IV. Environmental Impact Analysis

K.2 Utilities and Service Systems—Wastewater

1. Introduction

This section of the Draft EIR analyzes the potential impacts of the Project with regard to the existing wastewater infrastructure and treatment facilities that serve the Project Site. The analysis describes the existing wastewater system (including local and regional conveyance and treatment facilities), calculates the wastewater to be generated by the Project, and evaluates whether sufficient capacity is available and would be available to meet the Project's estimated wastewater generation. The analysis is based, in part, on the *Water, Sewer, and Energy Infrastructure Assessment Report—Senior Residential Community at the Bellwood* (Utility Report), dated February 2020, which was prepared for the Project by Fuscoe Engineering, Inc. and is included as Appendix J 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

The City of Los Angeles General Plan Framework guides the update of the community plans 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 City's General Plan Framework 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 and One Water LA 2040 Plan

The City of Los Angeles Integrated Resources Plan (City's IRP) addresses the facility needs of the City's wastewater program, recycled water, and urban runoff/ stormwater management through the year 2020.[1] The City's IRP preparation process began in 1999 in two phases. Phase I of the City's IRP 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 of the City's IRP, 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 of the City's IRP, 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 runoff management strategies. The Capital Improvement Program provides anticipated capital, operation, maintenance, project timing, and implementation strategies for tracking and monitoring triggers.[2]

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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*

(Footnote continued on next page)

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 City's 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 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 City's 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 City's 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 City's IRP EIR was certified.

Since the implementation of the City's 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 City's 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.

As discussed above, the City's IRP addressed the anticipated water, wastewater, and stormwater needs of the City through the year 2020. 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.[4] 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

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Management: A Visionary Strategy for the Right Facilities, in the Right Place, at the Right Time, Executive Summary, December 2006.

[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.*

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

the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[5] 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.

(c) Sewer System Management Plan

On May 2, 2006, the State Water Resources Control Board adopted the Statewide General Waste Discharge Requirements for publicly owned sanitary sewer systems greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in California. Under the Statewide General Waste Discharge Requirements, the owners of such systems must comply with the following requirements: (1) acquire an online account from the State Water Board and report all sanitary sewer overflows online; and (2) develop and implement a written plan referred to as a Sewer System Management Plan to control and mitigate sanitary sewer overflows and make it available to any member of the public upon request in writing.

In accordance with the Statewide General Waste Discharge Requirements, the City of Los Angeles acquired online accounts from the State Water Board and began reporting sanitary sewer overflows by the due date of January 2, 2007. The City's original Sewer System Management Plan was adopted by the City's Board of Public Works and certified with the State Water Resources Control Board on February 18, 2009.[6] The City's Sewer System Management Plans were last updated in January 2019 upon completion of a biennial audit, which confirmed the City's Sewer System Management Plans are in full compliance with the Statewide General Waste Discharge Requirements and are effective.[7]

The goal of the Sewer System Management Plan for the Hyperion Sanitary Sewer System, in which the Project Site is located (as discussed below), is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system.[8] In addition, the Sewer System Management Plan will help to reduce and prevent sanitary sewer overflows as well as mitigate any sanitary sewer overflows that do occur.

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

[6] *LASAN, Sewer System Management Plan: Hyperion Sanitary Sewer System, January 2019.*

[7] *LASAN, Sewer System Management Plan: Hyperion Sanitary Sewer System, January 2019.*

[8] *LASAN, Sewer System Management Plan: Hyperion Sanitary Sewer System, January 2019.*

(d) 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 upon 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.

LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when: (1) a sewer permit is required to connect to the City's sewer collection system; (2) additional discharge is proposed into an existing public sewer connection; or (3) a future sewer connection or future development is proposed that would generate 10,000 gallons or more of sewage per day. A SCAR determines if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

In addition, the City of Los Angeles Bureau of Engineering Special Order No. SO06-0691 sets forth design criteria for sewer systems requiring hat trunk, interceptor, outfall, and relief sewers (i.e. sewers that are 18 inches or greater in diameter) be designed for a planning period of 60 to 100 years, and lateral sewers (sewers that are less than 18 inches in diameter) be designed for a planning period of 100 years. The order also requires that sewers be designed so that the peak dry weather flow depth, during their planning period, shall not exceed 50 percent of the pipe diameter.

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by three existing multi-family residential developments totaling 43,939 square feet, including 112 residential units comprised of 95 studio units, 15 one-bedroom units, and two two-bedroom units. The Project would remove the 43,939 square feet of existing residential use to accommodate the Project. Existing wastewater generation for the Project Site was calculated using standard wastewater generation rates from the City of Los Angeles Bureau of Sanitation (LASAN). Based on these rates, the total existing average daily wastewater flow is approximately

16,800 gallons per day (gpd), as shown in Table IV.K.2-2 on page IV.K.2-13 in the analysis below.

(2) Wastewater Infrastructure

Sanitary sewer service to and from the Project area is owned and operated by the City of Los Angeles. The existing wastewater collection system includes more than 6,700 miles of public sewers, which serves a population of more than four million people and conveys approximately 400 million gallons per day (mgd) to the City's four wastewater treatment and water reclamation plants.[9]

As discussed in the Utility Report, included in Appendix J of this Draft EIR, there is an existing 8-inch sewer main within Bellwood Avenue, which the northerly and southerly portions of the Project Site tie into. Based on available record data from the City, there are currently ten existing sewer laterals connecting the 8-inch line in Bellwood Avenue to the Project Site. Two of these laterals serve the northernly portions of the Project Site, and the other eight serve the southernly portions of the Project Site. The 8-inch line in Bellwood Avenue then flows northwesterly to a 10-inch main within Olympic Boulevard and then continues southwesterly along Olympic Boulevard. There is also an 8-inch sewer line south of the Project Site, which the neighboring properties to the south tie into. This 8-inch line flows southwesterly, tying into an 8-inch line in Kerwood Avenue, and then ties into the 10-inch main in Olympic Boulevard. These sewer mains/lines connect to a network of sewer lines that ultimately convey wastewater to the Hyperion Water Reclamation Plant (HWRP).

(3) Wastewater Treatment

The Los Angeles Bureau of Sanitation (LASAN) is responsible for the operation of wastewater treatment facilities in the City. The main purpose of these treatment facilities is to remove potential pollutants from sewage in order to protect river and marine environments and public health. LASAN divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.[10] The Hyperion Service Area is serviced by the Hyperion Sanitary Sewer System, which consists of the Hyperion Water Reclamation Plant (HWRP), the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation

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[9] *LASAN, Sewers, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_adf.ctrl-state=w3f8ikamv_4&_afrLoop=18666739916391336#!, accessed October 15, 2020.*

[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 October 15, 2020.*

Plant.[11] The Terminal Island Service Area is served by the Terminal Island Treatment Plant.[12] The Project Site is located within the Hyperion Service Area.

(a) Hyperion Service Area

As shown in Table IV.K.2-1 on page IV.K.2-8, the existing design capacity of the Hyperion Sanitary Sewer System is approximately 550 mgd (consisting of 450 mgd at the HWRP,[13] 80 mgd at the Donald C. Tillman Water Reclamation Plant,[14] and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant[15]). 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).[16] The One Water LA 2040 Plan–Wastewater Facilities Plan projects that annual average wastewater flows in the Hyperion Sanitary Sewer System would increase to 323 mgd in 2020, 348 mgd in 2030, and 358 mgd in 2040. As such, current and projected flows are below the design capacity of approximately 550 mgd for the Hyperion Sanitary Sewer System.

(b) Hyperion Water Reclamation Plant

As discussed above, wastewater generated from the Project Site is conveyed via the local collector sanitary sewer system directly to the HWRP for treatment. As shown in Table IV.K.2-1, the HWRP has the capacity to treat approximately 450 mgd of wastewater for full secondary treatment and currently treats approximately 275 mgd.[17] As such, the

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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 October 15, 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 October 15, 2020.*

[13] *LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed October 15, 2020.*

[14] *LASAN, Water Reclamation Plants, Donald C. Tillman Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=1brav2vyj0_742&_afrLoop=4195638867182484#!, accessed October 15, 2020.*

[15] *LASAN, Water Reclamation Plants, Los Angeles–Glendale Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=1brav2vyj0_564&_afrLoop=4195912200544472#!, accessed October 15, 2020.*

[16] *LASAN, One Water LA 2040 Plan—Volume 2: Wastewater Facilities Plan, April 2018.*

[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 October 15, 2020.*

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

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

mgd = million gallons per day
Source: LASAN, Water Reclamation Plans, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=ja8bqrb52_5&_afrLoop=6972769757513469#!, accessed October 15, 2020.

HWRP is currently operating at approximately 61 percent of its capacity with a remaining available capacity of approximately 175 mgd.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.[18] The treated water from the HWRP is discharged through a 5-mile outfall pipe at a depth of 190 feet into the Santa Monica Bay and Pacific Ocean.[19] The discharge from the HWRP into Santa Monica Bay is regulated by the HWRP's National Pollutant Discharge Elimination System (NPDES) 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.[20] Accordingly, the HWRP's effluent that is released to Santa

[18] *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 October 15, 2020.*

[19] *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 October 15, 2020.*

[20] *California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, 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, www.lacitysan.org/san/sandocview?docname=cnt010051, accessed October 15, 2020.*

Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. LASAN also monitors flows into the Santa Monica Bay.[21]

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, 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 or expansion of existing facilities, the construction or relocation of which would cause significant environmental effects; or[22]

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

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's L.A. CEQA Thresholds Guide, as appropriate to assist in answering the Appendix G Thresholds. Refer to Section IV.K.1, Utilities and Service Systems—Water Supply of this Draft EIR for a discussion of water infrastructure; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas infrastructure; and Section VI, Other CEQA Considerations for a discussion of stormwater and telecommunications facility infrastructure.

The L.A. CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following factors to evaluate wastewater impacts:

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[21] *LASAN, Environmental Monitoring www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ec-em?_adf.ctrl-state=xsmd2kqwx_131&_afrLoop=21105064772207683#!, accessed October 15, 2020.*

[22] *Refer to Section IV.K.1, Utilities and Service Systems—Water Supply of this Draft EIR for a discussion of water infrastructure; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas infrastructure; and Section VI, Other CEQA Considerations for a discussion of stormwater and telecommunications facility infrastructure.*

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

- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.[23]

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Utility Report included in Appendix J of this Draft EIR. The Utility Report calculates the anticipated wastewater flows to be generated by the Project using wastewater generation factors provided by LASAN. Given the existing capacity of the Project Site's sanitary sewer system and the Project Site's future demand, an assessment was made of the impacts to the sanitary sewers and the City's downstream sewers and treatment plants. Data regarding the existing physical features and capacity of the system is based on information provided by LASAN and included in the Utility Report.

To evaluate potential impacts relative to wastewater treatment capacity, this analysis evaluates whether adequate treatment capacity within the Hyperion Service Area would be available to accommodate the Project based on the estimate of the Project's wastewater generation and data from LASAN. For the assessment of cumulative impacts on wastewater treatment, the projected cumulative wastewater generation is compared to the estimated available capacity of the Hyperion Service Area in 2023, the Project's buildout year.

c. Project Design Features

No specific project design features are proposed with regard to wastewater.

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications

[23] *The Wastewater Facilities Plan referenced in the L.A. City CEQA Thresholds Guide has since been superseded by the Integrated Resources Plan.*

facilities, the construction or relocation of which could cause significant environmental effects?[24]

(1) Impact Analysis

(a) Construction

Construction activities for the Project would result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal when compared with the Project Site wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows.

The Project would require the abandonment and removal of the existing 325 feet of 8-inch sewer line within Bellwood Avenue on the Project Site and adjacent on-site lateral lines as well as construction of on-site wastewater infrastructure to serve the new building, and potential limited extension/upgrade and/or relocation of existing adjacent public wastewater infrastructure. These construction activities would primarily be confined to trenching and would be limited to the on-site wastewater distribution as well as minor off-site work associated with connections to the public main. Therefore, as discussed in Section IV.I, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to reduce any temporary pedestrian and traffic impacts. The Construction Traffic Management Plan would ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, impacts would be of a relatively short-term duration and would cease to occur once the installation is complete.

As such, 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. Therefore, Project construction impacts to the wastewater conveyance or treatment system would be less than significant.

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[24] *Refer to Section IV.K.1, Utilities and Service Systems—Water Supply of this Draft EIR for a discussion of water infrastructure; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas infrastructure; and Section VI, Other CEQA Considerations for a discussion of stormwater and telecommunications facility infrastructure.*

(b) Operation

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. As described above, the HWRP has a capacity of 450 mgd and current average wastewater flows are at approximately 275 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table IV.K.2-2 on page IV.K.2-13, the Project would generate a net increase in wastewater flow from the Project Site of approximately 25,941 gpd, or approximately 0.026 mgd. (This is a conservative estimate as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code.) As discussed in more detail below, this net increase in wastewater would represent approximately 0.015 percent[25] of the current 175 mgd of remaining available capacity of the HWRP.

As discussed in the Utility Report, with the proposed realignment of Bellwood Avenue on the Project Site, sewer service for the Project would be provided utilizing new on-site sewer connections to the existing sewer lines adjacent to the Project Site. A request for Wastewater Service Information, included in the Utility Report (see Attachment D of Appendix J of this Draft EIR), was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. Based on the current approximate flow levels and design capacities in the sewer system and the Project's estimated wastewater flow, the City determined that the existing capacity of the sewer system may be able to accommodate the additional wastewater infrastructure demand created by the Project. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, operation of the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, operational impacts to the wastewater conveyance or treatment system would be less than significant.

[25] *(25,941 gpd ÷ 175 mgd) x 100 = 0.014823 (~0.015%)*

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

Land Use	Units	Generation Rate (gpd/unit) [a,b]	Wastewater Generation (gpd)
Existing Uses to be Removed			
Residential	112 unit	150	16,800
Total Existing to be Removed			***16,800***
Proposed			
Senior Independent Units	71 unit	110	7,810
Assisted Living Guest Rooms	75 unit	110	8,250
Memory Care Guest Rooms	46 unit	110	5,060
Indoor Common Areas	50,463 sf	0.05	2,523
Outdoor Common Areas	14,630 sf	0.05	732
Indoor Swimming Pool	1 unit	16,458	16,458
Indoor Spa	1 unit	1,908	1,908
Total Proposed Wastewater Flow			**42,741**
Total Existing Wastewater Flow			***16,800***
Project Net Wastewater Flow (Proposed – Existing)			**25,941**

gpd = gallons per day

sf = square feet

Note: Some numbers do not add up perfectly due to rounding.

[a] Based on 2012 LASAN Sewer Generation Rates.

[b] *Based on correspondence from BOS to Department of City Planning regarding the projected wastewater discharges for the proposed Project dated July 11, 2019.*

Source: Fuscoe Engineering, Inc, Water, Sewer, and Energy Infrastructure Assessment Report—Senior Residential Community at the Bellwood; Eyestone Environmental, 2021.

(2) Mitigation Measures

Project-level impacts related to the construction of expansion of wastewater facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related 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.

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

(1) Impact Analysis

As shown in Table IV.K.2-2 on page IV.K.2-13, the Project would generate a net increase in wastewater flow from the Project Site of approximately 25,941 gpd, or approximately 0.026 mgd.[26] The Project's increase in average daily wastewater flow of 0.026 mgd would represent approximately 0.015 percent[27] of the current 175 mgd of remaining available capacity of the HWRP. Therefore, wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2023, the year by which construction of the Project is expected to be completed. Future updates to the One Water LA 2040 Plan discussed above would provide for improvements beyond 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2023. Thus, based on this conservative assumption, the 2023 effective capacity of the Hyperion Sanitary Sewer System would continue to be 550 mgd. Similarly, the capacity of the HWRP in 2023 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2023, the Project build-out year, would be approximately 261.7 mgd.[28] Accordingly, the future remaining available capacity in 2023 would be approximately 188.3 mgd. The Project's increase in average daily wastewater flow of 0.026 mgd would represent approximately 0.014 percent of the estimated future remaining available capacity 188.3 mgd at the HWRP.[29] Therefore, wastewater generated under the Project would be accommodated by the future capacity of the HWRP.

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[26] *25,941 gpd ÷ 1 mgd = 0.025941 (~0.026 mgd)*

[27] *(25,941 gpd ÷ 175 mgd) x 100 = 0.014823 (~0.015%)*

[28] *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 2023 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 3] + 256 = ~ 261.7 mgd.*

[29] *(25,941 gpd ÷ 188.3 mgd) x 100 = 0.013776 (~0.014%)*

Additionally, the Project's net increase in average daily wastewater generation of 0.026 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent[30] of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.026 mgd plus the projected flows of approximately 261.7 mgd to the HWRP would also represent approximately 58.2 percent[31] of the HWRP's assumed future capacity of 450 mgd. Furthermore, as previously discussed, a request for Wastewater Service Information, included in the Utility Report (see Attachment D of Appendix J of this Draft EIR), was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. As concluded in the Wastewater Service Information, HWRP would be able to accommodate the increased flow from the Project.

Based on the above, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. As such, the Project would result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments, and impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related 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 system is the area that includes the Project Site and the related projects that would potentially utilize the same infrastructure as the Project. The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service

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[30] *[(25,941 gpd + 275 mgd) ÷ 450 mgd] x 100 = 61.11 (~ 61.1%)*

[31] *[(25,941 gpd + 261.7 mgd) ÷ 450 mgd] x 100 = 58.16 (~ 58.2%)*

Area. The Project, in conjunction with growth forecasted in the Hyperion Service Area through 2023 (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 2023 includes specific known development projects, as well as general ambient growth projected to occur.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 6 is a conservative assumption, as some of the related projects may not be built out by 2023 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 6 are fully built out by 2023, unless otherwise noted.

(a) 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 sewer capacity availability request to determine adequate sewer capacity. In addition, new development projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements, similar to the Project. Furthermore, like the Project, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. In addition, as with the Project, related projects would be required to implement construction management plans to ensure that adequate and safe access remains available during construction activities. Such construction management plans would also ensure that appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would be implemented, as necessary, to ensure emergency access and traffic flow is maintained on adjacent right-of-ways. **Therefore, the Project and related projects would not result in significant cumulative impacts related to the construction or expansion of wastewater infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Wastewater Treatment

Development of the Project, in conjunction with the related projects, would result in an increase in the demand for sanitary sewer service in Hyperion Service Area. As

identified in Section III, Environmental Setting, of this Draft EIR, there are 6 related projects located in the Project Site vicinity. Assuming that each of these related projects would connect to some or all of the City sewers serving the Project Site, forecasted growth from the related projects would generate an average daily wastewater flow of approximately 358,540 gpd or approximately 0.36 mgd, as shown in Table IV.K.2-3 on page IV.K.2-18. Combined with the Project's net increase in wastewater generation of 25,941 gpd (0.026 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 384,481 gpd, or 0.38 mgd.

Based on LASAN's average flow projections for the Hyperion Sanitary Sewer System, it is anticipated that the average flow in 2023 would be approximately 330.5 mgd.[32] In addition, the Hyperion Sanitary Sewer System's total treatment capacity is conservatively estimated to be approximately 550 mgd in 2023, which is the same as its existing capacity.

The Project wastewater flow of approximately 0.026 mgd combined with the wastewater flow from related projects flow of approximately 0.36 mgd and the forecasted 2023 wastewater flow of 330.5 mgd for the Hyperion Sanitary Sewer System would result in a total cumulative wastewater flow of approximately 330.9 mgd. Based on the Hyperion Sanitary Sewer System's estimated future capacity of approximately 550 mgd, the Sanitary Sewer System is expected to have adequate capacity to accommodate the wastewater flow of approximately 330.9 mgd aggregated from the Project, related projects, and forecasted growth by 2023. The 0.38 mgd of cumulative plus Project wastewater would represent approximately 0.07 percent of the Sanitary Sewer System's existing design capacity of 550 mgd.

Furthermore, as previously stated, the One Water LA Plan provides an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management based on water demand projections through 2040. The Wastewater Facilities Plan, which is included in Volume 2 of the One Water LA Plan, describes the City's existing wastewater collection and water reclamation plants, as well as the recommended improvements to meet future flow conditions. As stated therein, based on the design capacities and the projected future flows through the year 2040, it is anticipated that the

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[32] *Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Service Area (which is comprised of the Hyperion Water Reclamation Plant, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles-Glendale Water Reclamation Plant) for 2020 (approximately 323 mgd) and 2030 (approximately 348 mgd). The 2023 value is extrapolated from 2020 and 2030 values: : [(348 mgd – 323 mgd) ÷ 10) * 3] + 323 = 330.5 mgd.*

Table IV.K.2-3
Cumulative Wastewater Generation

No.	Project	Land Use	Size	Generation Rate[a,b]	Wastewater Generation (gpd)
1	Westfield Century City New Century Plan Project 10250 Santa Monica Boulevard, 1801 Avenue of the Stars, and 1930 Century Park West Street	Condominiums	262 du	190 gpd/du	49,780
		Shopping Center	358,881 sf	0.05 gpd/sf	17,944
2	Century City Center[c] 1950 S. Avenue of the Stars	Office	725,830 sf	0.12 gpd/sf	87,100
		Retail	4,120 sf	0.025 gpd/sf	103
		Mobility Hub	1,300 sf		—
3	Apartments 10306 W. Santa Monica Boulevard	Apartments	116 du	190 gpd/du	22,040
4	Century Plaza (Hyatt Regency Hotel) 2025 S. Avenue of the Stars	Condominiums	193 du	190 gpd/du	36,670
		Hotel	240 rm	120 gpd/rm	28,800
		Office	117,647 sf	0.12 gpd/sf	14,118
		Retail	93,814 sf	0.025 gpd/sf	2,345
		Spa/Fitness[d]	16,800 sf	0.65 gpdsf	10,920
		Restaurant (15,463 sf)[e]	516 seat	30 gpdseat	15,480
5	Apartments 10400 W. Santa Monica Boulevard	Apartments	96 du	190 gpd/du	18,240
6	Fox Studios Master Plan 2016 10201 W. Pico Boulevard	Commercial (may include creative office, specialty space, stage space, and facility and utility support)	1,100,000 sf	0.05 gpd/sf	55,000
Related Projects Wastewater Generation					**358,540**
Project Net Wastewater Generation					**25,941**
Total Wastewater Generation for Related Projects and Project					**384,481**

Table IV.K.2-3 (Continued)
Cumulative Wastewater Generation

No.	Project	Land Use	Size	Generation Rate[a,b]	Wastewater Generation (gpd)

du = dwelling units

gpd = gallons per day

rm = rooms

sf = square feet

[a] *This analysis is based on sewage generation rates provided by LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

[b] *This analysis conservatively assumes that all dwelling units are 3-bedroom units.*

[c] *The related project information reflects the modified Century City Center project that was entitled in January 2015 as part of the Final Subsequent Environmental Impact Report. An alternative residential project, which proposes the development of 483 dwelling units, was also entitled for this site. Based on 2012 LASAN Sewer Generation Rates, the proposed alternative would generate a wastewater flow of approximately 91,770 gpd, as compared to the 87,203 gpd shown above. Based on the Hyperion Sanitary Sewer System's estimated future capacity, the Sanitary Sewer System is expected to have adequate capacity to accommodate the additional wastewater flow generated by the alternative residential project.*

[d] *The rate of 650 gallons per 1,000 square feet for "Health Club/Spa" is applied.*

[e] *Restaurant space is assumed to be all full-service restaurant and assumed to be equivalent to 30 sf per seat for a conservative estimate.*

Source: Gibson Transportation Consulting, Inc., 2020; Eyestone Environmental, 2021.

existing Hyperion Sanitary Sewer System would have sufficient capacity to manage wastewater flows.[33]

Therefore, the Project and related projects would not result in significant cumulative impacts related to wastewater treatment. As such the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to wastewater generation, treatment, and infrastructure 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 were required or included, and the impact level remains less than significant.

[33] *Los Angeles Department of Water and Power, One Water LA 2040 Plan, Executive Summary, p. ES-20.*