuses on combining key elements of existing reduction and recycling programs and infrastructure with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables; soil amendments; and renewable fuels, chemicals, and energy. Furthermore, the plan calls for reductions in the quantity of and environmental impacts associated with residual materials disposed in landfills.

(e) City of Los Angeles Space Allocation Ordinance

Pursuant to AB 1327, the City enacted the Space Allocation Ordinance (Ordinance No. 171,687) on August 13, 1997, which is incorporated in various sections of the Los Angeles Municipal Code (LAMC). The Space Allocation Ordinance requires the provision of an adequate recycling area or room for collecting and loading recyclable materials for all new construction projects, multi-family residential projects of four or more units where the addition of floor area is 25 percent or more, and other development projects where the addition of floor area is 30 percent or more.

(f) *Citywide Construction and Demolition Debris Recycling Ordinance*

On March 5, 2010, the City Council approved a Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519) that requires LASAN to ensure that all mixed construction and demolition waste generated within City limits be taken to a City certified construction and demolition waste processor. The ordinance became effective in January 2011.[82] Compliance with the Ordinance and the Los Angeles Municipal Code (LAMC) Section 66.32, which requires the haulers to meet the diversion goals, would ensure that 70 percent of solid waste generated by the City, including C&D waste, would be recycled.

[82] *City of Los Angeles, Sanitation, Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=2386948483953796&_afrWindowMode=0&_afrWindowId=p463hihff&_adf.ctrl-state=d7px3i0z_80#!%40%40%3F_afrWindowId%3Dp463hihff%26_afrLoop%3D2386948483953796%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dd7px3i0z_84, accessed January 2020.*

(g) Citywide Exclusive Franchise System for Municipal Solid Waste Collection and Handling

Solid waste collection, management, and disposal in the City are handled both by LASAN crews and by various permitted private solid waste haulers. The City provides solid waste collection, recycling, and green waste collection services primarily to single-family uses and multi-family uses with four units or less. Private solid waste haulers collect from most multi-family residential uses with more than four units and commercial uses based on an open permit system. Permitted waste haulers must obtain an annual permit, submit an annual report, and pay quarterly fees. However, unlike LASAN, private waste haulers are not required to provide recycling services, operate clean fuel vehicles, offer similar costs for similar services, or reduce vehicle miles traveled. Thus, the existing open permit system limits the ability of the City to address compliance with state environmental mandates and the City's waste diversion goals. Although the City has obtained a 76 percent solid waste diversion rate as identified in the 2013 Zero Waste Progress Report, nearly 3 million tons of solid waste from the City are still disposed in landfills annually, nearly 70 percent of which is comprised of waste collected by private waste haulers from multi-family residential and commercial customers.[83]

In response to City Council directive, LASAN developed Zero Waste LA, a new public private partnership that establishes a new waste and recycling franchise systems for all businesses, commercial, industrial, and large multi-family customers in the City.[84] In April 2014, the Mayor and City Council approved Ordinance No. 182,986 that allows the City to establish an exclusive franchise system with 11 zones. With a single-trash hauler responsible for each zone, the franchise system allows for the efficient collection and sustainable management of solid waste resources and recyclables. Among other requirements, the City mandates maximum annual disposal levels and specific diversion requirements for each franchise zone to promote solid waste diversion from landfills in an effort to meet the City's zero waste goals. This program began rolling out on July 1, 2017.

(h) City of Los Angeles Green Building Ordinance

On December 20, 2016, the City Council approved Ordinance No. 184,692, which amended Chapter IX (Green Building Code) of the LAMC, by modifying certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CALGreen Code. Projects filed on or after January 1, 2017 must comply with the provisions of the City's Green Building Code. Specific mandatory requirements and

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[83] *City of Los Angeles, Final Implementation Plan for Exclusive Commercial and Multifamily Franchise Hauling System, April 2013, accessed March 2020.*

[84] *LASAN, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mde0/~edisp/cnt014133.pdf, accessed on July 25, 2018.*

elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

(i) Los Angeles Municipal Code

(i) Solid Waste Hauler Permit Requirements.

LAMC Section 66.32.1 requires all persons who collect, remove or transport Solid Waste, including Construction and Demolition Waste, Source-Separated Materials or Co-Mingled Recyclables, generated within the City, to obtain an AB 939 Compliance Permit from the Bureau of Sanitation. This requirement applies to construction and demolition waste generated within the City, and requires that such materials are transported to a Certified Construction and Demolition Waste Processing Facility or to a facility other than a Certified Construction and Demolition Waste Processing Facility if at least two Certified Construction and Demolition Waste Processing Facilities refuse to accept the Waste and provide the Person with a rejection slip. This section does not apply to the collection, removal, or transportation of Source-Separated Material generated from a project within the City and delivered to a recycling facility, or segregated for on-site recycling.

(j) City of Los Angeles General Plan Framework Element - Infrastructure and Public Services Chapter

The City's General Plan Framework Element, adopted in December 1996 and readopted in August 2001, contains goals, policies, and objectives that address solid waste services. The Framework Element of the City of Los Angeles General Plan provides a City-wide strategy for long-term growth planning. The Framework includes an Infrastructure and Public Services Chapter, which to address State and Federal mandates to plan for adequate infrastructure in the future. The Framework Element supports AB 939 and its goals by encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."[85] The Framework Element addresses many of the programs the City has implemented to divert waste from disposal facilities such as source reduction programs and recycling programs (e.g., Curbside Recycling Program and composting). Furthermore, the Framework Element states that for these programs to succeed, the City should site businesses at appropriate locations where recyclables can be handled, processed, and/or manufactured to allow a full circle recycling system to develop. The continuing need for solid waste transfer and disposal facilities, as well as the limited

[85] *City of Los Angeles Department of City Planning, Citywide General Plan Framework, August 2001, page 9-11.*

disposal capacity of the landfills in Los Angeles, is further addressed by the General Plan Framework, which indicates that more transfer facilities will be needed in order to dispose of waste at remote landfill facilities. Several landfill disposal facilities that may be accessed by truck are identified in addition to waste-by-rail landfill disposal facilities that can be utilized by the City to meet its disposal needs.[86]

b) Existing Conditions

(1) Solid Waste Generation and Disposal in the County of Los Angeles

(a) Class III Landfills

The 2018 Annual Report for the CIWMP, was released in December 2019. The purpose of the 2018 Annual Report is to provide an annual update to the Summary Plan and CSE. The Los Angeles County Department of Public Works prepares the Annual Report to summarize the changes in solid waste management that have taken place since the approval of the Summary Plan and the CSE, including updated strategies to meet the long-term needs and maintain adequate disposal capacity. The CIWMP 2018 Annual Report provides disposal analysis and facility capacities for 2018, as well as projections to the CIWMP's horizon year of 2033 for each in-county landfill.[87] As summarized in Table IV.K-16, below, the County of Los Angeles disposed a total of approximately 11,016,800 tons of solid waste in 2018.[88]

Table IV.K-16
Los Angeles County Solid Waste Disposal Tonnage Breakdown (2018)

	Annual Disposal Tonnage	Daily Disposal rate [a]
In-County Class III Landfills	5,121,209	16,414
Transformation Facilities	416,464	1,335
Exports to Out-of-County Landfills	5,120,871	16,413
Subtotal Solid Waste Disposed	10,658,546	34,162
Permitted Inert Waste Landfill	358,254	1,148
Grand Total Solid Waste Disposed	**11,016,800**	**35,310**

Source: County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (Table 1 at page 25).

[86] *City of Los Angeles Department of City Planning, Citywide General Plan Framework, Chapter 9, available online at http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm#solidwaste, accessed on January 2020.*

[87] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019.*

[88] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019, at page 25.*

The CIWMP 2018 Annual Report indicates that the County can adequately meet future Class III disposal needs through 2033 through scenarios that include a combination of all or some of the following: (1) maximize waste reduction and recycling; (2) expand existing landfills; (3) study, promote, and develop alternative technologies; (4) expand transfer and processing infrastructure; and (5) out-of-county disposal (including waste-by-rail).[89]

(b) Class I Landfills

Hazardous wastes are composed of properties that make them potentially dangerous or harmful to human health or the environment and are disposed of at Class I landfills. The closest Class I landfills to the Project Site are the Buttonwillow Landfill located in Kern County, approximately 135 miles north of the Project Site and The Kettleman Hills Facility, located in Kings County, approximately 173 miles north of the Project Site.

Buttonwillow is a fully permitted hazardous waste facility, permitted by various regulatory agencies in the State to receive, store, treat and landfill a variety of hazardous and non-hazardous waste streams. This facility is capable of managing a large number of Resource Conservation and Recovery Act (RCRA) hazardous wastes, California hazardous waste, and non-hazardous waste for stabilization treatment, solidification, and landfill. The treatment methods utilized at this facility typically reduce toxicity of waste materials and make it suitable for disposal. Buttonwillow has a maximum permitted landfill capacity of 13.25 million cubic yards and can accept up to 10,500 tons per day.[90]

Hazardous wastes may also be disposed of at Kettleman Hills Facility, a Class I landfill located in Kings County, approximately 170 miles north of the Project Site. The Kettleman Hills Facility is permitted to accept most types of hazardous wastes as defined by the U.S. Environmental Protection Agency and the State of California. Materials accepted at the Kettleman Hills Facility include asbestos debris, lead-based paint (LBP) materials, polychlorinated biphenyls (PCBs), petroleum-contaminated soils and debris, soils and debris with metal contamination, household hazardous wastes from collection events, baghouse dusts, various ash waste, filter cake, catalyst solids, latex paint, groundwater, stormwater, clarifier water, and various sludges. As of February 2020 the Kettleman Hills Facility had a remaining capacity of 15.6 million cubic yards.[91]

[89] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019, at page 50-51.*

[90] *SWIS Facility/Site Activity Details, Clean Harbors Buttonwillow LLC (15-AA-0257), accessed July 2020.*

[91] *SWIS Facility/Site Activity Details, Kettleman Hills - B18 Nonhaz Codisposal (16-AA-0023), accessed July 2020.*

(c) Transfer/Processing Facilities

There are 42 permitted Large Volume Transfer/Processing and Direct Transfer Facilities, which can receive 100 tons of waste or more per operating day, and numerous facilities of smaller volume operating within the County. A transfer station/processing facility refers to a facility which receives, handles, separates, converts, or otherwise processes solid waste. There are three types of facilities that are recognized as transfer/processing facilities in the County: transfer stations, material recovery facilities, and construction, demolition and inert debris processing facilities. Transfer stations typically transfer solid waste directly from one container to another or from one vehicle to another for transport, or temporarily store solid waste prior to final disposal at CalRecycle-permitted landfills or transformation facilities. Material recovery facilities (MRFs) refer to intermediate processing facilities designed to remove recyclables and other valuable materials from the waste stream. A construction, demolition, and inert (CDI) debris processing facility refers to a site that receives any combination of construction and demolition debris, and Type A[92] inert debris per operating day for the purposes of storage, handling, transferring, or processing.

(d) Transformation Facilities

Per Title 14, California Code of Regulations, Section 18720, a transformation facility's principal function is to convert, combust, or otherwise process solid waste by incineration, pyrolysis, distillation, gasification, or to chemically or biologically process solid waste for the purpose of volume reduction, synthetic fuel production, or energy recovery. Transformation facilities do not include biomass conversion or composting facilities. There are two transformation facilities in the County: the (Commerce Refuse-to-Energy Facility (CREF) and the Southeast Resource Recovery Facility (SERRF)). In 2018 these facilities had a combined average daily solid waste intake of 1,335 tons per day (tpd), which is equivalent to 416,465 tons per year (tpy).[93] CREF is closed permanently as of June 26, 2018. SERRF will continue to operate until June 2024 at its current average daily rate during the planning period.

(e) Waste by Rail

Waste-by-rail (WBR) systems allow the County to transport solid waste via existing railways to remote out-of-County disposal facilities. They involve the collection of

[92] *Type A inert debris includes, but is not limited to, concrete (including fiberglass or steel reinforcing bar embedded in the concrete), fully cured asphalt, crushed glass, fiberglass, asphalt or fiberglass roofing shingles, brick, slag, ceramics, plaster, and clay products.*

[93] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019.*

recyclable waste at materials recovery facilities and the loading of remaining non-hazardous wastes into rail-ready shipping containers. These containers are delivered by truck to local rail yard loading facilities where they are then transported to remote landfills designed and permitted to receive waste via rail. The Mesquite Regional Landfill in Imperial County, located approximately 210 miles east of downtown Los Angeles, along the Union Pacific Railroad could be used by the County for waste disposal. The Sanitation Districts of Los Angeles County completed acquisition of the landfill in 2002, and completed construction of all infrastructure in December 2008. This landfill is permitted to accept up to 20,000 tons per day with a total disposal capacity for 660 million tons of solid waste, which is equivalent to a lifespan of nearly 109 years.[94] This landfill is not currently used by the City of Los Angeles.

(2) City of Los Angeles Solid Waste Disposal

Solid waste disposal sites (i.e., landfills) serving the Project area are operated by the City and County of Los Angeles as well as by private companies. In addition, transfer stations are utilized to temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or waste shed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region).

The Project Site is located within the North Central Commercial Waste Franchise Zone, which is serviced under contract to Athens Services. Under the existing contract, the service provider is required to deliver all solid waste resources collected to the certified facilities specified in Table IV.K-17 below.

[94] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019, at page 63.*

Table IV.K-17
North Central Zone Authorized Disposal Facilities

Facility Name	Facility Address	Primary or Secondary
Mid-Valley Sanitary Landfill	2390 N Alder Ave Rialto, CA 92377	Primary/Secondary
Chiquita Canyon Landfill	29201 Henry Mayo Dr. Castaic, CA 91384	Primary/Secondary
San Timoteo Sanitary Landfill	San Timoteo Canyon Rd. Redlands, CA 72373	Primary/Secondary
Victorville Sanitary Landfill	18600 Stoddard Wells Rd Victorville, CA 92307	Primary/Secondary
Savage Canyon Landfill	13919 E Penn St. Whittier, CA 90602	Primary/Secondary
Athens Industry MRF	14048 E Valley Blvd. City of Industry, CA 91746	Secondary (Transfer)
Athens Sun Valley MRF & Transfer Station	11121 Pendleton St. Sun Valley, CA 91353	Primary (Transfer)
Central LA Recycling & Transfer Station (CLARTS)	2201 E Washington Blvd. Los Angeles, CA 90034	Secondary (Transfer)

Source: City of Los Angeles Department of Public Works, Personal Services Contract between the City of Los Angeles and Arakelian Enterprises, Inc., DBA Athens Services, for Exclusive Franchise to Provide Collection, Transfer, Processing, and Disposal Services for Solid Resources to Commercial Establishments and Applicable Multifamily Establishments in the West Los Angeles, North Central, and Harbor Zones, September 2016.

As noted in Table IV.K-17, above, landfill waste from areas within the North Central Commercial Waste Franchise Zone would utilize the Mid-Valley Sanitary Landfill, Chiquita Canyon Landfill, San Timoteo Sanitary Landfill, Victorville Sanitary Landfill, and the Savage Canyon Landfill. Under the Citywide Exclusive Franchise System for Municipal Solid Waste Collection and Handling, the Proposed Project's solid waste would be transferred to the Athens Sun Valley MRF & Transfer Station for initial transfer and processing of recyclable materials, and non-recyclable materials would be disposed of at the Chiquita Canyon Landfill, since this landfill is the closest landfill to the Project Site.

(a) Chiquita Canyon Landfill

The Chiquita Canyon Landfill in Santa Clarita is owned and operated by Waste Connections, Inc., and has provided the surrounding Los Angeles County area with waste disposal services for more than 30 years. The Chiquita Canyon Landfill continues to operate for six days per week. In July 2017, the Board of Supervisors approved a new Conditional Use Permit for the Landfill's Expansion Project.[95] Based on the current conditional use permit (CUP 2004-00042(5)), the overall average daily capacity of all incoming materials received for processing, disposal, and beneficial use at the facility

[95] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (at page 60).*

shall not exceed 6,730 tons per day.[96] The maximum tonnage of any combination of solid waste and other materials received by the facility for processing, beneficial use materials (including composting) and disposal shall not exceed 12,000 tons on any given day, provided the monthly tonnage capacity shall not be exceeded.[97] In 2018, the Chiquita Canyon Landfill had an average disposal intake of 2,307 tons per day. As of December 31, 2018, the Chiquita Canyon Landfill has an expected remaining lifespan of 29 years and an estimated remaining disposal capacity of 59.7 tons.[98]

(b) Azusa Land Reclamation

The Azusa Land Reclamation Company Landfill is owned and operated by Azusa Land Reclamation, Inc., and accepts inert waste only, such as asphalt and soil export. The Azusa Land Reclamation Company Landfill continues to operate for five days per week. The facility's maximum permitted daily capacity is 6,500 tons. Approximately 1,148 tons of waste had been disposed of daily for the year 2018. The average daily disposal tonnage is approximately 1,358 tons (based on 6 days). As of December 31, 2018, the combined Azusa Land Reclamation Company has an expected remaining lifespan of 28 years and an estimated remaining disposal capacity of 57.7 million tons of waste.[99]

(c) Athens Sun Valley MRF & Transfer Station

The Athens Sun Valley MRF & Transfer Station is owned and operated by Athens Services and accepts solid waste, commingled recyclables, and organics for transfer and recycling purposes. The facility's maximum permitted daily capacity is 1,500 tons. Approximately 30 percent of waste accepted at the Athens Sun Valley MRF & Transfer Station is recycled.[100]

(d) Construction Waste Recycling Facilities

The Los Angeles County has separate landfill facilities that accept construction and demolition (C&D) waste that can be recycled. The closest transfer and recycling facility to the Project Site that is authorized under the North Central Commercial Waste Franchise Zone services contract is the Central LA Recycling & Transfer Station

[96] *County of Los Angeles, Project No. R2004-00559-(5), Conditional Use Permit No. 2004-0042-(5) July 25, 2017.*
[97] *Ibid.*
[98] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (at page 60).*
[99] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (at page 57).*
[100] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (Appendix E-4).*

(CLARTS), which is located approximately 8 miles south of the Project Site.[101] This recycling center has a daily permitted intake of 4,025 tons per day and has a present capacity of 2,500 tons/day.[102]

(3) Existing Solid Waste Generation

The Development Site is currently developed with approximately 151,048 square feet of commercial/retail area including 144,963 square feet of retail space and 6,085 square feet of restaurant space and a surface parking lot. As shown in Table IV.K-18, below, based on the existing land uses on the Development Site, the existing solid waste generation is estimated to be 3,306 lbs/day, or approximately 603 tons per year.

Table IV.K-18
Estimated Existing Solid Waste Generation

Land Use	Size [a]	Solid Waste Generation Rate (lbs/unit/day) [b]	Total Solid Waste Generated (lbs/day)
Commercial/Retail	151,048 sf (314 employees [b])	10.53 lbs/emp/day	3,306

Notes: gpd = gallons per day; sf = square feet
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019 (see Table IV.G-5, Estimated Employee Generation, in Section IV.G, Population and Housing).*
Parker Environmental Consultants, 2019.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the significance criteria and threshold to analyze potential impacts to solid waste services is whether the Project would:

Threshold a) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

[101] *Los Angeles County, Department of Public Works, Recycling Facilities in Los Angeles County, Construction and Demolition Debris, accessed May 2019.*
[102] *City of Los Angeles, LASAN, CLARTS Facts and Services Fact Sheet, accessed July 2019.*

Threshold b) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?

In assessing impacts related to solid waste in this section, the City will use Appendix G as the thresholds of significance. The criteria identified in the L.A. CEQA Thresholds Guide (Thresholds Guide) will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. The Thresholds Guide states that the determination of significance shall be made on a case-by-case basis considering the following factors:

- *Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;*

- *Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and*

- *Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, City of Los Angeles Solid Waste Management Policy Plan, Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.*

b) Methodology

For purposes of determining significance upon solid waste resources the CEQA Thresholds questions in Appendix G are utilized. The Proposed Project's solid waste generation was estimated utilizing the solid waste generation rates provided by the *L.A. CEQA Thresholds Guide*. The Proposed Project's estimated solid waste generation was then compared to the regional available landfill capacity at the Chiquita Canyon Landfill and projected future remaining landfill capacity in the CIWMP 2018 Annual Report to assess whether the primary local landfill serving the Project Site has adequate capacity to accommodate the Proposed Project's estimated solid waste. Additionally, the Proposed Project's consistency with federal, state and local statutes and regulations related to solid waste was analyzed.

c) Project Design Features

No specific project design features are proposed with regard to solid waste.

d) Analysis of Project Impacts

Threshold a) Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

(1) Project Impacts

(a) Construction

Construction of the Proposed Project would generate demolition and construction debris that would need to be disposed of at area landfills and/or recycled. Construction debris includes concrete, asphalt, wood, drywall, metals, and a variety of other miscellaneous and composite materials. An estimate of the Project's construction and demolition debris is provided in Table IV.K-19, Estimated Construction and Demolition Debris (C&D), below. The estimated C&D debris is based on national average debris generation rates for residential and non-residential projects provided by the U.S. EPA. As shown in Table IV.K-19, the Proposed Project's demolition and construction activities are estimated to generate approximately 13,188 tons of construction and demolition debris.

Table IV.K-19
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate (lbs./sf) [a b]	Generated Waste (tons)
Demolition			
Commercial	151,048 sf	155 lbs/sf	11,706
Total Project Demolition Debris Generation:			**11,706**
Construction			
Residential (331 dwelling units)	343,000 sf	4.39 lbs/sf	753
New Commercial/Retail	83,994 sf	4.34 lb/sf	182
Renovated Commercial/Retail	63,688 sf	4.34 lb/sf	138
Parking Garage	188,400 sf	4.34 lb/sf	409
Total Project Construction Debris Generation:			**1,482**
Proposed Project TOTAL (Demolition and Construction):			**13,188**

Notes: sf = square feet; lbs = pounds
[a] *U.S. EPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003*
Source: Parker Environmental Consultants, 2019.

The LA Green Building Code prescribes mandatory measures for residential and non-residential projects to obtain an AB 939 Compliance Permit from the Bureau of Sanitation for the removal and transport of non-hazardous construction and demolition waste. Under

the requirements of the hauler's AB 939 Compliance Permit from the LASAN and pursuant to LAMC Section 66.32, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Implementation of regulatory compliance measures would effectively achieve a 65 percent reduction in the Proposed Project's solid waste disposal needs upon area landfills. Assuming a 65 percent reduction in construction and demolition debris, the total amount of C&D debris to be disposed of at area landfills is estimated to be approximately 4,616 tons.

Additionally, the Proposed Project is estimated to generate 110,000 cubic yards (cy) of soil export, approximately 165,000 tons. Soil export debris is an inert material and would be hauled to the Azusa Land Reclamation, which accepts inert solid waste. As mentioned previously, the Azusa Land Reclamation Company Landfill currently receives an average of 1,358 tons of daily intake and has a maximum daily disposal capacity of 6,500 tons. Azusa Land Reclamation is located approximately 30 miles east of the Project Site. For recycling efforts, C&D debris would be hauled to the Central LA Recycling & Transfer Station (CLARTS), which as stated above, has a daily permitted intake of 4,025 tons per day and accommodates an average of 2,500 tons/day.[103]

Given the existing waste processing and disposal intake capacities at the Azusa and CLARTS facilities, the Proposed Project's construction-related soil and inert C&D debris could be adequately accommodated by existing local waste recycling centers and regional landfill facilities. Combined, the most solid waste that construction activities could produce is 178,188 tons (13,188 tons demolition + 165,000 tons export soil[104]) over the duration of construction. The soil exports could be disposed of within approximately 17 days given the intake capacity of available landfills; and the demolition and construction debris could be disposed of within approximately four days given the intake capacity of available recycling facilities and landfills. These timeframes are well within the duration of construction and the volumes are well within the capacity of the available facilities. **Therefore, *construction of the proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.***

[103] *City of Los Angeles, LASAN, CLARTS Facts and Services Fact Sheet, accessed July 2019.*

[104] *The Proposed Project is estimated to generate 110,000 cubic yards of soil export. Assuming approximately 3,000 pounds per cubic yard, the Proposed Project would generate 165,000 tons of soil export (https://www.calrecycle.ca.gov/swfacilities/cdi/tools/calculations).*

(b) Operational Impacts

Operation of the Proposed Project would generate solid waste throughout the lifespan of the Project. The Proposed Project's solid waste would be handled by Athens Services, who currently services the North Central Commercial Waste Franchise Zone for commercial and multi-family residential uses. Pursuant to Section 66.32 of the LAMC, and as required under the current North Central Commercial Waste Franchise Zone collection services contract, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the LASAN.

The Proposed Project would generate approximately 4,101 pounds (2.05 tons) of solid waste per day, or approximately 748 tons per year (see Table IV.K-20, Estimated Operational Solid Waste Generation by Proposed Project, below). This estimate is conservative, as it does not factor in the amount of solid waste being recycled as a result of implementing on-site recycling areas. The Proposed Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable materials. Additionally, the Proposed Project would be required to comply with CALGreen Code and the L.A. Green Building Code waste reduction measures for the operation of the Proposed Project. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program.

As discussed above, the Chiquita Canyon landfill has an average daily intake of 2,307 tpd with a maximum daily limit of 12,000 tons. In 2018, the Chiquita Canyon Landfill received a total of 1,530,160 tons (4,192 tpd).[105] As such, the landfill has a current unused daily capacity of 9,693 tpd to accommodate the Proposed Project's 2.05 tons of solid waste per day. Additionally, the total remaining permitted Class III landfill capacity in the County is estimated at 163.39 million tons.[106] Based on this estimate, the additional solid waste demands generated by the Proposed Project could be readily accommodated by the existing landfill operations. ***Therefore, operation of the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Operational impacts would be less than significant.***

105 *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (at page 27).*

106 *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (at page 32).*

Table IV.K-20
Estimated Operational Solid Waste Generation by Proposed Project

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses (to be demolished)			
Commercial (151,048 sf)	314 employees [b]	10.53 lbs/emp/day	3,306
Proposed Project			
Multi-Family Residential	331 du	12.23 lbs/du/day	4,048
New Commercial/Retail (83,994 sf)	319 employees [b]	10.53 lbs/emp/day	3,359
		Total Project Solid Waste Generation:	***7,407***
		Less Existing Uses:	*-3,306*
		NET TOTAL Solid Waste Generation:	**4,101**

Notes: sf =square feet; du = dwelling units; emp = employees
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on factors provided in LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019.*
Source: Parker Environmental Consultants, 2020.

(2) Mitigation Measures

No mitigation measures are required.

(3) Level of Impact After Mitigation

Impacts 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 not comply with federal, state and local management and reduction statutes and regulations related to solid waste?

(1) Project Impacts

The construction and operation of the Proposed Project would comply with applicable statutes and regulations related to solid waste, including those pertaining to waste reduction and recycling, as summarized above in the Regulatory Framework subsection. The Project's construction contractor would deliver all C&D waste generated by the Project to a certified Construction and Demolition Waste Processing Facility in accordance AB 939 Compliance Permit requirements. Thus, the Project would promote source reduction and recycling, consistent with the applicable federal, state, and local

statutes and regulations related to solid waste. Therefore, Project construction would not conflict with applicable solid waste statutes and regulations related to solid waste.

As described above, the Proposed Project's solid waste would be handled by private waste collection services. Pursuant to Section 66.32 of the LAMC, the Proposed Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the LASAN. The Proposed Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable materials. Additionally, the Proposed Project would be required to comply with CALGreen Code and the L.A. Green Building Code waste reduction measures for the operation of the Proposed Project. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal and recycling program.

In accordance with Senate Bill 1374 and Assembly Bills 939 and 341, Project construction and operation would achieve at least a 65 percent and 50 percent solid waste diversion rate, respectively, until year 2020, and at least a 75 percent solid waste diversion rate thereafter, through source reduction, recycling, composting and other methods. Thus, the Proposed Project would promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, General Plan Framework Element, and RENEW LA Plan. The Proposed Project would generate solid waste that is typical of a residential mixed-use residential building with ground floor retail uses. The Proposed Project would comply with all federal, state, and local statutes and regulations regarding proper disposal. ***Therefore, the Proposed Project would comply with federal, state and local management and reduction statutes and regulations related to solid waste, and impacts upon solid waste resources would be less than significant.***

(2) Mitigation Measures

The Proposed Project would comply with all applicable federal, state and local management and reduction statutes and regulations related to solid waste and no mitigation measures are required.

(3) Level of Impact After Mitigation

Impacts 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

(a) Construction

Similar to the Project, the 63 related projects identified in Section III, Environmental Setting would generate C&D waste and be subject to the Citywide Construction and Demolition Waste Recycling Ordinance and the Waste Hauler Permit Program, wherein the construction and demolition waste would be recycled to the extent feasible. The C&D waste resulting from construction activities for the related projects is unquantifiable as each related project would result in differing amounts of demolition, building construction, and soil excavation. The C&D waste would be disposed of at the County's Azusa Land Reclamation Landfill or one of the inert debris engineered fill operations located in the County. As indicated above, the remaining capacity of the Azusa Land Reclamation Landfill is estimated at 57.7 million tons, with a projected lifespan of 28 years. Additional capacity would also be provided by inert debris engineered fill operations or the potential for reuse rather than disposal of exported soil. Given this available future capacity, it is expected that all C&D waste can be accommodated during that time, and cumulative impacts regarding the disposal of C&D waste would not occur.

Additionally, as required by LAMC Section 66.32.1 (Waste Hauler Permit Program), construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with recycling regulations. The related projects would also be required to comply with City Ordinance No. 181,519, which requires the related projects to implement a construction waste management plan to recycle and/or salvage a minimum of 65 percent of non-hazardous demolition and construction debris. The related projects' respective construction contractors would deliver all C&D waste generated by those projects to a certified C&D Waste Processing Facility under the AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate. Moreover, as discussed above the CIWMP 2018 Annual Report concludes that there is adequate capacity in permitted solid waste facilities to serve the County through the 15-year planning period of 2018 through 2033.[107] For these reasons, the Proposed Project's contribution to cumulative impacts during construction would not be cumulatively considerable. As such, cumulative impacts would be less than significant.

(b) Operational

The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the regional landfills, including the Chiquita

[107] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (at page 6).*

Canyon Landfill, which services the Project Site. The Chiquita Canyon Landfill has a remaining capacity of 59.7 million tons through the year 2047.[108] As discussed above, the Proposed Project would contribute approximately 2.05 tons of solid waste per day to the Chiquita Canyon Landfill, which represents approximately 0.2 percent of the current excess remaining daily capacity of the landfill (9,693 tpd). While this is the primary local landfill that would accommodate the Proposed Project's waste stream, there are several other landfill facilities within the County and out of County that serve the regional solid waste demands of the City of Los Angeles and County of Los Angeles.

For purposes of determining the cumulative impacts of the Proposed Project in conjunction with the related projects identified in Section III, Environmental Setting, of this Draft EIR, the cumulative solid waste generation of all 63 related projects was calculated based on generation factors provided in the LA CEQA Thresholds Guide. This includes the projects located within the City of Los Angeles and within the City of West Hollywood. Although the City of West Hollywood is not within the City's North Central Commercial Waste Franchise Zone, or subject to the collection services contract, the City of West Hollywood is within the service area of the Countywide Integrated Waste Management Planning area, and would result in a cumulative contribution to solid waste impacts within the region. As shown in Table IV.K-21, below, the Proposed Project, in conjunction with the related projects would generate a total of approximately 76,701 lbs/day of solid waste or approximately 38.35 tpd.

As of December 2018, there was an estimated 163.39 million tons of permitted solid waste disposal capacity remaining within the County, with a total daily intake capacity of 34,449 tpd.[109] The total combined in-County landfill disposal rate in 2018 was reported to be approximately 16,011 tpd.[110] The 38.35 tpd that are estimated to be generated by the Proposed Project and related projects combined, represents approximately 0.24 percent of the existing available daily permitted capacity of all of the in-County facilities. Additionally, the 2018 CIWMP accounts for cumulative waste generation for the 15-year planning period ending in 2033, as the analysis includes projected growth. As such, cumulative solid waste impacts would be less than significant.

[108] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (at page 60).*
[109] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2018 Annual Report, December 2019 (at Appendix E-2 Table 4).*
[110] *Ibid.*

Table IV.K-21
Estimated Cumulative Solid Waste Generation

Land Use	Quantity [a]			Solid Waste Generation Rate [b]	Solid Waste Generation (lbs/day)
	du/room/beds	sf	emp		
Residential	2,937		--	12.23/DU	35,920
Retail (general)		347,184	694	10.53/emp	7,308
Grocery/Supermarket		52,685	211	10.53/emp	2,222
Restaurant		80,945	324	10.53/emp	3,412
Office		232,340	929	10.53/emp	9,785
Medical Office		160,462	481	10.53/emp	5,065
Hospital/Assisted Living	283		524	10.53/emp	5,518
Hotel	341		171	10.53/emp	1,801
Health Club/Gym		14,000	14	10.53/emp	147
Museum			135	10.53/emp	1,422
Related Projects Solid Waste Generation					***72,600***
Proposed Project Solid Waste Generation					*4,101*
Cumulative Total Solid Waste Generation					**76,701**
Project % of Cumulative					5.6%

Notes:
[a] *DU = dwelling units; sf = square feet, emp = employees.*
[b] *Employment rates based on the LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019.*
[c] *The solid waste generation rates provided in the L.A. CEQA Threshold Guide are based on either dwelling units for all residential land uses or employees for commercial land uses.*
Source: Parker Environmental Consultants.

As with the Proposed Project, future projects within the County of Los Angeles' waste shed area would be subject to regional source reduction and recycling programs, significantly reducing the amount of solid waste deposited in area landfills. ***Since there is currently adequate capacity to accommodate the cumulative disposal needs of the Proposed Project and related projects, cumulative impacts with respect to solid waste would be less than significant.***

(2) Mitigation Measures

No mitigation measures are required.

(3) Level of Impact After Mitigation

Impacts 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.

IV. Environmental Impact Analysis

K. Utilities and Service Systems

4. Electric Power, Natural Gas, and Telecommunications Infrastructure

1. Introduction

This section analyzes the Proposed Project's potential impacts upon electric power, natural gas and telecommunications infrastructure. This section focuses on the existing infrastructure serving the project area and the potential for an environmental impact to occur as a result of physical improvements necessary to accommodate the Proposed Project. The information presented in this section is based in part on the information provided by the City of Los Angeles Department of Water and Power (LADWP) response letter, dated April 24, 2019 (included in Appendix J.1 to this EIR) and the Southern California Gas will serve letter (included in Appendix J.4 to this EIR). Potential impacts associated with energy demand and energy conservation polices are discussed in Section IV.B, Energy.

2. Environmental Setting

a) Regulatory Framework

(1) Federal

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

(2) State

California energy infrastructure policy is governed by three institutions: the California Independent System Operator (California ISO), the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC). These three agencies share similar goals, but have different roles and responsibilities in managing the State's energy needs. The majority of state regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to Section IV.B, Energy, of this Draft EIR. There are, however, regulations pertaining to infrastructure. These are discussed further below.

(a) California Independent System Operator

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

(b) California Public Utilities Commission

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUCs jurisdiction. The Digital Infrastructure and Video Competition Act of 2006 (DIVCA) established the CPUC as the sole cable/video TV franchising authority in the State of California. DIVCA took effect January 1, 2007.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the state Senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities.

(c) California Energy Commission

The CEC is a planning agency which provides guidance on setting the state's energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the state, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. The CEC also has regulatory specific regulatory authority over publicly owned utilities to certify, monitor and verify eligible renewable energy resources procured.

(d) Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. In 2018, the CEC decided to write the Integrated Energy Policy Report in two volumes. Volume I, which was published on August 1, 2018, highlights the implementation of California's policies and the role they have played in moving toward a clean energy economy. Volume II, which was adopted in February 2019, identifies several key energy issues and actions to address these issues and ensure the reliability of energy resources.[111]

(3) Local

The City of Los Angeles Information Technology Agency (ITA) is responsible for a broad spectrum of services related to technology services to both internal and external customers. These range from classic IT services, such as computer support, enterprise applications, data networks, and a 24/7 data center to progressive digital services, such as a TV station (LACityview), 3-1-1 Call Center, public safety radio/microwave communications, helicopter avionics, enterprise social media, and more.

ITA's Video Services Regulatory Division advises the Mayor and City Council on certain issues relating to video/cable TV services and private telecommunications franchises. The Division regulates and monitors the compliance of video/cable TV services and franchises issued by the CPUC. More specifically, it ensures that video/cable TV service

[111] *2018 Integrated Energy Policy Report Updated, Volume II, February 2019.*

providers comply with local, state and federal laws and oversees the video/cable TV service interests of City residents. [112]

b) Existing Conditions

(1) Electric Power

The Los Angeles Department of Water and Power's (LADWP) power system serves approximately 4 million people and is the nation's largest municipal utility. Its service territory covers the City of Los Angeles and many areas of the Owens Valley. The annual electricity sale to customers for the 2016-2017 fiscal year was approximately 22,878 million GWh.[113].[114] LADWP is a "vertically integrated" utility, both owning and operating the majority of its generation, transmission and distribution systems. Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is located within LADWP's Metropolitan Planning District.

LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2017 Power Strategic Long-Term Resources Plan (2017 SLTRP), the LADWP has a net dependable generation capacity greater than 7,531 MW.[115] In 2017, the LADWP power system experienced an instantaneous peak demand of 6,432 MW.[116] Approximately 32 percent of LADWP's 2018 electricity purchases were from renewable sources, which is similar to the 31 percent statewide percentage of electricity purchases from renewable sources.[117]

The LADWP currently provides electricity to the Project area with all required infrastructure present. There are 34.5-kilovolt (kV) underground circuits along W. 3rd

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112 *City of Los Angeles, Information Technology Agency, https://ita.lacity.org/about-ita, accessed July 2020.*

113 *Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resources Plan (SLTRP), Appendix A, Load Forecasting, pg. A-6, December 2017.*

114 *City of Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resources Plan, December 2017 (at page 17).*

115 *City of Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resources Plan, December 2017.*

116 *City of Los Angeles Department of Water and Power, 2017 Retail Electric Sales and Demand Forecast, page 6.*

117 *California Energy Commission, Utility Annual Power Content Labels for 2018, Los Angeles Department of Water and Power, 2018.*

Street adjacent to the Project Site and 4.8-kV underground circuits along W. 3rd Street and S. Fairfax Avenue adjacent to the Project Site.[118] As discussed in further detail in Section IV.B, Energy, based on the existing land use on the Project Site the existing electricity demand is approximately 2,607,637 kilowatt-hours per year (kWh/year).

(2) Natural Gas

The Southern California Gas Company (SoCalGas), a subsidiary of Sempra Energy (the nation's largest natural gas supplier), provides natural gas to the City of Los Angeles through existing gas mains located under the streets. Natural gas service is provided in accordance with the SoCalGas' policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made. The availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the CPUC but can also be affected by actions of federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas service would be provided in accordance with those revised conditions.

SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial market. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.[119]

SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.[120] The traditional southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.[121] Gas supply available to SoCalGas from California sources averaged 323 million cubic feet per day in 2017 (the most recent year for which data are available).[122]

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118 *City of Los Angeles Department of Water and Power, Water and Electric Connection Services Request, April 24, 2019 (see Appendix J.1 LADWP Water and Electricity Will Serve Letter).*

119 *Southern California Gas Company, Company Profile, www.socalgas.com/about-us/company-info.shtml*

120 *California Gas and Electric Utilities, 2018 California Gas Report, page 80.*

121 *California Gas and Electric Utilities, 2018 California Gas Report, page 80.*

122 *California Gas and Electric Utilities, 2018 California Gas Report, page 80.*

The Development Site is currently developed with approximately 151,048 square feet of retail commercial land uses and has access to existing gas mains connecting the property to a natural gas supply. The Development Site is currently served by an existing 4-inch SoCal Gas line under W. 3rd Street.[123] As discussed in further detail in Section IV.B, Energy, based on the existing land uses presently being occupied on the Development Site, the existing natural gas demand is estimated to be 1,689,853 kilo British thermal unit per year (kBTU/year) or approximately 138,004 cubic feet per month (cf/month).

(3) Telecommunications

Prior to 2006, the City of Los Angeles had 14 cable television franchise areas that were served by three incumbent cable operators; Time Warner, Cox, and Charter. The City had provided cable television franchising regulatory authority of its cable television operators for over 30 years. Through City-issued franchises and enforcement of relevant ordinances, the City oversaw these cable television operators in the areas of consumer services and financial payments to the City, technical compliance with all local, state and federal laws, and Public, Educational, and Governmental (P.E.G.) Access support. In 2006, the California Public Utilities Code was amended under state law and ceded the City's cable television franchising rights to the California Public Utilities Commission. In 2007 and 2008, Verizon and AT&T began operating in the City. Currently, the City's incumbent cable and video TV providers are AT&T, Charter/Spectrum, Cox Communications, Frontier, and Race Communications.[124]

3. Environmental Impacts

a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant impact related to electricity, natural gas, or telecommunications infrastructure systems if it would:

Threshold a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction

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123 *City of Los Angeles, Bureau of Engineering, Substructure Map No. 138-177-3), Navigate LA, accessed July 2020.*

124 *City of Los Angeles, Information Technology Agency, https://ita.lacity.org/blog/video-servicescable-tv, accessed July 2020.*

or relocation of which could cause significant environmental effects;[125]

For this analysis, the Appendix G Threshold listed above is 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 question. The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to energy infrastructure:

- Would the project result in the need for new (off-site) energy supply facilities, or major capacity enhancing alterations to existing facilities?

b) Methodology

This analysis evaluates the potential impacts of the Proposed Project on existing electric, natural gas and telecommunications infrastructure by comparing the estimated Project demand with the available capacity. The Proposed Project's energy usage, including electricity and natural gas, was calculated using CalEEMod Version 2016.3.2. During construction, energy would be consumed in the form of electricity associated with conveyance of water, lighting and other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Operational energy consumption would include electricity and natural gas from uses such as heating/ventilation/air conditioning (HVAC); water heating, cooking, lighting, and use of electronics/appliances. Additional details regarding Project energy usage are provided in Section IV.B, Energy, and Appendix D, Energy Demand Calculation Worksheets of this Draft EIR.

The Proposed Project's estimated energy demands were also analyzed relative to LADWP's and SoCalGas' existing and planned energy supplies in 2023 (i.e., full buildout of the Project) to determine if these two energy utility companies would be able to meet the Project's energy demands. Finally, the capacity of existing local infrastructure to accommodate the Project's estimated electricity and natural gas demand was assessed based on service letters included as part of Appendix J, Will Serve Letters, of this Draft EIR.

[125] *This section of the EIR focuses on impacts associated with electric power, natural gas, and telecommunications systems. With respect to impacts upon water supply and water conveyance facilities, see Section IV.K.1, Water, above. With respect to impacts upon wastewater treatment facilities, see Section IV.K.2, Wastewater, above. With respect to stormwater drainage impacts, this issue was concluded to be less than significant and dismissed from further analysis in the Initial Study (See Initial Study Checklist Question IX(c) in Appendix A to this Draft EIR and Section VI, Other CEQA Considerations).*

The analysis for telecommunications systems is based on the framework of cable television franchises in the City of Los Angeles and the availability of existing telecommunications services available to serve the Development Site.

c) Project Design Features

No specific project design features are proposed with regard to energy infrastructure.

d) Analysis of Project Impacts

Threshold (a): Would the project require or result in the relocation or construction of electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

(1) Impact Analysis

(a) Electric Power

(i) Construction

During Proposed Project construction, electricity would be consumed, on a limited basis, to power lighting of the Project Site and the temporary operation of an approximate 1,000 square foot construction trailer. Electricity would also be used indirectly for the treatment and conveyance of water used during construction for fugitive dust control. Electricity would be supplied to the Development Site by LADWP and would be obtained from the existing electrical lines that connect to the Development Site. As existing power lines are located in the vicinity of the Development Site, temporary power poles may be installed to provide electricity during Project construction. Moreover, construction electricity usage would replace the existing electricity usage at the Development Site during construction since the existing on-site uses which currently generate a demand for electricity would be removed. The total estimated electricity use from construction activities is 20,943 kilowatt-hours (kWh) (see Table IV.B-4, in Section IV.B, Energy). The energy demands during construction would be less than the existing demand of 2,607,637 kWh/year that is generated by the existing uses on the Development Site, and thus would not necessitate additional energy facilities or distribution infrastructure. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project during construction or demolition.

(ii) Operation

As further discussed in Section IV.B, Energy, the Proposed Project would be able to connect to and would be served by the existing power grid serving the Development Site.

The estimated net increase in electricity demand by the Proposed Project is estimated to be approximately 3,904,735 kWh/year which represents 0.017 percent of LADWP's projected sales for 2023 (see Table IV.B-5, in Section IV.B, Energy). In addition, during peak conditions, the Proposed Project's electricity demand would be approximately 0.025 percent of the LADWP base peak load conditions. A will-serve letter from LADWP's Metropolitan Service Planning division included in Appendix J.1 of this Draft EIR demonstrates the availability of sufficient electric resources to supply the Proposed Project's demand. Establishing electric power service to the Proposed Project would involve disconnecting existing power connections and establishing new connections to serve the proposed structures. Such improvements would be localized in nature and would include service connections to overhead power poles and/or existing underground transformers. ***Thus, the Proposed Project would not require or result in the relocation or construction of electric power facilities which could cause significant environmental effects, and impacts would be less than significant***.

(b) Natural Gas

(iii) Construction

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

(iv) Operation

The Proposed Project would increase demand for natural gas service on the Development Site. As discussed in further detail in Section IV.B, Energy, the Proposed Project's net natural gas demand is estimated to be approximately 4,505,879 kBTU/year, or approximately 367,981 cf/month, which represents 0.0005 percent of the SoCalGas' estimated daily consumption of 2,480 million cf/day for the SoCalGas planning area in 2023 (the Project's buildout year). As provided in the SoCalGas will serve letter (Appendix J.4 of this Draft EIR), natural gas service is currently supplied to the Development Site.

As such, the Proposed Project would not require extensive infrastructure improvements to serve the Development Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Proposed Project. The Proposed Project would, however, require local infrastructure improvements to connect to the existing infrastructure serving the area, such as "hooking-up" disruptions along sidewalks or streets. Establishing natural gas service to the Proposed Project would involve disconnecting existing connections and establishing new connections to serve the proposed structures. However, impacts associated with utility upgrades or additional connections would be temporary in nature, and would involve minimal trenching to access natural gas utility lines on or adjacent to the Project Site. ***As such, the Proposed Project would not require or result in the relocation or construction of natural gas facilities which could cause significant environmental effects, and impacts would be less than significant***.

(c) Telecommunications Systems

As discussed above, telecommunication services within the City of Los Angeles is currently provided by several commercial service providers, including AT&T, Charter/Spectrum, Cox Communications, Frontier, and Race Communications. The Development Site is currently developed with 151,048 square feet of commercial/retail space, and is served by existing telecommunications infrastructure. The Proposed Project would require construction of new onsite telecommunications facilities and potential upgrades and/or relocation of existing telecommunications facilities. The installation of telecommunications facility infrastructure would primarily involve trenching in order to place the lines below surface of the Development Site. However, the Applicant would prepare a Construction Traffic Control/Management Plan (see PDF-TRAFFIC-1 in Section IV.I, Transportation) to ensure safe pedestrian access to land uses in the vicinity of the Development Site, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts would be of a relatively short duration (i.e., months) and would cease when installation is complete. Installation of new telecommunications infrastructure would primarily take place onsite, with minor offsite work associated with connections to the public system. No upgrades to offsite telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers. Operation of the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities. ***Thus, the Proposed Project would not require or result in the relocation or construction of telecommunication facilities which could cause significant environmental effects, and impacts would be less than significant***.

(2) Mitigation Measures

Project impacts related to electric power, natural gas, and telecommunications infrastructure would be less than significant. Therefore, no mitigation measures would be required.

(3) Level of Impact After Mitigation

Project impacts related to electric power, natural gas, or telecommunication systems would 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) Electricity

Development of the Proposed Project in conjunction with the 41 related projects that are located within the City of Los Angeles (identified in Section III, Environmental Setting) would further increase demand for electricity service provided by LADWP. As discussed in detail in Section IV.B, Energy, the LADWP's 2017 SLTRP document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and reduce electricity demands. Therefore, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030 and SB 100, which increases the RPS to 60 percent by 2030 and requires all of California's electricity to come from carbon-free resources by 2045.[126] Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further

[126] *California Public Utilities Commission, California Renewables Portfolio Standard, website: website: https://www.cpuc.ca.gov/rps/, accessed March 2020.*

reduce cumulative energy demands. Furthermore, based on the will-serve letter from LADWP's Metropolitan Service Planning division (included in Appendix J.1 of this Draft EIR) LADWP has confirmed the availability of sufficient electric resources to supply the Proposed Project's demand. ***Cumulative impacts to electricity services and infrastructure would therefore be less than significant.***

(b) Natural Gas

Development of the Proposed Project in conjunction with the 63 related projects identified in Section III (Environmental Setting) in the SoCalGas service area would further increase regional demands for natural gas resources. As a public utility provider, the SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Moreover, SoCalGas' forecasts take into account projected population growth and development based on local and regional plans. Therefore, natural gas usage resulting from future operations at many of the related projects is likely accounted for in the SoCalGas projections. Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SoCalGas occur as needed. It is expected that SoCalGas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Although detailed information regarding natural gas infrastructure for each of the related projects is not known, it is expected that SoCalGas would provide for necessary improvements specific to each related project. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the natural gas infrastructure in the Project area.

Additionally, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine the SoCalGas' ability to serve each related project. As such, it is anticipated the related projects and the Proposed Project would be accommodated by SoCalGas. ***Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.***

(c) Telecommunications

Telecommunication services for the 41 related projects within the City of Los Angeles would be provided by several commercial service providers, including AT&T, Charter/Spectrum, Cox Communications, Frontier, and Race Communications. Establishing service to each of the related projects would involve disconnecting existing

connections and establishing new connections to each of the proposed structures. Such improvements would be analyzes on a case-by-case basis. Connection improvements would be localized in nature and would utilize existing conduit and service lines, and therefore, the Proposed Project would not combine with related projects to result in cumulative impacts. ***Thus, the cumulative impacts to telecommunication facilities and infrastructure would be less than significant***.

In conclusion, based on the analysis provided above, the Development Site is currently adequately served by existing electric power, natural gas, and telecommunications facilities, and the development of the Proposed Project would require localized utility connections to accommodate the proposed development. Similar to the Proposed Project, the related projects are generally located on infill development lots that are currently served by existing infrastructure, or are located adjacent to properties or right-of-way facilities that would accommodate utility hook-ups without resulting in significant environmental impacts. The Proposed Project's contribution to cumulative impacts related to electric power, natural gas, or telecommunications systems would not result in a cumulatively considerable effect related to available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electric power and natural gas facilities, the construction of which could cause significant environmental effects. ***As such, the Proposed Project's impacts would not be cumulatively considerable; therefore, cumulative infrastructure impacts under Threshold (a) are concluded to be less than significant.***

(2) Mitigation Measures

Cumulative impacts related to energy would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Impact After Mitigation

Cumulative impacts 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.