3.11 Water Supply

3.11.1 Introduction

This section discusses the water supply existing setting and whether the proposed Project would result in significant environmental impacts to existing water supply. This section describes the environmental and regulatory settings for potential impacts to water supply in connection with setup, operation, and breakdown of the proposed Arroyo Seco Music and Arts Festival.

Baseline water supply conditions and pertinent regulations have been identified in the Project area mainly from the State of California, the City of Pasadena, the Pasadena Department of Water and Power (PWP) Urban Water Management Plan, and the PWP Water Integrated Resources Plan. This section identifies potential Project-level and cumulative environmental impacts.

In the Initial Study that was distributed for public review from May 8 to June 8, 2015, the City preliminarily determined that there would be sufficient water supply available to serve the proposed Project, and impacts would be less than significant. However, this additional analysis has been completed in response to two comments received on the Notice of Preparation (NOP) expressing concerns about potential Project impacts to water supply in light of the current drought Southern California is experiencing (see Appendix A). The comments included questioning where drinking water would come from and what the associated impacts would be; and how commitments to large events could be made knowing there is a drought. As a result of these scoping / NOP comments, this analysis of Project-related impacts related to water supply has been included in this EIR.

3.11.2 Environmental Setting

Regional Water Supply and Demand

The Pasadena Department of Water and Power (PWP) provides potable water to the City of Pasadena and portions of unincorporated areas of Altadena, East Pasadena, and San Gabriel (PWP, 2010). The Project site, including the Rose Bowl, Brookside Golf Course, and facilities within Brookside Park obtain water from PWP. PWP's service area is located within the northwestern portion of the San Gabriel Valley in Los Angeles County, encompassing approximately 23 square miles.

As described in more detail below, PWP's current water supplies include local groundwater from the Raymond Basin, local surface water diversions from Arroyo Seco and Eaton Canyon (which receive surface runoff from the San Gabriel Mountains), and purchases of imported water from the Metropolitan Water District (MWD). MWD obtains its primary water supplies from the State Water Project (SWP) and Colorado River Aqueduct. In average hydrologic conditions, PWP pumps approximately 12,000 acre-

feet per year (AFY) from the Raymond Basin (PWP, 2011). However, in response to declining groundwater levels, a resolution was implemented basin-wide in 2009 by the Raymond Basin Management Board (RBMB) to reduce pumping until groundwater levels increased. PWP's has reduced groundwater pumping to approximately 10,300 AFY (PWP, 2015). Surface water diversions in the Arroyo Seco and Eaton Canyon are used to augment local groundwater, and average approximately 2,380 AFY (PWP, 2011). The water supplied to PWP's service area meets all federal and state drinking water standards (City of Pasadena, 2015a). **Table 3.11-1** shows the existing and projected water supply through the year 2035; 2010 was the most recent year measured at the time of PWP's projections and represents existing water supply. Supply estimates for years 2015 through 2035 are PWP Urban Water Management Plan (UWMP) projections based on the RBMB-required reduction in groundwater pumping, expected consistency of surface water supplies, and correspondence with MWD regarding their estimated reduction in water supplies due to drought and environmental restrictions (PWP, 2011).

TABLE 3.11-1
PASADENA WATER AND POWER EXISTING AND PROJECTED WATER SUPPLY (AF)

	2010	2015	2020	2025	2030	2035
Existing Supplies						
Existing Groundwater	12,056	10,304	10,304	10,304	10,304	10,304
Existing Surface Supplies	2,380	2,380	2,380	2,380	2,380	2,380
MWD Imported Water Purchases	24,024	23,626	21,149	21,149	21,149	21,149
Subtotal	**38,460**	**36,310**	**33,833**	**32,253**	**32,253**	**32,253**
Planned Supplies						
Recycled Water						
Non Potable	**0**	**0**	**1,130**	**1,130**	**1,130**	**1,130**
Groundwater Recharge	**0**	**0**	**920**	**920**	**920**	**920**
Devil's Gate Surface Diversion	**0**	**0**	**627**	**627**	**627**	**627**
Groundwater Storage Program	**0**	**0**	**0**	**0**	**0**	**0**
Subtotal	**0**	**1,130**	**2,677**	**2,677**	**2,677**	**2,677**
TOTAL	**38,460**	**38,460**	**37,440**	**36,510**	**36,510**	**36,510**

SOURCE: PWP, 2011

As shown above, Pasadena's use of imported water is expected to decrease within the PWP service area while use of groundwater and surface supplies is expected to remain constant. The decreased amount of imported water needed to meet service area demands is the expected outcome of reduced demands resulting from planned water

conservation efforts and a non-potable water use project scheduled for City approval in 2015 or 2016 (PWP, 2015). Water conservation efforts are described in more detail below.

The addition of recycled water and Devil's Gate surface diversion water supply sources are expected to contribute to overall supply in 2020. PWP's total imported water usage is expected to incrementally decrease until 2025, and then remain at the same level.

Table 3.11-2 below shows the existing and projected water demand in the PWP service area through 2035. The year 2007 was used to be representative of existing demand as there was no mandatory or drought-related conservation in 2007, but it was current enough to account for programmatic and passive conservation that has already occurred. Projections of water demand for PWP were developed as part of the recently completed Water Integrated Resources Plan (WIRP) based on historical water use factors, projected demographics, and passive (or code-based) water conservation. Demand for years 2015 through 2035 are PWP UWMP projections based on historical water use factors, projected demographics, and passive (or code-based) water conservation (PWP, 2011).

TABLE 3.11-2
PASADENA WATER AND POWER EXISTING AND PROJECTED WATER DEMAND WITHOUT NEW CONSERVATION (AF)

Water Use Sectors	2007	2015	2020	2025	2030	2035
Single family	18,759	19,200	19,900	20,300	20,500	20,600
Multi-family	6,854	6,800	7,200	7,500	7,600	7,700
Commercial/ Institutional	10,462	10,800	11,100	11,300	11,500	11,600
Unmetered water demand	3,093	3,200	3,300	3,400	3,400	3,400
Total	***36,075***	***40,000***	***41,500***	***42,500***	***43,000***	***43,300***
Adjusted totals for water conservation estimates[1]	**N/A**	**39,940**	**41,510**	**42,490**	**43,010**	**43,380**

[1] *These totals were referenced in several other areas of the Urban Water Management Plan as baseline prediction totals without water conservation. The differences between these totals and the totals resulting from the water use sector breakdowns shown above are not substantial. Thus, from here onward, we will refer to these water conservation estimate totals in our discussion.*

SOURCE: PWP, 2011

The water demand for every water use sector in PWP's service area is expected to increase steadily through the year 2035. Unmetered water demand is expected to increase through the year 2025 and then remain constant through 2035. Overall water demand is anticipated to increase from 36,075 AF in 2007 to 43,380 AFY in 2035, representing a total increase of 7,305 AF. Based on a comparison of the supply and demand tables above, projected water demand in the City of Pasadena is expected to exceed projected water supply beginning in the year 2020, which would result in a water supply shortage. This shortage is predicted to then increase incrementally through 2035.

However, in order for PWP to demonstrate compliance with the Water Conservation Bill requirements and to achieve its 2020 urban water use target, the following measures are being taken to conserve water:

- Ensuring correct application of more stringent design standards related to indoor and outdoor water use for new development projects (e.g., Statewide Model Water Efficient Landscape Ordinance);
- Enforcement of prohibited water uses during Stage 1 per the Emergency Water Conservation Ordinance (see Section 5.5. of the 2010 UWMP);
- Enhancement of demand management measure (DMM) implementation (see Section 6 of the 2010 UWMP); and/or
- Implementation of additional water conservation BMPs (see Section 3.5 of the 2010 UWMP).

As a result of the above recommended water conservation measures, PWP anticipates a 6,870 AFY reduction in demand by 2035. Therefore, if the water conservation measures are adhered to and have their intended effect, the water demand in 2035 would be reduced to 36,510 AFY. This would mean that water demand would only increase by 435 AFY between 2007 and 2035 (rather than the previously projected 7,305 AFY increase) and would be consistent with the planned water supplies for that year. It is important to note that if the 2015 UWMP shows that the interim water use target is not achieved by implementation of the recommended water conservation measures, adjustments will be made to its water conservation plan to achieve the 2020 urban water use target (PWP, 2011).

Rose Bowl Water Demand

Water is currently used at the Rose Bowl during displacement events and on a daily basis as part of general facility upkeep and maintenance. On average, the Rose Bowl uses 31,353 gallons during non-event days. The Rose Bowl uses an extra uses 145,860 gallons of water per day during events. Water is also used at the Brookside Golf Course to water the greens, for potable consumption, and other general use. Recently, the golf course has implemented water conservation efforts such as planting drought-resistant grasses and reducing irrigation during the winter in order to comply with City drought watering restrictions and still operate the golf course (Guzman, 2014).

3.11.3 Regulatory Framework

Federal

There are no applicable federal regulations related to water supply.

State

California Administrative Code

Title 24 of the California Administrative Code includes the California Building Standards, which in turn includes the California Plumbing Code (Part 5), which promotes water conservation. Title 20 addresses public utilities and energy and includes appliance and efficiency standards that promote water conservation. In addition, a number of state laws require water-efficient plumbing fixtures in structures.

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA), requires urban water suppliers to initiate planning strategies to ensure an appropriate level of reliability in its water service. CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 AF of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The CUWMPA describes the contents of Urban Water Management Plans as well as methods for urban water suppliers to adopt and implement the plans.

Senate Bill 610/Senate Bill 221

Senate Bill (SB) 610 and SB 221 are companion measures, which requires public urban water suppliers with 3,000 or more service connections to identify existing and planned sources of water for planned developments of a certain size. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects. Under SB 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply. SB 610 and SB 221 further require the public water system to prepare a specified water supply assessment for projects that meet the following criteria:

a) A proposed residential development of more than 500 dwelling units;

b) A proposed shopping center employing more than 1,000 persons or having more than 500,000 sf of floor space;

c) A commercial office building employing more than 1,000 persons or having more than 250,000 sf of floor space;

d) A hotel or motel, or both, with more than 500 rooms;

e) An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor area; and

f) A mixed-use project that includes one or more of the projects above.

The components of a WSA include existing water demand, future water demand by the project, and must ensure that water is available for the project during normal years, a

single dry year, and multiple dry years during a 20-year future projection period. The WSA must also describe whether the project's water demand is accounted for in the water supplier's UWMP. Supplies of water for future water supply must be documented in the WSA.

The proposed Project is a temporary three-day music and arts Festival that would occur on a yearly basis and, thus, would not meet the requirements of the project types listed above. Therefore, the Project is not required to prepare a water supply assessment pursuant to SB 610 and SB 221**.**

20x2020 Water Conservation Plan

Released in 2010, this plan aims to set in motion a range of activities designed to achieve a 20 percent per capita reduction in urban water demand by 2020. These activities include improving an understanding of the variation in water use across California, promoting legislative initiatives that incentivize water agencies to promote water conservation, and creating evaluation and enforcement mechanisms to assure regional and statewide goals are met (SWRCB, 2015). Recommendations of the plan include reducing landscape irrigation demand, reducing water waste, reinforcing efficiency codes and related BMPs, providing enforcement mechanisms for water conservation, and investigating potential flexible implementation measures. The plan requires annual progress reports from lead coordinating state agencies to chart their progress in complying with the plan (DWR et al, 2010).

As a water agency, PWP is required to comply with water conservation promotion. If additional conservation can offset water demand by 5,000 AFY by 2020, then PWP is expected to meet its urban water use target and demonstrate compliance with the Plan. PWP continues to evaluate conservation BMP elements for implementation, which include requiring single family homes to have drought tolerant landscaped front yards and converting multi-family and commercial landscapes to comply with the California Model Landscape Ordinance. PWP may implement a rate structure that increases cost fairness related to how customers use water, and is considering a stewardship charge on water sold to help pay for conservation measures (PWP, 2011)..

The City Council adopted the Pasadena Level 2 Water Shortage Plan on June 1, 2015, which bans outdoor watering on Thursdays. Outdoor watering is now allowed only two days per week, on Tuesdays and Saturdays, before 9:00AM or after 6:00PM through October. A one-day per week outdoor watering limit takes effect November to March. The Council adopted a 28 percent water conservation goal citywide that aligns Pasadena with mandated reductions set by the state. From June 2014 to February 2015, overall citywide water use was reduced by nine percent from 2013 levels. Between June 1, 2015 and September 9, 2015, the City's water conservation status was at 24 percent (PWP, 2015).

State Executive Order B-29-15

On April 1, 2015, the State issued Executive Order B-29-15 in response to the recent drought (a State of Emergency was proclaimed by the Governor in January of 2014 due to severe drought conditions). The Order stated that the State Water Resources Control Board (Water Board) shall impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage through February 28, 2016. These restrictions require water suppliers to California's cities and towns to reduce usage as compared to the amount used in 2013. Strategies provided to achieve this include pricing incentives, water efficiency measures, use restrictions and enforcement against waste. The State ordered the Water Board to require that those areas with high per capita use achieve proportionally greater reductions than those with low use (State of California, 2015).

The SWRCB announced their final urban water conservation tiers on July 15, 2015. There are nine separate tiers; each tier has a conservation standard ranging from a 4 percent decrease to a 36 percent decrease in water usage. The City of Pasadena is within the 7th tier and, therefore, must meet a conservation standard of 28 percent. This means that it must reduce water consumption by 28 percent of the total amount of water used in 2013 (SWRCB, 2015). For the period of June 1 through September 9, 2015, the City reported at 24 percent water savings (City of Pasadena, 2015b).

Local

Pasadena Water and Power Water Integrated Resource Plan and Urban Water Management Plan

In January 2011, PWP completed a Water Integrated Resources Plan (WIRP) providing an overall long-term water resources strategy through the year 2035. The WIRP serves as source document for preparation of the 2010 UWMP. The WIRP was developed using an open, participatory process, with input from the public. Various alternatives were evaluated to meet future water demands. Approximately fifty water supply and conservation options were considered in the WIRP. After extensive evaluation of the many different combinations of the various water supply and conservation options, a recommended supply portfolio that increases water conservation and local supplies was determined to be the best strategy (PWP, 2011).

The UWMP was prepared to comply with the Urban Water Management Planning Act of 1983, which requires all urban water suppliers to prepare UWMPs and update the plans every 5 years. An urban water supplier is defined by the Act as a supplier that provides water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. The UWMP was prepared per California Water Code Sections 10610 through 10657 which detail required information that must be included in the plans (PWP, 2011). The PWP, in compliance with the UWMP Planning Act of 1983, will update the current UWMP by July 1, 2016. The Draft 2015 UWMP Guidebook, prepared by the California Department of Water Resources, was released in November 2015.

City of Pasadena General Plan Public Facilities Element

The Public Facilities section provides for the Public buildings, structures and grounds to meet the needs of the community. It includes schools, parks, libraries, civic buildings, fire stations, social service centers, distribution systems for water and electrical power and collection systems for sanitary sewers and storm drainage

Strategy 200.0: Delivery of a high level of public services as means of maintaining or improving the City's urban environment and raising the quality of life for its residents

Policy 204.0 Continued search for opportunities to provide for the City's water and electrical energy needs at the lowest possible per unit cost.

City of Pasadena Municipal Code

Chapter 13.10: Water Waste Prohibitions and Water Shortage Supply Plans Ordinance

As part of the Comprehensive Water Conservation Plan approval on April 13, 2009, the City Council voted to replace the Water Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance. The Ordinance places 13 permanent mandatory restrictions on wasteful water use activities, includes water conservation measures specific to varying levels of water supply shortages, lists fines for violating the water reduction measures, places limits on watering hours and washing down hard or paved surfaces, defines water supply shortages implementation of water shortage plans. The Comprehensive Water Conservation Plan includes water conservation approaches employed to meet the City’s water conservation targets of reducing per-capita potable water consumption by 10 percent by 2015 and 20 percent by 2020.

City of Pasadena Level 2 Water Shortage Plan

On June 1, 2015 the Pasadena City Council adopted the Level 2 Water Shortage Plan under City Ordinance Chapter 13.10, limiting outdoor watering to two days per week from April through October (Tuesdays and Saturdays before 9:00 a.m. or after 6:00 p.m. only), and one day per week from November through March. The plan requires water leaks to be fixed within 48 hours and prohibits the filling of ornamental lakes and ponds. The City is also taking additional steps to reduce City water use, including: retrofitting city medians with low-emitting tree irrigation systems, replacing turf at fire stations with drought-tolerant landscaping, turning off City water fountains, investing in projects to increase water supplies, and introducing a graywater program (City of Pasadena, 2015b).

The City has seen some reduction in water usage; from June 2014 to February 2015, overall citywide water use declined by 9 percent and City-owned facilities (which includes the Rose Bowl, Brookside Golf Course, and Brookside Park) water use declined

by 22 percent compared to 2013 levels. Furthermore, since July 2015, 3,525 water conservation devices have been installed throughout the City, which will result in an estimated 31 million gallons of water per year saved (City of Pasadena, 2015b).

3.11.4 Impacts

Methodology

Impacts on water supply are considered significant if an increase in population or development levels as a result of the proposed Project would result in increased water demand such that new or expanded water entitlements are needed. While the Project would not result in a permanent increase in population or new development, it would result in a temporary increase in water use during the additional displacement events. Baseline water levels were determined in order to determine the project impact on water demand. To determine baseline water use at the Rose Bowl Stadium during a displacement event, water use during the months of January (when two of the largest displacement events, the Rose Bowl Game [about 90,000 attendees] and the BCS championship game, occurred) and February (when no displacement event occurred) was tracked for a period of two years (2014 and 2015). Thus, the difference in water consumption between the two months is assumed to be the average water use rate during a large displacement event. Given that the proposed Project is a three-day displacement event, the average water use rate was multiplied by three to conservatively account for water use in the Stadium and on the Golf Course during the three-day Festival event. It should be noted that since January accounts for two large displacements events, the Rose Bowl Game and the BCS championship game, the use of 2014 water demand resulted in a conservative estimate of the Project's water demand.

TABLE 3.11-3
ROSE BOWL WATER USAGE ESTIMATES DURING EVENT AND NON-EVENT DAYS

Year	Monthly Use (in cubic feet)		Difference
	January (with event)	February (without event)	
2014	181,500	149,500	32,000
2015	109,000	102,000	7,000
Total	**290,500**	**251,500**	**39,000**
Average Event Usage (total difference divided by two)			19,500 cubic feet per day[1] or 145,890 gallons[2] per day

[1] Although these amounts were monthly, this difference in water supply between the two can be attributed to the one-day long event in January. Therefore, the amount of water is "per day."
[2] One cubic foot equals 7.48 gallons.
SOURCE: City of Pasadena, 2015c.

Thresholds of Significance

Implementation of the Project may have a significant impact related to water supply if it would:

- Result in insufficient water supplies available to serve the Project from existing entitlements and resources, or need new or expanded entitlements.

It was determined in the NOP/Initial Study (Appendix A) that the proposed Project would have a less than significant impact related to having sufficient water supplies available to serve the project, however the additional analysis herein further supports that determination.

Impact Evaluation

The proposed Project would not result in insufficient water supplies available to serve the Project from existing entitlements and resources, or need new or expanded entitlements. (Less-than-Significant Impact)

Rose Bowl Facilities

The proposed Project would include increasing the number of displacement events to be held at the Rose Bowl Stadium and Brookside Golf Course from 12 to 15 annually, without further City Council approval, in order to allow for hosting of the Festival. Additionally, it would include amending the PMC to allow for uses on the Brookside Golf Course other than parking, consistent with current practice. Festival uses on the Brookside Golf Course would be the maximum level of disturbance and activity that would occur on the Brookside Golf Course. Any other events held on the golf course would be similar in size and scope to those that already occur (i.e., alumni events with amplified music, weddings, car shows, etc.).

The Rose Bowl Facilities are supplied with water by PWP. Existing water uses during a displacement event include the use of water by concession stands, restroom facilities, and operation and maintenance of the turf within the Stadium **[RBOC please confirm]**. During the Festival event, water use would be similar to use during an existing displacement event. Thus, the proposed Festival event would utilize approximately 145,860 gallons per day. Given that this is a three-day displacement event, water use would total approximately 437,580 gallons (or 1.3 AF). This amount of water would represent one one-hundredth of a percent of PWP's existing commercial/industrial water demand (10,462 AF) and three thousandths of a percent of PWP's existing total water demand (36,075 AF). The Festival booths located outside of the Stadium, within the Brookside Golf Course, would not utilize the Stadium's existing water supply. Water would be supplied to outside concession booths by water trucks and water would be supplied to attendees by vendors selling water in bottles or via water fill stations supplied by water trucks. Water trucks would obtain water from an onsite hydrant or another local hydrant; therefore, some concession booth water would likely be provided by PWP, whereas some would be from other commercial sources.

As previously mentioned, the water usage associated with the proposed Project would be minimal in comparison to the overall water demand in the PWP service area and would be a three day use over a one year period. In addition, the City's UWMP demonstrates PWP's ability to meet projected water demands through 2035 with existing and planned supplies as well as conservation measures.

The 2010 projections were made prior to the onset and recognition of a severe statewide drought. As an effort to reduce water demand in the midst of the severe drought recognized in the Governor's State of Emergency proclamation in January 2014, the state issued Order B-29-15 in April of 2015, which requires a reduction in urban water use throughout the state by 25 percent. The City of Pasadena has been ordered by the SWRCB to reduce its water use within its service area by 28 percent. The City has implemented several conservation measures associated with their recently adopted Level 2 Water Shortage Plan that have already been successful in reducing water usage; according to the City website, water usage has been reduced by 24 percent from the time period from June 1, 2015 to July 22, 2015. This includes reductions in water usage at Brookside Golf Course. Further, proposed upgrades to the Rose Bowl Stadium including new restroom fixtures would help improve water efficiency onsite. All renovations to the Stadium are anticipated to be complete in 2017. The proposed Festival would not disrupt the effectiveness of any water conservation measures implemented by the Rose Bowl in response to the City's water reduction requirements because it would not alter or replace any water efficient Stadium fixtures nor introduce any new irrigation demand. Further, the festival water use would occur over a three-day basis annually; as it would result in a minor temporary increase in water usage, and there would be no need for expanded or additional water supply facilities. Impacts would be less than significant.

Off-site Parking Locations

The off-site parking locations would be used by the proposed Project for parking only and would not generate any additional water demand at those locations. Therefore, no impact to water supplies would result.

Mitigation Measures

Impacts would be less than significant and no mitigation measures are required.

Significance Determination: Less than significant.

3.11.5 Cumulative Effects

Cumulative impacts occur when significant impacts from a proposed Project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. The cumulative context for this cumulative impact analysis considers the PWP service area as its geographic scope.

As previously mentioned, the water usage associated with the proposed Project would be minimal in comparison to the overall water demand in the PWP service area and would be a three day use over a one year period. In addition, the City's UWMP demonstrates PWP's ability to meet projected water demands through 2035 with existing and planned supplies as well as conservation measures.

The aforementioned water supply and demand projections were determined in 2011. In more recent years, the City of Pasadena has shown signs of water use reduction, and is continuing to make policy changes as a result of the State's severe drought. In response to the release of the SWRCB Urban Water Supplier Conservation Tiers in 2015, the City of Pasadena adopted a Level 2 Water Shortage Plan to meet their 28 percent conservation goal. This Plan involves outdoor water limitations, leak repair requirements, and prohibition of ornamental lakes and ponds. In regard to the Rose Bowl Stadium, RBOC has taken major steps in water conservation practices including: retrofitting all men's restroom urinals with ZeroFlush urinals (saving the facility and city around 2,200 gallons annually per unit); retrofitting irrigating systems with a drip system; and reducing the full stadium wash-downs from before and after each event, to pick up and blow after each event with full wash-down prior to next event. The Brookside Golf Course has also engaged in water management projects that included: irrigation improvements, relining or removing of lakes and irrigated turf, replacing cool season grasses with drought tolerant kikuyu grass, discontinuing the practice of over seeding the courses with rye grass in the fall, and filling lakes with non-domestic (Wilson Tunnel) water. These practices have allowed Brookside Golf Course to successfully reduce its water consumption by as much as 25 percent over the past six years. In 2010 (35 inches of rain), Brookside used only 520 acre feet of water, which is the least amount of irrigation water Brookside has used over the past 30 years.

Additional steps taken by the City have included retrofitting city medians with low-emitting tree irrigation systems, replacing turf at fire stations with drought-tolerant landscaping, turning off City water fountains, investing in projects to increase water supplies, and introducing a graywater program (City of Pasadena, 2015). Any other projects proposed within the City of Pasadena's jurisdiction would be required to comply with the Plan's water conservation measures as part of their project design. Furthermore, in accordance with SB 610 / SB221, projects satisfying the appropriate requirements would need to prepare a water supply assessment to determine whether sufficient water supplies are available to support the project's projected water demand. Determining whether sufficient water supplies exist for a project avoids the development of projects that are unable to successfully operate due to a lack of water supply, as well as avoids the over-allocation of water supplies in the supply service area, which could result in unexpected water shortages. Therefore, cumulative impacts to water supply would be less than significant.