IV. Environmental Impact Analysis

M.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 *Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater* (Infrastructure Technical Report: Wastewater)[1], prepared by KPFF Consulting Engineers, September 23, 2020. The *Infrastructure Technical Report: Wastewater* is included as **Appendix L** 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
- Los Angeles Municipal Codes
    - Los Angeles Green Building Code (Ordinance No. 181,480)
    - Sewer Capacity Availability Review (SCAR; LAMC Section 64.15)
    - Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1)
    - Bureau of Engineering Special Order No. SO 06-0691

[1] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020.*

(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.[2] 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.[3]

(b) Los Angeles Integrated Resources Plan

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

The Final IRP 5-Year Review was released in June 2012, which included 12 projects that were separated into two categories: (1) "Go Projects" for immediate implementation; and (2) "Go-If Triggered Projects" for implementation in the future once a trigger is reached.[4] Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the Final IRP 5-Year Review, the Go Projects consisted of six capital improvement projects for which triggers were considered to have been met at the time the IRP EIR was certified. The Go-If

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

[3] *City of Los Angeles Department of City Planning, Citywide General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Wastewater, originally adopted by City Council on December 11, 1996 and re-adopted on August 8, 2001.*

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

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.[5]

(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.[6] 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.[7] 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.

(d) 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.

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

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

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

LAMC Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),[8] 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),[9] 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 Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

(iv) Sewerage Facilities Charge

LAMC Sections 64.11 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.

[8] *City of Los Angeles, Ordinance No. 181480.*
[9] *City of Los Angeles, Ordinance No. 180822.*

(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).[10]

b) Existing Conditions

The Project Site is located within the South Park subarea of the Central City Community Plan, which is bounded by Figueroa Street and the Harbor Freeway to the west, Main Street to the east, 8th Street to the north, and the Santa Monica Freeway to the south, and is primarily made up of residential, medical, commercial, and retail uses. Warehouse space in one-story unreinforced masonry buildings is scattered throughout the district. The Central City Community Plan anticipates the South Park area will attract large commercial projects that will combine commercial and residential development to take advantage of the downtown area.

The Project Site is approximately 56,325 square feet (1.29 acres) and is currently occupied by multiple commercial buildings and a four-story residential hotel building. The Project fronts both West Pico Boulevard and South Hope Street.

(1) Wastewater Infrastructure

The City of Los Angeles has one of the largest sewer systems in the world including approximately 6,439 miles of sewers serving a population of more than four million. The Los Angeles sewer system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System.

The Project Site is located within the Hyperion Service Area, which has an existing design capacity of approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant).[11]

The Project Site is served by the Hyperion Sanitary Sewer System and the Hyperion Treatment Plant (HTP). In January 2019, a Sewer System Management Plan (SSMP) was prepared for the

[10] *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.*

[11] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants Website, accessed October 4, 2019.*

Hyperion Sanitary Sewer System pursuant to the State Water Control Board's (SWRCB) May 2, 2006 Statewide General Waste Discharge Requirements (WDRs).[12]

Wastewater conveyed into the HTP initially passes through screens and basins to remove coarse debris and grit. Primary treatment consisting of a physical separation process is then conducted where solids are allowed to either settle to the bottom of tanks or float on the surface. These solids (called sludge) are collected, treated, and recycled. The liquid portion that remains (called primary effluent) is treated through a secondary treatment using a natural biological process. Living microorganisms are added to the primary effluent to consume organic constituents. These microorganisms are later harvested and removed as sludge. After secondary treatment is completed, the treated effluent is conveyed approximately five miles offshore at a depth of approximately 200 feet. As this treated effluent enters the ocean environment, it is diluted at a ratio of over 80 parts seawater to one part treated effluent at the discharge point. Monitoring occurs throughout the treatment process and after the treated effluent is discharged into the marine environment.

The sludge that is collected at the plant is also treated. The sludge is anaerobically digested to reduce its volume and to produce reusable methane gas for energy use. Excess water that remains in the digested sludge is separated by centrifuge type dewatering equipment. The resultant material is reused in a variety of beneficial methods.

In addition to the HTP, the City operates other plants that serve the region, including the Donald Tillman Water Reclamation Plant, which uses a conventional activated sludge process with dual filters to produce treated effluent to a tertiary level that meets the State of California's requirements for recycled water use. The City provides recycled water throughout its service areas that can be used for irrigation, commercial toilets, or industrial purposes from the reclamation plant. The remaining sludge is returned to the Donald Tillman Water Reclamation Plant main sewer outfall for final treatment at the HTP. The primary responsibility of the BOS is to collect, clean, and recycle solid and liquid waste generated by residential, commercial, and industrial users in the City and surrounding communities. The Wastewater Engineering Services Division carries out its responsibilities by the management and administration of three primary programs:

(1) Wastewater collection, conveyance, treatment, and disposal;

(2) Solid resources collection, recycling, and disposal; and

(3) Watershed protection.

The City requires that, as part of the normal construction/building permit process, the Applicant or its successor confirms with the City that the capacity of the local and trunk lines are sufficient to accommodate a Project's sewer flows during the construction and operation phases.

[12] *City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 2019.*

Furthermore, a Project shall implement any upgrades to the sewer system serving the Project that could be needed to accommodate the Project's wastewater generation.

The Project fronts both West Pico Boulevard and South Hope Street. Based on available record data provided by the City, there is a 10-inch vitrified clay pipe (VCP) sewer line in South Hope Street, and a 10-inch VCP sewer line in West Pico Boulevard. Based on the City of Los Angeles Bureau of Engineering's online Navigate LA database, the sewer main in South Hope Street has a calculated capacity of 1.56273 cubic feet per second (cfs) (1.01001 million gallons per day (mgd)), and the sewer main in West Pico Boulevard has a calculated capacity of 1.57591 cfs (1.01853 mgd).[13] Available records indicate that South Hope Street has eight sewer wyes and four active laterals, and West Pico Boulevard has three wyes and no active laterals allocated to the Project Site.

The Project Site is approximately 56,325 square feet and is currently occupied by multiple commercial buildings and a four-story residential hotel building. Wastewater generation estimates for the existing Project Site have been prepared based on BOS sewerage generation factors, as summarized in **Table IV.M.2-1, Existing Average Daily Wastewater Generation**, below.

Table IV.M.2-1
Existing Average Daily Wastewater Generation

Land Use	Size (square feet)	Generation Rate (gpd/sf) [a]	Total Sewage Generation (gpd)
Commercial	32,550 sf	54.2 gpd/1,000 sf	1,764
Hotel	111 rooms	NA [b]	-- [b]
Total Existing Wastewater Generation			**1,764**

Notes: gpd = gallons per day; sf = square feet
a The average daily flow based on 100% of City of Los Angeles BOS sewerage generation factors.
b The Morrison Hotel has been vacant since 2006 and does not currently consume water.
*Source (table): KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, page 4. See **Appendix L** of this Draft EIR.*

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 utilities and service systems 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 telecommunication facilities, the construction or relocation of which could cause significant environmental effects?***

[13] *City of Los Angeles Navigate LA Interactive Website, accessed June 2019.*

Threshold b) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes the following factors and considerations identified in the Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions:

- *Cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or*

- *The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.*

b) Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Infrastructure Technical Report: Wastewater included as **Appendix L** of this Draft EIR. The anticipated wastewater flows to be generated by the Project are based on 100 percent of the water demand calculated in the WSA, discussed in **Section IV.M.1-1, Utilities and Service Systems – Water**, of this Draft EIR.

The environmental impacts of the Project with respect to wastewater are determined based on the proposed increase in wastewater generation and the capacity of existing and proposed wastewater infrastructure. The existing sewer capacity and wastewater generation is compared to the Project's wastewater generation and future sewer capacity, including improvements associated with the Project.

Pursuant to LAMC Section 64.15, the BOS Wastewater Engineering Division made a preliminary analysis of the local and regional sewer conditions to determine if available wastewater conveyance and treatment capacity exists for future development of the Project Site. The BOS's approach 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. The data used in this report are based on the findings of the BOS preliminary analysis. Based on this analysis, a determination is made as to whether the existing wastewater infrastructure and facilities can accommodate the Project's wastewater flow.

c) Project Design Features

No specific Project Design Features have been identified with regard to wastewater generation.

d) Analysis of Project Impacts

Threshold a) Would the project require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects?

(1) Impact Analysis

(a) Construction

Construction activities for the Project would result in a temporary increase in wastewater generation as a result of construction activities at the Project Site. Wastewater generation would occur incrementally throughout construction of the Project as a result of construction workers on-site. Construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the adjacent sewer infrastructure; however, it is assumed that the waste removed from the portable restrooms would ultimately be emptied within the service boundaries of the Hyperion Treatment Plant, which, as detailed below under the operation analysis, to have adequate capacity to treat the amount of wastewater projected to be produced by operation of the Project. Given that the amount of wastewater that would be produced by construction of the Project would be less than that produced by operation, which as discussed below can be adequately handled by existing wastewater facilities, the Hyperion Treatment Plant would have adequate capacity to treat the waste removed from the portable restrooms as well.

The Project will require construction of new on-site infrastructure to serve the new building, and potential upgrade and/or relocation of existing infrastructure. 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 will 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 is required in order to connect to the public main. Therefore, as part of the Project, pursuant to project design feature PDF TR-1, a Construction Staging and Traffic Management Plan (detailed in **Section IV.K, Transportation)**, would be implemented to reduce any temporary pedestrian and traffic impacts during construction, ensuring safe vehicle travel and safe pedestrian and emergency vehicle access. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete.

Therefore, construction of the Project would not require the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects and impacts would be less than significant.

(b) Operation

Implementation of the Project would increase the average and peak daily wastewater flows from the Project Site. As shown in **Table IV.M.2-2, Estimated Daily Wastewater Generation,** the Project is estimated to generate a net increase of approximately 97,593 gpd.

Table IV.M.2-2
Estimated Daily Wastewater Generation

Land Use	Size	Generation Rate (gpd) [a]	Total Generation (gpd)
Apartment: 1 Bedroom	74 du	110/du	8,140
Apartment: 2 Bedroom	62 du	150/du	9,300
Base Demand Adjustment [b]	--	--	2,110
Hotel	444 rooms	120/room	53,280
Base Demand Adjustment [b]	--	--	4,891
Museum	11,091 sf	30/1,000 sf	333
Gyms [c]	2,476 sf	650/1,000 sf	1,610
Ballroom [d]	17,019 sf	120/1,000 sf	2,042
Bar	2,838 sf	720/1,000 sf	2,043
Restaurant: Full Service [e]	586 seats [f]	30/seat	17,577
Meeting Rooms	1,372	120/1,000 sf	165
Lobbies and Amenities [g]	23,727 sf	50/1,000 sf	1,186
Pool/Spa [h]	1,089 sf	--	102
Covered Parking	90,000 sf	0.65/1,000 sf	53
Cooling Tower	1,200 tons	--	21,972
Total Project Wastewater Generation			124,804
Required Water Savings [i]			*-21,896*
Additional Water Savings [j]			*-3,551*
Existing Wastewater Generation			*-1,764*
Net Project Wastewater Generation			**97,593**

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

a Wastewater generation rate source: City of Los Angeles, Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge, Sewer Generation Factor for Residential and Commercial Categories, 2012.

b Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates.

c Includes both the hotel fitness center and residential gym amenities.

d Includes all ballroom space as well as all adjacent amenity terraces.

e Per the Traffic Assessment, the "Restaurant" land use includes all restaurant space, including the high-turnover restaurant (indoor seating, courtyard, chef's office, bathroom, and sidewalk restaurant space on W. Pico Boulevard and S. Hope Street), the rooftop restaurant/lounge (seating, kitchen/back of house, manager's office, service area, covered amenity space, bathrooms, elevator lobby, and open terrace), and the lobby restaurant/lounge (seating, kitchen, and bathrooms).

f Assumes 30 sf per seat. 17,577 sf / 30 sf per seat = 586 seats.

g Lounge was used for hotel lobby, residential lobby, loggia, courtyard, and amenity terraces on Levels 6 and 25 as these land uses do not have a designation in the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates.

h Pool square footage obtained from Architectural Floor Plans and an assumed maximum allowed depth of 3.5 feet per code.

i Required water savings are due to the Project's conformance to the City of Los Angeles Ordinance No. 184,248, 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code. While not directly regulating wastewater, reduction in water consumption would correspondingly reduce the amount of wastewater generated.

j Additional water savings are due to additional conservation commitments agreed to by the Project Applicant as detailed under project design features PDF WAT-1 through PDF WAT-4. While not directly reducing wastewater, reduction in water consumption would correspondingly reduce the amount of wastewater generated.

Source (table): KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, Table 2, pages 7-8, ***Appendix L*** *of this Draft EIR.*

A request of a sewer will-serve letter was submitted to ascertain whether the existing public infrastructure can accommodate the Project. The BOS has analyzed the Project demands in conjunction with existing conditions and forecasted growth.[14] Furthermore, as stated above, the existing capacity of the main in S. Hope Street has a calculated capacity of 1.56 cfs (1.01 mgd). The Project's net increase in sewage generation would be approximately 0.098 mgd; accounting for approximately 9.8 percent of the capacity of the S. Hope Street main. Accordingly, the existing sewer infrastructure would be able to accommodate the projected wastewater generated by operation of the Project. Additionally, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant).[15] Currently, up to 300 mgd is treated at the Hyperion Treatment Plant, resulting in an available treatment capacity of 150 mgd, which means the Project's estimated wastewater generation of 0.098 mgd would account for approximately 0.07 percent of the available capacity.

Because the projected wastewater generation amount would represent an insignificant amount of the existing sewer line and treatment plant capacities and would be less than the amount approved by the BOS for discharge by the Project, no new water or wastewater treatment facilities or expansion of existing facilities would be required, and impacts would be less than significant during operation of the Project.

(2) Mitigation Measures

Impacts regarding wastewater 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.

(3) Level of Significance After Mitigation

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

Threshold b) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has

[14] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, page 9,* ***Appendix L*** *of this Draft EIR.*

[15] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, page 9,* ***Appendix L*** *of this Draft EIR.*

adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

(1) Impact Analysis

(a) Construction

As discussed in **Threshold a)** above, during construction, a minimal amount of wastewater would be generated by the construction employees. Portable toilets would be provided by a private company and the wastewater would be disposed off-site. Furthermore, no new connections to the sewer system would be required to accommodate the construction. Overall, there would be a negligible potential impact on sewer facilities and there would not be an increase in wastewater flows beyond the available capacity of the existing conveyance and treatment systems. Furthermore, the BOS has sent a sewer will-serve letter indicating that there is sewer capacity available to handle the anticipated discharge of the Project.[16] **Therefore, construction of the Project would result in a determination by the wastewater treatment provider that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments and impacts would be less than significant.**

(b) Operation

Based on the current hydraulic capacity available in the local sewer system, the City has determined that there is capacity available to handle the anticipated discharge of 97,593 gpd from the Project.[17] In addition, before the LADBS formally accepts a set of plans and specifications for a project for plan check, the LADPW must confirm that there is allotted sewer capacity available for the Project. The BOS has sent a sewer will serve letter indicating that there is sewer capacity available to handle the anticipated discharge of the Project.[18] **Therefore, operation of the Project would result in a determination by the wastewater treatment provider that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments and impacts would be less than significant**.

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[16] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, Exhibit 1,* ***Appendix L*** *of this Draft EIR.*

[17] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, Exhibit 1,* ***Appendix L*** *of this Draft EIR.*

[18] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, Exhibit 1,* ***Appendix L*** *of this Draft EIR.*

(2) Mitigation Measures

Impacts regarding water supply 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.

(3) Level of Significance After Mitigation

Impacts regarding water supply 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

(a) Construction

As with the Project, during construction of the related projects, a minimal amount of wastewater would be generated by the construction employees. Portable toilets would be provided by a private company and the wastewater would be disposed off-site. Overall, there would be a negligible potential impact on sewer facilities and there would not be an increase in wastewater flows beyond the available capacity of the existing conveyance and treatment systems.

(b) Operation

The Project would result in the additional generation of sewer flow. However, as discussed above, BOS has conducted an analysis of existing and planned capacity and determined that adequate capacity exists to serve the Project. Similarly, future projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a SCAR to BOS during the design phase of the project. The analysis by BOS takes into consideration previously approved SCARs as part of their review. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and BOS to construct the necessary improvements.

In addition to the City's SCAR analysis, a Related Projects list has been generated. There are 172 Related Projects, which consist of, but are not limited to, residential, schools, retail, restaurants, museums, hotels, offices, industrial, medical offices, gyms, cinemas, pharmacies, manufacturing, bowling alley, bus maintenance, and event space. The total increase in wastewater generation for the Related Projects would be approximately 11.17 mgd. Combined with the Project, the net increase in wastewater generation would be approximately 11.27 mgd.[19]

[19] *The tabulation of Related Projects' wastewater generation is presented in* ***Appendix M*** *of this Draft EIR.*

Wastewater generated by the Project, and Related Projects, would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant system. As previously stated, based on information from BOS, the existing design capacity of the Hyperion Service Area is approximately 550 mgd[20] and the existing average daily flow for the system is approximately 300 mgd, resulting in an available capacity of 150 mgd.[21] The estimated cumulative wastewater generation increase of the Project and Related Projects combined of 11.27 mgd would represent approximately 3.76 percent of the available capacity in the system. The Related Projects would also be required to adhere to the BOS's annual wastewater flow increase allotment of 5.0 million gallons per day.[22]

Based on these forecasts, the Project's increase in wastewater generation would be adequately accommodated within the Hyperion Service Area. In addition, the BOS analysis confirms that the Hyperion Treatment Plant has sufficient capacity and regulatory allotment for the Project, combined with all Related Projects. **Therefore, the Project's contribution to cumulative impacts to wastewater treatment capacity would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related to wastewater would be less than significant.

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[20] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants Website, accessed October 4, 2019.*

[21] *City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 2019.*

[22] *KPFF Consulting Engineers, Morrison Hotel Project Utility Infrastructure Technical Report: Wastewater Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020, page 10,* ***Appendix L*** *of this Draft EIR.*