

## **IV. Environmental Impact Analysis**

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

#### **1. Introduction**

This section of the Draft EIR analyzes the proposed Project’s potential impacts to water supply and the water infrastructure system serving the Project Site. The analysis describes regional water supplies and existing water infrastructure serving the Project Site, estimates the water demand associated with the proposed Project, and assesses whether there is sufficient water supply and infrastructure capacity to meet that demand. The analysis is based, in part, on the *8920 Sunset—Water Infrastructure Memo* (Water Memo), prepared for the proposed Project by KPFF Consulting Engineers (June 16, 2016), and the *2015 Beverly Hills Urban Water Management Plan*, which are included in Appendix I to this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) State**

###### **(a) California Urban Water Management Plan Act**

The California Urban Water Management Planning Act (California Water Code, Sections 10610–10656) addresses several state policies regarding water conservation and the development of water management plans to ensure that adequate supplies are available to meet existing and future demands. The California Urban Water Management Planning Act also requires water suppliers to develop water management plans every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, single-dry, and multiple-dry years. Specifically, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 acre-feet of water per year (AFY) must assess the reliability of its water sources over a 20-year planning horizon and adopt an urban water management plan.

A number of recent requirements regarding the preparation of water management plans have been added to the Urban Water Management Planning Act. These additional

requirements include: (1) a narrative description of water demand measures implemented over the past five years and future measures planned to meet 20-percent demand reduction targets in urban water use by December 31, 2020; (2) a standard methodology for calculating system water loss; (3) a voluntary reporting of passive conservation savings, energy intensity, and climate change; and (4) an analysis of water features that are artificially supplied with water.

**(b) Senate Bill X7-7 (California Water Conservation Act of 2009)**

Due to supply concerns in the San Joaquin Delta, the state passed Senate Bill (SB) X7-7, also known as the Water Conservation Act of 2009 (codified in California Water Code, Section 10608), which requires all water suppliers to increase water use efficiency. This legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. SB X7-7 requires cities to establish a per capita water use target for the year 2020, as well as interim targets. The state was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. During the period from June 2015 through March 2017, the state achieved 22.5 percent in cumulative statewide savings.<sup>1</sup> The City of West Hollywood is located in the South Coast Hydrologic Region, which has a regional target of 149 gallons per day (gpd) per capita.<sup>2</sup>

**(c) Senate Bill 610 (California Water Code, Sections 10910 et seq.)**

SB 610, codified in the California Water Code, Sections 10910 *et seq.*, became effective on January 1, 2002. SB 610 requires counties and cities to consider the availability of adequate water supplies for certain new large development projects as part of the California Environmental Quality Act (CEQA) process. Specifically, SB 610 requires that for certain projects subject to CEQA, the urban water supplier must prepare a water supply assessment (WSA) that determines whether the projected water demand associated with a project is included as part of the most recently adopted urban water management plan. The WSA shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. The WSA must be incorporated into the CEQA document, and the lead agency must make certain findings related to water supply based on the WSA. In addition, it must address water supplies over a 20-year future period and consider average, single-dry, and multiple-dry years. In accordance with California Water

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<sup>1</sup> State Water Resources Control Board, *Presentation, Water Conservation Report, May 2, 2017.*

<sup>2</sup> City of Beverly Hills, *2015 Urban Water Management Plan, June 2016.*

Code Section 10912, projects subject to CEQA requiring submittal of a WSA include the following:

- Residential developments of more than 500 dwelling units;
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plant, or industrial parks of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- Mixed-use projects that include one or more of the above-identified categories; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

As discussed in Section II, Project Description, of this Draft EIR, the proposed Project would provide for the development of an approximately 132,000-square-foot mixed-use commercial building. The proposed uses would be located within a nine-story building that would include retail space, an art gallery, creative offices, and space dedicated to the Arts Club. The proposed Project is not subject to the requirements of SB 610 since the proposed Project would not include the development of any of the categories listed above or generate a demand for domestic water that would be greater than the demand generated by 500 residential units (approximately 60,000 gallons per day assuming all 500 residential units include one bedroom). As described further below, the proposed Project would generate approximately 26,598 gallons per day. Therefore, a WSA is not required for the Project.

***(d) California Plumbing Code***

Title 24, Part 5 of the California Code of Regulations (CCR), establishes the California Plumbing Code. The 2016 update to the California Plumbing Code became effective as of January 1, 2017. 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. Accordingly, the maximum flow rate for showerheads is 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi). The maximum flow rate for lavatory faucets is 1.2 gpm at 60 psi. In addition, all water closets

(i.e., flush toilets) are limited to 1.6 gallons per flush and urinals are limited to 0.5 gallon per flush. In addition, the California Building Standards Commission approved an Emergency Supplement to the 2013 California Plumbing Code on January 20, 2016, and April 19, 2016, in order to establish new or replacement standards on an emergency basis for insertion in the 2013 California Plumbing Code.<sup>3</sup> This Emergency Supplement is also applicable to the now effective 2016 California Building Standards Code.

In response to recent California drought conditions, the State Water Resources Control Board (SWRCB) submitted an emergency action plan in Title 23 of the CCR pertaining to drought emergency water conservation. The emergency regulation, which became effective on July 29, 2014, established water conservation practices for all urban water users and water suppliers to reduce outdoor urban water use, such as prohibiting the application of potable water to any driveway or sidewalk, prohibiting the use of potable water to water outdoor landscapes in a manner that causes runoff, and prohibiting the use of a hose that dispenses potable water to wash a motor vehicle.

**(e) Article 22.5 Drought Emergency Water Conservation, California Code of Regulations (Emergency Declaration and Executive Orders B-29-15, B-36-15, and B-37-16)**

In response to California's drought conditions, in January 2014, Governor Edmund G. Brown, Jr. (Governor Brown) proclaimed a state of emergency and directed state officials to take all necessary action to make water available.<sup>4</sup> Key measures in the proclamation included:

- Asking all Californians to reduce water consumption by 20 percent and referring residents and water agencies to the Save Our Water campaign for practical advice on how to do so;
- Directing local water suppliers to immediately implement local water shortage contingency plans;
- Ordering the State Water Resources Control Board (SWRCB) to consider petitions for consolidation of places of use for the State Water Project and Central Valley Project, which could streamline water transfers and exchanges between water users;

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<sup>3</sup> *California Building Standards Commission, Revision Record for the State of California, Emergency Supplement, 2013 Title 24, Part 5, California Plumbing Code.*

<sup>4</sup> *Office of Governor Edmund G. Brown Jr., Newsroom, Governor Brown Declares Drought State of Emergency, January 17, 2014, [www.gov.ca.gov/news.php?id=18368](http://www.gov.ca.gov/news.php?id=18368), accessed April 19, 2017.*

- Directing the Department of Water Resources (DWR) and the SWRCB to accelerate funding for projects that could break ground in 2014 and enhance water supplies;
- Ordering the SWRCB to put water rights holders across the state on notice that they may be directed to cease or reduce water diversions based on water shortages;
- Asking the SWRCB to consider modifying requirements for releases of water from reservoirs or diversion limitations so that water may be conserved in reservoirs to protect cold water supplies for salmon, maintain water supplies and improve water quality.

In April 2014, Governor Brown issued a Proclamation of Continued State of Emergency in order to strengthen the state’s ability to manage water and habitat effectively in drought conditions, which called on all Californians to redouble their efforts to conserve water.<sup>5</sup>

In April 2015, Governor Brown issued Executive Order B-29-15, which included mandatory water reduction measures directed at conserving water use, streamlining the state’s drought response, and investing in new technologies to make the state more drought resilient. The executive order directed the SWRCB to work with cities in implementing water usage reductions measures such as replacing up to 50 million square feet of lawns with drought-tolerant landscaping, creating temporary consumer rebate programs to replace older, energy-inefficient appliances, banning the watering of ornamental grass on public street medians, and prohibiting new residential developments from irrigating with potable water unless systems include water-efficient drip systems. The goal of the executive order was to reduce urban water usage by 25 percent statewide based on 2013 usage levels. The executive order also sought to prioritize state water infrastructure projects and incentivize new technology for water efficiencies, streamline permitting and review of emergency drought salinity barriers, and simplify the approval process for voluntary water transfers and emergency drinking water projects. In addition, the executive order directed the California Energy Commission (CEC) to adopt emergency regulations establishing standards to improve the efficiency of water appliances, including toilets, urinals, and faucets. On April 8, 2014, the CEC adopted new efficiency standards for toilets, faucets, and other appliances, which became effective January 1, 2016.

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<sup>5</sup> Office of Governor Edmund G. Brown Jr., Newsroom, *Governor Brown Issues Executive Order to Redouble State Drought Actions, April 25, 2014*, [www.gov.ca.gov/news.php?id=18496](http://www.gov.ca.gov/news.php?id=18496), accessed April 19, 2017.

In November 2015, Governor Brown issued Executive Order B-36-15, which called for additional actions to build on the state’s response to record dry conditions and assist recovery efforts from devastating wildfires. These included extension of previous executive orders, prioritization of projects that enhance water conservation, support for the extension of water restrictions, and support for projects that remediate wildfire damage and restore power plant operation.

In May 2016, Governor Brown issued Executive Order B-37-16, which extends the provisions of Executive Order B-29-15 and further directs the DWR and the SWRCB to develop long-term efficiency targets that go beyond the 20-percent reductions mandated by SB X7-7, discussed above. The executive order established longer-term water conservation measures that include permanent monthly water use reporting, new urban water use targets, reducing system leaks and eliminating wasteful practices, strengthening urban drought contingency plans and improving agricultural water management and drought plans. The executive order also directs the SWRCB to permanently prohibit wasteful uses of potable water, including hosing off driveways and sidewalks and watering lawns within 48 hours of measurable precipitation.

As a result, on May 18, 2016, the SWRCB further revised emergency regulations in consideration of improved hydrologic conditions. The prior percentage reduction-based water conservation standard was replaced by a localized “stress-test” approach, which requires local water agencies to ensure a three-year supply under three more dry years such as those that the state experienced from 2012 to 2015. Water agencies that would face shortages under three additional dry years are required to meet a conservation standard equal to the amount of shortage. On November 30, 2016, state agencies, including the SWRCB released a public draft of *Making Water Conservation A California Way of Life*, which addresses elements of Executive Order B-37-16 that require state agencies to develop a framework for using water more wisely, eliminating water waste, strengthening local drought resilience, and improving agricultural water use efficiency and drought planning.<sup>6</sup>

The regulatory requirements resulting from these executive orders have been codified in Title 23, Article 22.5, Drought Emergency Water Conservation, of the CCR.

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<sup>6</sup> California State Water Resources Control Board, *Water Conservation Portal—Emergency Conservation Regulation, State Plan Seeks to Make Water Conservation A Way of Life, November 30, 2016.*

**(f) Executive Order B-40-17 and Making Water Conservation a California Way of Life**

On April 7, 2017, Governor Brown issued Executive Order B-40-17 and lifted the drought state of emergency for all California counties except for Fresno, Kings, Tulare, and Tuolumne. In addition, Executive Order B-40-17 rescinds the two emergency proclamations from January and April 2014 and four drought-related executive orders issued in 2014 and 2015.<sup>7</sup> However, Executive Order B-40-17 builds on Executive Order B-37-16 to maintain urban water use reporting requirements and prohibitions of wasteful practices, such as watering during rainfall, hosing off sidewalks, and irrigating ornamental turf on public street medians.<sup>8</sup> As such, the *Making Water Conservation a California Way of Life Final Report* was also released with the announcement of Executive Order B-40-17. This final report was prepared by the DWR, SWRCB, the California Public Utilities Commission, the California Department of Food and Agriculture, and the California Energy Commission, who will work closely with the State Legislature to implement four objectives: using water more wisely, eliminating water waste, strengthening local drought resilience, and improving agricultural water use efficiency and drought planning.<sup>9</sup>

**(g) California Water Plan<sup>10</sup>**

As required by the California Water Code Section 10005(a), the California Water Plan is the state's strategic plan for managing and developing water resources statewide for current and future generations. 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.

Updated every five years, the Water Plan 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

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<sup>7</sup> The four executive orders include Executive Order B-26-14 from September 2014, Executive Order B-28-14 from December 2014, Executive Order B-29-15 from April 2015, and Executive Order B-36-15 from November 2015.

<sup>8</sup> Office of Governor Edmund G. Brown Jr., Newsroom, Governor Brown Lifts Drought Emergency, Retains Prohibition on Wasteful Practices, April 7, 2017, [www.gov.ca.gov/news.php?id=19747](http://www.gov.ca.gov/news.php?id=19747), accessed May 4, 2017.

<sup>9</sup> California Department of Water Resources, State Water Resources Control Board, California Public Utilities Commission, California Department of Food and Agriculture, and California Energy Commission, *Making Water Conservation a California Way of Life Final Report*, April 2017.

<sup>10</sup> California Department of Water Resources, *About the Water Plan*, [www.water.ca.gov/waterplan/about\\_us/index.cfm](http://www.water.ca.gov/waterplan/about_us/index.cfm), accessed February 8, 2017.

also evaluates coordinated efforts 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, thus, help identify effective plan actions and policies for meeting California's resource management objectives in both the short term and long term of future decades. While the California Water Plan cannot mandate actions or authorize itemized spending, policy-makers and lawmakers have the ability to authorize specific actions and appropriate necessary funding. In addition, while the California Water Plan Update 2013 represents the latest complete update, the California Water Plan Update 2018 is in development and will work in tandem with the Governor Brown's California Water Action Plan, as discussed further below.

#### ***(h) Governor's California Water Action Plan***

While the California Water Plan is required by the California Water Code, in January 2014, Governor Brown also released the California Water Action Plan (Action Plan), which identifies actions the state can make between 2014 and 2019 in order to implement strategies to meet three broad objectives: more reliable water supplies, the restoration of important species and habitat, and a more resilient, sustainably managed water resources system (water supply, water quality, flood protection, and environment) that can better withstand inevitable and unforeseen pressures in the coming decades.<sup>11</sup> The Action Plan discusses the challenges for managing the state's water resources supply, scarcity, and quality, and also considers the effects of ecosystems, flooding, population growth, and climate change and floods.<sup>12</sup> Ten actions were presented: (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; (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. In complementing local efforts, the Action Plan emphasizes collaboration between different levels of government, water agencies, conservationists, tribes, farmers, and other stakeholders. Since the Action Plan Update for 2016 has been released, its implementation progress has also been documented with focuses on policy, funding, and coordinated projects. The Action Plan will continue to be implemented simultaneously with the California Water Plan Update 2018 as it is completed.

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<sup>11</sup> California Department of Natural Resources, *California Water Action Plan 2016 Update*.

<sup>12</sup> California Department of Natural Resources, *California Water Action Plan 2014*.

## **(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, the MWD has adopted a series of official reports on the state of its water supplies. These plans are summarized below. 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 Regional Urban Water Management Plan***

MWD's 2015 Regional Urban Water Management Plan (Regional UWMP) addresses the future of MWD's water supplies and demand through the year 2040.<sup>13</sup> Based on the 2015 Regional UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under single-dry year and multiple-dry year hydrologic conditions. The 2015 Regional UWMP includes plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, State Water Project, Central Valley transfers, local resource projects, and in-region storage that enable the region to meet its water supply needs. In addition, MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies. MWD will continue investments in water use efficiency measures to help the region achieve the 20-percent per person potable water use reduction by 2020. 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, as well as working with the state to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. In addition, MWD is working with the state on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project deliveries.

### ***(b) MWD's Integrated Resources Plan***

MWD first adopted its Integrated Resources Plan (IRP) in 1996, which is updated every five years. The IRP 2015 Update, which was adopted in 2016, demonstrates how MWD plans to develop its water resource supply portfolio to the year 2040, including

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<sup>13</sup> *Metropolitan Water District of Southern California, 2015 Urban Water Management Plan, June 2016.*

planning for hydrologic, regulatory, and other types of uncertainties.<sup>14</sup> Under the strategy of the IRP 2015 Update, MWD will continue to look locally to close the gap between supply and demand, while making the necessary investments and initiatives to maintain the reliability of imported supplies.<sup>15</sup> Overall, the strategies presented in the IRP 2015 Update are projected to meet the future water supply needs of Southern California and identify measures that MWD can take in order to swiftly respond to the uncertainties that exist with all water resource programs.

### ***(c) MWD's Water Surplus and Drought Management Plan***

In 1999, MWD incorporated the water shortage contingency analysis that is required as part of any urban water management plan into a separate, more detailed plan, called the Water Surplus and Drought Management (WSDM) Plan. The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required.<sup>16</sup> The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside and then outside of the region. The Shortage Actions of the WSDM Plan are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as a part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.

### ***(d) MWD's Water Supply Allocation Plan***

While the WSDM 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, MWD adopted a water supply plan called the Water Supply Allocation Plan in February 2008, and has since been implemented three times, with the most recent implementation in April 2015. The Water Supply Allocation Plan includes a formula for determining reductions of water deliveries to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions

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<sup>14</sup> *Metropolitan Water District of Southern California, Integrated Water Resources Plan 2015 Update, January 2016.*

<sup>15</sup> *Metropolitan Water District of Southern California, Integrated Water Resources Plan 2015 Update, January 2016.*

<sup>16</sup> *Metropolitan Water District of Southern California, Water Surplus and Drought Management Plan: Report No. 1150, August 1999.*

or unforeseen cuts in water supplies). The formula allocates shortages of MWD supplies and seeks to balance the impacts of a shortage at the retail level while maintaining equity on the wholesale level, and takes 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. The allocation period covers 12 consecutive months from July of a given year through the following June.

### **(3) Local**

The City of Beverly Hills is the water supplier for the portion of the City of West Hollywood that includes the Project Site. The City of Beverly Hills covers a water service area of approximately 4,069 acres. The City of Beverly Hills itself consists of 3,646 acres (89.6 percent of the service area), and the western portion of the City of West Hollywood consists of the remaining 423 acres (10.4 percent of the service area).<sup>17</sup> The eastern portion of the City of West Hollywood is served by the Los Angeles Department of Water and Power.

#### **(a) *City of Beverly Hills 2015 Urban Water Management Plan (UWMP)***<sup>18</sup>

Cities throughout southern California are faced with various on-going challenges in securing their future water supplies due to (among other things) drought, environmental restrictions, and climate change. In response to these uncertainties, the California Urban Water Management Planning Act requires every urban water supplier providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually to prepare and adopt a UWMP. These plans must be filed with the DWR every five years. The water service area of the City of Beverly Hills includes the western portion of the City of West Hollywood.

The City of Beverly Hills' 2010 UWMP, adopted in August 2011, detailed the City of Beverly Hills' efforts to secure a sustainable water supply through 2035. The 2010 UWMP contained analyses of past, current, and projected future water supply and demand as related to population density, types of water use, water quality, climate, water source availability and reliability, alternative water sources, and potential water shortages. The 2010 UWMP also contained conservation measures and a contingency plan to increase water supply during water supply interruptions or continued drought.

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<sup>17</sup> *City of Beverly Hills, 2015 Urban Water Management Plan, June 2016.*

<sup>18</sup> *City of Beverly Hills, 2015 Urban Water Management Plan, June 2016.*

In June 2016, the City of Beverly Hills adopted its 2015 UWMP, which provides the most current data to be used for this analysis. The 2015 UWMP reflects water supply planning through 2040 based on growth projections, which forecast an increase of 8.7 percent in population between 2015 and 2040 in the water service area.<sup>19</sup> The 2015 UWMP shows that while the service population continues to increase, water use continues to decrease with the implementation water conservation efforts and ordinances. Total water use for the City of Beverly Hills service area has decreased 6.9 percent since 2010 and has decreased 21.4 percent since 2005, while per-capita water uses has decreased by similar amounts.<sup>20</sup> Water supply from imported water purchases and groundwater production has also decreased from 2005 to 2015. Nonetheless, the City of Beverly Hills' 2015 UWMP accounts for an estimated demand increase by 5 percent between single-dry year and multiple-dry year supply scenarios. In order to establish an improved water supply and less reliance on imported water, the City of Beverly Hills has also adopted the Water Enterprise Plan (WEP) to establish a ten-year strategy to increase water supply, as further described below.

***(b) City of Beverly Hills Water Enterprise Plan<sup>21</sup>***

In December 2015, the City of Beverly Hills adopted its WEP to evaluate a ten-year water portfolio that would enable the City of Beverly Hills to reduce its dependence on purchased and imported water from the MWD.<sup>22</sup> The recommended portfolio, which was determined to be the most feasible and viable, includes groundwater water supply development in the La Brea Subbasin of the unadjudicated Central Basin, water conservation, water staffing, and water banking.

As of April 17, 2017, the City of Beverly Hills Public Works Department has received the draft Preliminary Design Report (PDR) for the groundwater development in the La Brea Subbasin, which includes preliminary drilling and inspections of existing physical conditions of well sites. Pipeline alignments are being investigated to convey water from the wells to the treatment plant sites, of which the location and facility are considered. The final PDR is expected to be presented to the Public Works Commission and City Council by June

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<sup>19</sup> *City of Beverly Hills, 2015 Urban Water Management Plan, June 2016.*

<sup>20</sup> *City of Beverly Hills, 2015 Urban Water Management Plan, June 2016.*

<sup>21</sup> *City of Beverly Hills Public Works Department, Memorandum, Water Enterprise Plan (WEP) Updates, April 17, 2017.*

<sup>22</sup> *City of Beverly Hills, Water Enterprise Plan, July 2015.*

2017.<sup>23</sup> Furthermore, key positions related to water resources and conservation have been added and filled.

The adopted City of Beverly Hills Operating Budget for Fiscal Year 2016/2017 includes implementation of the WEP as one of its key budget priorities.<sup>24</sup> As proposed for Fiscal Year 2017/2018, the City of Beverly Hills would budget for major enterprise funds related to water, including the Water Enterprise Fund, Water Capital Facilities Fund, and Water Supply Capital Facilities Fund.<sup>25</sup>

**(c) City of Beverly Hills Municipal Code—Water Supply Fee**

Title 6, Chapter 1, Article 2.7 of the Beverly Hills Municipal Code codified an ordinance to establish a water supply fee for the City of Beverly Hills. The ordinance, which took effect on January 7, 2017, establishes a water supply fee for the cost of water facilities in existence and for new water facilities to be acquired or constructed to provide water supplies to serve a new or expanded connection to the water system.<sup>26</sup> The fee would help maintain the City's goal of reducing its reliance on water imported from the MWD.

An applicable project is defined as that which provides the construction or addition of floor area which requires a building permit. Moreover, an applicable project can be defined as that which provides any change of use in property which requires a larger water meter and a building permit. Floor area is further defined in the Beverly Hills Municipal Code under specific non-residential, multi-family residential, and single-family residential criteria.

As such, the user of the Beverly Hills water service shall pay a water supply fee in an amount established by resolution of the Beverly Hills City Council. As deemed appropriate by the Director of Public Works Services, the water supply fee would be due upon the occurrence of either the installation of a new water meter, change in the size of a water meter, or final inspection of a project.

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<sup>23</sup> *City of Beverly Hills Public Works Department, Memorandum, Water Enterprise Plan (WEP) Update, April 17, 2017.*

<sup>24</sup> *City of Beverly Hills, FY 2016/2017 Adopted Operating Budget, Volume 1, June 2016.*

<sup>25</sup> *City of Beverly Hills, FY 2017/2018 Proposed Operating Budget, Volume 1, April 2017.*

<sup>26</sup> *Including supply or capacity contracts for rights or entitlements, real property interests, and entitlements and other rights of the City of Beverly Hills involving capital expense relating to its use of existing or new water facilities that are of proportional benefit to the person being charged.*

**(d) City of West Hollywood General Plan**

Chapter 9, Infrastructure, Resources, and Conservation, of the City's General Plan identifies goals, objectives, and policies for utilities in the City, including those for water distribution. The following policies regarding water supply and distribution are relevant to the Project:

- IRC-2.2: Require development projects to provide a “will serve” letter or similar proof of the availability of necessary infrastructure and services by outside service providers during the permit review process.
- IRC-2.3: Require that development projects pay for their share of the costs of improvements to water, gas, power and other utilities that they necessitate.
- IRC-3.1: Allow for construction of new development only when there is sufficient water to supply that development, as determined by the service provider.
- IRC-3.2: Require development projects with the water-use equivalent of 10 dwelling units or more to conduct a long-term water supply analysis as part of the development approval process.
- IRC-3.6: Require all new buildings to meet the following standards:
  - Achieve a reduction of water use of 40 percent less than baseline for buildings as calculated by the Energy Policy Act of 1992. Single-family homes are exempted from this requirement but must still meet the other standards of the Green Building Ordinance.
  - Reduce water consumption for outdoor landscape irrigation, consistent with the most recent City policy.
  - Comply with all prevailing state laws and City regulations regarding indoor and outdoor water conservation and efficiency in new construction.

**(e) West Hollywood Municipal Code**

The City of West Hollywood has adopted several ordinances in an effort to reduce water consumption and provide for water conservation, which are set forth in Title 15, Article 3 of the West Hollywood Municipal Code (WHMC). Chapter 15.52, Water Conservation Plan, includes water conservation provisions that restrict water usage for the following activities: irrigation practices, exterior washing practices, water for ornamental or recreational uses and other miscellaneous uses. In addition, the chapter provides prohibitions regarding leaking plumbing facilities. Chapter 15.54, Water Conservation Landscaping, details water efficient landscaping requirements within the City.

**(f) West Hollywood Green Building Program**

The City of West Hollywood adopted one of the nation's first green building ordinances, which became effective in October 2007. The requirements pertain to remodels, tenant improvements, additions, and new construction. The green building standards were incorporated into the Zoning Ordinance so that all projects incorporate elements, such as drought-tolerant landscaping, low-flow plumbing fixtures, and energy efficient appliances.

As part of the Green Building Program, the City has a green building point system that allows developers to choose from a menu of options to meet City requirements. The system also awards incentives for projects that go above and beyond the minimum requirements. The points system was designed to emphasize locally available materials, encourage green elements to be incorporated into early project design, and provide flexibility as the project evolves.<sup>27</sup> A total of 160 points are available, with 60 required for compliance and 90 needed for incentives.

**b. Existing Conditions****(1) Water Supply**

The City of Beverly Hills is responsible for providing water for the portion of the City of West Hollywood where the Project Site is located and ensuring that the water quality meets applicable California health standards for drinking water. The City of Beverly Hills obtains over 90 percent of its water supply from MWD, while the remainder is supplied by local groundwater production in the Hollywood Subbasin, as discussed further below. The City of Beverly Hills' water service area distribution system is comprised of 170 miles of water mains ranging from 2 to 24 inches in diameter and includes 16 water service pressure zones and 10 reservoirs with a combined storage capacity of 43.5 million gallons.<sup>28</sup>

**(a) Groundwater**

The City of Beverly Hills currently extracts groundwater from four wells in the Hollywood Subbasin. The subbasin is located in western Los Angeles County and is bounded by the Santa Monica Mountains and Hollywood Fault to the north, the Elysian

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<sup>27</sup> *City of West Hollywood, Department of Building and Safety, Green Building Program, [www.weho.org/city-hall/city-departments/community-development/building-and-safety/green-building-program](http://www.weho.org/city-hall/city-departments/community-development/building-and-safety/green-building-program), accessed April 26, 2016.*

<sup>28</sup> *City of Beverly Hills, 2015 Urban Water Management Plan, June 2016.*

Hills to the east, the Inglewood Fault Zone to the west, and the La Brea High to the south. The subbasin has a surface area of 16.4 square miles and has an estimated total storage capacity of 200,000 acre-feet. Groundwater in the subbasin is replenished by precipitation, surface stream flows, and subsurface flows. The natural safe yield of the basin based on natural replenishment only is approximately 3,000 AFY. The Hollywood Subbasin is currently unadjudicated and is managed by the City of Beverly Hills. A combination of municipal ordinances and state oversight regulates the subbasin's water quality and contaminant levels. Water drawn from the four production wells is treated at a reverse osmosis treatment plant operated by the City of Beverly Hills, which has a current capacity of 2.35 million gallons per day.<sup>29</sup>

As shown in Table IV.K.1-1 on page IV.K.1-17, over a five-year period from 2011 to 2015, an average of 740.2 AFY was pumped, well below the subbasin's natural limit of 3,000 AFY. However, the City of Beverly Hills' groundwater treatment plant has been out of service since January 2015 for rehabilitation. Although rehabilitation was completed in October/November 2016, the treatment plant has been undergoing dry and wet commissioning since October 2016.<sup>30</sup> For comparison, during 2011 to 2014 period in which the groundwater treatment plant was operational, the average amount of groundwater pumped from the Hollywood Subbasin was 898.5 acre-feet and well below the subbasin's natural limit.

The City of Beverly Hills is also proposing to develop three new groundwater wells capable of producing up to 1,700 net AFY in the La Brea Subbasin of the Central Basin. As the City of Beverly Hills prioritizes water supply developments, construction of the wells, pipelines, and treatment plant upgrades included in this project is anticipated to be completed by June 2022. As discussed above, the City of Beverly Hills Public Works Department has received the related draft PDR, which includes inspections of existing physical conditions of work sites and feasibility considerations. The final PDR is expected to be presented to the Public Works Commission and City Council by June 2017.

The 2015 UWMP includes production from these new wells in future supply planning. As stated therein, increased groundwater production will reduce the City of Beverly Hills' reliance on imported water from MWD.

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<sup>29</sup> *City of Beverly Hills, 2015 Urban Water Management Plan, June 2016.*

<sup>30</sup> *City of Beverly Hills Public Works Department, Memorandum, Well Water Quality Analysis and Recommendations, April 17, 2017.*

**Table IV.K.1-1  
Five-Year Historic Groundwater Production**

Year	Production (acre-feet)
2011	933.0
2012	961.8
2013	971.9
2014	727.4
2015	106.8 <sup>a</sup>
<b>Average</b>	<b>740.2</b>
<hr/> <p><sup>a</sup> <i>The groundwater treatment plant has been out of service since January 2015 and is currently undergoing dry and wet commissioning.</i></p> <p><i>Source: City of Beverly Hills, 2015 Urban Water Management Plan, June 2016.</i></p>	

**(b) Metropolitan Water District of Southern California**

As one of the 26 member agencies of MWD, the City of Beverly Hills purchases water from MWD, which is the wholesale agency serving the City of Beverly Hills. MWD imports a portion of its water supplies from Northern California through the State Water Project's California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct. The City of Beverly Hills has access to two connections to the MWD feeder system, each having an operational capacity of 23,000 AFY. The City has a Tier 1 rate allocation of 13,380 AFY.<sup>31</sup>

As shown in Table IV.K.1-2 on page IV.K.1-18, over a five-year period from 2011 to 2015, an average of 10,776 AFY was purchased, below the City's Tier 1 rate allocation of 13,380 AFY.

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<sup>31</sup> *According to the Metropolitan Water District of Southern California, 2015 Urban Water Management Plan (June 2016), for its member agencies, MWD has a two-tier rate structure. The costs of maintaining existing supplies and developing additional supplies are recovered through this pricing approach. The Tier 1 Supply Rate recovers the cost of maintaining a reliable amount of supply. Each member agency has a predetermined amount of water that can be purchased at the lower Tier 1 Supply Rate. Purchases in excess of this limit will be made at the higher Tier 2 Supply Rate.*

**Table IV.K.1-2  
Five-Year Historic Purchases from MWD**

Year	Production (acre-feet)
2011	10,249
2012	10,495
2013	11,114
2014	11,632
2015	10,389
<b>Average</b>	<b>10,776</b>
<hr/> <i>Source: City of Beverly Hills, 2015 Urban Water Management Plan, June 2016.</i>	

**(c) Water Conservation and Recycling**

Water conservation and recycling play an increasing role in meeting future water demands. The City of Beverly Hills has implemented water conservation and recycling programs with efforts underway to further promote and increase the level of these programs. The City of Beverly Hills' primary focus is on achieving the mandated 20-percent reduction in water use required by the Water Conservation Act of 2009. Accordingly, the City of Beverly Hills 2015 UWMP, shows a drop in water demand between 2010 and 2015, and only modest increases in the future in spite of population growth.

**(2) Water Demand**

**(a) City of Beverly Hills Water Demand**

The 2015 UWMP provides water supply and demand projections in five-year increments to 2040, based on projected population growth estimated from the California Department of Finance, Census data, and SCAG. According to the 2015 UWMP, existing water demand was 10,432 AFY in 2015 (the most recent year of available data). Table IV.K.1-3 on page IV.K.1-19 shows projected water demand from the year 2020 through 2040.

As shown in Table IV.K.1-3, in 2040 during average year hydrological conditions, the City of Beverly Hills' water demand is forecasted to be approximately 11,428 AFY. Use of the current demand per capita within this demand forecast provides a conservative estimate of projected future water demand to ensure that water supplies are available to meet projected demands. The 2015 UWMP anticipates adequate water supplies would be

**Table IV.K.1-3**  
**City of Beverly Hills Water Demand Projections Based on Hydrological Conditions**  
**(AFY)**

Hydrological Conditions	Year				
	2020	2025	2030	2035	2040
Average Year	11,104	11,182	11,262	11,344	11,428
Single- and Multiple-Dry Years	11,659	11,741	11,825	11,911	11,999
<hr/> <i>AFY = acre-feet per year</i> <i>Source: City of Beverly Hills, 2015 Urban Water Management Plan, June 2016, Tables 7-2 through 7-4.</i>					

available to meet the projected demands (based on SCAG population projections) of the service area under normal, single-dry, and multiple-dry year conditions through 2040.<sup>32</sup>

**(b) On-Site Water Demand**

The existing 20,241-square-foot Project Site is currently developed with an approximately 19,670-square-foot, two-story commercial building and contains two and a half levels of subterranean parking and surface parking. As provided in Table IV.K.1-4 on page IV.K.1-25 in the Project Impacts discussion below, the existing commercial uses on the Project Site are estimated to have a water demand of approximately 6,274 gallons per day or approximately 7.0 AFY.

**(3) Water Infrastructure**

Water infrastructure in the vicinity of the Project Site is maintained and operated by the City of Beverly Hills. The City of Beverly Hills water system is comprised of 16 water service pressure zones with a combined storage capacity of 43.5 million gallons and 170 miles of water mains ranging from 2 to 24 inches in diameter.<sup>33</sup>

Domestic water service is available to the Project Site via City of Beverly Hills water lines within the adjacent streets. There is an existing 6-inch water line in Hilldale Avenue west of the Project Site and an existing 8-inch water line in Sunset Boulevard north of the Project Site.

<sup>32</sup> *City of Beverly Hills, 2015 Urban Water Management Plan, June 2016, Tables 7-2 through 7-4.*

<sup>33</sup> *City of Beverly Hills, 2015 Urban Water Management Plan, June 2016.*

In addition to providing domestic water service, the City of Beverly Hills also provides water for firefighting services as required by the Los Angeles County Fire Department (LACFD). Two fire hydrants serve the Project Site—fire hydrant 9002, located immediately in front of the Project Site on Sunset Boulevard, and fire hydrant 5039, located southwest of the Project Site on Hilldale Avenue.

### **3. Project Impacts**

#### **a. Methodology**

The analysis of the proposed Project's impacts relative to water supply is based on anticipated net increase in water demand and the capacity of the existing and proposed infrastructure. Water supply and availability data were obtained from the City of Beverly Hills 2015 UWMP and the Water Memo prepared by KPFF Consulting Engineers, both of which are included as Appendix I of this Draft EIR. To analyze the water infrastructure available within the vicinity of the Project Site, the anticipated increase in water demand resulting from the proposed Project's implementation was compared with the existing and planned future water supply and infrastructure to determine if supply and infrastructure would be available to accommodate the proposed Project's water demands during average, single-dry, and multiple-dry years hydrologic conditions.

#### **b. Thresholds of Significance**

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to water supply and infrastructure. Therefore, in the context of these questions from the CEQA Guidelines, a significant impact related to water supply would occur if the proposed Project would:

- Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Result in insufficient water supplies to serve the Project from existing entitlements and resources, or result in the need for new or expanded entitlements.

#### **c. Project Design Features**

The following project design features are proposed with regard to water supply:

**Project Design Feature K.1-1:** The Project design will incorporate the following design features to support water conservation:

- High-efficiency clothes washers (commercial washers with water factor of 7.5 or less) to service the Arts Club guest rooms and spa uses.
- No-flush or waterless urinals in all non-residential restrooms as appropriate.
- Non-residential restroom faucets with a maximum flow rate of 0.5 gallon per minute and of a self-closing design (i.e., that would automatically turn off when not in use)
- Non-residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute. Restaurant kitchen faucets shall have pre-rinse self-closing spray heads with a maximum flow rate of 1.6 gallons per minute.
- Installation of tankless and on-demand water heaters in commercial kitchens and restrooms, when appropriate.
- Minimum irrigation system distribution uniformity of 75 percent.
- Use of proper hydro-zoning, turf minimization, zoned irrigation and use of native/drought-tolerant plant materials.
- Use of landscape contouring to minimize precipitation runoff.

#### **d. Analysis of Project Impacts**

##### **(1) Water Infrastructure**

###### ***(a) Construction***

As discussed in the Water Memo included as Appendix I to this Draft EIR, the existing water infrastructure would be adequate to provide for the water flow necessary to serve the proposed Project. No upgrades to the mainlines that serve the Project Site would be required. However, the proposed Project would require new service connections to connect the proposed Project to the existing water mainlines adjacent to the Project Site. The proposed Project would connect to either the 8-inch water line in Sunset Boulevard or the 6-inch water line in Hilldale Avenue. The design and installation of new service connections would be required to meet applicable City of West Hollywood and City of Beverly Hills standards. Once the design is finalized, the City of Beverly Hills will review the proposed Project and issue a “will serve” letter confirming the proposed Project can connect to the existing infrastructure. Minor off-site construction work associated with trenching would occur, resulting in partial street closures along Sunset Boulevard and/or Hilldale Avenue adjacent to the Project Site. However, such closures would be temporary in nature and would not result in a substantial inconvenience to motorists or pedestrians, who would have additional options for navigating around the proposed Project’s construction activities. Furthermore, as discussed in Section IV.J, Traffic, Access, and

Parking, of this Draft EIR, a Construction Management Plan would be implemented during construction of the proposed Project pursuant to Project Design Feature J.1-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. In addition, prior to conducting any ground disturbing activities, contractors would coordinate with the cities of West Hollywood and Beverly Hills to identify the locations and depths of existing water lines in the vicinity of the Project Site to avoid disruption of water service.

Overall, construction activities associated with the proposed Project would not require or result in the construction of new water facilities or expansion of existing facilities, except for the new service connections to connect to the mainlines. In addition, the water distribution capacity would be adequate to serve the proposed Project. Furthermore, as discussed above, off-site construction impacts associated with installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water service or inconvenience to motorists or pedestrians. As such, construction-related impacts to water infrastructure would be less than significant.

### ***(b) Operation***

As discussed above, water service to the Project Site would continue to be supplied by the City of Beverly Hills for domestic uses and fire fighting services. While domestic water demand is typically the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and, therefore, are the primary means for analyzing infrastructure capacity.

Fire flow to the proposed Project would be required to meet County of Los Angeles fire flow requirements. The Los Angeles County Fire Code (LACFC) establishes fire flow standards by development type. Based on the LACFC, the fire flow requirement for the proposed Project would be 2,000 gpm.<sup>34</sup> Flow testing was performed by the City of Beverly Hills on the fire hydrants closest to the Project Site. Fire hydrant 9002, located at the corner of Sunset Boulevard and Hilldale Avenue was found to have an available water flow of 4,638 gpm at 20 psi. Fire hydrant 5039 located on Hilldale Avenue south of the Project Site was found to have an available water flow of 5,733 gpm at 20 psi. Therefore, the proposed Project's fire flow demands could be met by existing infrastructure.

The proposed Project would provide new metered service connections as needed to connect to the existing water mainlines adjacent to the Project Site. As discussed above,

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<sup>34</sup> *Los Angeles County Fire Code, Appendix B, Table B105.1, Minimum Required Fire-Flow and Flow Duration for Buildings.*

the City of Beverly Hills would review the proposed Project's final water infrastructure plan and confirm existing lines are available to serve the Project Site. Project-related infrastructure would be designed and installed to meet all applicable City of West Hollywood and City of Beverly Hills requirements. No upgrades to the mainlines that serve the Project Site would be required as they have capacity to serve the proposed Project's water demand.

Based on the above, the proposed Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Accordingly, the proposed Project would not require or result in the construction of new water facilities or expansion of existing facilities. In addition, the water distribution capacity would be adequate to serve the proposed Project. Therefore, the proposed Project's operational impacts on water infrastructure would be less than significant.

## **(2) Water Supply**

### **(a) Construction**

Construction activities for the proposed Project would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the proposed Project (from the start of construction to Project buildout in 2020) and would be temporary in nature. The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed but is not expected to be substantial. Water use during construction would be anticipated to be less than the net new water consumption of the proposed Project at buildout. In addition, water use during construction would be short-term and have an intermittent demand for water during construction activities and would be offset by the water currently consumed by the existing commercial building, which would be removed.<sup>35</sup> Water for construction activities would be conveyed using the existing water infrastructure at the Project Site, and no infrastructure improvements would be needed. Construction of the proposed Project would commence in late 2017/early 2018 and end in 2020, which would be within the projections accounted for in the previous 2010 UWMP's planning period (i.e., 2015—2035). As concluded in the City

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<sup>35</sup> As shown in Table IV.K.1-4 on page IV.K.1-25, existing uses currently consume approximately 6,274 gallons of water per day. Generally, compaction and stabilization of graded earthwork during construction of a project could result in a water usage rate of 25 gallons of water per cubic yard of soil. Additional water may be required for erosion control and control of windblown dust during construction, which would vary greatly with weather conditions. However, an average of 1,200 gallons per acre per day could be expected for dust control.

of Beverly Hills 2010 UWMP, water demand within the City of Beverly Hills' service area was projected to remain fairly constant through 2035 due to minimal growth combined with water use efficiency measures.<sup>36</sup> Therefore, the proposed Project's temporary and intermittent demand for water during construction could be met by the City of Beverly Hills' available supplies.

Based on the above, construction activities associated with the proposed Project would require minimal water demand and are not anticipated to have a substantial adverse impact on available water supplies or infrastructure. In addition, off-site construction impacts would be temporary in nature and would not disrupt water service. As such, construction-related impacts to water supply would be less than significant.

### ***(b) Operation***

As described in Section II, Project Description, of this Draft EIR, the proposed would include a total of approximately 132,000 square feet of development. The proposed Project would be comprised of 6,853 square feet of retail use, 2,192 square feet of gallery use, and 37,900 square feet of creative office space. The Arts Club would comprise 30,795 square feet and include a fitness center/spa, screening rooms, guestrooms/spa treatment, brasserie, holding bar, lounge, anteroom, drawing room, supper club, restaurant, and bar. The proposed Project would also include 53,678 square feet for uses related to support, administrative, and lobby areas, reception, cloak rooms, backstage, storage, and other areas. The current on-site commercial uses would be removed.

As discussed above, the analysis of the proposed Project's impacts relative to water supply is based on a calculation of the proposed Project's net new water demand by applying the sewage generation rates established by the County of Los Angeles, which also serve to estimate water demand, to the proposed uses, as provided in Table IV.K.1-4 on page IV.K.1-25. As shown in Table IV.K.1-4, it is estimated that the proposed Project would result in a net increase in the Project Site's average daily water demand of approximately 26,598 gpd, or approximately 29.8 AFY (assuming constant water use throughout the year).

It should be noted that the County's wastewater generation rates do not account for water conservation features, and, therefore, the proposed Project's estimated water demand is conservative. As discussed above, WHMC Chapter 15.52, Water Conservation Plan, includes water conservation provisions that restrict water usage for the following activities: irrigation practices, exterior washing practices, water for ornamental or

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<sup>36</sup> *City of Beverly Hills, 2010 Urban Water Management Plan, August 2011, p. 5-16.*

**Table IV.K.1-4  
Estimated Project Water Consumption**

Land Use	Size	Daily Average Consumption Rate <sup>a</sup> (gpd per unit)	Total Water Consumption (gpd)
<b>Existing Uses (To Be Removed)</b>			
Retail Store	5,600 sf	0.08 gpd/sf	448
Cafe	3,200 sf	0.28 gpd/sf	896
Office	4,000 sf	0.15 gpd/sf	600
Fitness/Gym	5,250 sf	0.80 gpd/sf	4,200
Common Area	1,620 sf	0.08 gpd/sf	130
<i>Total Existing</i>			<b>6,274</b>
<b>Proposed Project</b>			
Lobby/Support Area/Reception <sup>b</sup>	53,678 sf	0.08 gpd/sf	4,294
Retail Space	6,853 sf	0.08 gpd/sf	548
Art Gallery <sup>c</sup>	2,192 sf	0.15 gpd/sf	329
Office	37,900 sf	0.15 gpd/sf	5,685
Health Club/Spa	6,794 sf	0.80 gpd/sf	5,435
Theatre: Cinema <sup>d</sup>	98 seats	4.00 gpd/seat	392
Hotel <sup>e</sup>	15 rooms	130.00 gpd/room	1,950
Lounge	6,216 sf	0.08 gpd/sf	497
Restaurant <sup>f</sup>	433 seats	30.00 gpd/seat	12,990
Bar: Cocktail, Public Table Area	1,502 sf	0.50 gpd/sf	751
<i>Subtotal Proposed Arts Club</i>			<b>32,872</b>
<b>Net Water Consumption (Proposed – Existing To Be Removed)</b>			<b>26,598</b>
<p><i>gpd = gallons per day    sf = square feet</i></p> <p><sup>a</sup> Project wastewater generation was calculated using the County Sanitation District No. 4 of Los Angeles County's Mean Loading Table.</p> <p><sup>b</sup> According to the County's Mean Loading Table, generation rates for "Lobby" and "Commercial" uses are the same.</p> <p><sup>c</sup> Generation rates are not provided for art gallery uses. Therefore, the highest comparable rate for "Museums" (i.e., 150 gallons per day per 1,000 square feet) is applied.</p> <p><sup>d</sup> As estimated by Gensler for this proposed Project, the theater/cinema uses are provided in the form of two screening rooms with 49 seats per room.</p> <p><sup>e</sup> The proposed Project's guestrooms are not anticipated to generate the same level demand as those in a typical hotel. To provide a conservative estimate, the highest comparable rate for "Hotel" uses (i.e., 130 gallons per day per room) is applied.</p> <p><sup>f</sup> As the number of seats for restaurant and supper club uses is currently unknown, based on general seating guidelines, it is assumed that one seat is comprised of 15 square feet.</p> <p>Source: Eyestone Environmental, 2017.</p>			

recreational uses, and other miscellaneous uses. Furthermore, the proposed Project would include Project Design Feature K.1-1, which incorporates sustainability features, such as efficient plumbing features, updated landscaping, modern irrigation, and efficient appliances.

The proposed Project's net increase in water demand of 26,598 gallons per day would be incremental in the context of the 10,432 AFY (i.e., 9.31 million gallons per day) of existing water supplies from 2015 (the most recent year of available data). Additionally, as concluded in the 2015 UWMP, projected water demand for the City of Beverly Hills service area would be met by the available supplies during an average year, single-dry year, and multiple-dry years through the year 2040, as well as the interim years. These projections account for residential and commercial growth within the City of Beverly Hills service area, which includes the proposed Project.<sup>37</sup> Therefore, the City of Beverly Hills would be able to meet the existing and planned water demands of its service area, inclusive of the proposed Project.

Based on the above, the estimated water demand for the proposed Project would not exceed the available supplies projected by the City of Beverly Hills. In addition, as codified in the Beverly Hills Municipal Code, a water supply fee is imposed on applicable projects to account for the cost of water facilities in existence and for new water facilities to be acquired or constructed to provide water supplies to serve a new or expanded connection to the water system.<sup>38</sup> Such fee is applicable to the proposed Project. Thus, the City of Beverly Hills would be able to meet the water demand of the proposed Project, as well as the existing and planned future water demands of its service area. Therefore, the City of Beverly Hills would have sufficient water supplies available to adequately serve the proposed Project during operation. As such, the proposed Project's operation-related impacts on water supply would be less than significant.

## 4. Cumulative Impacts

The proposed Project, in conjunction with growth forecasted in the City through 2020 (i.e., the proposed Project's buildout year), would cumulatively increase the demand for water, thus potentially resulting in cumulative impacts on water supplies and water

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<sup>37</sup> *The City of Beverly Hills service area is built out, and, as such, the 2015 UWMP accounts for future growth based on SCAG projections and infill/redevelopment projects. Since the UWMP is updated every five years, it takes into account changing growth projections to ensure that the City continues to provide adequate water service to its customers.*

<sup>38</sup> *Including supply or capacity contracts for rights or entitlements, real property interests, and entitlements and other rights of the City of Beverly Hills involving capital expense relating to its use of existing or new water facilities that are of proportional benefit to the person being charged.*

infrastructure. The cumulative growth analysis below includes all proposed, recently approved, under construction, or reasonably foreseeable projects that have been identified within proximity to the proposed Project through 2020 that could affect environmental conditions in the vicinity of the Project Site, as described in Section III, Environmental Setting, of this Draft EIR. These related projects and their projected water demand are listed in Table IV.K.1-5 on page IV.K.1-28.

#### **a. Water Infrastructure**

The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the water infrastructure that would serve the proposed Project). Development of the proposed Project and future new development in the vicinity of the Project Site would cumulatively increase demands on the existing water infrastructure system. However, as with the proposed Project, other new development projects would be subject to City of Beverly Hills review to ensure that the existing public infrastructure would be adequate to meet the domestic and fire water demands of each project, and individual projects would be subject to City of Beverly Hills and City of West Hollywood requirements regarding infrastructure improvements needed to meet respective water demands, flow and pressure requirements, etc. Furthermore, the City of Beverly Hills, the LACFD, and the City of West Hollywood would conduct on-going evaluations of its infrastructure to ensure facilities are adequate. Therefore, it is anticipated that the City of Beverly Hills would be able to supply the demands of the proposed Project and the related projects. As such, cumulative impacts on the water infrastructure system would be less than significant.

#### **b. Water Supply**

The geographic context for the cumulative impact analysis on water supply is the City of Beverly Hills' service area. As discussed above, the City of Beverly Hills, as a public water service provider, is required to prepare and periodically update its urban water management plan to plan and provide for water supplies to serve existing and projected demands. The 2015 UWMP prepared by the City of Beverly Hills accounts for existing development within its service area, as well as projected growth through the year 2040 based on demographic growth projections, which forecast an increase of 8.7 percent population increase between 2015 and 2040 in the water service area. Additionally, under the provisions of SB 610, the applicable storm water provider would be required to prepare a comprehensive WSA for some of these new development projects. The WSA for such projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures, to secure alternative sources if needed.

**Table IV.K.1-5  
Cumulative Water Demand Within the City of Beverly Hills Water Service Area**

No.	Related Project	Use	Size of Units	Generation Rate <sup>a,b</sup> (per unit)	Total (gpd)
<b>City of West Hollywood</b>					
5	511 Flores St.	Apartments	9 du	200 gpd	1,800
11	1003 Hancock Ave.	Apartments	3 du	200 gpd	600
17	627 La Peer Dr.	Hotel	69 rm	130 gpd	8,970
		Condominiums	8 du	200 gpd	1,600
		Restaurant (2,700 sf)	180 seats	30 gpd	5,400
		Retail	1,760 sf	0.08 gpd	141
18	829 Larrabee St.	Apartments	13 du	200 gpd	2,600
22	8650 Melrose Ave.	Retail	14,571 sf	0.08 gpd	1,166
		Apartments	7 du	200 gpd	1,400
23	8711 Melrose Ave.	Commercial	21,565 sf	0.08 gpd	1,725
		Restaurant (8,997 sf)	600 seats	30 gpd	17,994
		Retail	10,355 sf	0.08 gpd	828
24	8715 Melrose Ave.	Restaurant (8,997 sf)	600 seats	30 gpd	17,994
		Retail	10,355 sf	0.08 gpd	828
29	507 Orlando Ave.	Apartments	9 du	200 gpd	1,800
30	923 Palm Ave.	Senior Housing	45 du	200 gpd	9,000
31	645 Robertson Blvd.	Hotel	241 rm	130 gpd	31,330
		Restaurant (33,300 sf)	2,220 seats	30 gpd	66,600
		Retail	18,130 sf	0.08 gpd	1,450
		Design Showroom <sup>c</sup>	10,325 sf	0.08 gpd	826
		Nightclub <sup>d</sup>	3,780 sf	0.60 gpd	2,268
38	9001 Santa Monica Blvd.	Retail	9,850 sf	0.08 gpd	788
		Restaurant (9,800 sf)	653 seats	30 gpd	19,600
		Condominiums	42 du	200 gpd	8,400
39	9040–9098 Santa Monica Blvd.	Condominiums	76 du	200 gpd	15,200
		Retail	82,000 sf	0.08 gpd	6,560
		Office	137,000 sf	0.15 gpd	20,550
43	8950 Sunset Blvd. <sup>e</sup>	Hotel	169 rm	—	49,714
		Office	36,701 sf		
		Restaurant	30,000 sf		
		Health Club/Spa	9,230 sf		

**Table IV.K.1-5 (Continued)**  
**Cumulative Water Demand Within the City of Beverly Hills Water Service Area**

No.	Related Project	Use	Size of Units	Generation Rate <sup>a,b</sup> (per unit)	Total (gpd)
44	9040 Sunset Blvd.	Hotel	190 rm	130 gpd	24,700
		Condominiums	20 du	200 gpd	4,000
		Retail	370 sf	0.08 gpd	30
		Restaurant (6,750 sf)	450 seats	30 gpd	13,500
		Lobby	900 sf	0.08 gpd	72
		Meeting Rooms <sup>f</sup>	8,500 sf	0.15 gpd	1,275
		Bar/Club	10,000 sf	0.5 gpd	5,000
		Spa	4,771 sf	0.80 gpd	3,817
<b>City of Beverly Hills</b>					
1	9265 Burton Way	Condominiums	23 du	200 gpd	4,600
2	257 N. Canon Dr.	Theater	388 seats	4 gpd	1,552
		Retail	14,000 sf	0.08 gpd	1,120
3	250 N. Crescent Dr.	Condominiums	8 du	200 gpd	1,600
4	309–239 S. Elm Dr.	Condominiums	30 du	200 gpd	6,000
5	154–168 N. La Peer Dr.	Condominiums	16 du	200 gpd	3,200
6	325 N. Maple Dr.	Office	50,000 sf	0.15 gpd	7,500
7	332 N. Oakhurst Dr.	Condominiums	31 du	200 gpd	6,200
8	8955 Olympic Blvd.	Automobile Sales <sup>c</sup>	19,800 sf	0.08 gpd	1,584
9	9212 Olympic Blvd.	Office	13,300 sf	0.15 gpd	1,995
		Fast-Food Restaurant with Drive-Thru (1,000 sf)	67 seats	30 gpd	2,000
		Automobile Sales <sup>c</sup>	4,700 sf	0.08 gpd	376
10	425 N. Palm Dr.	Condominiums	20 du	200 gpd	4,000
11	207 S. Robertson Blvd.	Office	1,700 sf	0.15 gpd	255
12	312–314 N. Rodeo Dr.	Shopping Center	3,018 sf	0.08 gpd	241
13	9908 S. Santa Monica Blvd.	Condominiums	27 du	200 gpd	5,400
14	121 San Vicente Blvd.	Medical Office Building	35,000 sf	0.25 gpd	8,750
15	8600 Wilshire Blvd.	Condominiums	21 du	200 gpd	4,200
		Retail	7,300 sf	0.08 gpd	584
16	9000 Wilshire Blvd.	Office	31,700 sf	0.15 gpd	4,755
17	9200 Wilshire Blvd.	Condominiums	53 du	200 gpd	10,600
		Retail	8,400 sf	0.08 gpd	672
		Restaurant (5,600 sf)	373 seats	30 gpd	11,200
18	9230 Wilshire Blvd.	Automobile Sales <sup>c</sup>	150,300 sf	0.08 gpd	12,024

**Table IV.K.1-5 (Continued)**  
**Cumulative Water Demand Within the City of Beverly Hills Water Service Area**

No.	Related Project	Use	Size of Units	Generation Rate <sup>a,b</sup> (per unit)	Total (gpd)
19	9876 Wilshire Blvd.	Condominiums	110 du	200 gpd	22,000
		Restaurant (5,000 sf)	333 seats	30 gpd	10,000
		Retail	5,000 sf	0.08 gpd	400
20	9900 Wilshire Blvd.	Retail	231,656 sf	0.08 gpd	18,532
		High-Rise Condominiums	235 du	200 gpd	47,000
		Restaurant (4,200 sf)	280 seats	30 gpd	8,400
<b>Total Related Projects Generation</b>					<b>556,267</b>
<b>Total Project Net Generation</b>					<b>26,598</b>
<b>Total Generation from Related Projects and Proposed Project</b>					<b>582,865</b>

*gpd = gallons per day*

*du = dwelling unit*

*rm = rooms*

*sf = square feet*

*Numbers may not sum precisely due to rounding.*

*This list only includes those related projects within the water service area of the City of Beverly Hills.*

<sup>a</sup> *Water generation rates are based on flow generation rates provided by the Los Angeles County Sanitation District No. 4, Table for Mean Loadings Per Unit of Usage.*

<sup>b</sup> *As the number of seats for restaurant-related uses is not provided, based on general seating guidelines used by KPFF Consulting Engineers, it is assumed that one seat is comprised of 15 square feet.*

<sup>c</sup> *Generation rates are not provided for design showroom or automobile sales uses. Therefore, the highest comparable rate for "Retail Area" (i.e., 80 gallons per day per 1,000 square feet) is applied.*

<sup>d</sup> *Generation rates are not provided for nightclub uses. Therefore, the highest comparable rate for "Dancing Area (of Bars or Nightclub)" (i.e., 600 gallons per day per 1,000 square feet) is applied.*

<sup>e</sup> *As shown in Table IV.K.2-4 in Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR.*

<sup>f</sup> *Generation rates are not provided for meeting room uses. Therefore, the highest comparable rate for "Office Building" (i.e., 150 gallons per day per 1,000 square feet) is applied.*

*Source: Eyestone Environmental, 2017.*

As identified in Section III, Environmental Setting, of this Draft EIR, there are 191 related projects located in the vicinity of the Project Site, 34 of which are in the City of Beverly Hills service area. The estimated water demand of the related projects is shown in Table IV.K.1-5 on page IV.K.1-28. As shown in the table, the related projects would generate a total average water demand of approximately 556,267 gpd. The estimate of the

related projects' water demand is conservative as it does not account for water conservation measures required by state and local codes. The proposed Project in conjunction with the related projects would yield a cumulative average water demand of approximately 582,865 gpd.

As previously discussed, the City of Beverly Hills' water supply under existing conditions in 2015 (the most recent year of available data) is 10,432 AFY (i.e., 9.31 million gallons per day). Thus, the cumulative average water demand of 582,865 gpd would be incremental in the context of existing water supply. Furthermore, as previously stated, based on water demand projections through 2040 in its 2015 UWMP, the City of Beverly Hills has determined that it will be able to reliably provide water to its customers through the year 2040, as well as the interim years. Therefore, it is anticipated that, as with the proposed Project, the related projects would be within the available and projected available water supplies for normal, single-dry, and multiple-dry years through the year 2040.

Compliance of the proposed Project and other future development projects with regulatory requirements that promote water conservation, such as the City's Green Building Ordinance, as well as AB 32, which is discussed in detail in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, would also assist in assuring that adequate water supply is available on a cumulative basis. Furthermore, as described above, the Beverly Hills Municipal Code has established a water supply fee to account for the cost of water facilities in existence and for new water facilities to be acquired or constructed to provide water supplies to serve a new or expanded connection to the water system.<sup>39</sup> As such, this water supply fee would be imposed on applicable related projects to help maintain the City's goal of reducing its reliance on imported water from the MWD.

Overall, as discussed above, based on its 2015 UWMP, the City of Beverly Hills will meet all new demand for water resulting from projected population growth, through a combination of improved groundwater production and banking, imported water supplies, and water conservation and recycling. Based on the related project list and projections provided in the adopted plans above, it is anticipated that the City of Beverly Hills would be able to meet the water supply demands of the proposed Project and future growth through 2020 and beyond. Therefore, cumulative impacts on associated water supply would be less than significant.

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<sup>39</sup> *Including supply or capacity contracts for rights or entitlements, real property interests, and entitlements and other rights of the City of Beverly Hills involving capital expenses relating to its use of existing or new water facilities that are of proportional benefit to the person being charged.*

## **5. Mitigation Measures**

Project-level and cumulative impacts with regard to water supply and infrastructure would be less than significant with implementation of the regulatory requirements and project design features. Therefore, no mitigation measures are required.

## **6. Level of Significance After Mitigation**

Project-level and cumulative impacts related to water supply and infrastructure would be less than significant without mitigation.