

I.V Environmental Impact Analysis

O.2 Utilities and Service Systems – Wastewater

1. Introduction

This section describes the existing wastewater services and facilities setting of the Project Site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Project. Specifically, the analysis in this section includes a description of the existing systems and the proposed wastewater systems for the Project. The information and analysis in this section are based, in part, on a Sewer Capacity Letter completed by the LA Sanitation & Environment (LASAN), provided in Appendix M of this Draft Environmental Impact Report (EIR).

2. Environmental Setting

a) Regulatory Framework

There are several plans, policies, and programs regarding Wastewater at the state and local levels. Described below, these include:

- California Green Building Standards Code
- City of Los Angeles General Plan Framework Element
- Water Integrated Resources Plan (IRP) 5-year Reviews
- Sewer System Management Plan
- One Water LA 2040 Plan – Wastewater Facilities Plan
- Los Angeles Municipal
 - Los Angeles Green Building Code
 - Water Efficiency Requirements Ordinance
 - Sewer Capacity Availability Review

- Sewerage Facilities Charge
- Bureau of Engineering Special Order

(1) State

(a) *California Green Building Standards Code*

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

(2) Regional

(a) *Los Angeles Regional Water Quality Control Board*

The Los Angeles Regional Water Quality Control Board (RWQCB) protects groundwater and surface water quality in the Los Angeles Region, including the coastal watersheds of Los Angeles and Ventura Counties, and small portions of Kern and Santa Barbara Counties. The Los Angeles RWQCB establishes waste discharge requirements for discharge from point sources, including wastewater treatment plants, via National Pollutant Discharge Elimination System (NPDES) permits.

(3) Local

(a) *City of Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for utilities in the City, including wastewater collection and treatment. Goal 9A

is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.¹

The General Plan goals, objectives, and policies related to wastewater are listed below.²

Goal 9A: Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

Objective 9.1: Monitor and forecast demand based upon actual and predicted growth.

Policy 9.1.1: Monitor wastewater generation

Policy 9.1.2: Monitor wastewater flow quantities in the collection system and conveyed to the treatment plants.

Policy 9.1.3: Monitor wastewater effluent discharged into the Los Angeles River, Santa Monica Bay, and San Pedro Harbor to ensure compliance with water quality requirements.

Objective 9.2: Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.

Policy 9.2.1: Collect and treat wastewater as required by law and Federal, State, and regional regulatory agencies.

Policy 9.2.2: Maintain wastewater treatment capacity commensurate with population and industrial needs.

Policy 9.2.3: Provide for additional wastewater treatment capacity in the Hyperion Service Area (HSA), as it becomes necessary.

Policy 9.2.4: Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.

Policy 9.2.5: Review other means of expanding the wastewater system's capacity.

¹ City of Los Angeles Department of City Planning, Citywide General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Wastewater, originally adopted by City Council on December 11, 1996 and readopted on August 8, 2001, <http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm>. Accessed September 2020.

² City of Los Angeles, City of Los Angeles General Plan, Framework Element, readopted 2001.

Objective 9.3: Increase the utilization of Demand Side Management (DSM) strategies to reduce system demand and increase recycling and reclamation.

Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.

Policy 9.3.2: Consider the use of treated wastewater for irrigation, groundwater recharge, and other beneficial purposes.

Objective 9.4: Ensure continued provision of wastewater collection and treatment after an earthquake or other emergency.

Policy 9.4.1: Restore minimal operations as soon as possible after an emergency, and full operations as soon as feasible.

Policy 9.4.2: Establish joint cooperation agreements with other jurisdictions for mutual assistance during emergencies.

These goals, objectives, and policies are addressed by the City in its ordinances.

(b) *Los Angeles Integrated Resources Plan*

The City of Los Angeles Integrated Resources Plan (IRP) was developed by multiple departments in order to address the facility needs of the City’s wastewater program, recycled water, and urban runoff/stormwater management through the year 2020.

The Final IRP 5-Year Review was released in June 2012, which included 12 projects that were separated into two categories: (1) “Go Projects” for immediate implementation and (2) “Go-If Triggered Projects” for implementation in the future once a trigger is reached.³ Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the Final IRP 5-Year Review, the Go Projects consisted of six capital improvement projects for which triggers were considered to have been met at the time the IRP EIR was certified. The Go-If Triggered Projects consisted of six capital improvement projects for which triggers were not considered to have been met at the time the IRP EIR was certified.

Since the implementation of the IRP, new programs and projects, which have resulted in a substantial decrease in wastewater flows, have affected the Go Projects and Go-If Triggered Projects. Based on the Final IRP 5-Year Review, two of the Go Projects have been moved to the Go-If Triggered Projects category (Go Project 2 and Go Project 3),

³ City of Los Angeles, Department of Public Works (LADPW), LA Sanitation & Environment (LASAN), and Department of Water and Power (LADWP), Water Integrated Resources Plan 5-Year Review, June 2012.

and two have been deferred beyond the 2020 planning window of the IRP (Go Project 4 and Go Project 5). Construction of wastewater storage facilities at the Donald C. Tillman Water Reclamation Plant (Go Project 1) has been completed. In addition, Go Project 6, involving the design of the North East Interceptor Sewer Phase 2, is no longer being pursued.⁴

(c) *Water IRP 5-year Reviews*

LADWP monitored implementation of the IRP and updated its projections via the preparation Water IRP 5-Year Review Final Documents. The last 5-year review, prior to preparation of the One Water LA Plan that now supersedes the 5-year reviews as discussed below, was completed in 2012.⁵ Based on updated 2008 Southern California Association of Governments (SCAG) data, the estimated future flow for the Hyperion Service Area (HSA) was forecasted as 500 million gallons per day (mgd) by 2020, and approximately 496 mgd by 2018. At the same time, IRP data in the 5-year review showed that the actual Hyperion Sanitary Sewer System service area flow was less than projected by the 2008 SCAG data used for planning. Per that data, the Hyperion Sanitary Sewer System service area flow had decreased from 400 mgd in 2002 to 350 mgd in 2012.⁶ This could be attributed to such factors as water conservation and the economic downturn. The 5-year report estimated reductions in flow requirements indicating that there had been a reduction of wastewater flow of 26.5 percent relative to the amount estimated in the SCAG projection.

(d) *Sewer System Management Plan*

The State Water Resources Control Board adopted the Statewide General Waste Discharge Requirements on May 2, 2006, for publicly owned sanitary sewer systems that are greater than 1 mile in length and collect and convey untreated or partially treated wastewater to a publicly owned facility. Under the Waste Discharge Requirements, the owners of such systems must develop and implement a Sewer System Management Plan to control and mitigate sewer overflows. The City has one of the largest sewer systems in the world, including more than 6,600 miles of sewer lines, serving a population of more than four million people. The Sewer System Management Plan provides goals and objectives to help maintain, repair, and manage existing and future sewer systems in a cost-effective and timely manner.⁷

⁴ LADPW, Bureau of Engineering, Project Information Report, North East Interceptor Sewer (NEIS) Phase 2A, n.d.

⁵ LADPW, LASAN, and LADWP, Water Integrated Resources Plan 5-Year Review, June 2012.

⁶ LADPW, LASAN, and LADWP, Water Integrated Resources Plan 5-Year Review, June 2012.

⁷ LASAN, Sewer System Management Plan, Version 3.0, January 25, 2019.

(e) One Water LA 2040 Plan – Wastewater Facilities Plan

In 2018, the City adopted the One Water LA 2040 Plan, which provides a comprehensive and integrated approach to achieving water sustainability through 2040.⁸ The One Water LA 2040 Plan identifies multi-departmental and multi-agency integration opportunities to manage water in a more efficient, cost-effective, and sustainable manner, including improvement and expansion projects relating to wastewater treatment. Volume 2 of this plan is the Wastewater Facilities Plan, which provides an overview of the City's existing collection system, and planned major projects.⁹ The Wastewater Facilities Plan provides the underlying documentation to make informed decisions when considering investments to repair, replace, or enhance existing facilities and construct new water conveyance and treatment facilities required to serve the City's needs through 2040.

*(f) Los Angeles Municipal Code**(i) Los Angeles Green Building Code*

The City has been pursuing a number of green development initiatives intended to promote energy conservation and reductions in the amount of greenhouse gas emissions generated within the City. While these ordinances do not focus on the provision of sewer services, they do mandate the use of water conservation features in new developments. Examples of such water conservation features include, but are not limited to, low water shower heads, toilets, clothes washers, and dishwashers. Because the flow through these fixtures is reduced, residual wastewater passing through is reduced, in turn reducing the demand for sewage conveyance and treatment.

The Los Angeles Municipal Code (LAMC) Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code), was adopted as Ordinance No. 181,480 in April 2008 and provides standards and a mechanism for evaluating projects for their water conservation features during site plan review. The LA Green Building Code has been subsequently amended to incorporate various provisions of the CALGreen Code. The LA Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for nonresidential buildings.

(ii) Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),¹⁰ effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

⁸ LASAN and LADWP, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

⁹ LASAN and LADWP, One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan, April 2018.

¹⁰ City of Los Angeles, Ordinance No. 180822, July 29, 2009.

(iii) *Sewer Capacity Availability Review*

The LAMC includes regulations that require the City to ensure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A Sewer Capacity Availability Review provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

(iv) *Sewerage Facilities Charge*

LAMC Sections 64.11 and 64.12 require approval of a sewer permit, also called an "S" Permit, prior to connection to the wastewater system. LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City's sewer system to ensure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based on wastewater flow strength as well as volume. The determination of wastewater flow strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters—biological oxygen demand and suspended solids—for each type of land use. Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

(v) *Bureau of Engineering Special Order*

The City establishes design criteria for sewer systems to ensure that new infrastructure provides sewer capacity and operating characteristics to meet City standards per Bureau of Engineering Special Order No. SO 06-0691. Per the Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period does not exceed one-half of the pipe diameter (D) (i.e., depth-to-diameter ratio or d/D).¹¹

¹¹ LADWP, Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

b) Existing Conditions

(1) Wastewater Infrastructure and Facilities

The Project Site is located within the HSA, which collects, conveys, and treats wastewater for approximately 515 square miles of the greater Los Angeles region, including 29 contract agencies that are located outside the City boundary. The entire HSA ultimately drains to the Hyperion Water Reclamation Plant (HWRP), which consists of treatment plants, outfalls, numerous sewer connections, and major interceptors. Satellite treatment plants within the HSA include the Donald C. Tillman Water Reclamation Plant (DCTWRP) and Los Angeles-Glendale Water Reclamation Plant (LAGWRP).¹²

On average, 275 million gallons of wastewater enters the HWRP on a dry weather day. Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.¹³ In addition, the DCTWRP and LAGWRP have existing treatment capacities of 80 mgd and 30 mgd, respectively. In 2020, the DCTWRP is expected to treat, on average, approximately 46 mgd of wastewater, while the LAGWRP is expected to treat approximately 21 mgd.¹⁴

(2) Existing Wastewater Generation

The Project Site is currently improved with approximately 2 million square feet of building area comprised of residences, medical office buildings, and parking structures. For purposes of assessing the current wastewater generation from the existing land uses on the Project Site, the wastewater demand was based on these existing improvements. No wastewater generation was assumed for the parking areas on the Project Site. As indicated in **Table IV.O.2-1**, existing uses and associated wastewater generation on the Project Site total approximately 50,496 gallons per day (gpd).

¹² LASAN and LADWP, One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan.

¹³ LASAN, Hyperion Water Reclamation Plant, accessed February 11, 2021.

¹⁴ LASAN and LADWP, One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan.

**TABLE IV.O.2-1
ESTIMATED EXISTING WASTEWATER GENERATION**

Land Use	Size	Wastewater Generation Rates	Average Daily Flow
Medical Office Buildings	219,112 sf	225 gpd/1,000 sf	49,300 gpd
Residential	2,587 sf (5 du)	110 gpd/du	550 gpd
Commercial	12,926 sf	50 gpd/1,000 sf	646 gpd
Total Existing Wastewater Generation:			50,496 gpd

SOURCE Sewer Capacity Letter, provided in Appendix M of this Draft EIR.

NOTES: sf = square feet; gpd = gallons per day; du = dwelling unit.

(3) Existing Sewer Infrastructure

Wastewater produced by the existing uses on the Project Site is conveyed to sewer infrastructure in the adjacent streets. The respective size, capacity, and location of each existing pipeline adjacent to Building Sites 1 through 6 of the Project Site are described below.¹⁵

(a) Site 1

The sewer infrastructure in the vicinity of Site 1 of the Project includes two existing 8-inch lines on 1317 North Vermont Avenue and 1328 North New Hampshire Avenue. The sewage from the two existing lines converges in the 33-inch line on Normandie Avenue before discharging into a 42-inch line on Norton Avenue (see Figures 1a and 1b in Appendix M). The current approximate flow level and capacities at 50 percent design in the sewer system in the vicinity of Site 1 are shown below in **Table IV.O.2-2**.

¹⁵ Sewer Capacity Letter, provided in Appendix M of this Draft EIR.

**TABLE IV.O.2-2
SITE 1 EXISTING SEWER INFRASTRUCTURE**

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Vermont Avenue	*	507,627 gpd
8	New Hampshire Avenue	*	615,337 gpd
33	Nomadic Avenue	25	11.55 mgd
42	Norton Avenue	11	27.34 mgd

SOURCE: Sewer Capacity Letter, provided in Appendix M in this Draft EIR.

NOTES: in = inch; d/D = flow level (depth-to-diameter ratio); gpd = gallons per day; mgd = million gallons per day.

* No gauging available.

(b) Site 2

The sewer infrastructure in the vicinity of Site 2 of the Project includes an existing 8-inch line on Sunset Boulevard. The sewage from the existing line feeds into a 33-inch line on Vine Street before discharging into a 45-inch sewer line on Willoughby Avenue (Figure 2 of Appendix M). The current approximate flow level and capacities at 50 percent design in the sewer system in the vicinity of Site 2 are shown below in **Table IV.O.2-3**.

**TABLE IV.O.2-3
SITE 2 EXISTING SEWER INFRASTRUCTURE**

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Sunset Boulevard	*	475,534 gpd
18	Sunset Boulevard	37	2.27 mgd
33	Vine Street	21	21.11 mgd
45	Willoughby Avenue	41	24.88 mgd

SOURCE: Sewer Capacity Letter, provided in Appendix M in this Draft EIR.

NOTES: in = inch; d/D = flow level (depth-to-diameter ratio); gpd = gallons per day; mgd = million gallons per day.

* No gauging available.

(c) Sites 3 and 4

The sewer infrastructure in the vicinity of Sites 3 and 4 of the Project includes an existing 8-inch line on Edgemont Street. The sewage from the existing line feeds into a 33-inch line on Vine Street before discharging into a 45-inch sewer line on Willoughby Avenue (see Figures 3 and 4 in Appendix M). The current approximate flow level and capacities at 50 percent design in the sewer system in the vicinity of Sites 3 and 4 are shown below in **Table IV.O.2-4**.

**TABLE IV.O.2-4
SITES 3 AND 4 EXISTING SEWER INFRASTRUCTURE**

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Edgemont Street	*	664,640 gpd
18	Sunset Boulevard	37	2.27 mgd
33	Vine Street	21	21.11 mgd
45	Willoughby Avenue	41	24.88 mgd

SOURCE Sewer Capacity Letter, provided in Appendix M in this Draft EIR.

NOTES: in = inch; d/D = flow level (depth-to-diameter ratio); gpd = gallons per day; mgd = million gallons per day.

* No gauging available.

(d) Site 5

The sewer infrastructure in the vicinity of Site 5 of the Project includes an existing 8-inch line on Vermont Avenue. The sewage from the existing line feeds into a 33-inch line on Normandie Avenue before discharging into a 42-inch sewer line on Norton Avenue (see Figure 5 in Appendix M). The current approximate flow level and capacities at 50 percent design in the sewer system in the vicinity of Site 5 are shown below in **Table IV.O.2-5**.

**TABLE IV.O.2-5
SITE 5 EXISTING SEWER INFRASTRUCTURE**

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Vermont Avenue	*	593,587 gpd
18	Vermont Avenue	18	11.79 mgd
33	Normandie Avenue	25	11.55 mgd
42	Norton Avenue	11	27.34 mgd

SOURCE Sewer Capacity Letter, provided in Appendix M of this Draft EIR.

NOTES: in = inch; d/D = flow level (depth-to-diameter ratio); gallons per day (gpd); mgd = million gallons per day.

* No gauging available.

(e) Site 6

The sewer infrastructure in the vicinity of Site 6 of the Project includes an existing 8-inch line on Alexandria Avenue. The sewage from the existing line feeds into a 33-inch line on Normandie Avenue before discharging into a 42-inch line on Norton Avenue (see Figure 6 in Appendix M). The current approximate flow level and capacities at 50 percent design in the sewer system in the vicinity of Site 6 are shown below in **Table IV.O.2-6**.

**TABLE IV.O.2-6
SITE 6 EXISTING SEWER INFRASTRUCTURE**

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Vermont Avenue	*	486,467 gpd
33	Normandie Avenue	25	11.55 mgd
42	Norton Avenue	11	27.34 mgd

SOURCE: Sewer Capacity Letter, provided in Appendix M of this Draft EIR.

NOTES: in = inch; d/D = flow level (depth-to-diameter ratio); gpd = gallons per day; mgd = million gallons per day.

* No gauging available.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State California Environmental Quality Act (CEQA) Guidelines Appendix G (Appendix G), the Project would have a significant impact related to wastewater if it would:

Threshold (a): Require or result in the relocation or construction of new or expanded wastewater treatment facility, the construction or relocation of which could cause significant environmental effects; or

Threshold (b): Result in a determination by the wastewater treatment provider, which serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

This analysis relies on the Appendix G thresholds.¹⁶ The analysis uses the following factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide,¹⁷ as appropriate, to assist in answering the Appendix G threshold questions:

- The Project would exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- The Project would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

¹⁶ Thresholds related to water supply, solid waste, electric power, natural gas, and telecommunication are included in Sections IV.O.1, IV.O.3, and IV.O.4.

¹⁷ City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

- The Project would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- The Project would result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

b) Methodology

The analysis of the Project's impact relative to wastewater generation is based on a calculation of the Project's anticipated net wastewater generation. The existing and proposed wastewater demand for the Project site was calculated by the LASAN Wastewater Engineering Services Division.¹⁸ The proposed Project's estimated net daily wastewater generation was then compared to the available daily wastewater treatment capacity of the HWRP, to determine whether the proposed Project would require the construction of new or expanded wastewater treatment facilities. Additionally, the local sewer infrastructure was assessed by the LASAN Wastewater Engineering Services Division to determine whether the proposed Project would have any impacts on the local sewer lines in the Project area and if any local improvements are required.¹⁹

c) Project Design Features

Proposed water conservation features include a range of techniques that enhance site sustainability. As previously discussed in Section IV.H, Hydrology and Water Quality, of this Draft EIR, Project Design Features (PDFs) **PDF-HYD-1**, **PDF-HYD-2**, **PDF-HYD-3**, **PDF-HYD-4**, and **PDF-HYD-5** will be incorporated into the Project to increase on-site conservation rates and subsequently reduce potentially significant impacts related to wastewater generation.

¹⁸ Sewer Capacity Letter, provided in Appendix M of this Draft EIR.

¹⁹ Sewer Capacity Letter, provided in Appendix M of this Draft EIR.

d) Analysis of Project Impacts

Threshold (a): *Would the Project require or result in the relocation or construction of a new or expanded wastewater treatment facility, the construction or relocation of which could cause significant environmental effects?*

(1) Impact Analysis

(a) Wastewater Treatment

Off-site, wastewater²⁰ from the Project would be conveyed to the HWRP. As shown in **Table IV.O.2-7**, the Project is estimated to generate a net increase over existing wastewater generation at the Project site equaling approximately 39,348 gpd under Option A and 46,548 gpd under Option B.

As previously discussed, on average, 275 million gallons of wastewater enters the HWRP on a dry weather day. Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd. Therefore, the HWRP has an average daily (dry weather) remaining capacity of 175 mgd. Based on this remaining capacity, the net increase in wastewater generation under Option A represents approximately 0.02 percent of the remaining capacity at the HWRP. Similarly, the net increase in wastewater generation under Option B represents approximately 0.03 percent of the remaining capacity at the HWRP. The negligible net increase in wastewater generation compared to the HWRP's available capacity indicates that the HWRP would have adequate capacity to treat Project wastewater under either option.²¹

²⁰ Thresholds related to water supply, solid waste, electric power, natural gas, and telecommunication are included in Sections IV.O.1, IV.O.3, and IV.O.4.

²¹ Wastewater Capacity Letter, provided in Appendix M of this Draft EIR.

**TABLE IV.O.2-7
ESTIMATED WASTEWATER GENERATION OF PROPOSED USES**

Land Use	Size	Wastewater Generation Rates	Avg Daily Flow (gpd)
MOB	Option A: 398,800 sf	225 gpd/1,000 sf	89,730
MOBs and Hospital Expansion	Option B: 430,800 sf	225 gpd/1,000 sf	96,930
Commercial	2,300 sf (Options A and B)	50 gpd/1,000 sf	115
Total Option A			89,845
Total Option B			97,045
Net Increase Option A (total less existing generation; Table IV.O.2-1)			39,348
Net Increase Option B (total less existing generation; Table IV.O.2-1)			46,548

SOURCE Wastewater Capacity Letter, provided in Appendix M of this Draft EIR.
NOTES: gpd = gallons per day; MOB = medical office building; sf = square feet.

As the HWRP would have adequate capacity to treat proposed Project wastewater, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Additionally, the proposed Project would incorporate water efficiency measures, such as low-flow plumbing fixtures. As such, the proposed Project would be designed to minimize wastewater generation to the maximum extent practicable. Therefore, impacts would be less than significant.

(b) Wastewater Conveyance

(i) Construction

The proposed Project would likely be served by existing sewer lines located in Vermont Avenue, New Hampshire Avenue, Edgemont Street, Sunset Boulevard, and Alexandria Avenue.²² The Project would be connected directly to sewer trunk lines in the adjacent streets. Sewer laterals would extend into each parcel to serve the respective land uses, based upon the approved site plans for each parcel. Installation of new sewer laterals would likely be limited to on-site wastewater conveyance and minor off-site work associated with connections to sewer mains. However, as indicated in Appendix M,

²² Wastewater Capacity Letter, provided in Appendix M of this Draft EIR.

Wastewater Capacity Letter, it is unclear whether the existing sewer mains in adjacent streets would be able to accommodate increased Project-related wastewater flows, in part because sewer gauging data is not available for the 8-inch sewer mains located adjacent to the Project Site. Therefore, new sewer mains may be required to accommodate increased Project-related wastewater flows.

Impacts associated with the construction of new sewer lines and associated laterals in the vicinity of the Project Site would primarily be related to trenching in order to install and/or remove the belowground lines. All construction work within the City public right-of-way would be subject to LAMC requirements. As described in Section IV.G, Hydrology and Water Quality, of this Draft EIR, the Project would be constructed in accordance with the State NPDES General Construction Permit, which requires the filing of a notice of intent with the SWRCB, followed by the development of a site-specific NPDES-mandated Storm Water Pollution Prevention Plan (SWPPP), for construction activities. The property owner/developer must comply with the Construction General Permit applicable at the time a grading permit is issued.

The SWPPP must include erosion and sediment control best management practices (BMPs) that will meet or exceed measures required by the determined risk level of the Construction General Permit, as well as BMPs that control the other potential construction-related pollutants. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. The SWPPP is required to identify BMPs that protect stormwater runoff and ensure avoidance of substantial degradation of water quality during short-term construction activities. **As a result, Project construction would not require or result in the relocation or construction of new or expanded wastewater conveyance facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.**

(ii) Operation

As discussed for construction, it is unclear whether the existing sewer mains in adjacent streets would be able to accommodate increased Project-related wastewater flows, in part because sewer gauging data is not available for the 8-inch sewer mains located adjacent to the Project Site. Similarly, it is unclear whether the existing downstream larger main sewer lines and associated pumps would be sufficient to accommodate increased flows associated with the proposed Project. However, as required by LAMC Section 64.14, further detailed gauging and evaluation would be conducted as part of the normal permitting process to obtain final approval of sewer capacity and connection permits for the Project. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN

and California Plumbing Code standards. Furthermore, in accordance with LAMC Sections 64.11 and 64.16.1, the Project would pay the required sewer connection fees to help offset the Project's contribution to the City's wastewater collection infrastructure needs and would require approval of sewer permits prior to connection to the sewer system. **As a result, Project operations would not require or result in the relocation or construction of new or expanded wastewater conveyance facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding the relocation or construction of new or expanded wastewater treatment and conveyance facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding the relocation or construction of new or expanded wastewater treatment and conveyance facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (b): Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

(1) Impact Analysis

As previously discussed under Threshold (a), the Project is estimated to generate a net increase over existing wastewater generation at the Project Site equaling approximately 39,348 gpd under Option A and 46,548 gpd under Option B. Although the HWRP has sufficient capacity to treat increased Project-related wastewater flows, it is unclear whether the existing sewer lines in the vicinity of the Project Site, the downstream larger main sewer lines, and associated pumps would be sufficient to accommodate increased flows associated with the proposed Project. However, as required by LAMC Section 64.14, further detailed gauging and evaluation would be conducted as part of the normal permitting process to obtain final approval of sewer capacity and connection permits for the Project. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Furthermore, in accordance with LAMC Sections 64.11 and 64.16.1, the Project would pay the required sewer connection fees to help offset the Project's contribution to the City's wastewater collection infrastructure

needs and would require approval of sewer permits prior to connection to the sewer system. **As a result, the Project would not result in a determination by the wastewater treatment provider that serves or may serve the Project that it does not have adequate treatment and conveyance capacity to serve the Project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant.**

(2) Mitigation Measure

Impacts regarding capacity for wastewater treatment and conveyance were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding capacity for wastewater treatment and conveyance were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant..

e) Cumulative Impacts

(1) Impact Analysis

Implementation of the Project, in conjunction with the cumulative projects identified in Chapter II, Environmental Setting, would increase demand for wastewater services provided by the City's sewer system. The cumulative growth in the greater Project area through the year 2023 includes 85 known related projects, as identified in **Table II-2**, Related Projects. As shown in **Table IV.O.2-8**, cumulative wastewater generation of proposed dwelling units, office space, and retail/commercial development would be approximately 1.8 mgd. The total sizes of the cumulative projects listed in Table IV.O.2-8 were derived by adding the number of dwelling units, office square footage, and retail/commercial square footage, respectively, of the projects listed in Table II-2. The wastewater generation rates were derived from Appendix M, Sewer Capacity Letter. And the estimated total gpd at operation was estimated by multiplying the total size by the wastewater generation rate. The Project's incremental contribution to the total cumulative wastewater generation by these related projects and the Project would be approximately 2.0 percent under Option A and 2.6 percent under Option B.

**TABLE IV.O.2-8
ESTIMATED CUMULATIVE PROJECTS WASTEWATER GENERATION**

Land Use Types	Total Size	Generation Rate	Total gpd Generation at Operation
Dwelling Units	10,794 du	110 gpd/ du	531,441.45 gpd
Office	2,361,962 sf	225 gpd/ 1,000 sf	1,187,340 gpd
Retail/Commercial	1,470,387 sf	50 gpd/ 1,000 sf	73,519.35 gpd
Estimated Total gpd at full build out:			1,792,300.8 gpd (rounded to 1.8 mgd)
Option A percentage of cumulative			2.0 %
Option B percentage of cumulative			2.6 %
Estimated total including Cumulative Projects and Proposed Project (Option B)			1,838,850.30 gpd

SOURCES: See Section II.4, Related Projects, for land use types and sizes. See Appendix M, Sewer Capacity Letter, for generation rates.

NOTES: gpd = gallons per day; mgd = million gallons per day; sf = square feet; du = dwelling unit.

The related projects would rely on the wastewater treatment services provided by the HWRP, as all analyzed related projects are within the service boundaries of the HWRP. The capacity of the HWRP is 450 mgd, and the HWRP's current average wastewater flow is 275 mgd. The cumulative wastewater generation would be well within the design capacity of the HWRP and would represent approximately 0.5 percent of the remaining capacity of the HWRP.

All new wastewater infrastructure proposed or necessitated by cumulative project development would be subject to CEQA review and applicable LAMC regulations, LASAN standards, and California Plumbing Code standards.

Projects lacking sufficient wastewater infrastructure would also be required to comply with City grading and construction ordinances, as well as other applicable regulations protecting environmental resources. Compliance with CEQA and other existing regulations would ensure that new sewer facilities constructed to serve cumulative projects would not result in significant cumulative environmental effects. **As such, impacts related to wastewater infrastructure are not cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding wastewater were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

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