

IV. Environmental Impact Analysis

L.2 Utilities and Service Systems— Wastewater

1. Introduction

This section analyzes potential Project impacts on wastewater collection and treatment facilities and infrastructure, including whether such existing infrastructure has sufficient capacity to serve the Project. This analysis utilizes the *1360 Vine St—Mixed Use Residential Utility Infrastructure Technical Report: Energy, Water, and Wastewater* (Utility Report), dated August 2021, which was prepared by KPFF Consulting Engineers and included in Appendix F of this Draft 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;
- Los Angeles Integrated Resources Plan;
- One Water LA 2040 Plan; and
- Los Angeles Municipal Codes (LAMC):
 - Los Angeles Green Building Code (Ordinance No. 181,480);
 - Water Efficiency Requirements Ordinance (Ordinance No. 180,822);
 - Sewer Capacity Availability Review (SCAR; LAMC Section 64.15);
 - Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1); and
 - Bureau of Engineering Special Order No. SO 06-0691.

(1) State

(a) California Green Building Standards Code

The California Green Building Standards Code (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 flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush. In addition, maximum flow rates for faucets are established at 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, and 1.8 gpm at 60 psi for kitchen faucets.

(2) Local

(a) City of Los Angeles General Plan Framework

The Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.¹ The Framework Element 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 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.²

(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

¹ City of Los Angeles Department of City Planning, *Citywide General Plan Framework, An Element of the Los Angeles General Plan*, July 27, 1995.

² 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.

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 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 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.⁴

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.⁵ The new plan builds upon 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 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 resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.⁶ Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

³ City of Los Angeles, Department of Public Works, Bureau of Sanitation and Department of Water and Power, *Water IRP 5-Year Review FINAL Documents*, June 2012.

⁴ City of Los Angeles, Department of Public Works, Bureau of Engineering, *Project Information Report, North East Interceptor Sewer (NEIS) Phase 2A*.

⁵ City of Los Angeles, *One Water LA 2040 Plan, Volume 1, Summary Report*, April 2018.

⁶ City of Los Angeles, Office of the Mayor, *Executive Directive No. 5, Emergency Drought Response—Creating a Water Wise City*, October 14, 2014.

(d) *City of 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.

LAMC Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),⁷ was adopted 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 three categories of buildings, the first 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.

(ii) *Water Efficiency Requirements Ordinance*

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),⁸ 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*

The LAMC includes regulations that require the City to assure 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 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

⁷ *City of Los Angeles, Ordinance No. 181,480.*

⁸ *City of Los Angeles, Ordinance No. 180,822.*

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 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 assure 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 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 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 assure that new infrastructure provides sewer capacity and operating characteristics to meet City standards (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).⁹

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with a mix of uses that consist of a 17,100 square-foot post-production facility, an 8,044 square-foot commercial building, six bungalows that comprise approximately 8,988 square feet of floor area, and an eight-unit multi-family building

⁹ *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.*

comprised of approximately 7,700 square feet of floor area. The eight-unit multi-family residential building is vacant. Three of the six bungalows are occupied by office/post-production uses, while the three remaining bungalows are vacant. There are also ancillary buildings such as sheds and garages adjacent to the bungalows. There is also a surface parking lot behind the commercial building. Based on LASAN's estimates, the total existing average daily wastewater flow is approximately 2,792 gallons per day (gpd).¹⁰

(2) Wastewater Infrastructure

Sanitary sewer service to and from the Project area is owned and operated by the City of Los Angeles. The existing wastewater collection system includes more than 6,700 miles of public sewers, which serves a population of more than 4 million people and conveys approximately 400 million gallons per day (mgd) to the City's four wastewater treatment and water reclamation plants.¹¹

As described in the Utility Report, there is an existing 10-inch vitrified clay pipe (VCP) sewer main in Vine Street, an 8-inch VCP sewer main in De Longpre Avenue, and an 8-inch VCP sewer main in Afton Place. Based on the Bureau of Engineering's online Navigate LA database, the Utility Report reported that the 10-inch sewer main in Vine Street flows south with a capacity of 2.96 cfs (1,913,098 gpd), the 8-inch sewer main in De Longpre Avenue flows east with a capacity of 0.71 cfs (458,885 gpd), and the 8-inch sewer main in Afton Place flows west with a capacity of 0.71 cfs (485,885 gpd). Sewer flows originating from the Project Site are collected and conveyed through a network of sewer lines for treatment at the Hyperion Water Reclamation Plant (HWRP).

(3) Wastewater Treatment

LASAN is responsible for the operation of wastewater treatment facilities in the City. The main purpose of these treatment facilities is to remove potential pollutants from sewage in order to protect river and marine environments and public health. LASAN divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.¹² The Hyperion Service Area is served by the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los

¹⁰ LASAN, *Wastewater Service Information (WWSI) Letter for the Project*. See Exhibit 3 of the Utility Report, which is included as Appendix F of this Draft EIR.

¹¹ LA Sanitation, *Sewers and Pumping Plants*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_adf.ctrl-state=s4vffrigl_5&_afLoop=9147980240166846#!, accessed May 4, 2021.

¹² LA Sanitation, *Clean Water*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=hgp4yycqp_5&_afLoop=3961446775342746#!, accessed May 4, 2021.

Angeles–Glendale Water Reclamation Plant. The Terminal Island Service Area is served by the Terminal Island Treatment Plant. The Project Site is served by the HWRP within the Hyperion Service Area.

(a) Hyperion Service Area

As shown in Table IV.L.2-1 on page IV.L.2-8, the existing design capacity of the Hyperion Service Area is approximately 550 mgd (consisting of 450 mgd at the HWRP, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant).^{13,14,15} Based on the One Water LA 2040 Plan—Wastewater Facilities Plan, the average wastewater flow rate in the Hyperion Service Area was 314 mgd in 2016 (consisting of 250 mgd at the HWRP, 47 mgd at the Donald C. Tillman Water Reclamation Plant, and 17 mgd at the Los Angeles–Glendale Water Reclamation Plant).¹⁶ The One Water LA 2040 Plan—Wastewater Facilities Plan projects that annual average wastewater flows in the Hyperion Service Area would increase to 323 mgd in 2020, 348 mgd in 2030, and 358 mgd in 2040. All other flow in the Hyperion Service Area, as well as biosolids from the upstream reclamation plants that are returned to the collection system are treated at the HWRP in Playa Del Rey. As such, current flows are below the design capacity of approximately 550 mgd for the Hyperion Service Area.

(b) Hyperion Water Reclamation Plant

As discussed above, wastewater generated from the Project Site is conveyed via the local collector sanitary sewer system directly to the HWRP for treatment. As shown in Table IV.L.2-1, the HWRP has the capacity to treat approximately 450 mgd of wastewater for full secondary treatment. LASAN reports that the plant currently treats approximately 275 mgd.¹⁷ As such, the HWRP is currently operating at approximately 61 percent of its

¹³ LASAN, *Hyperion Water Reclamation Plant*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=s4vffrigl_86&_afLoop=9148703519520976#!, accessed May 4, 2021.

¹⁴ LASAN, *Donald C. Tillman Water Reclamation Plant*, 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=s4vffrigl_86&_afLoop=9148800438155154#!, accessed May 4, 2021.

¹⁵ LASAN, *Los Angeles-Glendale Water Reclamation Plant*, 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=s4vffrigl_86&_afLoop=9148852583300197#!, accessed May 4, 2021.

¹⁶ LASAN, *One Water LA 2040 Plan—Volume 2: Wastewater Facilities Plan, Table ES.1, April 2018*.

¹⁷ LASAN, *Hyperion Water Reclamation Plant*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=s4vffrigl_86&_afLoop=9148703519520976#!, accessed May 4, 2021.

**Table IV.L.2-1
Existing Capacity of Hyperion Service Area**

	Design Capacity (mgd)
Hyperion Water Reclamation Plant	450
Donald C. Tillman Water Reclamation Plant	80
Los Angeles–Glendale Water Reclamation Plant	20
Total	550
<p><i>mgd = million gallons per day</i></p> <p><i>Source: LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=s4vffrigl_86&_afLoop=9148703519520976#, accessed May 4, 2021; LASAN, Donald C. Tillman Water Reclamation Plant, 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=s4vffrigl_86&_afLoop=9148800438155154#, accessed May 4, 2021; LASAN, Los Angeles–Glendale Water Reclamation Plant, 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=s4vffrigl_86&_afLoop=9148852583300197#, accessed May 4, 2021.</i></p>	

capacity with a remaining available capacity of approximately 175 mgd. Based on the above, current flows to the HWRP are well below its design capacity of approximately 450 mgd.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.¹⁸ The treated water from the HWRP is discharged through a five-mile outfall pipe into the Santa Monica Bay and Pacific Ocean.¹⁹ The discharge from the HWRP into Santa Monica Bay is regulated by the HWRP's NPDES Permit issued under the Clean Water Act and is required to meet Regional Water Quality Control Board (RWQCB)

¹⁸ LASAN, *Treatment Process*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tp?_adf.ctrl-state=s4vffrigl_2930&_afLoop=9150602188413392#, accessed May 4, 2021.

¹⁹ LASAN, *Hyperion Water Reclamation Plant*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=s4vffrigl_86&_afLoop=9148703519520976#, accessed May 4, 2021.

requirements for a recreational beneficial use.²⁰ Accordingly, the HWRP's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. LASAN also monitors flows into the Santa Monica Bay.²¹

3. Project Impacts

a. Thresholds of Significance

In accordance with the State 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 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;²² or

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

In assessing impacts related to wastewater in this section, the City will use Appendix G as the thresholds of significance. The factors and considerations identified below from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions:

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate wastewater:

²⁰ LARWQCB, Order No. 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, effective April 1, 2017, through March 31, 2022.

²¹ LASAN, Environmental Monitoring, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-em?_adf.ctrl-state=s4vffrigl_2930&_afLoop=9150807899794673#!, accessed May 4, 2021.

²² Refer to Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of water infrastructure; Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas infrastructure; the Project's Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater drainage; and Section VI, Other CEQA Considerations for a discussion of telecommunications facilities infrastructure.

- 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.²³

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Utility Report (including the WWSI) and the Water Supply Assessment included in Appendices F and U of this Draft EIR, respectively. The Utility Report calculates the anticipated wastewater flows to be generated by the Project using wastewater generation factors provided by LASAN. Given the existing capacity of the sanitary sewer system in the vicinity of the Project Site and the Project Site's future wastewater generation, an assessment was made of the impacts to the sanitary sewers and the City's downstream sewers and treatment plants. Data regarding the existing physical features and capacity of the system is based on information provided by LASAN.

To evaluate potential impacts relative to wastewater treatment capacity, this analysis evaluates whether adequate treatment capacity of the HWRP, which is within the Hyperion Service Area, would be available to accommodate the Project based on the estimate of the Project's wastewater generation and data from LASAN. For the assessment of cumulative impacts on wastewater treatment, the projected cumulative wastewater generation is compared to the estimated available capacity of the Hyperion Service Area.

c. Project Design Features

The following project design features are proposed with regard to wastewater:

Project Design Feature WAS-PDF-1: During operation of the Project, if the proposed swimming pool is to be drained, the draining will occur over a minimum span of two days.

The Project would also include water conservation features, which would also result in a reduction in wastewater. Such conservation features are included in Project Design

²³ *The Wastewater Facilities Plan referenced in the L.A. CEQA Thresholds Guide has since been superseded by the Integrated Resources Plan/One Water LA 2040 Plan.*

Feature WAT-PDF-1, included in Section IV.L.1, Utilities and Service System—Water Supply and Infrastructure, of this Draft EIR.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development options—the Residential Option and the Office Option.

The Residential Option would develop a new high-rise building with four levels of subterranean parking consisting of up to 429 new residential units, including 36 units designated for Very Low-Income households, an approximately 55,000-square-foot grocery store, approximately 5,000 square feet of neighborhood-serving commercial retail uses, and 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or 12 residential units, in which case the development would still propose a total of 429 residential units.

The Office Option would develop a new high-rise building with eight levels of subterranean parking with approximately 463,521 square feet of office uses and 11,914 square feet of restaurant uses in the proposed building, as well as 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or nine residential units.

The following analysis accounts for both development options and the term “Project” is used to describe all development scenarios unless stated otherwise.

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?²⁴

²⁴ Refer to Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of water infrastructure; Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas infrastructure; the Project’s Initial Study included as Appendix A of this Draft EIR for a discussion of stormwater drainage; and Section VI, Other CEQA Considerations, of this Draft EIR for a discussion of telecommunications facilities infrastructure.

(1) Impact Analysis

(a) Construction

The Project would require construction of new on-site infrastructure to serve new buildings and facilities of proposed Project. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work would be required in order to connect to the public main. Therefore, as set forth in Project Design Feature TR-PDF-2 included in Section IV.J, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The Construction Traffic Management Plan would ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration and would cease to occur once the installation is complete. Based on the above, construction activities would not have any adverse impact on wastewater conveyance or treatment infrastructure. In addition, most construction impacts associated with the installation of on-site wastewater facilities and off-site connections are expected to be confined to trenching and would be temporary in nature and would not result in significant environmental effects.

With respect to wastewater generation during construction, construction activities for the Project would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Furthermore, as with the Project, the removal of the existing on-site uses under this alternative would result in a short-term decrease in wastewater discharges to the public sewer system from the Project Site during the construction period. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows, which would also be offset by the removal of existing uses that generate wastewater. Therefore, Project construction would not substantially or incrementally exceed the future scheduled capacity of any treatment plant by generating flows greater than those anticipated in the IRP and the One Water LA Plan.

As such, Project construction would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, Project construction impacts to the wastewater conveyance or treatment system would be less than significant.

(b) Operation

As noted above, wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. Wastewater flows would be typical of residential, office, and commercial developments. No industrial discharge into the wastewater system would occur and as discussed in the Initial Study, included as Appendix A of this Draft EIR, the Project would implement capture and reuse to reduce stormwater pollution on the Project Site in accordance with the City's Low Impact Development requirements. In addition, discharge of effluent from the HWRP into Santa Monica Bay is regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As LASAN monitors the treated wastewater, wastewater generated from the Project Site would not exceed wastewater treatment requirements of LARWQCB. As described above, the HWRP has a design capacity of 450 mgd, and current wastewater flow levels are at approximately 275 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd.

As provided in Exhibit 3 of the Utility Report, a WWSI was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. In preparing the WWSI, LASAN analyzed the Project's wastewater demands in conjunction with existing conditions and forecasted growth and has provided current sewer gauging information for the relevant sewer lines of the Project. The WWSI analyzed a flow of up to 117,439 gpd for Project. The WWSI conservatively did not account for required water savings and additional water conservation commitments committed to by the Applicant (refer to the WSA included as Appendix U of this Draft EIR and Project Design Feature WAT-PDF-1 in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR). In addition, the WWSI conservatively assumed that the pool proposed by the Residential Option would be discharged to the sewer system over a one day span. Note that in accordance with Project Design Feature WAS-PDF-1, the proposed pool would be drained over a minimum span of two days.

As shown in Table IV.L.2-2 on page IV.L.2-14, when accounting for required water savings, the Applicant's water conservation commitments (Project Design Feature WAT-PDF-1), and the draining of the proposed pool over a two-day span (Project Design Feature WAS-PDF-1), the Residential Option with bungalows as restaurants would generate a net increase in wastewater flow from the Project Site of approximately 98,040 gpd, or approximately 0.098 mgd. As shown in Table IV.L.2-3 on page IV.L.2-16, the Residential Option with bungalows as residential units would generate less wastewater—a net increase of 82,194 gpd, or approximately 0.082 mgd.

As shown in Table IV.L.2-4 on page IV.L.2-18, when accounting for required water savings and the Applicant's water conservation commitments (Project Design Feature WAT-PDF-1), the Office Option with bungalows as restaurants would generate a net

**Table IV.L.2-2
Estimated Project Wastewater Generation—Residential Option with Bungalows as Restaurants**

Land Use	Units	Wastewater Generation Rate (gpd/unit) ^a	Wastewater Generation (gpd)
Existing Uses^b			
Post-Production Facility	17,100 sf	0.12	2,052
Post-Production (in bungalows)	4,494 sf	0.12	539
Commercial	8,044 sf	0.025	201
<i>Total Existing</i>			2,792
Proposed Uses^c			
Residential: 1-bedroom	240 du	110	26,400
Residential: 1-bedroom plus den	56 du	110	6,160
Residential: 2-bedroom	127 du	150	19,050
Residential Apartment: 3-bedroom	6 du	190	1,140
Base Demand Adjustment (Residential) ^d	—	—	5,519
Fitness Center/Club Room	10,250 sf	0.65	6,663
Pool ^e	1,335 sf		19,972
Grocery	55,000 sf	0.05	2,750
Retail	5,000 sf	0.025	125
Restaurant (8,988 sf) ^f	600 seats	30	18,000
Covered Parking ^g	352,931 sf	0.02	232
Cooling Tower	800 tons	21.60	17,280
<i>Total Proposed by Project</i>			123,291
Required Savings^h			
Residential Units	—	—	(9,986)
Residential Amenities/Commercial	—	—	(6,431)
Cooling Tower	—	—	(3,456)
<i>Total Required Savings</i>			(19,873)
Additional Conservationⁱ			
			(2,586)
Net Wastewater Generation of Residential Option with Bungalows as Restaurants (Proposed – Required Savings – Additional Conservation – Existing to be Removed)			98,040
<p><i>du = dwelling units</i> <i>gpd = gallons per day</i> <i>sf = square feet</i> <i>— = Information is not applicable.</i> <i>All totals have been rounded and may not sum due to rounding.</i></p> <p>^a This analysis is based on 100 percent of sewage generation rates provided by LASAN (effective April 6, 2012).</p> <p>^b As described in Section II, Project Description, of this Draft EIR, three of the six bungalows are</p>			

Table IV.L.2-2 (Continued)
Estimated Project Wastewater Generation—Residential Option with Bungalows as Restaurants

Land Use	Units	Wastewater Generation Rate (gpd/unit) ^a	Wastewater Generation (gpd)
<p><i>occupied by office/post-production uses, while the three remaining bungalows are vacant. The eight-unit multi-family residential building is also vacant.</i></p> <p>^c <i>Uses not shown here do not have additional water demand.</i></p> <p>^d <i>The Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of LASAN sewage generation rates.</i></p> <p>^e <i>Per the WWSI dated April 5, 2021, “Residential with Bungalows as Restaurants” option, the pool wastewater flow is estimated to be 39,943 gallons if the pool is drained in one day. In order to minimize impact on existing sewer infrastructure, pursuant to Project Design Feature WAS-PDF-1, if the Project’s pool requires draining, draining will occur over a minimum span of two days instead of one day; therefore, the pool daily flow is reduced to an estimated 19,972 gallons per day.</i></p> <p>^f <i>A standard factor of 15 square feet per seat was applied to calculate the number of seats.</i></p> <p>^g <i>Auto parking estimates are based on LASAN sewage generation rates and assumption of cleaning 12 times per year.</i></p> <p>^h <i>The proposed development land uses will conform to City of Los Angeles Ordinance Nos. 184,248 and 186,488, 2019 Los Angeles Plumbing Code, and 2019 Los Angeles Green Building Code.</i></p> <p>ⁱ <i>Water conservation due to additional conservation commitments agreed to by the Applicant as identified in Table II-1 of the WSA.</i></p> <p><i>Source: Los Angeles Department of Water and Power, Water Supply Assessment for the 1360 North Vine Street Project, February 9, 2021, Table I-1; Eyestone Environmental, 2021.</i></p>			

increase in wastewater flow from the Project Site of approximately 108,670 gpd, or approximately 0.109 mgd. As shown in Table IV.L.2-5 on page IV.L.2-21, the Office Option with bungalows as residential units would generate less wastewater—a net increase of 94,340 gpd, or approximately 0.094 mgd.

According to LASAN and as provided in the WWSI, the sewer system may be able to accommodate the Project’s flow of up to 117,439 gpd to the 10-inch sewer main in Vine Street. Per LASAN, further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. Ultimately, as noted in the WWSI, this sewage flow will be conveyed to the HWRP, which has sufficient capacity for the Project.

Under the Residential Option’s most conservative scenario, the 0.098 mgd increase in average daily wastewater flow would represent approximately 0.06 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Under the Office Option’s most conservative scenario, the 0.109 mgd increase in average daily wastewater flow would represent approximately 0.06 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing available capacity of the HWRP.

**Table IV.L.2-3
Estimated Project Wastewater Generation—Residential Option with Bungalows as Residential Units**

Land Use	Units	Wastewater Generation Rate (gpd/unit) ^a	Wastewater Generation (gpd)
Existing Uses^b			
Post-Production Facility	17,100 sf	0.12	2,052
Post-Production (in bungalows)	4,494 sf	0.12	539
Commercial	8,044 sf	0.025	201
<i>Total Existing</i>			2,792
Proposed Uses^c			
Residential: 1-bedroom	240 du	110	26,400
Residential: 1-bedroom plus den	56 du	110	6,160
Residential: 2-bedroom	115 du	150	17,250
Residential Apartment: 3-bedroom	6 du	190	1,140
Residential: 2-bedroom duplex bungalows	12 du	150	1,800
Base Demand Adjustment (Residential) ^d	—	—	5,520
Fitness Center/Club Room	10,250 sf	0.65	6,663
Pool ^e	1,335 sf	—	19,972
Grocery	55,000 sf	0.05	2,750
Retail	5,000 sf	0.025	125
Covered Parking ^f	352,931 sf	0.02	232
Cooling Tower	800 tons	21.60	17,280
<i>Total Proposed by Project</i>			105,292
Required Savings^g			
Residential Units	—	—	(9,986)
Residential Amenities/Commercial	—	—	(4,461)
Cooling Tower	—	—	(3,456)
<i>Total Required Savings</i>			(17,903)
Additional Conservation^h			
Net Wastewater Generation of Residential Option with Bungalows as Residential Units (Proposed – Required Savings – Additional Conservation – Existing to be Removed)			82,194
<p><i>du = dwelling units</i> <i>gpd = gallons per day</i> <i>sf = square feet</i> — = Information is not applicable. All totals have been rounded and may not sum due to rounding.</p> <p>^a This analysis is based on 100 percent of sewage generation rates provided by LA Sanitation (effective April 6, 2012).</p>			

Table IV.L.2-3 (Continued)
Estimated Project Wastewater Generation—Residential Option with Bungalows as Residential Units

Land Use	Units	Wastewater Generation Rate (gpd/unit) ^a	Wastewater Generation (gpd)
<p>^b As described in Section II, Project Description, of this Draft EIR, three of the six bungalows are occupied by office/post-production uses, while the three remaining bungalows are vacant. The eight-unit multi-family residential building is also vacant.</p> <p>^c Uses not shown here do not have additional wastewater generation.</p> <p>^d The Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of LA Sanitation sewage generation rates.</p> <p>^e Per the WWSI dated April 5, 2021, “Residential with Bungalows as Residential” option, the pool wastewater flow was estimated to be 39,943 gallons per day if the pool is drained in one day. In order to minimize impact on existing sewer infrastructure, pursuant to Project Design Feature WAS-PDF-1, if the Project’s pool requires draining, draining will occur over a minimum span of two days instead of one day; therefore, the pool daily flow is reduced to an estimated 19,972 gallons per day.</p> <p>^f Auto parking estimates are based on LA Sanitation sewage generation rates and assumption of cleaning 12 times per year.</p> <p>^g The proposed development land uses will conform to City of Los Angeles Ordinance Nos. 184,248 and 186,488, 2019 Los Angeles Plumbing Code, and 2019 Los Angeles Green Building Code.</p> <p>^h Water conservation due to additional conservation commitments agreed to by the Applicant as identified in Table II-1 of the WSA.</p> <p>Source: Los Angeles Department of Water and Power, Water Supply Assessment for the 1360 North Vine Street Project, February 9, 2021, Table I-2; Eyestone Environmental, 2021.</p>			

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2027, the year by which construction of the Project is expected to be completed. Future iterations of the IRP, such as the One Water Los Angeles 2040 Plan discussed above, would provide for improvements beyond 2020 through 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2027. Thus, based on this conservative assumption, the 2027 effective capacity of the Hyperion Service Area would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2027 will continue to be 450 mgd.

Based on LASAN’s average flow projections for the HWRP, it is anticipated that average flows in 2027 would be approximately 269.3 mgd.²⁵ Accordingly, the future remaining available capacity in 2027 would be approximately 180.7 mgd. Under the

²⁵ LASAN, *One Water LA 2040 Plan—Volume 2: Wastewater Facilities Plan, Table ES.1, April 2018*. Based on a straight-line interpolation of the projected flows for the HWRP for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2027 value is $[(275 \text{ mgd} - 256 \text{ mgd}) \div 10] \times 7 + 256 = 269.3 \text{ mgd}$.

**Table IV.L.2-4
Estimated Project Wastewater Generation—Office Option with Bungalows as Restaurant**

Land Use	Units	Generation Rate (gpd/unit) ^a	Sewage Generation (gpd)
Existing Uses^b			
Post-Production Facility	17,100 sf	0.12	2,052
Post-Production (in bungalows)	4,494 sf	0.12	539
Commercial	8,044 sf	0.025	201
<i>Total Existing</i>			2,792
Proposed Uses^c			
Office	463,521 sf	0.12	55,623
Fitness Center	8,243 sf	0.65	5,358
Yoga Room	1,283 sf	0.65	834
Billiard Room	105 per	3	315 ^d
Restaurant (11,914 sf) ^e	795 seats	30	23,850
Restaurant in bungalows (8,988 sf) ^e	600 seats	30	18,000
Covered Parking ^f	667,608 sf	0.02	439
Cooling Tower	1,200 tons	21.60	25,920
<i>Total Proposed by Project</i>			130,034
Required Savings^g			
Office	—	—	(6,735)
Commercial	—	—	(5,361)
Cooling Tower	—	—	(5,184)
<i>Total Required Savings</i>			(17,280)
Additional Conservation^h			
			(1,292)
Net Wastewater Generation of Office Option with Bungalows as Restaurants (Proposed – Required Savings – Additional Conservation – Existing to be Removed)			108,670
<p><i>du = dwelling units</i> <i>gpd = gallons per day</i> <i>per = persons</i> <i>sf = square feet</i> — = Information is not applicable. All totals have been rounded and may not sum due to rounding.</p> <p>^a This analysis is based on 100 percent of sewage generation rates provided by LA Sanitation (effective April 6, 2012).</p> <p>^b As described in Section II, Project Description, of this Draft EIR, three of the six bungalows are occupied by office/post-production uses, while the three remaining bungalows are vacant. The eight-unit multi-family residential building is also vacant.</p> <p>^c Uses not shown here do not have additional water demand.</p> <p>^d Per discussion with LADWP on 10/13/21, the value has been revised to 315 gpd. The revised value</p>			

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2027, the year by which construction of the Project is expected to be completed. Future iterations of the IRP, such as the One Water Los Angeles 2040 Plan discussed above, would provide for improvements beyond 2020 through 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2027. Thus, based on this conservative assumption, the 2027 effective capacity of the Hyperion Service Area would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2027 will continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2027 would be approximately 269.3 mgd. Accordingly, the future remaining available capacity in 2027 would be approximately 180.7 mgd. Under the

Table IV.L.2-4 (Continued)

Estimated Project Wastewater Generation—Office Option with Bungalows as Restaurant

Land Use	Units	Generation Rate (gpd/unit) ^a	Sewage Generation (gpd)
<p><i>does not impact the net additional water demand nor the Conclusion in the WSA.</i></p> <p>^e <i>A standard factor of 15 square feet per seat was applied to calculate the number of seats.</i></p> <p>^f <i>Auto parking estimates are based on LA Sanitation sewage generation rates and assumption of cleaning 12 times per year.</i></p> <p>^g <i>The proposed development land uses will conform to City of Los Angeles Ordinance Nos. 184,248 and 186,488, 2019 Los Angeles Plumbing Code, and 2019 Los Angeles Green Building Code.</i></p> <p>^h <i>Water conservation due to additional conservation commitments agreed to by the Applicant as identified in Table II-1 of the WSA.</i></p> <p><i>Source: Los Angeles Department of Water and Power, Water Supply Assessment for the 1360 North Vine Street Project, February 9, 2021, Table I-3; Eyestone Environmental, 2021.</i></p>			

Residential Option's most conservative scenario, the increase in average daily wastewater flow of 0.098 mgd would represent approximately 0.05 percent of the estimated future remaining available capacity of 180.7 mgd at the HWRP. Under the Office Option's most conservative scenario, the increase in average daily wastewater flow of 0.109 mgd would also represent approximately 0.06 percent of the estimated future remaining available capacity of 180.7 mgd at the HWRP. Therefore, during operation, the Project-generated wastewater would be accommodated by the future available capacity of the HWRP.

Additionally, the Residential Option's net increase in average daily wastewater generation of up to 0.098 mgd plus the current flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent of the HWRP's design capacity of 450 mgd. Similarly, the Office Option's net increase of up to 0.109 mgd plus current flows

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2027, the year by which construction of the Project is expected to be completed. Future iterations of the IRP, such as the One Water Los Angeles 2040 Plan discussed above, would provide for improvements beyond 2020 through 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2027. Thus, based on this conservative assumption, the 2027 effective capacity of the Hyperion Service Area would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2027 will continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2027 would be approximately 269.3 mgd. Accordingly, the future remaining available capacity in 2027 would be approximately 180.7 mgd. Under the

Table IV.L.2-4 (Continued)

Estimated Project Wastewater Generation—Office Option with Bungalows as Restaurant

of 275 mgd would represent approximately 61.1 percent of the HWRP's capacity of 450 mgd. With regard to future flows, the Residential Option's net increase of up to 0.098 mgd plus the projected flows of approximately 269.3 mgd to the HWRP would represent approximately 59.9 percent of the HWRP's assumed future capacity of 450 mgd. The Office Option's net increase of up to 0.109 mgd plus the projected flows of approximately 269.3 mgd to the HWRP would also represent approximately 60.0 percent of the HWRP's assumed future capacity of 450 mgd.

**Table IV.L.2-5
Estimated Project Wastewater Generation—Office Option with Bungalows as Residential Units**

Land Use	Units	Water Demand Rate (gpd/unit) ^a	Water Demand (gpd)
Existing Uses^b			
Post-Production Facility	17,100 sf	0.12	2,052
Post-Production (in bungalows)	4,494 sf	0.12	539
Commercial	8,044 sf	0.025	201
<i>Total Existing</i>			2,792
Office Option Proposed Uses^c			
Residential: 2-bedroom ^d	12 du	150	1,800
Base Demand Adjustment (Residential) ^e	—	—	243
Office	463,521 sf	0.12	55,623
Fitness Center	8,243 sf	0.65	5,358
Yoga Room	1,283 sf	0.65	834
Billiard Room	105 per	3	315 ^f
Restaurant (11,914 sf) ^g	795 seats	30	23,850
Covered Parking ^h	667,608 sf	0.02	439
Cooling Tower	1,200 tons	21.60	25,920
<i>Total Proposed by Project</i>			114,077
Required Savingsⁱ			
Residential Units	—	—	(430)
Office	—	—	(6,735)
Commercial	—	—	(3,392)
Cooling Tower	—	—	(5,184)
<i>Total Required Savings</i>			(15,741)
Additional Conservation^j			(1,204)
Office Option Net Water Demand (Proposed – Required Savings – Additional Conservation – Existing to be Removed)			94,340
<p><i>du = dwelling units</i> <i>gpd = gallons per day</i> <i>per = persons</i> <i>sf = square feet</i> <i>— = Information is not applicable.</i> <i>All totals have been rounded and may not sum due to rounding.</i></p> <p>^a This analysis is based on 100 percent of sewage generation rates provided by LASAN (effective April 6, 2012).</p> <p>^b As described in Section II, Project Description, of this Draft EIR, three of the six bungalows are occupied by office/post-production uses, while the three remaining bungalows are vacant. The eight-unit multi-family residential building is also vacant.</p>			

Table IV.L.2-5 (Continued)
Estimated Project Wastewater Generation—Office Option with Bungalows as Residential Units

Land Use	Units	Water Demand Rate (gpd/unit) ^a	Water Demand (gpd)
<p>^c Uses not shown here do not generate wastewater.</p> <p>^d Only nine residential bungalows are currently proposed. However, the WSA prepared for the Project analyzed 12 residential bungalows which is more conservative and included in this analysis.</p> <p>^e The Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of LASAN sewage generation rates.</p> <p>^f Per discussion with LADWP on 10/13/21, the value has been revised to 315 gpd. The revised value does not impact the net additional water demand nor the Conclusion in the WSA.</p> <p>^g A standard factor of 15 square feet per seat was applied to calculate the number of seats.</p> <p>^h Auto parking estimates are based on LASAN sewage generation rates and assumption of cleaning 12 times per year.</p> <p>ⁱ The proposed development land uses will conform to City of Los Angeles Ordinance Nos. 184,248 and 186,488, 2019 Los Angeles Plumbing Code, and 2019 Los Angeles Green Building Code.</p> <p>^j Water conservation due to additional conservation commitments agreed to by the Applicant as identified in Table II-1 of the WSA.</p> <p>Source: Los Angeles Department of Water and Power, Water Supply Assessment for the 1360 North Vine Street Project, February 9, 2021, Table I-4; Eyestone Environmental, 2021.</p>			

As such, based on the above, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Operation of the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, operational impacts of the Project with respect to wastewater treatment facilities would be less than significant, and mitigation measures are not required.

(2) Mitigation Measures

Project-level impacts with regard to wastewater treatment facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts with regard to wastewater treatment facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, 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

As discussed above, wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. The discharge will be typical of that associated with residential and commercial uses. The discharge of effluent from the HWRP into Santa Monica Bay is regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As LASAN monitors the treated wastewater, wastewater generated from the Project Site would not exceed wastewater treatment requirements of the LARWQCB.

As discussed above, the sewer mains adjacent to the Project Site ultimately connect to a network of sewer lines that convey wastewater to the HWRP, and the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of the treatment plant. In addition, based on the temporary nature of construction of new on-site infrastructure and minor off-site work associated with connections to the public main line, as well as operational wastewater generation, the Project would not constrain existing and future scheduled wastewater treatment and infrastructure capacity. Furthermore, LASAN has confirmed that the local sewer system would be able to handle the increased flow from the Project, and the Project would comply with relevant design requirements as well as applicable sanitation and plumbing standards. Therefore, it is expected there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments.

(2) Mitigation Measures

Project-level impacts with regard to wastewater treatment capacity would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts with regard to wastewater treatment capacity were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis on the wastewater conveyance system is the area that includes the Project Site and the related projects that would potentially utilize the same infrastructure as the Project. The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. The Project, in conjunction with growth forecasted in the Hyperion Service Area through 2027 (i.e., the Project buildout year), would generate wastewater, potentially resulting in cumulative impacts on wastewater conveyance and treatment facilities. Cumulative growth in the greater Project area through 2027 includes specific known development projects, as well as general ambient growth projected to occur.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 102 is a conservative assumption, as some of the related projects may not be built out by 2027 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 102 are fully built out by 2027, unless otherwise noted. The cumulative analysis also considers Related Project No. 130, the Hollywood Community Plan Update, which once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2027, well before the Community Plan Update's horizon year. Moreover, 2027 is a similar projected buildout year as many of the 102 related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Community Plan Update upon its adoption.

(a) Wastewater Generation

Development of the Project, in conjunction with the related projects, would result in an increase in the demand for sanitary sewer service in the Hyperion Service Area. As identified in Section III, Environmental Setting, of this Draft EIR, there are 102 related projects located in the Project vicinity. Assuming that each of these related projects would connect to some or all of the City sewers serving the Project Site, forecasted growth from the related projects would generate an average daily wastewater flow of approximately 4,609,255 gpd or approximately 4.61 mgd, as shown in Table IV.L.2-6 on page IV.L.2-25. Combined with the Project's net increase in wastewater generation of up to 108,670 gpd

**Table IV.L.2-6
Cumulative Wastewater Generation**

No.	Project	Description/Land Use	Size	Generation Factor^{a,b}	Total Wastewater Generation (gpd)
1	1610 N. Highland Ave.	Apartments	248 du	190 gpd/du	47,120
		Commercial	12,785 sf	0.05 gpd/sf	639
2	1740 N. Vine St.	Residential	492 du	190 gpd/du	93,480
		Hotel	200 rm	120 gpd/rm	24,000
		Office	100,000 sf	0.12 gpd/sf	12,000
		Fitness Club	35,000 sf	0.2 gpd/sf	7,000
		Retail	15,000 sf	0.025 gpd/sf	375
		Restaurant (34,000 sf)	2,267 seats	30 gpd/seat	68,010
3	5555 W. Melrose Ave.	Office	1,273,600 sf	0.12 gpd/sf	152,832
		Retail	89,200 sf	0.025 gpd/sf	2,230
		Stage	21,000 sf	0.12 gpd/sf	2,520
		Support	1,900 sf	0.12 gpd/sf	228
4	1824 N. Highland Ave.	Apartments	118 du	190 gpd/du	22,420
5	6200 Hollywood Blvd.	Apartments	1,014 du	190 gpd/du	192,660
		Live/Work	28 du	190 gpd/du	5,320
		Retail/Restaurant ^c (175,000 sf)	11,667 seats	30gpd/seat	350,000
6	5800 W. Sunset Blvd.	Office/Studio Expansion	404,799 sf	0.05 gpd/sf	20,240
7	1800 Argyle Ave.	Hotel	225 rm	120 gpd/rm	27,000
8	956 N. Seward St.	Office	126,980 sf	0.12 gpd/sf	15,238
9	6381 W. Hollywood Blvd.	Hotel	80 rm	120 gpd/rm	9,600
		Restaurant (15,290 sf)	1,020 seats	30 gpd/seat	30,600
10	6300 W. Romaine St.	Office	114,725 sf	0.12 gpd/sf	13,767
		Studio	38,072 sf	0.05 gpd/sf	1,904
		Other	40,927 sf	0.2 gpd/sf	8,185
11	6601 W. Romaine St.	Office	106,125 sf	0.12 gpd/sf	12,735

**Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation**

No.	Project	Description/Land Use	Size	Generation Factor^{a,b}	Total Wastewater Generation (gpd)
12	6523 W. Hollywood Blvd.	Restaurant (10,402 sf)	694 seats	30 gpd/seat	20,820
		Office	4,074 sf	0.12 gpd/sf	489
		Storage	890 sf	0.03 gpd/sf	27
13	6677 Santa Monica Blvd.	Apartments	695 du	190 gpd/du	132,050
		Commercial	24,900 sf	0.05 gpd/sf	1,245
14	6100 W. Hollywood Blvd.	Apartments	220 du	190 gpd/du	41,800
		Retail/Restaurant ^c (3,270 sf)	218 seats	30 gpd/seat	6,540
15	6230 Yucca St.	Commercial	2,697 sf	0.05 gpd/sf	135
		Apartments	114 du	190 gpd/du	21,660
16	5245 Santa Monica Blvd.	Apartments	49 du	190 gpd/du	9,310
		Retail	32,272 sf	0.025 gpd/sf	807
17	959 Seward St.	Office	241,568 sf	0.12 gpd/sf	28,988
18	5550 Hollywood Blvd.	Apartments	280 du	190 gpd/du	53,200
		Retail	12,030 sf	0.025 gpd/sf	301
19	6417 Selma Ave.	Hotel	180 rm	120 gpd/rm	21,600
		Restaurant/Club ^c (12,840 sf)	856 seats	30 gpd/seat	25,680
20	1601 Vine St.	Office	100,386 sf	0.12 gpd/sf	12,046
		Commercial	2,012 sf	0.025 gpd/sf	50
21	1149 Gower St.	Apartments	57 du	190 gpd/du	10,830
22	5520 Sunset Blvd.	Target	163,862 sf	0.05 gpd/sf	8,193
		Shopping Center	30,887 sf	0.025 gpd/sf	772
23	936 La Brea Ave.	Office	88,750 sf	0.12 gpd/sf	10,650
		Retail	12,000 sf	0.025 gpd/sf	300
24	1133 Vine St.	Hotel	112 rm	120 gpd/rm	13,440
		Café (661 sf)	45 seats	25 gpd/seat	1,125

Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation

No.	Project	Description/Land Use	Size	Generation Factor ^{a,b}	Total Wastewater Generation (gpd)
25	6121 Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Office	422,610 sf	0.12 gpd/sf	50,713
		Retail/Restaurant ^c (41,300 sf)	2,754 seats	30 gpd/seat	82,620
		Hotel	125 rm	120 gpd/rm	15,000
26	1718 Las Palmas Ave.	Condominiums	29 du	190 gpd/du	5,510
		Apartments	195 du	190 gpd/du	37,050
		Retail	985 sf	0.025 gpd/sf	25
27	1546 Argyle Ave.	Apartments	276 du	190 gpd/du	52,440
		Retail	9,000 sf	0.025 gpd/sf	225
		Restaurant (15,000 sf)	1,000 seats	30 gpd/seat	30,000
28	1541 Wilcox Ave.	Hotel	200 rm	120 gpd/rm	24,000
		Restaurant (9,000 sf)	600 seats	30 gpd/seat	18,000
29	6230 Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Retail	4,700 sf	0.025 gpd/sf	118
30	5901 Sunset Blvd.	Office	274,000 sf	0.12 gpd/sf	32,880
		Retail	26,000 sf	0.025 gpd/sf	650
31	6201 W. Sunset Blvd.	Apartments	731 du	190 gpd/du	138,890
		Retail/Restaurant ^c (24,000 sf)	1,600 seats	30 gpd/seat	48,000
32	5600 W. Hollywood Blvd.	Apartments	33 du	120 gpd/rm	3,960
		Commercial	1,289 sf	0.05 gpd/sf	64
33	904 N. La Brea Ave.	Apartments	169 du	190 gpd/du	32,110
		Retail	37,057 sf	0.025 gpd/sf	926
34	707 N. Cole Ave.	Apartments	84 du	190 gpd/du	15,960
35	1921 N. Wilcox Ave.	Hotel	122 rm	120 gpd/rm	14,640
		Restaurant (4,225 sf)	282 seats	30 gpd/seat	8,460

Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation

No.	Project	Description/Land Use	Size	Generation Factor^{a,b}	Total Wastewater Generation (gpd)
36	7302 Santa Monica Blvd.	Apartments	371 du	190 gpd/du	70,490
		Office	7,800 sf	0.12 gpd/sf	936
		Restaurant (5,000 sf)	334 seats	30 gpd/seat	10,020
		Commercial	19,500 sf	0.05 gpd/sf	975
37	1717 N. Bronson Ave.	Apartments	89 du	190 gpd/du	16,910
38	1525 N. Cahuenga Blvd.	Hotel	64 rm	120 gpd/rm	7,680
		Restaurant/Lounge ^c (700 sf)	47 seats	30 gpd/seat	1,410
		Restaurant (3,300 sf)	220 seats	30 gpd/seat	6,600
39	901 N. Vine St.	Apartments	70 du	190 gpd/du	13,300
		Commercial	3,000 sf	0.05 gpd/sf	150
40	525 Wilton Pl.	Apartments	88 du	190 gpd/du	16,720
41	1233 N. Highland Ave,	Apartments	72 du	190 gpd/du	13,680
		Retail	12,160 sf	0.025 gpd/sf	304
42	7107 W. Hollywood Blvd.	Apartments	410 du	190 gpd/du	77,900
		Retail	5,000 sf	0.025 gpd/sf	125
		Restaurant (5,000 sf)	333 seats	30 gpd/seat	10,000
43	1310 N. Cole Ave.	Apartments	369 du	190 gpd/du	70,110
		Office	2,570 sf	0.12 gpd/sf	308
44	5750 W. Hollywood Blvd.	Apartments	161 du	190 gpd/du	30,590
		Commercial	4,747 sf	0.05 gpd/sf	237
45	6421 W. Selma Ave.	Restaurant (1,993 sf)	133 seats	30 gpd/seat	3,990
		Hotel	114 rm	120 gpd/rm	13,680
46	1400 N. Cahuenga Blvd.	Hotel	221 rm	120 gpd/rm	26,520
		Restaurant (3,000 sf)	200 seats	30 gpd/seat	6,000
47	1868 N. Western Ave.	Apartments	96 du	190 gpd/du	18,240
		Retail	5,546 sf	0.025 gpd/sf	139

**Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation**

No.	Project	Description/Land Use	Size	Generation Factor^{a,b}	Total Wastewater Generation (gpd)
48	7000 W. Melrose Ave.	Apartments	40 du	190 gpd/du	7,600
		Retail	6,634 sf	0.025 gpd/sf	166
49	5460 W. Fountain Ave.	Apartments	75 du	190 gpd/du	14,250
50	6220 W. Yucca St.	Hotel	210 rm	120 gpd/rm	25,200
		Apartments	136 du	190 gpd/du	25,840
		Restaurant (6,980 sf)	466 seats	30 gpd/seat	13,980
51	5525 W. Sunset Blvd.	Apartments	293 du	190 gpd/du	55,670
		Commercial	33,980 sf	0.05 gpd/sf	1,699
52	1657 N. Western Ave.	Apartments	91 du	190 gpd/du	17,290
		Retail	15,300 sf	0.025 gpd/sf	383
53	1118 N. McCadden Pl.	Housing	45 du	70 gpd/du	3,150
		Social Service Support	50,325 sf	0.12 gpd/sf	6,039
		Office	17,040 sf	0.12 gpd/sf	2,045
		Commercial/Restaurant ^c (1,885 sf)	126 seats	30 gpd/seat	3,780
		Temporary Housing	100 bed	70 gpd/du	7,000
54	1717 N. Wilcox Ave.	Hotel	133 rm	120 gpd/rm	15,960
		Retail	3,580 sf	0.025 gpd/sf	90
55	6516 W. Selma Ave.	Hotel	212 rm	120 gpd/rm	25,440
		Bar/Lounge	3,855 sf	0.72 gpd/sf	2,776
		Rooftop Bar/Event Space	8,500 sf	0.72 gpd/sf	6,120
56	1749 N. Las Palmas Ave.	Apartments	70 du	190 gpd/du	13,300
		Retail	3,117 sf	0.025 gpd/sf	78
57	6901 W. Santa Monica Blvd.	Apartments	231 du	190 gpd/du	43,890
		Restaurant (5,000 sf)	333 seats	30 gpd/seat	10,000
		Retail	10,000 sf	0.025 gpd/sf	250

**Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation**

No.	Project	Description/Land Use	Size	Generation Factor^{a,b}	Total Wastewater Generation (gpd)
58	5632 W. De Longpre Ave.	Apartments	185 du	190 gpd/du	35,150
59	6200 W. Sunset Blvd.	Apartments	270 du	190 gpd/du	51,300
		Restaurant (1,750 sf)	117 seats	30 gpd/seat	3,500
		Pharmacy	2,300 sf	0.025 gpd/sf	58
		Retail	8,070 sf	0.025 gpd/sf	202
60	4914 W. Melrose Ave.	Live/Work	45 du	190 gpd/du	8,550
		Retail	3,760 sf	0.025 gpd/sf	94
61	5939 Sunset Blvd.	Apartments	299 du	190 gpd/du	56,810
		Office	38,440 sf	0.12 gpd/sf	4,613
		Restaurant (5,064 sf)	338 seats	30 gpd/seat	10,140
		Retail	3,739 sf	0.025 gpd/sf	3,739
62	7143 Santa Monica Blvd.	Apartments	145 du	190 gpd/du	27,550
		Retail/Restaurant ^c (7,858 sf)	524 seats	30 gpd/seat	15,720
63	1718 N. Vine St.	Hotel	216 rm	120 gpd/rm	25,920
		Restaurant (4,354 sf)	291 seats	30 gpd/seat	8,730
64	1600 N. Schrader Blvd.	Hotel	168 rm	120 gpd/rm	20,160
		Restaurant (4,028 sf)	269 seats	30 gpd/seat	8,070
65	1350 N. Western Ave.	Apartments	204 du	190 gpd/du	38,760
		Retail/Restaurant ^c (5,500 sf)	367 seats	30 gpd/seat	11,000
66	7510 W. Sunset Blvd.	Apartments	213 du	190 gpd/du	40,470
		Retail	20,000 sf	0.025 gpd/sf	500
		Restaurant (10,000 sf)	667 seats	30 gpd/seat	20,000
67	1601 N. Las Palmas Ave.	Apartments	86 du	190 gpd/du	16,340
68	7219 W. Sunset Blvd.	Hotel	93 rm	120 gpd/rm	11,160
		Restaurant (2,800 sf)	187 seats	30 gpd/seat	5,600

**Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation**

No.	Project	Description/Land Use	Size	Generation Factor^{a,b}	Total Wastewater Generation (gpd)
69	100 N. Western Ave.	Apartments	187 du	190 gpd/du	35,530
		Retail	76,500 sf	0.025 gpd/sf	1,913
70	1001 N. Orange Dr.	Office	53,537 sf	0.12 gpd/sf	6,424
71	5420 W. Sunset Blvd.	Apartments	735 du	190 gpd/du	139,650
		Commercial	95,820 sf	0.05 gpd/sf	4,791
72	6650 Franklin Ave.	Senior housing	68 du	190 gpd/du	12,920
73	1719 N. Whitley Ave.	Hotel	156 rm	120 gpd/rm	18,720
74	6140 W. Hollywood Blvd.	Hotel	102 rm	120 gpd/rm	12,240
		Condominiums	27 du	190 gpd/du	5,130
		Restaurant (11,460 sf)	764 seats	30 gpd/seat	22,920
75	6400 W. Sunset Blvd.	Residential	232 du	190 gpd/du	44,080
		Commercial	7,000 sf	0.05 gpd/sf	350
76	6430–6440 W. Hollywood Blvd.	Residential	260 du	190 gpd/du	49,400
		Office	3,580 sf	0.12 gpd/sf	430
		Retail	11,020 sf	0.025 gpd/sf	276
		Restaurant (3,200 sf)	213 seats	30 gpd/seat	6,400
77	6630 W. Sunset Blvd.	Apartments	40 du	190 gpd/du	7,600
		Retail	6,634 sf	0.025 gpd/sf	166
78	747 N. Western Ave.	Residential	44 du	190 gpd/du	8,360
		Retail	7,700 sf	0.025 gpd/sf	193
79	5570 W. Melrose Ave.	Apartments	52 du	190 gpd/du	9,880
		Commercial	5,500 sf	0.05 gpd/sf	275
80	1317–1345 N. Vermont/1328 N. New Hampshire/4760 Sunset/1505 N. Edgemont/1517 N. Vermont/1424–1430 N. Alexandria	Hospital Expansion	211,992 sf	0.25 gpd/sf	52,998
81	712 N. Wilcox Ave.	Apartments	103 du	190 gpd/du	19,570

**Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation**

No.	Project	Description/Land Use	Size	Generation Factor^{a,b}	Total Wastewater Generation (gpd)
82	1540–1552 Highland Ave.	Residential	950 du	190 gpd/du	180,500
		Hotel	308 rm	120 gpd/du	36,960
		Office	95,000 sf	0.12 gpd/sf	11,400
		Commercial Retail	185,000 sf	0.05 gpd/sf	9,250
83	1276 N. Western Ave.	Apartments	75 du	190 gpd/du	14,250
84	1723 N. Wilcox Ave.	Apartments	68 du	190 gpd/du	12,920
		Retail	3,700 sf	0.025 gpd/sf	93
85	1300 N. Vermont Ave.	Office	30,933 sf	0.12 gpd/sf	3,712
86	5651 W. Santa Monica Blvd.	Condominiums	375 du	190 gpd/du	71,250
		Retail	377,900 sf	0.025 gpd/sf	9,448
87	915 N. La Brea Ave.	Supermarket	33,500 sf	0.025 gpd/sf	838
		Apartments	179 du	190 gpd/du	34,010
88	6225 W. Hollywood Blvd.	Office	210,000 sf	0.12 gpd/sf	25,200
89	1411 N. Highland Ave.	Apartments	76 du	190 gpd/du	14,440
		Commercial	2,500 sf	0.05 gpd/sf	125
90	6915 Melrose Ave.	Condominiums	13 du	190 gpd/du	2,470
		Retail	6,250 sf	0.025 gpd/sf	156
91	5663 Melrose Ave.	Condominiums	96 du	190 gpd/du	18,240
		Retail	3,350 sf	0.025 gpd/sf	84
92	2580 Cahuenga Blvd. E.	Theater	311 seats	3 gpd/seat	933
		Restaurant (5,400 sf)	360 seats	30 gpd/seat	10,800
		Office	30 emp	11 gpd/emp	330
93	1341 Vine St.	Office	285,719 sf	0.12 gpd/sf	34,286
		Apartments	200 du	190 gpd/du	38,000
		Restaurant (16,135 sf)	1,076 seats	30 gpd/seat	32,280

**Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation**

No.	Project	Description/Land Use	Size	Generation Factor^{a,b}	Total Wastewater Generation (gpd)
94	925 La Brea Ave.	Retail	16,360 sf	0.025 gpd/sf	409
		Office	45,432 sf	0.12 gpd/sf	5,452
95	135 N. Western Ave.	Restaurant (4,066 sf)	272 seats	30 gpd/seat	8,160
96	7445 W. Sunset Blvd.	Specialty Grocery	32,416 sf	0.025 gpd/sf	810
97	7811 Santa Monica Blvd.	Hotel	78 rm	120 gpd/du	9,360
		Apartments	88 du	190 gpd/du	16,720
		Commercial	65,888 sf	0.05 gpd/sf	3,294
98	6421 W. Selma Ave.	Quality Restaurant (17,607 sf)	1,174 seats	30 gpd/seat	35,220
99	Hollywood Central Park Hollywood Freeway (US-101)	Park (14.35 acres) ^d	625,086 sf	0.093 gpd/sf	58,133
		Amphitheater	500 seats	3 gpd/seat	1,500
		Inn	5 rm	120 gpd/rm	600
		Community Center	30,000 sf	0.05 gpd/sf	1,500
		Banquet Space	15,000 sf	0.35 gpd/sf	5,250
		Commercial	29,000 sf	0.05 gpd/sf	1,450
		Apartments	15 du	190 gpd/du	2,850
100	4905 W. Hollywood Blvd.	Retail	36,600 sf	0.025 gpd/sf	915
101	6409 W. Sunset Blvd.	Hotel	275 rm	120 gpd/du	33,000
		Retail	1,900 sf	0.025 gpd/sf	48
102	4900 W. Hollywood Blvd.	Apartments	150 du	190 gpd/du	28,500
		Retail	13,813 sf	0.025 gpd/sf	345

**Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation**

No.	Project	Description/Land Use	Size	Generation Factor^{a,b}	Total Wastewater Generation (gpd)
103	Hollywood Community Plan Update South of City of Burbank, City of Glendale, and SR-134; west of Interstate 5; north of Melrose Ave.; south of Mulholland Dr., City of West Hollywood, Beverly Hills, including land south of the City of West Hollywood and north of Rosewood Ave. between La Cienega Blvd. and La Brea Ave.	Updates to the existing land use policies and land use diagram in the Hollywood Community Plan would result in future growth through horizon year 2040.			
Total Wastewater Generation from Related Projects					4,609,255
Net Wastewater Generation from Project^e					108,670
Total Wastewater Generation from Related Projects and Project					4,717,925

**Table IV.L.2-6 (Continued)
Cumulative Wastewater Generation**

No.	Project	Description/Land Use	Size	Generation Factor ^{a,b}	Total Wastewater Generation (gpd)
<p><i>du = dwelling units</i> <i>emp = employees</i> <i>gpd = gallons per day</i> <i>rm = rooms</i> <i>sf = square feet</i> <i>stu = students</i></p> <p>^a <i>This analysis is based on 100 percent of sewage generation rates provided by LASAN (effective April 6, 2012).</i></p> <p>^b <i>This analysis conservatively assumes all dwelling units are 3-bedroom units. In addition, consistent with assumptions applied by LADWP and KPFF Consulting Engineers, a standard factor of 15 square feet per seat was assumed to calculate the number of seats for restaurant uses.</i></p> <p>^c <i>This related project does not distinguish square footage between these uses. Therefore, to provide a conservative analysis, this related project is assumed to include only restaurant uses.</i></p> <p>^d <i>Sewage generation rates provided by LASAN do not include rates for parks uses per acre. Therefore, the generation rate for park uses is assumed to be equivalent to that of landscaping needs. The generation rate for landscaping is based on calculations from the Project's WSA.</i></p> <p>^e <i>As discussed above, the Residential Option with bungalows as restaurants would generate 98,040 net gpd; the Residential Option with bungalows as residential units would generate 82,194 net gpd, the Office Option with bungalows as restaurants would generate 108,670 net gpd; and the Office Option with bungalows as residential units would generate 94,340 net gpd. In order to provide a conservative analysis, the highest estimated wastewater generation (i.e., 108,670 net gpd) is used in this impact analysis.</i></p> <p><i>Source: Eyestone Environmental, 2021.</i></p>					

(0.109 mgd),²⁶ this equates to a cumulative increase in average daily wastewater flow of approximately 4,717,925 gpd, or 4.72 mgd.

(b) Wastewater Treatment

Based on LASAN's average flow projections for the Hyperion Service Area, it is anticipated that the average flow in 2027 would be approximately 335.5 mgd.²⁷ In addition, the Hyperion Service Area's total treatment capacity would be approximately 550 mgd in 2027, which is the same as its existing capacity.

The Project's wastewater flow of up to approximately 0.109 mgd combined with the related projects' flow of approximately 4.61 mgd and the forecasted 2027 wastewater flow of 335.5 mgd for the Hyperion Service Area would result in a total wastewater flow of approximately 340.2 mgd. Based on the Hyperion Service Area's estimated future capacity of approximately 550 mgd, the Hyperion Service Area is expected to have adequate capacity to accommodate the wastewater flow of approximately 340.2 mgd aggregated from the Project, related projects, and forecasted growth by 2027. The 4.72 mgd of cumulative plus Project wastewater would represent approximately 0.86 percent of the Hyperion Service Area's existing design capacity of 550 mgd. Furthermore, as previously stated, the One Water LA Plan provides an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management based on water demand projections through 2040. The Wastewater Facilities Plan, which is included in Volume 2 of the One Water LA Plan, describes the City's existing wastewater collection and water reclamation plants, as well as the recommended improvements to meet future flow conditions. As stated therein, based on the design capacities and the projected future flows through the year 2040, all existing water reclamation facilities are anticipated to have sufficient capacity to manage wastewater flows.²⁸

²⁶ As discussed above, the Residential Option with bungalows as restaurants would generate 98,040 net gpd; the Residential Option with bungalows as residential units would generate 82,194 net gpd, the Office Option with bungalows as restaurants would generate 108,670 net gpd; and the Office Option with bungalows as residential units would generate 94,340 net gpd. In order to provide a conservative analysis, the highest estimated wastewater generation (i.e., 108,670 net gpd) is used in this impact analysis.

²⁷ Los Angeles Department of Water and Power, *One Water LA 2040 Plan, Volume 2, Table ES.1, Projected Wastewater Flows*. Based on a straight-line interpolation of the projected flows for the Hyperion Service Area (which is comprised of the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles-Glendale Water Reclamation Plant) for 2020 (approximately 323 mgd) and 2030 (approximately 348 mgd). The 2025 value is extrapolated from 2020 and 2030 values: $[(348 \text{ mgd} - 323 \text{ mgd}) \div 10] \times 5 + 323 = 335.5 \text{ mgd}$

²⁸ LADWP, *One Water LA 2040 Plan, Executive Summary*, p. ES-20.

Therefore, the Project would not combine with related development to exceed wastewater treatment requirements of the LARWQCB or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Project impacts on the wastewater treatment systems would not be cumulatively considerable, and cumulative impacts would be less than significant.

(c) Wastewater Infrastructure

As with the Project, new development projects occurring in the vicinity of the Project Site would be required to coordinate with LASAN via WWSIs or SCARs to determine adequate sewer capacity. In addition, new development projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements. Furthermore, similar to the Project, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code.

Therefore, the Project would not combine with related development to result in a determination by LASAN that it does not have adequate capacity to serve projected demand. Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts with regard to wastewater would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to wastewater were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact levels remain less than significant.