IV. Environmental Impact Analysis

N.1. Utilities and Service Systems – Wastewater

1. Introduction

This section of the Draft EIR analyzes potential Project impacts on existing wastewater conveyance infrastructure and treatment facilities that would serve the Project Site. The analysis provides an overview of existing infrastructure and facilities and evaluates whether sufficient capacity is available to serve the Project's estimated wastewater generation. Information regarding existing wastewater infrastructure, conveyance and treatment capacity, and Project improvements is based, in part, on the Wastewater Utility Infrastructure Technical Report (Wastewater Technical Report) prepared for the Project by KPFF Consulting Engineers, which includes correspondence from the City of Los Angeles (City) Bureau of Sanitation (LASAN) and the Waste Water Services Information (WWSI) Request from LASAN.[1] The Wastewater Technical Report is provided in Appendix O-1, Utilities Service Provider Documentation, of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) California Green Building Code

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

[1] KPFF Consulting Engineers, *Wastewater Utility Infrastructure Technical Report* (*Wastewater Technical Report*), September 11, 2020. Provided in Appendix O-1 of this Draft EIR.

(2) 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.[2] The General Plan Framework sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework 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.[3]

(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.[4] 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 category (Go Project 2 and Go Project 3) 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

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

3 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 re-adopted on August 8, 2001.

4 City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, *Water Integrated Resources Plan 5-Year Review FINAL Documents*, June 2012.

Reclamation Plant (Go Project 1) has been completed. In addition, Go Project 6, involving the design of the North East Interceptor Sewer Phase II, is no longer being pursued.[5]

(c) Water IRP 5-year Reviews

LADWP had been monitoring implementation of the IRP and updating 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.[6] Based on updated 2008 SCAG data, the estimated future flow of [XX System] was forecasted as 500 mgd by 2020, and approximately 496 mgd by 2018. At the same time, IRP data in the five-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.[7] This could be attributed to such factors as water conservation and the economic downturn. The five-year Report estimated reductions in flow requirements indicating that there had been a reduction of wastewater flow of 26.5% relative to the amount estimated in the SCAG projection.

(d) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.[8] The One Water LA Plan builds upon the success of the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The main purpose of the One Water LA Plan is to increase sustainable water management for the City by (1) developing a vision and implementation strategy to more sustainably and cost-effectively manage water; and (2) identifying ways for City departments and regional agencies to integrate their water management strategies. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resiliency to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's

5 City of Los Angeles Department of Public Works, Bureau of Engineering, *Project Information Report, North East Interceptor Sewer (NEIS) Phase 2A*.

6 City of Los Angeles Department of Public Works, Bureau of Sanitation, and Department of Water and Power, *Water Integrated Resources Plan 5-Year Review FINAL Documents*, June 2012.

7 City of Los Angeles Department of Public Works, Bureau of Sanitation, and Department of Water and Power, *Water Integrated Resources Plan 5-Year Review FINAL Documents*, June 2012.

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

Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[9] The One Water LA Plan includes seven objectives:

1. Integrate management of water resources and policies
2. Balance environmental, economic, and societal goals
3. Improve health of local watersheds
4. Improve local water supply reliability
5. Implement, monitor, and maintain a reliable wastewater system
6. Increase climate resilience
7. Increase community awareness and advocacy for sustainable water

The One Water LA Plan integrates the City's Wastewater Facilities Plan (WWFP) to guide LASAN's decisions on implementing system improvements to its wastewater collection and treatment facilities.[10] The WWFP provides documentation to make informed decisions on investments to repair, replace, or enhance existing wastewater facilities and construct new conveyance or treatment facilities through year 2040. The WWFP includes a trigger-based capital improvement plan for the four reclamation plants and collection systems within the LASAN service area. The capital improvements for the reclamation plants include conceptual options to maximize water recycling and potable reuse.

(e) Green New Deal

The City released the first Sustainable City pLAn in April 2015[11], which has been updated in 2019 as the Green New Deal. The Green New Deal includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability. Towards the end, the Green New Deal establishes a target of recycling 100 percent of all wastewater for beneficial reuse by 2035, which would be an improvement from the fiscal year 2017-2018, baseline of 27 percent.[12]

The Green New Deal establishes a number of milestones and initiatives:

- 2021: Produce 1.5 mgd of recycled water at HWP for use at LAWA and other local facilities;
- 2025: Recycle 17,000 AFY of water at the Tillman WRP to recharge into groundwater basin;

9 City of Los Angeles, *Office of the Mayor, Executive Directive No. 5, Emergency Drought Response – Creating a Water Wise City*, October 14, 2014.
10 City of Los Angeles, *One Water LA 2040 Plan*, Volume 2, Wastewater Facilities Plan, April 2018.
11 City of Los Angeles, *Sustainable City pLAn*, 2015.
12 City of Los Angeles, *LA's Green New Deal*, 2019, page 47.

- 2025/2035: Increase non-potable reuse of recycled water by an additional of 6,000 AFY 2025; and an additional 8,000 AFY by 2035; and
- 2025/2035: Reduce annual sewer spills to fewer than 65 by 2025; and 60 by 2035.

(f) Sewer System Management Plan

The State, via the State Water Quality Control Board's May 2, 2006 Statewide General Waste Discharge Requirements (WDRs), requires all publicly owned sanitary sewer systems to have a written Sewer System Management Plan (SSMP). The City has prepared one SSMP for each of the three sanitary sewer systems it operates: Hyperion Sanitary Sewer System, in which the Project is located; Terminal Island Sanitary Sewer System (which includes the TTP that services the Harbor Area in the City); and City of Los Angeles Regional Sanitary Sewer System. These plans include measures to control and mitigate sewer spills and must be made available to the public. The SSMPs further establish design and performance standards for the City's sewer system. It also provides procedures for evaluating the system and providing capacity assurance. It establishes a standard of depth-to-diameter ratio or d/D of 0.75 or greater for identifying sewers in need of replacement or relief.

The City reviews and updates these plans periodically to check for continued compliance with the State's requirements and effectiveness in addressing spills. The plans were updated in January 2019 following a biennial internal audit pursuant to the State requirements.[13] The audit team reported that the SSMP is effective in controlling sewer spills and in providing mitigation measures when spills occur, and that there were no compliance deficiencies identified.[14] As noted within the audit, all recommendations requested by the audit team were implemented into the updated January 2019 SSMP or are planning to be updated as part of the Sewer Design Manual.

(g) 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. Through the use of less water by residents, residual wastewater is reduced, in turn reducing the demand for sewage conveyance and treatment.

In April 2008, the City adopted the Green Building Program Ordinance to provide standards and a mechanism for evaluating projects for their water conservation features during site plan review. In 2011, 2014, and 2016, Chapter IX of the LAMC, referred to as the LA Green Building Code, was amended to incorporate various provisions of the CALGreen

[13] LASAN, *Sewer System Management Plan*, Version 3.0, January 25, 2019.
[14] LASAN, SSMP Program Audit, page 37, January 25, 2019.

Code.[15,16,17] The LA Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the second of which applies to this Project: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings. Section 99.05.304.4, Wastewater Reduction, requires buildings to reduce wastewater by 20 percent by either (1) installing water-conserving features; or (2) utilizing non-potable water systems. Section 99.09.301 includes various provisions to conserve water used indoors, outdoors, and in wastewater conveyance.

(ii) Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),[18] 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.

(iii) Sewer Capacity Availability Review, LAMC Section 64.15

The LAMC includes regulations that require the City to assure available sewer capacity for new projects and fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) 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 SCAR 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 64.11.2 and 64.16.1

LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City's sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed in a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon 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

15 City of Los Angeles, Ordinance No. 181,480, approved December 15, 2010. Accessed June 2020.
16 City of Los Angeles, Ordinance No. 182,849, approved December 23, 2013. Accessed June 2020.
17 City of Los Angeles, Ordinance No. 184,691, approved December 19, 2016. Accessed June 2020.
18 City of Los Angeles, Ordinance No. 180,822.

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 No. SO 06-0691

The City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City standards (Bureau of Engineering [BOE] 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).[19]

(h) Central City North Community Plan

The Land Use Element of the City's General Plan is comprised of 35 Community Plans. The City's Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use at the community level. The Community Plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems.[20] The City's Community Plans implement the City's Framework Element at the local level, express the goals, objectives, policies, and programs to address growth within each of the individual communities and depict the desired arrangement of land uses, as well as street classifications and the locations and characteristics of public service facilities. The Project is located within the Central City North Community Plan (Community Plan) area.

The Central City North Community Plan includes within its purpose statement the promotion of "…an arrangement of land use, streets, and services which will encourage and contribute to health, safety, welfare and convenience of the people who live and work in the community."[21] The Community Plan identifies aging infrastructure as an issue, but does not provide specific policies regarding the provision of infrastructure facilities for individual development projects, which are routinely evaluated on a project-by-project basis.

b) Existing Conditions

(1) Treatment Capacity

The City's wastewater treatment and conveyance system includes four wastewater treatment and water reclamation plants operated by LASAN. LASAN provides service within two service areas: the Terminal Island Service Area and the Hyperion Service Area.

[19] City of Los Angeles Department of Public Works, 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.

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

[21] City of Los Angeles Department of City Planning, *Central City North Community Plan*, 2003.

The Hyperion Service Area includes the HWRP in Playa del Rey, the TWRP in the City of Van Nuys, and the LAGWRP in the City of Los Angeles. The current treatment capacity of the Hyperion Service Area is approximately 550 mgd which consists of 450 mgd at HWRP, 80 mgd at TWRP, and 20 mgd at LAGWRP. The Project Site is located within the Hyperion Service Area, and its wastewater would be conveyed to and treated at the HWRP.[22,23,24]

Typically, the TWRP and LAGWRP treat wastewater up to or near their capacities on most days. The HWRP is the City's primary water reclamation plant and one of the oldest and largest wastewater treatment facilities in the world. The HWRP provides preliminary, primary, and secondary treatment processes, and also treats wastewater flows bypassed from the TWRP and LADWRP. On average, 275 million gallons of wastewater enters the HWRP on a typical dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily dry weather flow of 450 mgd and peak wet weather flow of 800 mgd.[25] As such, the HWRP's current remaining treatment capacity for dry weather flows is approximately 175 mgd on an average day.

Following the secondary treatment of wastewater, the majority of effluent from HWRP is discharged into Santa Monica Bay, while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. The HWRP has two outfalls that presently discharge into the Santa Monica Bay, a one-mile outfall pipeline and five-mile outfall pipeline. Both outfalls are 12 feet in diameter. The one-mile outfall pipeline is 50 feet deep and is only used on an emergency basis. The five-mile outfall pipeline is 187 feet deep and is used to discharge secondary treated effluent on a daily basis.

HWRP effluent is required to meet the Regional Water Quality Control Board's (RWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are equal to or more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit. Accordingly, HWRP effluent to Santa Monica Bay is continually monitored by the City of Los Angeles Environmental Monitoring Division (EMD) to ensure that it meets or exceeds prescribed standards.

[22] LASAN, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=8kqxsrvo2_13&_afrLoop=6324281261161833#!. Accessed May 2018.

[23] LASAN, Donald C. Tillman Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=eu61rh3y2_344&_afrLoop=1039495806625525#!. Accessed May 2018.

[24] LASAN, Los Angeles-Glendale Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=eu61rh3y2_344&_afrLoop=1039463772479031. Accessed May 2018.

[25] LASAN, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1186mdvh8u_393&_afrLoop=10107387348315793#!. Accessed May 2018.

The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.

(2) Wastewater Generation

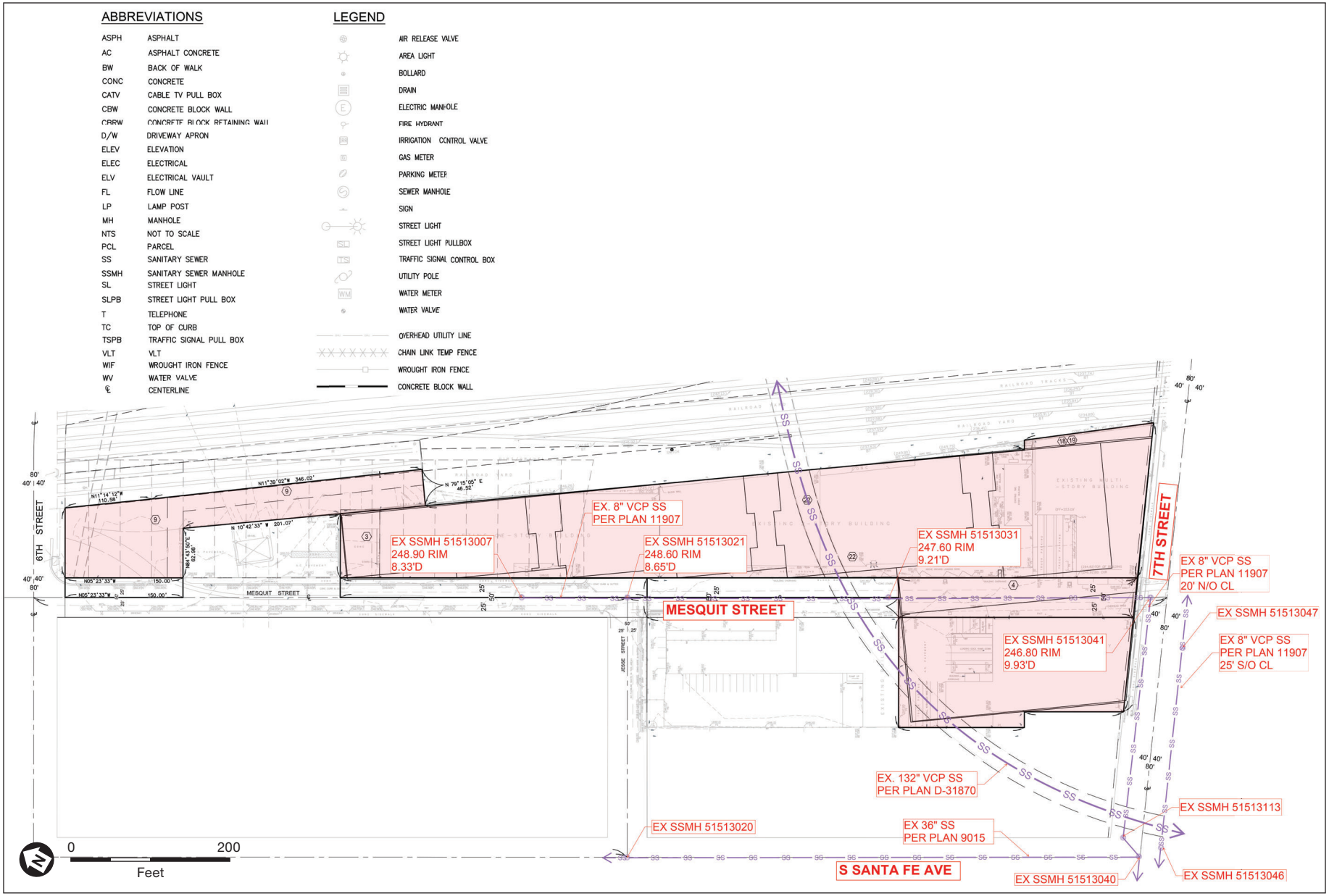
As discussed in Chapter II, *Project Description*, of this Draft EIR, the Project Site is currently developed with existing one-and two-story freezer, cold storage, and dry storage warehouses with associated office space, loading docks, and surface parking. The existing warehouses total approximately 205,393 gross square feet. As set forth in the Wastewater Technical Report, the Project Site currently generates approximately 58,256 gallons per day (gpd) of wastewater based on LADWP billing data for the Project Site averaged over four years from 2013 to 2017. However, the LASAN Wastewater Engineering Division indicated that the existing flow evaluations, as reported in the WWSI, must adhere to the Bureau of Engineering Sewer Design Manual as opposed to the LADWP data that was used in LADWP's Water Supply Assessment (WSA). As such, the existing uses on the Project Site are estimated to generate approximately 6,162 gpd (see Exhibit 3 of the Wastewater Technical Report).[26]

(3) Wastewater Collection

Wastewater in the City is collected and conveyed by three separate sanitary sewer systems owned and operated by LASAN. The largest of these, the Hyperion Sanitary Sewer System, encompasses the majority of the City (including the Project Site as previously noted) and also accepts sewage from 29 other jurisdictions. The Hyperion Sanitary Sewer System is a network of approximately 6,117 miles of gravity-fed sewer laterals and mains, pressurized mains, pump stations, treatment plants, and outfalls in the Pacific Ocean.[27]

Multiple sewer lines are located in the streets surrounding the Project Site. As shown in **Figure IV.N.1**, *Existing Wastewater Systems*, there is an 8-inch vitrified clay pipe (VCP) sewer line in Mesquit Street beginning north of Jesse Street that flows south and intersects with an 8-inch main in 7th Street. There is no existing sewer main in Jessie Street between Santa Fe Avenue and Mesquit Street. There are two sewer mains in 7th Street between the 7th Street Bridge and Mateo Street. The northerly main is an 8-inch line between Mesquit Street and Santa Fe Avenue, which then upsizes to a 38-inch line between Santa Fe Avenue and Mateo Street. The southerly main is an 8-inch line between the 7th Street Bridge and Mateo Street. There is a 36-inch sewer line in Santa Fe Avenue between 6th Street and 7th Street that connects to the northerly 38-inch sewer line in 7th Street.[28]

[26] KPFF Consulting Engineers, *Wastewater Technical Report*, page 2.
[27] LASAN, *Sewer System Management Plan, Hyperion Sanitary Sewer System*, February 2017.
[28] KPFF Consulting Engineers, *Wastewater Technical Report*, pages 2 and 3.



SOURCE: KPFF Consulting Engineers, 2018

670 Mesquit

Figure IV.N.1-1
Existing Wastewater Systems

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a 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 water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;[29] or***

Threshold (b): ***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.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold Questions. The factors to evaluate wastewater impacts include:

- *The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or*
- *The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.*

b) Methodology

All wastewater generation calculations are provided in the Wastewater Technical Report and are based on the LASAN sewage generation factors. The WWSI, which is included as Exhibit 2 of the Wastewater Technical Report, was processed by the City on July 22, 2020.

To evaluate wastewater collection capacity, the LASAN reviewed the WWSI and evaluated the existing sewer system to determine the availability of adequate capacity to convey sewage to treatment facilities. A combination of flow gauging data and computed results from the City's hydrodynamic model were used to assess the potential for impacts on wastewater conveyance capacity due to additional sewer discharge from the Project.

[29] Electricity and natural gas are addressed in Section IV.C, *Energy*, and Section IV.N.4, *Electric Power, Natural Gas, and Telecommunications Infrastructure*, of this Draft EIR. Stormwater drainage is addressed in more detail in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR.

In order to evaluate treatment capacity, the Project's estimated wastewater generation and projected average dry weather flow were compared with the available treatment capacity within the HWRP. Cumulative wastewater generation was compared with the available capacity of the HWRP using the average dry weather flow for 2015 and 2020, the latest projections available. While it is anticipated that future iterations of the IRP would provide for improvements to serve future population needs, it was conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to the Project's earliest potential buildout year of 2026 if the Project is constructed in a single phase. Based on this conservative assumption, wastewater generation would be compared with the projected available treatment capacity of the Hyperion Sanitary Sewer System of 550 mgd for 2026, the Project's earliest potential buildout year.

c) Project Design Features

No specific Project Design Features are proposed with regard to wastewater.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction Impacts

During construction of the Project, a negligible amount of wastewater would be generated by construction workers. However, any such wastewater generation would be temporary, only lasting as long as Project construction activities occur. It is anticipated that portable toilets would be provided by a licensed private vendor that would dispose of the wastewater off-site. Such wastewater generation is, therefore, anticipated to result in either no or negligible discharges to the City's wastewater treatment conveyance systems or treatment facilities and would not be discharged through any service connections at or near the Project Site. No such service connections would be established during Project construction to handle wastewater generated by construction workers. The minimal wastewater generation during construction would not require the construction of new or expansion of existing facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

Construction of the Project would include all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction relative to the wastewater system for the Project would occur at

the Project Site and immediate vicinity. Such activities would be confined to trenching to place the connections below the ground's surface and would be temporary in nature. The design of these connections would be developed by a registered engineer and approved by the BOE. If, during construction, existing sewer lines are found to be substandard or in deteriorated condition, the Project Applicant would be required to make necessary improvements to achieve adequate service under City's Building and Safety Code and the LADPW requirements. All necessary improvements would be verified through the permit approval process of obtaining a sewer connection permit from the City. Further, all construction activities would happen in coordination with the appropriate agencies, including the LADPW, LASAN, and BOE. These agencies would provide input on the Project and would coordinate with the Project Applicant before, during, and after construction activities. This coordination would ensure that impacts would be less than significant. **Therefore, based on these factors, Project construction 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, and impacts would be less than significant.**

(b) Operational Impacts

Table IV.N.1-1, *Wastewater Generation during Project Operation*, shows that the Project would result in an estimated average gross wastewater generation of approximately 564,468 gpd. The Project would have an estimated net wastewater generation volume of 558,306 gpd or 0.558 mgd. This estimate does not account for reductions in wastewater generation that would result from required compliance with applicable LAMC requirements or the Project's water conservation measures, as presented in WS-PDF-1 in Section IV.N.2, *Water Supply*, of this Draft EIR.[30]

The Project's increase in wastewater generation of 0.558 mgd would represent approximately 0.124 percent of the HWRP's current design capacity of 450 mgd and approximately 0.101 percent of the Hyperion Sanitary Sewer System's estimated capacity of 550 mgd. As previously stated, the HWRP currently receives flows of approximately 275 mgd, which represents approximately 61 percent of its capacity and leaves approximately 175 mgd of remaining daily capacity. The Project's contribution of approximately 0.558 mgd of wastewater represents 0.319 percent of HWRP's remaining daily capacity of 175 mgd, which is a negligible increase in the wastewater volumes treated at the HWRP.

[30] As discussed in Section IV.N.2, *Water Supply*, a water supply assessment (WSA) was prepared for the Project. The WSA provides a higher level of detail by assigning subcategories to the Project's proposed uses and includes typical daily water demand for swimming pools, which allows for an accurate long-term water supply analysis. The Project's wastewater generation is appropriately based on the WWSI and conservatively assigns wastewater to a broader set of land use categories. This, along with the maximum daily swimming pools generation (assuming full drainage), allows for a conservative assessment of impacts to wastewater facilities.

TABLE IV.N.1-1
WASTEWATER GENERATION DURING PROJECT OPERATION

Land Use[a]	Units[b]	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Existing to Be Removed			
Cold Storage	205,393 sf	30/1,000 sf	6,162[c]
Proposed			
Residential: Apt – Bachelor[d]	73 Rooms	75/Room	5,475
Residential: Apt- 1 Bedroom	169 Rooms	110/Room	18,590
Residential: Apt - 2 Bedrooms	49 Rooms	150/Room	7,350
Residential: Apt - 3 Bedrooms	17 Rooms	190/Room	3,230
Hotel: Use Guest Rooms Only	236 room	120/room	28,320
Hotel Bar: Cocktail, Fixed Seat[b,e]	4,000 sf (267 seats)	15/seat	4,005
Ballroom	3,000 sf	350/1,000 sf	1,050
Meeting Room	1,000 sf	120/1,000 sf	120
Restaurant: full Service Indoor Seat[b,e]	89,577 sf (5,972 seats)	30/seat	179,160
General Retail	79,240 sf	25/1,000 sf	1,981
Grocery Store	28,054 sf	50/1,000 sf	1,403
Market Retail	800 sf	25/1,000 sf	20
Market: Fast Food, Outdoor[b]	1,000 sf (67 seats)	25/seat	1,675
Market: Bar[b,e]	1,000 sf (67 seats)	15/seat	1,005
Market: Coffee House	800 sf	720/1,000 sf	576
Office Building w/ Cooling Towers	944,055 sf	170/1,000 sf	160,489[f]
Water Features	2,400 cf[g]		17,952
Reflecting Pools	4,800 cf		35,904
Museum: All Area	93,617 sf	30/1,000 sf	2,809
Health Club/Spa	62,148 sf	650/1,000 sf	40,396
Pools	6,000 cf		44,880
Spas	1,080 cf		8,078
		Gross Wastewater Generation	**564,468**
		Less Existing to be Removed	-6,162
		Net Increase	***558,306***

TABLE IV.N.1-1
WASTEWATER GENERATION DURING PROJECT OPERATION

NOTE(S):

sf = square feet; gpd = gallons per day

[a] The land use categories in this table are based on the general land use categories as presented in Chapter II, *Project Description*, and the rest of this Draft EIR. The land use categories presented within the WWSI are based on the facility descriptions presented in the LASAN Sewage Generation Factors for Residential and Commercial Categories.

[b] It is assumed that each seat requires 15 square feet.

[c] The existing wastewater generation is based on the Bureau of Engineering Sewer Design Manual generation factors as opposed to the LADWP billing data for the Project Site averaged over four years from 2013 to 2017 used to calculate existing water usage from the WSA. The existing wastewater generation as calculated within the WWSI provides a more conservative total net wastewater generation for the Project.

[d] The residential amenities are accessible only by the residents and are therefore accounted for in the sewage generation factors for the residential units. A similar methodology is employed for the hotel and its ancillary uses (e.g., lobby, pool decks).

[e] Some sewage generation factors assigned by LASAN in the WWSI to proposed uses differ from those assigned by LADWP to the same uses in the WSA prepared for the Project and included in Appendix O-3 of this Draft EIR, as the two agencies employ slightly different methodologies in their calculations. For example, for the Hotel and Market Bar uses, the WSA assumes a generation factor of 720 gpd/1,000 square feet for "Bar: Cocktail, Public Table Area", whereas the wastewater WWSI assumes a generation factor of 15 gpd/seat for "Bar: Cocktail, Fixed Set". Net water demand and wastewater generation amounts also differ because of LAMC-required water conservation measures as well as the applicant's voluntary conservation commitments that are taken into consideration by LADWP, but not LASAN. Both analyses provide conservative projections for purposes of the respective analyses.

[f] The wastewater volume assigned to the Project office building in the WWSI is identical to the water demand assigned in the WSA. However, the WWSI assigns a single wastewater generation total to the office building that includes the cooling towers, whereas the WSA itemizes water demand for the office building office and cooling tower. As stated above under footnote e, LAMC-required water conservation measures as well as the applicant's voluntary conservation commitments are also taken into consideration by LADWP when calculating net water demand.

[g] The water features are anticipated to be up to 1,200 sf and two feet in depth.

SOURCE(S): KPFF Consulting Engineers, Wastewater Technical Report, September 11, 2020.

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. Estimates of the Project's wastewater generation and the remaining capacity in the HWRP and Hyperion Sanitary Sewer System are considered conservative. Nonetheless, the calculations demonstrate that the HWRP and Hyperion Sanitary Sewer System would have available capacity to treat the Project's wastewater generation.

(c) Conclusion

The Project would not require or result in the relocation or construction of new or expanded water or wastewater treatment facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

(d) Project with the Deck Concept

As stated in Chapter II, *Project Description*, the Applicant seeks to construct a 132,000-square foot Deck that extends over a portion of the off-site Railway Properties east of the Project Site. While construction of the Project with the Deck Concept would include the additional Deck, construction and demolition activities would be the same as under the Project. Similar to the Project, during construction of the Project with the Deck Concept, wastewater generated by construction workers would be temporary. Such wastewater generation is, therefore, anticipated to result in either no or negligible discharges to the City's wastewater treatment conveyance systems or treatment facilities and would not be discharged through any service connections at or near the Project Site. No such service connections would be established during Project construction to handle wastewater generated by construction workers. The minimal wastewater generation during construction would not require the construction of new or expansion of existing facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems. Construction of the Project with the Deck Concept would include the same necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system as needed under the Project. **Therefore, construction of the Project with the Deck Concept 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, and impacts would be less than significant.**

Operation of the Project with the Deck Concept would not include additional uses that are not already analyzed under the Project. Additional event programming, as compared to the Project, proposed under the Project with the Deck Concept would be temporary and would not occur every day and throughout the day. Therefore, it is unlikely that any wastewater generated during these events would be more than the current remaining capacities at the HWRP. The Project with the Deck Concept would still be required to pay the required sewer connection fees to help offset the Project with the Deck Concept's contribution to the City's wastewater collection infrastructure needs and would require approval of sewer permits prior to connection to the sewer system. **Therefore, operation of the Project with the Deck Concept would not require or result in the relocation or construction of new or expanded water or wastewater treatment facilities, the construction 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 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 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 has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

(1) Impact Analysis

(a) Construction Impacts

As previously discussed under Threshold (a), construction of the Project would generate a negligible amount of wastewater by construction workers. Any such wastewater generated would be temporary only lasting as long as Project construction activities occur. Any wastewater generation from Project construction activities would also not cause a measurable increase in wastewater flows requiring treatment at the HWRP. Lastly, construction workers typically utilize portable restrooms, which would be serviced by a licensed contractor who would dispose of wastewater off-site and would not contribute to wastewater flows to the local wastewater collection system. **Accordingly, Project construction would result in a determination by HWRP, the wastewater treatment provider that would serve the Project, that it has adequate capacity to serve the Project's construction wastewater treatment demand, in addition to HWRP's existing commitments (i.e., existing customers in its service area). Therefore, impacts resulting from Project construction would be less than significant.**

(b) Operational Impacts

Sanitary sewer service to the Project Site from the surrounding streets is provided by LASAN. Sewer services for the Project would be provided using new and existing on-site sewer connections to the existing sewer mains within and adjacent to the Project Site. As noted in the WWSI, which is provided as Exhibit 2 of the Wastewater Technical Report, the existing 8-inch line on Mesquit Street lacks sufficient capacity to convey the total volume of estimated discharge from the Project. The nearest location that may have sufficient capacity is at the intersection of Santa Fe Avenue and Jesse Street. Therefore, the wastewater conveyance infrastructure improvements described below would ensure available sewer capacity to serve the Project:31

- **Mesquit Street:** The southernmost segment of the eight-inch main in Mesquit Street would be removed in order to construct Buildings 4 and 5. This would sever

31 KPFF Consulting Engineers, *Wastewater Technical Report*, pages 5-6.

the existing connection of the south-flowing eight-inch line in Mesquit Street to the northerly east-west eight-inch main in 7th Street. As a result of severing the existing connection in Mesquit Street and the increased wastewater discharge of the Project, the segment of the eight-inch main in Mesquit Street between 7th Street and Jesse Street would need to be upgraded to a 10 to 15-inch line and flows redirected to the north to discharge to the new 10 to 15-inch line required in Jesse Street (see below). Final pipe size will be determined during the design phase when the LADBS plumbing system requirements, sewer ejectors, and design parameters are finalized and can be used to determine the sewer discharge (see Exhibit 3 of the Wastewater Technical Report).

- **Jesse Street:** A new 10 to 15-inch line would be needed in Jesse Street to connect the new 10 to 15-inch line in Mesquit to the existing 36-inch line in Santa Fe Avenue. Approximately 870 linear feet of sanitary sewer line would be constructed to connect the Project Site to the line in Jesse Street. Because the Santa Fe line connects to the line in 7th Street, it would effectively replace the existing Mesquit Street line's connection to that line in 7th Street, which would be severed to construct Buildings 4 and 5.

As previously stated under Threshold (a), the design of these connections would be developed by a registered engineer and approved by the BOE. All necessary improvements would be verified through the required standard permit approval process of obtaining a sewer connection permit from the City. All construction activities would happen in coordination with the appropriate agencies, including the LADPW, LASAN, and BOE. Therefore, the required coordination and improvements would ensure that the construction of the necessary improvements would be able to accommodate the total flow of the Project. Additionally, as detailed above, ample future capacity also exists at the HWRP, which would treat wastewater discharged from the Project Site, to handle Project wastewater flows.

Accordingly, Project operation would result in a determination by HWRP, the wastewater treatment provider that would serve the Project Site, that it has adequate capacity to serve the Project's operational wastewater treatment demand, in addition to HWRP's existing commitments. Therefore, operational impacts would be less than significant.

(c) Project with the Deck Concept

As previously discussed, similar to the Project, during construction of the Project with the Deck Concept, wastewater generated by construction workers would be temporary and negligible. Such wastewater generation would not cause a measurable increase in wastewater flows requiring treatment at the HWRP. **Accordingly, construction of the Project with the Deck Concept would result in a determination by HWRP, the wastewater treatment provider that would serve the Project, that it has adequate capacity to serve the Project's construction wastewater treatment demand, in addition to HWRP's existing commitments (i.e., existing customers in its service area). Therefore, impacts resulting from construction of the Project with the Deck would be less than significant.**

Operation of the Project with the Deck Concept would include the same wastewater conveyance infrastructure improvements as described above to ensure available sewer capacity to serve the Project with the Deck Concept. Operation of the Project with the Deck Concept would not include additional uses that are not already analyzed under the Project. Additional event programming, as compared to the Project, proposed under the Project with the Deck Concept would be temporary and would not occur every day and throughout the day. Therefore, ample future capacity exists at the HWRP which would be able to handle the Project with the Deck Concept wastewater flows. **Accordingly, Project with the Deck Concept operation would result in a determination by HWRP, the wastewater treatment provider that would serve the Project Site, that it has adequate capacity to serve the Project with the Deck Concept's operational wastewater treatment demand, in addition to HWRP's existing commitments. Therefore, operational impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding capacity for wastewater treatment 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 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

Chapter III, *Environmental Setting*, of this Draft EIR identified 141 related projects within an approximately two-mile radius of the Project Site. During construction of the related projects, wastewater generation by construction workers would be temporary and would last as long as the related projects' construction activities occur. Portable toilets would be provided and any generated wastewater would be disposed of off-site, and therefore, would be anticipated to result in negligible or no discharges to the City's wastewater treatment conveyance systems or treatment facilities.

Operation of these 141 related projects would cumulatively contribute, in conjunction with the Project, to wastewater generation in the Hyperion Service Area. For purposes of this analysis, wastewater generated by the related projects is assumed to be treated at the HWRP. As shown in **Table IV.N.1-2**, *Operational Cumulative Wastewater Generation*, the estimated cumulative wastewater generation for the Project plus the related projects is approximately 11,676,775 gpd (11.68 mgd). This is conservative, as the related projects' wastewater estimates represents gross generation, rather than net generation after removal of any existing uses. This estimate also does not account for water conservation measures associated with each related project, and therefore likely overstates wastewater generation.

TABLE IV.N.1-2
OPERATIONAL CUMULATIVE WASTEWATER GENERATION

Land Use	Quantity	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Residential[b]	40,289 du	150/du	6,043,350
Office[c,d]	13,438.37 ksf	170/ksf	2,284,523
Retail (Less than 100 ksf)	1,016.9 ksf	25/ksf	25,423
Retail (More than 100 ksf)	2,602.32 ksf	50/ksf	130,116
Child Care[e]	350 children	9/child	3,150
Restaurant[f]	733 ksf (48,866 seats)	30/seat	1,465,980
Fast-Food Restaurant[g]	3.5 ksf (234 seats)	25/seat	5,850
Cinema[h]	744 seats	3/seat	2,232
University	1,400 students	16/student	22,400
Hotel	3,643 rooms	120/room	437,160
High School[i]	532 students	11/student	5,852
Elementary School[j]	925 students	9/student	8,325
Other & Mixed Use[k,l]	69.924 ksf (4,662 seats)	30/seat	139,848
Assisted Living	55 beds	70/bed	3,850
Private Club[m]	48.862 ksf	50/ksf	2,443
Bus Facility[n]	87.12 ksf	20/ksf	1,742
Club[o]	4.8 ksf	50/ksf	240
Commercial	953 ksf	50/ksf	47,627
Museum[p]	114 ksf	30/ksf	3,420
Industrial[q]	2,165 ksf	50/ksf	108,269
Event Space[r]	7,357 seats	3/seat	22,071
Bar	22.19 ksf	720/ksf	15,977
Commercial: Others[s]	373 ksf	50/ksf	18,661
Medical Office	25 ksf	250/ksf	6,250
Library	15 ksf	50/ksf	750
Health Club	54 ksf	650/ksf	35,100
Jail	3,885 inmates	85/inmate	330,225
	Total Wastewater Generation by Related Projects		**11,170,833**
	Project Net Operational Wastewater Generation Increase		558,306[t]
	Cumulative Wastewater Generation with Project		***11,729,139***[u]

TABLE IV.N.1-2
OPERATIONAL CUMULATIVE WASTEWATER GENERATION

NOTE(S):

du = dwelling unit; ksf = thousand square feet; gpd = gallons per day

[a] Wastewater generation factors are based on LASAN Sewage Generation Factors for Residential and Commercial Categories, dated April 6, 2012.
[b] Rates for residential wastewater generation vary depending on unit type and size. It was assumed that all residential projects would have an average size of two bedrooms.
[c] Office applies the Office Building with Cooling Tower generation factor.
[d] Related Project No. 14 (Office) assumes 150 square feet per office employee.
[e] Child Care and Day Care applies the School: Nursery – Day Care generation factor. It is assumed that each child will require approximately 50 square feet.
[f] Restaurant uses Restaurant: Full Service Outdoor Seat generation factor. Retail/Restaurant projects applies the Restaurant generation factor as it is more conservative. It is assumed that each seat will require approximately 15 square feet.
[g] Fast Food Restaurants assume each seat requires 15 square feet.
[h] Cinema and Theater applies the Theater: Cinema generation factor.
[i] Related Project No. 8 applies the School: High School generation factor as no school type has been determined.
[j] Related Project No. 135 is an elementary school serving K-4. It is assumed that each person provided equates one seat.
[k] Other and Mixed Use applies the Restaurant: Full Service Outdoor Seat generation factor to be conservative.
[l] Related Project No. 137 (Other) provides a number of people. It is assumed that each person equates one seat.
[m] Related Project No. 21 (Mixed Use Private Club) applies the Lounge generation factor.
[n] Bus Facility applies the Auto Parking generation factor. Related Project No. 24 is converted from two acres to 87,120 square feet.
[o] Related Project No. 27 assumes that each room in the Club is approximately 100 square feet.
[p] Museum includes Museum, Art Space, and Art School uses
[q] Industrial includes Wholesale/Storage, Industrial/ Warehouse, and Manufacturing uses.
[r] Event Space applies the Theater: Cinema generation factor and includes Event Space, Sports Complex, and Production Space. It is assumed that each seat requires approximately 9 square feet.
[s] Commercial: Others includes Supermarket, Grocery, Pharmacy/Drugstore, and Shopping.
[t] Project Net Operational Wastewater Generation is from Table IV.N.1-1.
[u] Totals may not add up due to rounding.

SOURCE(S): ESA, 2020.

The net increase in wastewater generation from operation of the Project plus the related projects, totaling approximately 11.73 mgd, represents approximately 2.61 percent of the HWRP's current design capacity of 450 mgd and approximately 2.13 percent of the Hyperion Sanitary Sewer System's estimated future capacity of 550 mgd in 2040 (the latest anticipated year of Project buildout). This increase represents approximately 6.70 percent of the remaining capacity of 175 mgd; when added to existing commitments, approximately 63.7 percent of the total capacity of the HWRP would be utilized.[32] Therefore, cumulative impacts on the location or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects, would be less than significant.

[32] (275 mgd + 11.73 mgd) / 450 mgd = 63.7 percent of the Hyperion Water Reclamation Plant's current design capacity of 450 mgd.

The HWRP currently meets applicable water quality standards as set forth by its NPDES Permit.[33] Implementation of the SSMPs, upgrades in the advanced treatment processes at the treatment plants, and continual monitoring by the EMD would ensure that effluent discharged into Santa Monica Bay by the Project and related projects are within applicable limits. Accordingly, the Project's incremental impacts, when considered together with the impacts of the related projects, would not result in a cumulatively considerable contribution to a significant cumulative impact related to wastewater treatment requirements. Therefore, cumulative impacts on wastewater treatment requirements would be less than significant.

All related projects would be subject to the provisions of the LAMC requiring provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. In particular, related projects would be subject to LAMC Section 64.15, which requires a determination that there is sufficient sewer capacity available for each project. The City would continue to review new development projects to ensure that local sewer capacity is available prior to the on-set of construction, and fees and mitigation included requirements to improve infrastructure if necessary to account for the project would be required. The preparation of a SCAR or WWSI takes into account other recently approved SCARs or WWSIs, to evaluate the cumulative impact of all known SCARs or WWSIs on the sewer system. Also, in accordance with LAMC Section 64.11, the related projects would pay the required sewer connection fees to further assist in offsetting their contribution to City wastewater treatment infrastructure needs. Therefore, with the provision of the SCAR and any necessary local improvements on sewer capacity, cumulative impacts on capacity to serve projected demand would be less than significant.

Therefore, cumulative impacts on wastewater would be less than significant.

(a) Project with the Deck Concept

Cumulative impacts associated with wastewater would be the same under the Project or the Project with the Deck Concept as the Deck would not include additional uses that are not already accounted for under the Project. Thus, the conclusions regarding cumulative impact significance presented above are the same and apply to the Project and the Project with the Deck Concept. **As such, cumulative impacts associated with wastewater under the Project with the Deck Concept would be less than significant.**

[33] California Regional Water Quality Control Board Los Angeles Region, U.S. Environmental Protection Agency Region IX, Order R4-2017-0045, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

(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.

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