IV. Environmental Impact Analysis

L.2 Utilities and Service Systems—Wastewater

1. Introduction

This section of the Draft EIR analyzes the potential impacts of the Project on the existing wastewater infrastructure and treatment facilities that serve the Project Site. The analysis describes the existing wastewater system (including local and wregional conveyance and treatment facilities), calculates the wastewater to be generated by the Project, and evaluates whether sufficient capacity would be available to meet the Project's estimated wastewater generation. The analysis is based, in part, on the *Utility Infrastructure Technical Report* (Utility Report) prepared for the Project by KPFF Consulting Engineers dated December, 2020, and included in Appendix L of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

The California Green Building Standards Code, commonly referred to as the CALGreen Code, is set forth in California Code of Regulations Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all water closets (i.e., flush toilets) are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush (or 0.125 gallon per flush for wall-mounted urinals). 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 0.5 gpm at 60 psi for nonresidential lavatory faucets; and 1.8 gpm at 60 psi for kitchen faucets.

(2) Local

(a) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) guides the update of the community plan and Citywide elements, thereby providing a

Citywide strategy for long-term growth. As such, it addresses state and federal mandates to plan for the future. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for utilities in the City. Goal 9A of Chapter 9 is to provide for adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

(b) City of Los Angeles Integrated Resources Plan

The City of Los Angeles 2006 Integrated Resources Plan (IRP) addresses the facility needs of the City's wastewater program, recycled water, and urban runoff/stormwater management through the year 2020.[1] The IRP preparation process began in 1999 in two phases. Phase I addressed the anticipated water, wastewater, and stormwater needs of the City through the year 2020 using comprehensive, basin-wide water resources planning. During this initial phase, which took place from 1999 to 2001, gaps in the existing water system's capability to serve future populations, as projected by the Southern California Association of Governments (SCAG), were examined and different Preliminary Alternatives to address these gaps were created. Phase II, which took place from 2002 to 2006, involved the selection and comparison of four Preliminary Alternatives all aimed at ensuring implementation of the appropriate infrastructure, policies, and programs to reliably serve Los Angeles to 2020 and beyond. Within Phase II, a Financial Plan, a Public Outreach Program, and a five-volume Facilities Plan were also developed. The Facilities Plan contains alternative development options and a Capital Improvement Program, as well as wastewater, water, and stormwater runoff management strategies. The Capital Improvement Program provides anticipated capital, operation, maintenance, project timing, and implementation strategies for tracking and monitoring triggers.[2]

The Los Angeles City Council certified the IRP Final Environmental Impact Report (EIR) prepared within Phase II on November 14, 2006, and adopted a final alternative, the Approved Alternative (Alternative 4), from the four Preliminary Alternatives. The City's Final IRP 5-Year Review was released in June 2012. According to the 2012 Final IRP 5-Year Review, Alternative 4 included 12 projects that were separated into two categories: (1) "Go Projects" for immediate implementation; and (2) "Go-If Triggered Projects" for

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[1] *The IRP replaced the City's 1991 Wastewater Facilities Plan.*

[2] *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; City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, City of Los Angeles Integrated Resources Plan Summary Report, December 2006; City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, City of Los Angeles Integrated Resources Plan: Planning for Wastewater, Recycled Water and Storm Water Management: A Visionary Strategy for the Right Facilities, in the Right Place, at the Right Time, Executive Summary, December 2006.*

implementation in the future once a trigger is reached.[3] Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the Final IRP 5-Year Review, the Go Projects consisted of six capital improvement projects for which triggers were considered to have been met at the time the IRP EIR was certified. The Go-If Triggered Projects consisted of six capital improvement projects for which triggers were not considered to have been met at the time the IRP EIR was certified.

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

(c) City of Los Angeles One Water LA 2040 Plan—Wastewater Facilities Plan

The City has developed the One Water LA 2040 Plan, which builds on the premise of the IRP as a collaborative approach to develop an integrated framework for managing the City's water resources, watersheds, and water and wastewater facilities in an environmentally, economically, and socially beneficial manner.[4] This includes the Final Draft Wastewater Facilities Plan (WWFP). The purpose of the WWFP is to guide the Los Angeles Bureau of Sanitation (BOS or LASAN) with its decision-making related to the implementation of system improvements to its wastewater collection and treatment facilities through 2040. The WWFP provides the underlying documentation to make informed decisions when considering investments to repair, replace, or enhance existing facilities and construct new water conveyance and treatment facilities required to serve the City's needs through 2040.[5]

(d) Sewer System Management Plan

On May 2, 2006, the State Water Resources Control Board (SWRCB) adopted the Statewide General Waste Discharge Requirements (WDRs) for publicly owned sanitary

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[3] *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.*

[4] *LASAN, About One Water Los Angeles CA www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla/s-lsh-es-owla-au?_adf.ctrl-state=le24zdn44_5&_afrLoop=8232048882336511#!, accessed January 24, 2020.*

[5] *LASAN, One Water LA 2040 Plan, Vol. 2—Final Draft Wastewater Facilities Plan, April 2018.*

sewer systems that are greater than one mile in length and that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in California. Under the Statewide General WDRs, the owners of such systems must comply with the following requirements: (1) acquire an online account from the SWRCB and report all sanitary sewer overflows online; and (2) develop and implement a written plan referred to as a Sewer System Management Plan (SSMP) to control and mitigate sanitary sewer overflows. The City's original SSMP was adopted by the City and certified with the SWRCB on February 18, 2009.[6] The City's SSMP was last updated in February 2017, which confirmed that the SSMP is in full compliance with the Statewide General WDRs and are effective.[7]

The goal of the SSMP for the Hyperion Service Area, the wastewater treatment system in which the Project Site is located, is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system to meet the WDRs established by the SWRCB for the system.[8] In addition, the SSMP identifies protocols to help reduce and prevent sanitary sewer overflows, and to mitigate any sanitary sewer overflows that do occur.

(e) City of Los Angeles Municipal Code

Los Angeles Municipal Code (LAMC) Sections 64.11 and 64.12 require approval of a sewer permit prior to connection to the sewer system. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based on wastewater flow strength as well as volume. The determination of wastewater strength for each applicable project is based on City guidelines for the average wastewater concentrations of biological oxygen demand and suspended solids for each type of land use. Fees paid to the Sewerage Facilities Charge 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.

Section 64.15 of the LAMC requires that the City perform a Sewer Capacity Availability Request (SCAR) review when: (1) a sewer permit is required to connect to the City's sewer collection system; (2) there is a proposal for additional discharge into an existing public sewer connection; or (3) a future sewer connection or future development would generate 10,000 gallons or more of sewage per day. A SCAR determines if there is

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[6] *LASAN, Sewer System Management Plan: Hyperion Sanitary Sewer System, February 2017.*

[7] *LASAN, Sewer System Management Plan: Hyperion Sanitary Sewer System, February 2017.*

[8] *LASAN, Sewer System Management Plan: Hyperion Sanitary Sewer System, February 2017.*

adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site includes 2.24 acres located bounded by Angels Flight to the north, 4th Street to the south, Hill Street to the east, and Olive Street to the west. The Project Site currently contains vacant land and the Los Angeles County Metropolitan Transportation Authority (Metro) B and D Lines (formerly Red and Purple Lines) Pershing Square Station portal. According to the Utility Report, no wastewater is currently generated at the Project Site. Hence, all the wastewater generated by the Project (discussed in the Project Impacts subsection later in this section) would be a net increase.

(2) Wastewater Infrastructure

LASAN operates and maintains the wastewater treatment, reclamation and collection facilities serving most of the City and several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. The City's wastewater infrastructure consists of over 6,700 miles of local, trunk, mainline and major interceptor sewers, five major outfall sewers, 47 pumping plants, and four wastewater treatment plants serving approximately four million people.[9]

According to the Utility Report, there are multiple sanitary sewer mains surrounding the Project Site as set forth below:

- 15-inch sewer main in Olive Street which flows southwest to 4th Street and has a calculated capacity of 13.14 cfs (7.07 mgd) according to the online Navigate LA database. According to LASAN's Wastewater Service Information (WWSI) included as Exhibit 4 of the Utility Report, this sewer main a 50-percent design capacity of 4.25 mgd.

- 15-inch sewer main in Hill Street which flows southwest to 4th Street and has a calculated capacity of 8.05 cfs (4.33 mgd) according to the online Navigate LA database. According to the WWSI, this sewer main has a 50-percent design capacity of 2.6 mgd.

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[9] *LASAN, Wastewater System Fact Sheet. Also, KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water, Wastewater and Energy—Angels Landing Mixed-Use Project, December 2020. Included as Appendix L of this Draft EIR.*

- 12-inch sewer main in Hill Street which flows southwest to 4th Street and does not have a calculated capacity available on Navigate LA. The capacity of this 12-inch pipe was not provided in the WWSI.

- 18-inch sewer main in Hill Street which the 15-inch and 12-inch mains in Hill Street listed above connect into, and which flows southwest to 4th Street, does not have a calculated capacity available on Navigate LA. The capacity of this sewer main was not provided in the WWSI.

- 15-inch sewer main in 4th Street which flows southeast to Hill Street and does not have a calculated capacity available on Navigate LA. The capacity of this sewer main was not provided in the WWSI.

- 6-inch sewer main in 4th Street which flows southeast to Hill Street with a calculated capacity of 3.76 cfs (2.02 mgd) according to Navigate. The capacity of this sewer main was not provided in the WWSI.

- 30-inch sewer main in 4th Street which flows southeast to Hill Street and has a calculated capacity of 32.98 cfs. (17.7 mgd) according to Navigate LA. The capacity in this sewer main was not provided in the WWSI.

- 36-inch sewer main in 4th Street which all of the sewer mains listed above connect into, and which flows southeast to Hill Street, does not have a calculated capacity available on Navigate LA. According to the WWSI, this sewer main has a 50-percent design capacity of 16.14 mgd.

These sewer mains connect to a network of sewer lines which ultimately convey wastewater to the Hyperion Water Reclamation Plant (HWRP) discussed further below.

The Project Site contains mostly unmaintained landscaping, vacant area, and the Metro B/D Lines Pershing Square Station portal, with no apparent existing sewer services.

(3) Wastewater Treatment

LASAN is responsible for 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.[10] The Hyperion Service Area

[10] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed January 24, 2020. Also, KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water, Wastewater and Energy—Angels Landing Mixed-Use Project, December 2020. Included as Appendix L of this Draft EIR.*

is served by the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant.[11] The Terminal Island Service Area is served by the Terminal Island Treatment Plant.[12] As indicated previously, the Project Site is located within the Hyperion Service Area and is served by the HWRP.

(a) Hyperion Sanitary Sewer System

As shown in Table IV.L.2-1 on page IV.L.2-8, the existing design capacity of the Hyperion Sanitary Sewer System 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] Based on the One Water LA 2040 Plan–Wastewater Facilities Plan, the average wastewater flow rate in the Hyperion Sanitary Sewer System 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).[14] The One Water LA 2040 Plan—Wastewater Facilities Plan projects that annual average wastewater flows in the Hyperion Sanitary System would increase to 323 mgd in 2020, 348 mgd in 2030, and 358 in 2040.[15] As such, current and projected flows are below the Hyperion Sanitary Sewer System's design capacity of approximately 550 mgd.

(b) Hyperion Water Reclamation Plant

As discussed above, the Project Site is served by the HWRP. As shown in Table IV.L.2-1, the HWRP has capacity to treat approximately 450 mgd of wastewater for full secondary treatment and currently treats approximately 275 mgd.[16] As such, the HWRP is currently operating at approximately 61 percent of its capacity, with a remaining

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[11] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed January 24, 2020.*

[12] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed January 24, 2020.*

[13] *LASAN, Wastewater System Fact Sheet.*

[14] *LASAN, One Water LA 2040 Plan, Vol. 2—Final Draft Wastewater Facilities Plan, April 2018. Also, KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water, Wastewater and Energy—Angels Landing Mixed-Use Project, December 2020. Included as Appendix L of this Draft EIR.*

[15] *LASAN, One Water LA 2040 Plan, Vol. 2—Final Draft Wastewater Facilities Plan, April 2018. Also, KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water, Wastewater and Energy—Angels Landing Mixed-Use Project, December 2020. Included as Appendix L of this Draft EIR.*

[16] *LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afrLoop=3950078628628745#!, accessed January 24, 2020.*

Table IV.L.2-1
Existing Capacity of Hyperion Sanitary Sewer System

	Design Capacity (mgd)
Hyperion Water Reclamation Plant	450
Donald C. Tillman Water Reclamation Plant	80
Los Angeles–Glendale Water Reclamation Plant	20
Total	**550**

mgd = million gallons per day
Source: LA Sanitation, Wastewater System Fact Sheet.

available capacity of approximately 175 mgd. Based on the above, current flows to the HWRP are well below the design capacity of the HWRP 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.[17] The treated water from the HWRP is discharged through a five-mile outfall pipe at a depth of 190 feet into the Santa Monica Bay and Pacific Ocean.[18] The discharge from the Hyperion Treatment Plant into Santa Monica Bay is regulated by the HWRP's National Pollutant Discharge Elimination System Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use.[19] Accordingly, the HWRP's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds

[17] *LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afrLoop=3950078628628745#!, accessed January 24, 2020.*

[18] *LASAN, Hyperion Virtual Tour, Hyperion Treatment Plant Tour, Ocean Outfall into the Bay, 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/s-lsh-au-h?_adf.ctrl-state=ljvz6q49_596&_afrLoop=8243477885026291#!, accessed January 24, 2020.*

[19] *California Regional Water Quality Control Board, Los Angeles Region, 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.*

prescribed water quality standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay.[20]

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines 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; 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 listed above 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 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate wastewater impacts:

- 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.[21]

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[20] *LASAN, Environmental Monitoring www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ec-em?_adf.ctrl-state=xsmd2kqwx_131&_afrLoop=21105064772207683#!, accessed January 24, 2020.*

[21] *The Wastewater Facilities Plan referenced in the L.A. City CEQA Thresholds Guide has since been superseded by the Integrated Resources Plan and One Water LA 2040 Plan.*

b. Methodology

The analysis of Project impacts on wastewater conveyance infrastructure and treatment capacity is based on the Utility Report included in Appendix L of this Draft EIR. The assessment of the ability of the wastewater conveyance infrastructure system to accommodate the Project was made based on existing conditions and a preliminary analysis provided by LASAN in its WWSI and SCAR for the Project (included as Exhibits 4 and 10, respectively, of the Utility Report). LASAN's approach in the WWSI consisted of the study of a worst-case scenario envisioning peak demands from the relevant facilities occurring simultaneously on the wastewater system. A combination of flow gauging data and computed results from the City's hydrodynamic model were used to project current and future impacts due to additional sewer discharge from the Project. The Utility Report analyzes the potential impacts of the Project on wastewater conveyance infrastructure by comparing the estimated Project wastewater generation with the calculated available capacity of the sewer mains that would serve the Project.

To evaluate potential impacts relative to wastewater treatment capacity, the analysis evaluates whether adequate treatment capacity at the HWRP would be available to accommodate the Project based on the estimate of the Project's wastewater generation and data from LASAN.

c. Project Design Features

The Project would include water conservation features that would result in a reduction in wastewater generation. Such conservation features are listed in Section IV.L.1, Utilities and Service System—Water Supply and Infrastructure, of this Draft EIR.

d. Analysis of Project Impacts

Threshold (a): Would the Project 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]

[22] *Refer to: Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of water impacts; Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts; and the Initial Study, included as Appendix A of this Draft EIR, for a discussion of stormwater impacts.*

(1) Impact Analysis

(a) Construction

The Project Site is vacant and does not contain structures or uses that connect to the wastewater treatment infrastructure in the adjacent streets. Construction activities for the Project would result in minor amounts or wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal, and would be managed by the use of portable restrooms and hand wash areas that would not connect to the wastewater infrastructure. Accordingly, there would minimal to no wastewater flows into the City's wastewater system, and therefore wastewater generation from construction activities would not cause a measurable increase in wastewater flows compared to existing conditions.

Furthermore, based on the Geotechnical Report prepared for the Project in the context of the Initial Study (included in Appendix A of this Draft EIR), construction dewatering would not be required. Nevertheless, should any construction dewatering be required and discharged to the local sewers, the quantity of flow would be substantially less than the 373,382 gallons per day (gpd) of sewage to be generated during Project operation which the analysis in the next subsection concludes could be adequately accommodated by the existing sewer lines.

The Project would construct new on-site wastewater conveyance infrastructure that would link the proposed buildings. to the existing wastewater infrastructure in the surrounding streets. LASAN reviewed the wastewater characteristics of the Project in relation to available wastewater infrastructure around the Project Site, which includes the following: two existing 15-inch line on Olive Street and Hill Street; the sewage from those two lines joins to feed a 36-inch line on 4th Street before discharging into a 42-inch sewer line on Los Angeles Street.[23] The Project would grade and excavate most earthen areas on the Project Site except the Metro facilities, which will remain as is. The Project would then construct new onsite wastewater infrastructure that would require minor off-site trenching and connection work along the frontages of the Project Site to hook up with new wastewater infrastructure with the City's existing sanitary sewer lines.

LASAN determined in the WWSI and SCAR (included as Exhibits 4 and 10, respectively, of the Utility Report) that, based on the estimate operational sewer flows from the Project, the existing sewer system should accommodate the new sewer flows. No upgrades to the existing off-site sewer mains or greater wastewater conveyance system

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[23] *KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water, Wastewater and Energy—Angels Landing Mixed-Use Project, December 2020. Included as Appendix L of this Draft EIR.*

are anticipated. In addition, LASAN would further confirm sewer capacity during review of the building permits for the Project to ensure adequate sewer capacity for the Project. Furthermore, impacts associated with the installation of the wastewater infrastructure would be temporary and cease to occur once the installation is complete.

Based on the above, 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 to the wastewater conveyance and treatment system would be less than significant.

(b) Operation

Wastewater generated by the Project was estimated using LASAN sewage generation factors for the proposed uses. As shown in Table IV.L.2-2 on page IV.L.2-13, the Project would generate an estimated 373,382 gallons per day (gpd) of wastewater.

The Project would directly connect to the existing 15-inch sewer main in Hill Street, the existing 15-inch sewer main in Olive Street, the existing 36-inch sewer main in 4th Street, each of which is located adjacent to the Project Site, or to some combination of these sewer mains. The Hill Street and Olive Street sewer mains flow downhill in the southern direction, and connect to the 36-sewer main in 4th Street where the sewage flows in an easterly direction to a 42-inch segment of the 4th Street sewer main and then south in a 42-inch sewer main in South Los Angeles Street. The sewage then continues flowing through the Hyperion Sanitary Sewer System to the HWRP treatment.

LASAN prepared a WWSI for the Project on November 2, 2020, included as Exhibit 4 of the Utility Report, which evaluates the ability of the wastewater system to serve the Project. LASAN evaluated a Project wastewater generation of 468,206 gpd in the WWSI, which is approximately equal to the Project's base wastewater generation before the implementation of the required and additional proposed water conservation measures discussed in Section IV.L.1, Water Supply and Infrastructure, of this Draft EIR. Table IV.L.2-3 on page IV.L.2-15, from the WWSI, identifies the current approximate flow level (d/D) and the design capacities at d/D of 50 percent in the applicable existing sewer mains. As indicated therein, the 15-inch Hill Street, 36-inch 4th Street, and 42-inch 4th Street sewer main all have adequate remaining available capacity to serve the Project. In addition, the WWSI states that: "Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project." As is typical with development projects, the WSSI also notes that a final approval for sewer capacity will be made conjunction with the issuance of connection permits. In addition, it should be noted that further gauging and evaluation is required by LAMC Section 64.14 and would be conducted to obtain final approval of sewer capacity and a connection permit for the Project

Table IV.L.2-2
Estimated Project Wastewater Generation

Facility	Average Daily Flow (gpd)[a]	Quantity	Base Generation (gpd)	Required Ordinances Water (and thus Wastewater) Savings (gpd)	Average Daily Wastewater Generation (gpd)
Residential: Bachelor Apt	75 du	42	3,150		
Residential: 1-Bedroom Apt	110 du	126	13,860		
Residential: 2-Bedroom Apt	150 du	60	9,000		
Residential: 3-Bedroom	190 du	24	4,560		
Residential: 1-Bedroom Condo	110 du	51	5,610		
Residential: 2-Bedroom Condo	150 du	91	13,650		
Residential: 3-Bedroom Condo	190 du	38	7,220		
Residential Units: Base Demand Adjustment		—	7,026		
Residential Units Total		**432**	**64,076**	**12,560**	**51,516**
Hotel: Rooms	120 rm	515	61,800		
Hotel: Base Demand Adjustment		—	5,597		
Hotel Room Total		**515**	**67,397**	**7,355**	**60,042**
Residential Amenity: Lounge/Bar	0.72 sf	3,000	2,160		
Residential Amenity: Fitness Center	0.65 sf	3,800	2,470		
Residential Amenity: Community Dining Area	0.36 sf	1,475	527		
Residential Amenity: Game Room	0.10 sf	1,150	115		
Residential Amenity: Co-Working Space/ Business Center	0.12 sf	1,000	120		
Residential Amenity: Outdoor Dining Area	0.36 sf	2,400	857		
Residential Amenity: Dog Washing Area	0.425 sf	500	213		
Hotel Amenity: Full-Service Restaurant	30 seats	541	16,230		
Hotel Amenity: Ballroom	0.12 sf	16,590	2,034		
Hotel Amenity: Meeting Rooms	0.12 sf	7,390	887		
Hotel Amenity: Fitness/Spa	0.65 sf	14,780	9,607		
General Commercial: Retail	25 kgsf	30,466	762		
General Commercial: High-Turnover Restaurant	25 seats	925	23,125		
General Commercial: Quality Restaurant	30 seats	926	27,780		
Swimming Pools and Spa		—	281		
Amenities and Commercial Total		**—**	**87,168**	**23,315**	**63,853**
Covered Parking[e]	**20 kgsf**	**178,145**	**117**	**0**	**117**
Cooling Towers	**35.64 ton**	**7,000**	**249,480**	**49,896**	**199,584**
Proposed Subtotal			**468,238**	**93,126**	**375,112**
Less Additional Conservation					– 1,730
Net Additional Wastewater Generation					**373,382**

Table IV.L.2-2 (Continued)
Estimated Project Wastewater Generation

Facility	Average Daily Flow (gpd)[a]	Quantity	Base Generation (gpd)	Required Ordinances Water (and thus Wastewater) Savings (gpd)	Average Daily Wastewater Generation (gpd)

kgsf = thousand gross square feet
du = dwelling units
gpd = gallons per day
ksf = thousand square feet
rm = rooms
sf = square feet
[a] *City of Los Angeles Bureau of Sanitation wastewater generation rates (2012).*
Source: KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water, Wastewater and Energy—Angels Landing Mixed-Use Project, December 2020.

during the Project's permitting process. Furthermore, sanitary sewer connections and on-site infrastructure must be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards.

In addition to the WWSI, LASAN performed a SCAR review for the Project on May 23, 2018, which is included as Exhibit 10 of the Utility Report. As indicated therein, the 15-inch Hill Street sewer main has an available capacity of at least 388,405 gpd (0.388 mgd) which exceeds the total Project wastewater generation estimate of 373,382 gpd (0.373 mgd). As further indicated therein, the existing available capacity in the 36-inch and 42-inch 4th Street sewer mains also exceed the Project's wastewater generation.

Thus, based on existing conditions, expected sewer flows from the Project, and applicable regulatory compliance, the existing sewer mains that serve the Project Site are anticipated to have adequate available capacity to serve the Project.

Wastewater generated by the Project would be conveyed via LASAN's wastewater conveyance system within the Hyperion Sanitary Sewer System to the HWRP for treatment. The Hyperion Sanitary Sewer System has an existing capacity of 550 mgd and currently treats approximately 314 gpd, while the HWRP has an existing capacity of 450 mgd and currently treats approximately 275 mgd. Accordingly, the remaining available capacity at the Hyperion Sanitary Sewer System and HWRP are approximately 236 mgd and 175 mgd, respectively. The Project's wastewater flow of 373,382 gpd (0.373 mgd) would represent approximately 0.16 percent of the current remaining capacity of the

Table IV.L.2-3
WWSI Sewer Main Analysis

Pipe Diameter (inches)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity	Remaining Capacity Available
15-inch	Olive St.	(No gauging available)	4.25 mgd	Unknown
15-inch	Hill St.	(No gauging available)	2.6 mgd	>100% of Project Sewer Generation
36-inch	4th St.	8	16.14 mgd	14.85 mgd
42-inch	Los Angeles St.	26	17.6 mgd	13.02 mgd

d/D = current approximate flow level.

mgd = million gallons per day

Source: KPFF Consulting Engineers, Utility Infrastructure Technical Report: Water, Wastewater and Energy—Angels Landing Mixed-Use Project, December, 2020.

Hyperion Sanitary Sewer System and approximately 0.21 percent of the current remaining available capacity of the HWRP. Therefore, wastewater generated by the Project would be accommodated by the existing remaining available capacity of the Hyperion Sanitary Sewer System and HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, and development of new technologies, will ultimately determine the available capacity of the Hyperion Sanitary Sewer System in 2026, the anticipated buildout year of the Project. Future updates to the One Water LA 2040 Plan discussed above would provide for improvements beyond 2040 to serve future population needs. Nonetheless, for purposed of impact analysis in this Draft EIR, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2026. Thus, based on this conservative assumption, the 2026 effective capacity of the Hyperion Sanitary Sewer System would continue to be 550 mgd. Similarly, the capacity of the HWRP in 2026 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2026, the Project build-out year, would be approximately 267.4 mgd.[24] Accordingly, the future remaining available capacity in 2026 would be approximately 182.6 mgd. The Project's increase in average daily wastewater flow of 0.373 mgd would represent approximately 0.20 percent of the estimated remaining available capacity

[24] *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 Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2026 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 6] + 256 = ≈267.4 mgd.*

182.6 mgd at the HWRP in 2026. Therefore, wastewater generated by the Project is well with the capacity of the HWRP in the 2026 Project buildout year.

Therefore, given the amount of wastewater generated during Project operation, existing wastewater treatment capacity, and future wastewater treatment capacity, sufficient wastewater treatment capacity would be available to serve the proposed Project. **Based on the above, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to wastewater would be less than significant without mitigation.

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

Project construction would generate nominal amount of wastewater which would be collected and disposed of off-site by a private company providing portable restrooms. Accordingly, construction-related wastewater would not constrain the City's sanitary sewer system or exceed the capacity of the HWRP.

The WWSI shows sufficient capacity existing within the City's sanitary sewer system serving the Project Site to accommodate wastewater generated as part of Project operations without constraining sewer capacity. Ample future capacity also exists at the HWRP to handle Project wastewater flows. As indicated previously, the Project would generate an estimated 0.373 mgd of wastewater during operation. Wastewater generated by the Project would be conveyed via to the HWRP for treatment. The Project's wastewater flow would represent approximately 0.21 percent of the current remaining available capacity of the HWRP. Similarly, the Project's increase in average daily wastewater flow of 0.373 mgd would represent approximately 0.20 percent of the estimated remaining

available capacity 182.6 mgd at the HWRP in 2026 (the Project buildout year). Therefore, wastewater generated by the Project would be well within the capacity of the HWRP under both existing and 2026 (Project buildout year) conditions.

Based on the above, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. **Therefore, the Project would not result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's demand in addition to the provider's existing commitments, and, as such, impacts would be less than significant.**

(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 or included, 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 and treatment 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 Sanitary Sewer System. The Project, in conjunction with growth forecasted in the Hyperion Service Area through 2026 (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 2026 includes specific known development projects and general ambient growth.

(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 Sanitary Sewer System. As identified in Section III, Environmental Setting, of this Draft EIR, there are 50 related projects located in the vicinity of the Project Site. While not all of these Projects

would be served by the sewer lines serving the Project Site, these related projects would be located within the Hyperion Sanitary Sewer System. Forecasted growth from the related projects would generate an average daily wastewater flow of approximately 4,559,416 gpd (4.56 mgd), as shown in Table IV.L.2-4 on page IV.L.2-19. Combined with the Project's wastewater generation of 373,382 gpd (0.373 mgd), this equates to a cumulative increase in average daily wastewater flow of 4,932,798 gpd (4.93 mgd).

(b) 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 a WWSI (and eventually a SCAR) to determine adequate sewer capacity. In addition, new development projects would 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 offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. 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, which would reduce wastewater generation. **Therefore, Project impacts on the City's wastewater conveyance infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(c) Wastewater Treatment

Based on LASAN's average flow projections for the Hyperion Sanitary Sewer System, it is conservatively anticipated that the average flow in 2026, the Project's buildout year, would be 348 mgd.[25] The Hyperion Service Area's total treatment capacity would be approximately 550 mgd in 2026, conservatively assuming that the capacity would be the same as its existing capacity.

The Project wastewater flow of approximately 0.373 mgd, combined with the related projects flow of approximately 4.56 mgd and the forecasted 2026 wastewater flow of 348 mgd for the Hyperion Service Area, would together result in a total cumulative wastewater flow of approximately 353 mgd. Based on the Hyperion Sanitary Sewer System's current capacity of approximately 550 mgd, the Hyperion Sanitary Sewer System would have adequate capacity to accommodate the cumulative wastewater flow to

[25] *LASAN, One Water LA 2040 Plan, Vol. 2—Final Draft Wastewater Facilities Plan, April 2018.*

Table IV.L.2-4
Cumulative Wastewater Generation

No.	Project Name	Description	Size	Generation Rate (gpd)[a]	Total Wastewater Generation (gpd)
1	Equity Residential Mixed-Use 340 S. Hill St.	Apartments	406	190	77,140
		Affordable Apartments	22	190	4,180
		Office	2,980	0.12	358
		Retail	2,630	0.025	66
2	437 S. Hill St.	Condominiums	660	190	125,400
		Restaurant	13,742	30	13,742
3	Mixed-Use 400 S. Broadway	Apartments	450	190	85,500
		Retail	6,904	0.025	173
		Bar	5,000	0.72	3,600
4	4th & Spring Hotel 361 S. Spring St.	Hotel	315	120	37,800
		Meeting Space	2,000	0.12	240
5	5th & Hill 323 W. 5th St.	Hotel	190	120	22,800
		Meeting Room	6,100	0.12	732
		Apartments	31	190	5,890
		Restaurant[b]	29,200	30	29,200
6	Grand Avenue Project 100 S. Grand Ave.	Apartments	412	190	78,280
		Condominiums	1,648	190	313,120
		Retail	225,300	0.025	5,633
		Supermarket	53,000	0.025	1,325
		Restaurant[b]	67,000	30	67,000
		Health Club	50,000	0.65	32,500
		Event Facility	250	3	750
		Hotel	275	120	33,000
		Office	681,000	0.12	81,720
7	Hellman/Banco Building 354 S. Spring St.	Apartments	212	190	40,280

Table IV.L.2-4 (Continued)
Cumulative Wastewater Generation

No.	Project Name	Description	Size	Generation Rate (gpd)[a]	Total Wastewater Generation (gpd)
8	Tribune (LA Times) South Tower Project 222 E. 2nd St.	Condominiums	107	190	20,330
		Office	534,044	0.12	64,085
		Retail	7,200	0.025	180
9	433 South Main Street 433 S. Main St.	Condominiums	196	190	37,240
		Retail	5,300	0.025	133
		Restaurant[b]	900	30	900
10	Medallion Phase 2 300 S. Main St.	Apartments	471	190	89,490
		Restaurant[b]	27,780	30	27,780
		Retail	5,190	0.025	130
11	Mixed-Use (Times Mirror Square) 100 S. Broadway	Apartments	1,127	190	214,130
		Office	285,088	0.12	34,211
		Supermarket	50,000	0.025	1,250
		Restaurant[b]	75,589	30	75,589
12	Budokan of Los Angeles 237 S. Los Angeles St.	Sports Complex	43,453	0.2	8,691
13	Mixed-Use 601 S. Main St.	Apartments	452	190	85,880
		Retail	25,000	0.025	625
14	Spring Street Hotel 633 S. Spring St.	Hotel	176	120	21,120
		Bar	5,290	0.72	3,809
		Restaurant[b]	8,430	30	8,430
15	Broadway Mixed-Use 955 S. Broadway	Apartments	163	190	30,970
		Retail	6,406	0.025	160
16	Wilshire Grand Project 900 W. Wilshire Blvd	Hotel	560	120	67,200
		Apartments	100	190	19,000
		Office	150,000	0.12	18,000
		Retail/Restaurant[c]	275,000	0.025	5,156
				30	68,750

Table IV.L.2-4 (Continued)
Cumulative Wastewater Generation

No.	Project Name	Description	Size	Generation Rate (gpd)[a]	Total Wastewater Generation (gpd)
17	LA Civic Center Office 150 N. Los Angeles St.	Office	712,500	0.12	85,500
		Retail	35,000	0.025	875
		Child Care[e]	2,500	30	2,500
18	Mixed-Use 737 S. Spring St.	Apartments	320	190	60,800
		Pharmacy/Drugstore	25,000	0.025	625
19	Mixed-Use 732 S. Spring St.	Apartments	400	190	76,000
		Retail	15,000	0.025	375
20	8th/Grand/Hope Project 754 S. Hope St.	Condominiums	409	190	77,710
		Retail	7,329	0.025	183
21	Beaudry Ave & 2nd St. Mixed-Use Project 130 S. Beaudry Ave.	Apartments	220	190	41,800
		Other[d]	9,000	0.025	225
22	Mixed-Use 820 S. Olive St.	Apartments	589	190	111,910
		Retail	4,500	0.025	113
23	Mixed-Use 840 S. Olive St.	Condominiums	303	190	57,570
		Restaurant[b]	9,680	30	9,680
24	7th & Maple Mixed-Use 701 S. Maple Ave.	Apartments	452	190	85,880
		Retail	6,800	0.025	170
		Restaurant[b]	6,800	30	6,800
25	Mitsui Fudosan (Eighth and Figueroa Tower) 744 S. Figueroa St.	Apartments	436	190	82,840
		Restaurant[b]	3,750	30	3,750
		Retail	3,750	0.025	94
26	945 West 8th Street 945 W. 8th St.	Apartments	781	190	148,390
		Commercial	6,700	0.025	168
27	Mixed-Use 755 S. Los Angeles St.	Office	60,243	0.12	7,229
		Retail	16,694	0.025	417
		Restaurant[b]	26,959	30	26,959

Table IV.L.2-4 (Continued)
Cumulative Wastewater Generation

No.	Project Name	Description	Size	Generation Rate (gpd)[a]	Total Wastewater Generation (gpd)
28	Alexan South Broadway 850 S. Hill St.	Apartments	305	190	57,950
		Retail	3,500	0.025	88
		Restaurant[b]	3,500	30	3,500
29	845 Olive & 842 Grand Mixed-Use 845 S. Olive St.	Apartments	208	190	39,520
		Retail	2,430	0.025	61
30	Embassy Tower 848 S. Grand Ave.	Condominiums	420	190	79,800
		Retail	38,500	0.025	963
31	Southern California Flower Market Project 755 S. Wall St.	Apartments	323	190	61,370
		Office	53,200	0.12	6,384
		Commercial	8,820	0.025	221
32	Tenten Wilshire Expansion (the Icon) 1027 W. Wilshire Blvd	Condominiums	402	190	76,380
		Retail	4,728	0.025	118
33	Weingart Tower—Affordable Housing 554 S. San Pedro St.	Affordable Apartments	378	190	71,820
		Market-Rate Apartments	4	190	760
		Retail	1,758	0.025	44
		Office	4,410	0.12	529
		Flex	5,932	0.025	148
34	1018 West Ingraham Street 1018 W. Ingraham St.	Apartments	43	190	8,170
		Retail	7,400	0.025	185
35	Mixed-Use 609 E. 5th St.	Apartments	151	190	28,690
36	Sapphire Mixed-Use (Revised) 1111 W. 6th St.	Apartments	362	190	68,780
		Retail	25,805	0.025	645
37	600 South San Pedro Street 600 S. San Pedro St.	Apartments	303	190	57,570
		Commercial	19,909	0.025	498
38	Hill Street Mixed-Use 920 S. Hill St.	Apartments	239	190	45,410
		Retail	5,400	0.025	135

Table IV.L.2-4 (Continued)
Cumulative Wastewater Generation

No.	Project Name	Description	Size	Generation Rate (gpd)[a]	Total Wastewater Generation (gpd)
39	Ferrante 1000 W. Temple St.	Apartments	1,500	190	285,000
		Retail	30,000	0.025	750
40	655 South San Pedro Street Residential 655 S. San Pedro St.	Apartments	81	190	15,390
41	Broadway Palace 928 S. Broadway	Apartments	667	190	126,730
		Condominiums	17	190	3,230
		Retail	58,800	0.025	1,470
42	La Plaza Cultura Village 527 N. Spring St.	Apartments	345	190	65,550
		Retail	23,000	0.025	575
		Specialty Retail	21,000	0.025	525
		Restaurant[b]	11,000	30	11,000
43	Mixed-Use 1322 W. Maryland St.	Apartments	47	190	8,930
		Retail	760	0.025	19
44	Mixed-Use 700 W. Cesar Chavez Ave.	Apartments	300	190	57,000
		Retail	8,000	0.025	200
45	Hotel & Apartments 675 S. Bixel St.	Apartments	422	190	80,180
		Hotel	126	120	15,120
		Retail	4,874	0.025	122
46	949 South Hope Street Mixed-Use Development 949 S. Hope St.	Apartments	236	190	44,840
		Retail	5,954	0.025	149
47	940 South Hill Mixed-Use 940 S. Hill St.	Apartments	232	190	44,080
		Retail	14,000	0.025	350
48	Residential 350 S. Figueroa St.	Apartments	570	190	108,300

Table IV.L.2-4 (Continued)
Cumulative Wastewater Generation

No.	Project Name	Description	Size	Generation Rate (gpd)[a]	Total Wastewater Generation (gpd)
49	333 South Figueroa Street 333 S. Figueroa St.	Apartments	224	190	42,560
		Condominiums	242	190	45,980
		Hotel	599	120	71,931
		Commercial	28,705	0.025	718
50	Figueroa Centre 911 S. Figueroa St.	Hotel	220	120	26,400
		Apartments	200	190	38,000
		Commercial	94,080	0.025	2,352
Total					**4,559,416**
Proposed Project					**373,382**
Total + Proposed Project					**4,932,798**

[a] *City of Los Angeles Bureau of Sanitation wastewater generation rates (2012).*

[b] *Restaurant space assumed to be all full-service restaurant with 30 sf per seat.*

[c] *Assumed to be 75 percent retail, 25 percent restaurant.*

[d] *Assumed to be retail.*

[e] *The BOS wastewater generation rates do not include a rate for childcare, so the restaurant rate of 30 gpd/seat at 30 sf per seat is applied to each child.*

Source: Gibson Transportation Consulting, Inc., January 2020; Eyestone Environmental, December 10, 2020.

accommodate the Project and related projects. **Therefore, Project impacts on wastewater treatment systems 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 generation, treatment, and infrastructure were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.