

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 *District NoHo Utility Infrastructure Technical Report: Water, Wastewater, and Energy* (Utility Report), dated January 2022, which was prepared by KPFF Consulting Engineers and included in Appendix G of this Draft EIR; the Wastewater Service Information (WWSI) prepared for the Project by the City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN), dated September 8, 2020, and included as Appendix U of this Draft EIR; and the Water Supply Assessment (WSA) prepared for the Project and approved by the Los Angeles Department of Water and Power (LADWP) in April 2021 and included as Appendix T 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 Code;
- City of Los Angeles General Plan Framework;
- Los Angeles Integrated Resources Plan;
- Water IRP 5 Year Reviews
- One Water LA 2040 Plan;
- Green New Deal;
- Sewer System Management Plan; and

- Los Angeles Municipal Codes including the Los Angeles Green Building Code (Ordinance No. 181,480), Water Efficiency Requirements Ordinance (Ordinance No. 180,822), [if applicable] Sewer Capacity Availability Review (LAMC Section 64.15), Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1), and the Bureau of Engineering Special Order No. SO 06-0691.

(1) State

(a) *California Green Building Code*

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

(2) Local

(a) *City of Los Angeles General Plan Framework*

The Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.¹ The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for utilities in the City including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.²

¹ *City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, July 27, 1995, <https://planning.lacity.org/plans-policies/framework-element>, accessed March 5, 2021.*

² *City of Los Angeles Department of City Planning, Citywide General Plan Framework Element, Chapter 9: Infrastructure and Public Services—Wastewater, originally adopted by City Council on December 11, 1996, and re-adopted on August 8, 2001, <http://cityplanning.lacity.org/cwd/framwkw/chapters/09/09.htm>, accessed March 5, 2021.*

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

Since the implementation of the IRP, new programs and projects, which have resulted in a substantial decrease in wastewater flows, have affected the Go Projects and Go-If Triggered Projects. Based on the Final IRP 5-Year Review, two of the Go Projects have been moved to the Go-If Triggered category (Go Project 2 and Go Project 3) and two have been deferred beyond the 2020 planning window of the IRP (Go Project 4 and Go Project 5). Construction of wastewater storage facilities at the Donald C. Tillman Water Reclamation Plant (Go Project 1) has been completed. In addition, Go Project 6, involving the design of the North East Interceptor Sewer Phase II, is no longer being pursued.⁴

(c) Water IRP 5-Year Reviews

LADWP had been monitoring implementation of the IRP and updating its projections via the preparation Water IRP 5-Year Review Final Documents. The last 5-year review, prior to preparation of the One Water LA Plan that now supersedes the 5-year reviews as discussed below, was completed in 2012.⁵ Based on updated 2008 SCAG data, the estimated future flow of the Hyperion Sanitary Sewer System was forecasted as 500 mgd by 2020, and approximately 496 mgd by 2018. At the same time, IRP data in the 5-year review showed that the actual Hyperion Sanitary Sewer System service area flow was less

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

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

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

than projected by the 2008 SCAG data used for planning. Per that data, the Hyperion Sanitary Sewer System service area flow had decreased from 400 mgd in 2002 to 350 mgd in 2012.⁶ This could be attributed to such factors as water conservation and the economic downturn. The 5-year Report estimated reductions in flow requirements indicating that there had been a reduction of wastewater flow of 26.5 percent relative to the amount estimated in the SCAG projection.

(d) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.⁷ 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 2024.⁸ 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.

(e) Green New Deal

The City released the first Sustainable City pLAN in April 2015,⁹ which has been updated in 2019 as the Green New Deal. The Green New Deal includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability. Towards the end, the Green New Deal establishes a target of recycling 100 percent of all wastewater for beneficial reuse by 2035, which would be an improvement from the fiscal year 2017-2018, baseline of 27 percent.¹⁰

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

⁷ City of Los Angeles, *One Water LA 2040 Plan, Volume 1, Summary Report, Final Draft, April 2018*.

⁸ City of Los Angeles, Office of the Mayor, *Executive Directive No. 5, Emergency Drought Response—Creating a Water Wise City*, October 14, 2014.

⁹ City of Los Angeles, *Sustainable City pLAN, 2015*.

¹⁰ City of Los Angeles. *LA's Green New Deal, Sustainable City pLAN 2019*, p. 47.

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

- 2021: Produce 1.5 mgd of recycled water at Hyperion Water Reclamation Plant (HWRP) for use at Los Angeles International Airport and other local facilities;
- 2025: Recycle 17,000 AFY of water at the Donald C. Tillman Water Reclamation Plant (WRP) to recharge into groundwater basin;
- 2025/2035: Increase non-potable reuse of recycled water by an additional of 6,000 AFY 2025; and an additional 8,000 AFY by 2035; and
- 2025/2035: Reduce annual sewer spills to fewer than 65 by 2025; and 60 by 2035.

(f) Sewer System Management Plan

The State of California, via the State Water Quality Control Board's May 2, 2006, Statewide General Waste Discharge Requirements (WDRs), requires a Sewer System Management Plan (SSMP) to be prepared for all publicly owned sanitary sewer systems. The plans include measures to control and mitigate sewer spills and must be made available to the public. Accordingly, the City has prepared three SSMPs, one for each of the three separate sanitary sewer systems owned and operated by LA Sanitation: the Hyperion Sanitary Sewer System; the City of Los Angeles Regional Sanitary Sewer System (Harbor Gateway); and the Terminal Island Water Reclamation Plant Sanitary Sewer System. The City's SSMPs were last updated in January 2019 as part of a required biennial internal audit.¹¹ The SMMPs address the proper management, operation, and maintenance of all parts of the systems. The SSMP establishes design and performance standards for the sewer system; provides procedures for evaluating the system and providing capacity assurance; and establishes a performance standard to identify sewers in need of replacement or relief. The City's SSMP is in full compliance with the WDRs and meets applicable WDR objectives.¹²

(g) Los Angeles Municipal Code

(i) Los Angeles Green Building Code

The City has been pursuing a number of green development initiatives intended to promote energy conservation and reductions in the amount of greenhouse gas emissions

¹¹ *City of Los Angeles, Department of Public Works, Department of Sanitation, Sewer System Management Plan, Version 3.0, January 25, 2019.*

¹² *City of Los Angeles, Department of Public Works, Department of Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2017, Overview.*

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.

The Los Angeles Municipal Code (LAMC) Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),¹³ 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),¹⁴ 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.

¹³ City of Los Angeles, Ordinance No. 181,480, www.ladbs.org/docs/default-source/publications/ordinances/l-a-green-building-code-ordinance-181480.pdf?sfvrsn=12, accessed March 5, 2021.

¹⁴ City of Los Angeles, Ordinance No. 180,822.

(iv) Sewerage Facilities Charge

LAMC Sections 64.11 and 64.12 require approval of a sewer permit, also called an “S” Permit, prior to connection to the wastewater system. LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City’s sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength as well as volume. The determination of wastewater flow strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Sewerage Facilities Charge fees are deposited in the City’s Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

(v) Bureau of Engineering Special Order

The City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City standards (Bureau of Engineering Special Order No. SO 06-0691). Per the Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period does not exceed one-half of the pipe diameter (D) (i.e., depth-to-diameter ratio or d/D).¹⁵

b. Existing Conditions**(1) Wastewater Generation**

As discussed in Section II, Project Description, of this Draft EIR, the 15.9-acre Project Site includes four sub sites, located generally north/east and south/west of Lankershim Boulevard under existing conditions. The East Site is comprised of 46 lots totaling approximately 10.7 acres located east of Lankershim Boulevard and is currently improved with the Metro B (Red) Line subway east portal, a surface parking lot, and a local bus plaza. The Northwest, Central, and South Sites are located west of Lankershim Boulevard. The South Site is comprised of 12 lots, totaling approximately 1.8 acres and improved with a surface parking lot adjacent to an existing historic building containing a restaurant. The Central Site is comprised of two lots, totaling approximately 2.7 acres and

¹⁵ *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.*

improved with industrial/warehouse buildings, the G (Orange) Line Bus plaza, the B (Red) Line subway west portal, and the historic Lankershim Depot Building. The Northwest Site is comprised of seven lots, totaling approximately 0.7 acre and improved with one- and two-story industrial/warehouse buildings. The existing uses are located within one- and two-story buildings that total approximately 25,145 square feet of floor area, which includes the 1,725 square foot Lankershim Depot.¹⁶

With respect to the Off-Site Metro Parking Areas, the East Lot is currently developed with a surface parking lot that does not generate wastewater. The West Lot is currently occupied by industrial/warehouse buildings totaling 25,691 square feet and associated surface parking.

Existing wastewater generation for the Project Site and Off-Site Metro Parking Areas is based on the existing water use provided by the Los Angeles Department of Water and Power (LADWP) in the Water Supply Assessment prepared for the Project and included as Appendix T of this Draft EIR. As discussed therein, based on LADWP billing data, the existing water demand associated with the 49,111 square feet of existing industrial/warehouse uses within the Project Site and Off-Site Metro Parking Areas to be removed under the Project is estimated at 3,374 gpd.¹⁷

(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 6,600 miles of public sewers, which serves a population of more than 4 million people and conveys approximately 400 million gallons per day (mgd) to the City's four wastewater treatment and water reclamation plants.¹⁸

As described in the Utility Report, sanitary sewer service to the Project Site from the surrounding streets is provided by LASAN, with ten existing sanitary sewers within the site vicinity. There is an 18-inch vitrified clay pipe (VCP) sewer line in Lankershim Boulevard flowing southwest with a capacity of 8.27 cubic feet per second (cfs) or 5.345 million gallons per day (mgd). There is also a 12-inch VCP sewer line in Chandler (S) Boulevard flowing west with a capacity of 0.93 cfs (0.601 mgd). The sewer line in Tujunga Avenue is

¹⁶ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

¹⁷ Excludes the 1,725 square foot Lankershim Depot which would remain with no change in use.

¹⁸ LASAN, *Sewers and Pumping Plants*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_adf.ctrl-state=hgp4yyccp_5&_afLoop=3961669001041971#!, accessed January 17, 2022.

an 8-inch VCP flowing south with a capacity of 0.76 cfs (0.491 mgd). The sewer line within N. Chandler (Boulevard is an 8-inch VCP line flowing easterly with a capacity of 1.09 cfs. (0.70 mgd). The Cumpston Street sewer line is an 8-inch VCP flowing west with a capacity of 0.80 cfs (0.517 mgd). Fair Avenue sewer line is an 8-inch VCP flowing south with a capacity of 0.76 cfs (0.491 mgd). Bakman Avenue sewer line is an 8-inch VCP flowing south with a capacity of 0.76 cfs (0.491 mgd). Weddington Street sewer line is an 8-inch VCP flowing west with a capacity of 0.76 cfs (0.491 mgd). The alley sewer line is an 8-inch VCP flowing west with a capacity of 0.76 cfs (0.491 mgd). Lastly, there is an 18-inch sewer main in Vineland Ave flowing southerly with a capacity of 7.55 cfs (4.8 mgd). Sewer flows originating from the Project Site are collected and conveyed through a network of sewer lines for treatment at the HWRP.

(3) Wastewater Treatment

LASAN is responsible for the operation of wastewater treatment facilities in the City. The main purpose of these treatment facilities is to remove potential pollutants from sewage in order to protect river and marine environments and public health. LASAN divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.¹⁹ The Hyperion system includes two upstream water reclamation plants: the Donald C. Tillman WRP, and the Los Angeles–Glendale WRP.²⁰ These treatment facilities remove potential pollutants from sewage in order to protect river and marine environments and public health. The Project is located within the Hyperion Service Area.

(a) Hyperion Sanitary Sewer System

As shown in Table IV.M.2-1 on page IV.M.2-10, 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 WRP, and 20 mgd at the Los Angeles–Glendale WRP). 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 WRP, and 17 mgd at the Los Angeles–Glendale WRP).²¹ 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 in 2040. All other flow in the Hyperion Sanitary Sewer System, as well as biosolids from the upstream

¹⁹ LASAN, *Clean Water*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afLoop=8241807351592071#!, accessed January 17, 2022.

²⁰ LASAN, *Clean Water*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afLoop=8241807351592071#!, accessed January 17, 2022.

²¹ LASAN, *One Water LA 2040 Plan—Volume 2: Wastewater Facilities Plan*, January 2018.

**Table IV.M.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
<hr/> <i>mgd = million gallons per day</i> <i>Source: LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=ljvz6q49_5&_afLoop=8241943613187783#!; Donald C. Tillman Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=ljvz6q49_5&_afLoop=8242084065330158#!; and Los Angeles–Glendale Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=ljvz6q49_5&_afLoop=8242559400318952#!, accessed January 17, 2022.</i>	

reclamation plants that are returned to the collection system are treated at the HWRP in Playa Del Rey.²² As such, current 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.M.2-1, the HWRP has the capacity to treat approximately 450 mgd. The HWRP currently treats a daily average of approximately 275 mgd. As such, the HWRP is currently operating at approximately 61 percent of its capacity, with a remaining available capacity of approximately 175 mgd. Based on the above, current flows to the HWRP are well below its design capacity of approximately 450 mgd.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested

²² LASAN, *Sewer System Management Plan: Hyperion Sanitary Sewer System, February 2017.*

and removed as sludge.²³ 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.²⁴ The discharge from the HWRP into Santa Monica Bay is regulated by the HWRP's National Pollution 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.²⁵ Accordingly, the HWRP's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. LASAN also monitors flows into the Santa Monica Bay.²⁶

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, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects;²⁷

Threshold (b): (Not) result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity

²³ LASAN, Treatment Process, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tp?_adf.ctrl-state=ljvz6q49_458&_afLoop=8243207467760408#!, accessed January 17, 2022.

²⁴ 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&_afLoop=8243477885026291#!, accessed January 17, 2022.

²⁵ 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.

²⁶ LASAN, Environmental Monitoring, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-em?_adf.ctrl-state=ljvz6q49_793&_afLoop=8243608662499891#!, accessed January 17, 2022.

²⁷ Refer to Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure of this Draft EIR for a discussion of water supply impacts; the Project's Initial Study included as Appendix A of this Draft EIR and Section VI, Other CEQA Considerations, of this Draft EIR, for a discussion of stormwater impacts; Section IV.M.3, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts.

to serve the project's projected demand in addition to the provider's existing commitments.

In assessing impacts related to wastewater in this section, the City will use Appendix G as the thresholds of significance. The factors identified below from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering 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.²⁸

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Utility Report, the WWSI, and the WSA included in Appendices G, U, and T of this Draft EIR, respectively. The anticipated wastewater flows to be generated by the Project are based on 100 percent of the water demand calculated in the WSA (which is based on LASAN rates), less water for the parking structure which would flow to the storm drain and water for landscaping. Given the existing capacity of the sanitary sewer system in the vicinity of the Project Site and the Project Site's future wastewater generation, an assessment was made of the impacts to the sanitary sewers and the City's downstream sewers and treatment plants. Data regarding the existing physical features and capacity of the system is based on information provided by LASAN 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 Sanitary Sewer System 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 Sanitary Sewer System.

²⁸ *The Wastewater Facilities Plan referenced in the L.A. CEQA Thresholds Guide has since been superseded by the Integrated Resources Plan.*

c. Project Design Features

The Project would include water conservation features, which would also result in a reduction in wastewater generation. Such conservation features are included in Project Design Feature WAT-PDF-1, included in Section IV.M.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?²⁹

(1) Impact Analysis

(a) Construction

During construction, existing sewer laterals would be capped and no sewage would enter the public sewer system from the Project. Temporary facilities, including a portable toilet and hand wash stations would be provided by the contractor for construction crews. Sewage from these facilities would be collected and hauled offsite and not discharged into the public sewer system. Therefore, since the anticipated constructed wastewater generation to existing facilities is zero, the impacts to the infrastructure system due to construction activity are considered less than significant.

The Project would require construction of new sewer lines. The new sewer system will collect sewage from the Project and connect to the existing public sewer laterals at the property line or at the existing sewer wye connections in the public right of way. Construction impacts associated with new wastewater infrastructure would primarily be confined to trenching for the placement of pipe, and connection into the existing sewer wyes or laterals. Any offsite work that may affect services to the existing sewer line will be coordinated with the City of Los Angeles BOE. BOE will be able to provide for connection requirements, pipe depths, and connection location(s). In addition, as set forth in Project

²⁹ Refer to Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of water supply impacts; the Project's Initial Study included as Appendix A of this Draft EIR and Section VI, Other CEQA Considerations, of this Draft EIR, for a discussion of stormwater impacts; Section IV.M.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations, of this Draft EIR for a discussion of telecommunications facility impacts.

Design Feature TR-PDF-1 included in Section IV.K, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The Construction Traffic Management Plan would ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration and would cease to occur once the installation is complete. Based on the above, construction activities would not have any adverse impact on wastewater conveyance or treatment infrastructure. In addition, most construction impacts associated with the installation of on-site wastewater facilities and off-site connections are expected to be confined to trenching, would be temporary in nature and would not result in significant environmental effects.

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.

(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.M.2-2 on page IV.M.2-15, the Project would generate a net increase in wastewater flow from the Project Site of approximately 482,898 gpd, or approximately 0.483 mgd.³⁰ The Project's increase in average daily wastewater flow of 0.483 mgd would represent approximately 0.28 percent of the current 175 mgd remaining available capacity of HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP and impacts with respect to treatment capacity would be less than significant.

Furthermore, wastewater flows would be typical of residential, office, and commercial developments. No industrial discharge into the wastewater system would occur and as discussed in the Initial Study, included as Appendix A of this Draft EIR, the

³⁰ *As discussed in Section II, Project Description, of this Draft EIR, the Project includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant. Under this scenario, the Project would generate a net increase of 403,704 gpd, or approximately 0.404 mgd.*

**Table IV.M.2-2
Estimated Project Wastewater Generation**

Land Use	Units	Average Daily Flow (gpd/unit) ^a	Average Daily Water Demand (gal)
Residential			
Studio	441 du	75/du	33,075
1 Bedroom	708 du	110/du	77,880
2 Bedroom	299 du	150/du	44,850
3 Bedroom	79 du	190/du	15,010
Base Demand Adjustment			19,236
Residential Amenities			
NoHo Square Water Feature	250 sf	650/kgsf	163
Community Room	1,015 sf	120/kgsf	122
Resident Services	1,207 sf	120/kgsf	145
Business Center	1,297 sf	120/kgsf	156
Case Management	905 sf	120/kgsf	109
Classroom	27 stu	11/stu	297
Computer Lab	972 sf	120/kgsf	117
Conference Room	706 sf	120/kgsf	85
Courtyard	5,142 sf	120/kgsf	617
Dog-Washing Area	370 sf	650/kgsf	241
Laundry Rooms	35 washers	185/washer	6,475
Media/Recording Studio	1,437 sf	120/kgsf	172
Screening Room	157 seats	3/seat	471
Fitness Center	6,584 sf	650/k	4,280
Co-Work	3,301 sf	120/kgsf	396
Amenity Deck	84,909 sf	120/kgsf	10,189
Tenant Lounge	9,145 sf	50/kgsf	457
Pool Deck	23,535 sf	200/kgsf	4,707
Pool	4,255 sf	—	406
Spa	646 sf	—	62
Clubhouse	1,230 sf	120/kgsf	148
Commercial and Office			
Retail	30,125 sf	25/kgsf	753
Restaurant	3,750 seats	30/seat	112,500
Office	580,374 sf	120/kgsf	69,645
Base Demand Adjustment ^a			1,537
Landscaping ^b	87,225 sf		8,279
Covered Parking ^c	1,894,810 sf	20/kgsf	1,246
Cooling Tower Total ^d	4,950 ton	35.64/ton	176,418

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

Land Use	Units	Average Daily Flow (gpd/unit) ^a	Average Daily Water Demand (gal)
Proposed Subtotal			590,244
Required Ordinances Water Savings			-102,634
Less Additional Conservation^e			-1,338
Existing Wastewater Generation to Be Removed			-3,374
Net Increase in Wastewater Generation			482,898
<hr/> <i>du = dwelling units</i> <i>kgsf = thousand gross square feet</i> <i>sf = square feet</i> <i>stu = students</i> ^a <i>Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.</i> ^b <i>Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance</i> ^c <i>Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.</i> ^d <i>Assumed to operate 24 hours/day, 7 days/week and at 55 percent of chiller capacity.</i> ^e <i>Water conservation due to additional conservation commitments agreed by the Applicant. Refer to Project Design Feature WAT-PDF-1 in Section IV.M.1, Utilities and Service Systems – Water Supply and Infrastructure of this Draft EIR.</i> <i>Source: KPFF Consulting Engineers, January 2022.</i>			

Project would implement capture and reuse or biofiltration to reduce stormwater pollution on the Project Site in accordance with the City’s Low Impact Development requirements. In accordance with the wastewater reduction requirements for new non-residential and high-rise residential construction set forth in the LAMC (Chapter IX, Article 9, Section 99.05.303.2), the Project would be required to demonstrate a 20-percent reduction in potable water use to comply with the City of Los Angeles Green Building Code.³¹ In addition, discharge of effluent from the HWRP into Santa Monica Bay is regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As LASAN monitors the treated wastewater, wastewater generated from the Project Site would not exceed wastewater treatment requirements of LARWQCB.

³¹ *In accordance with LAMC Section 99.05.303.2, “the reduction shall be based on the maximum allowable water use per plumbing fixture and fittings as required by the LAMC.” Water use baselines are set in Table 99.05.303.2.2 of the LAMC.*

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 2037, the year by which construction of the Project is expected to be completed. Future iterations of the IRP, such as the One Water LA 2040 Plan discussed above, would provide for improvements beyond 2020 through 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2037. Thus, based on this conservative assumption, the 2037 effective capacity of the Hyperion Sanitary Sewer System would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2037 would continue to be 450 mgd.

The Project's net increase in average daily wastewater generation of 0.483 mgd would represent approximately 0.09 percent of the Hyperion Service Area's assumed future capacity of 550 mgd and approximately 0.11 percent of the HWRP's design capacity of 450 mgd. Thus, the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant. The WWSI prepared for the Project and included as Appendix XX of this Draft EIR confirms the HWRP has capacity to serve the Project. Therefore, impacts with respect to wastewater treatment capacity would be less than significant and no mitigation measures would be required.

Furthermore, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. As provided in the WWSI for the Project and included as Appendix U of this Draft EIR, the sewer infrastructure of the Project includes three sewer systems. The first system is for Blocks 1, 2, 3, 4, and 5, the second system is for Blocks 0, 6, and 8, and the third system is for Block 7.³² The first sewer system includes an existing 8-inch line on Cumpston Street and an existing 12-inch line on Chandler Boulevard. The sewage from the two existing lines join to feed into an 18-inch line on Vineyard Avenue before discharging into a 24-inch sewer line on Lankershim Boulevard. The second sewer system includes an 18-inch line on Lankershim Boulevard, an existing 8-inch line on Bakman Avenue, and an existing 8-inch line on Weddington Street. The existing sewer lateral on Bakman feeds into an 8-inch line on Morrison Street. The sewage from the existing 18-inch line on Blocks 0, 1, and 6 join the sewage from the existing 8-inch line on Morrison Street to feed into an 18-inch line on Lankershim Boulevard before discharging into a 24-inch sewer line on Lankershim Boulevard to join two other systems. The third sewer system includes an existing 8-inch line on Tujunga Avenue. The sewage system from the existing 8-inch line

³² *Blocks 5 and 6 are generally described as a combined block throughout this Draft EIR. However, because they will drain to different wastewater infrastructure, they are separated for purposes of this analysis.*

feeds into an 8-inch line on Camarillo Street before discharging into a 24-inch sewer line on Lankershim Boulevard to join the other two systems.

The Project's net increase in wastewater generation is approximately 482,898 gpd. Based on estimated flows, the sewer system would be able to accommodate the Project. Specifically, as required by LAMC Section 64.15, the Project has submitted a SCAR to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing sewer lines. As discussed in the Utility Report included as Appendix G of this Draft EIR, the SCAR confirmed the lines serving the Project have adequate capacity. 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.

As such, based on the above, operation of the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required.

(2) Mitigation Measures

Project 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 related to wastewater treatment facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

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

(1) Impact Analysis

As discussed above, based on the temporary nature of construction of new on-site infrastructure and minor off-site work associated with connections to the public main line, as well as operational wastewater generation, the Project would not constrain existing and future scheduled wastewater treatment and infrastructure capacity. In addition, the Project would obtain approval from LASAN to discharge the Project's wastewater flows to the existing sewer systems and comply with relevant design requirements, as well as applicable sanitation and plumbing standards. Furthermore, the Project's net increase in average daily wastewater generation of 0.483 mgd would represent approximately 0.09 percent of the Hyperion Sanitary Sewer System's assumed future capacity of 550 mgd. The WWSI included as Appendix U of this Draft EIR confirmed the HWRP has sufficient capacity to serve the Project. Therefore, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. **As such, 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 projected demand in addition to the provider's existing commitments, and impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis on the wastewater conveyance system is the area that includes the Project Site and the related projects that would potentially utilize the same infrastructure as the Project. The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. The Project, in conjunction with growth forecasted in the Hyperion Service Area through 2037 (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 2037 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 34 is a conservative assumption, as some of the related projects may not be built out by 2037 (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 34 are fully built out by 2037, 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 the submittal of a SCAR to determine adequate sewer capacity pursuant to LAMC Section 64.15. 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. As demonstrated above, the Hyperion Sanitary Sewer System has adequate capacity to serve the Project and related Projects. Therefore, any infrastructure improvements associated with the related projects would likely be limited to the immediate area around each related project site to connect to or upgrade existing sewer lines which would be unlikely to combine with any impact from the Project to create cumulative impacts. Furthermore, similar to the Project, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. **Therefore, Project impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Wastewater Treatment Capacity

Development of the Project, in conjunction with the related projects, would result in an increase in the demand for sanitary sewer service in the Hyperion Service Area. As identified in Section III, Environmental Setting, of this Draft EIR, there are 34 related projects located in the Project vicinity. Assuming that each of these related projects would connect to some or all of the City sewers serving the Project Site, forecasted growth from the related projects would generate an average daily wastewater flow of approximately 340,933 gpd (0.341 mgd), as shown in Table IV.M.2-3 on page IV.M.2-21. Combined with the Project's net increase in wastewater generation of 482,898 gpd (0.483 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 823,831 gpd, or 0.824 mgd.

**Table IV.M.2-3
Cumulative Wastewater Generation**

No.	Project	Land Use	Size	Generation Factor^a	Total Wastewater Generation (gpd)
1.	NoHo Lankershim Station 5401 Lankershim Blvd.	Apartments	127 du	150/du	19,050
		Retail	14,500 sf	0.05/sf	725
		Office	1,918 sf	0.12/sf	230
2.	New NoHo Artwalk Project 11126 Chandler Blvd.	Apartments	73 du	150/du	10,950
		Retail	2,900 sf	0.05/sf	145
3.	The Weddington 11120 Chandler Blvd.	Apartments	324 du	150/du	48,600
4.	Apartments 5508 Fulcher Ave.	Apartments	46 du	150/du	6,900
5.	Apartments 5513 Case Ave.	Apartments	90 du	150/du	13,500
6.	Apartments 11112 Burbank Blvd.	Apartments	12 du	150/du	1,800
7.	Apartments 11433 Albers St.	Apartments	59 du	150/du	8,850
8.	Mixed-Use 5553 N. Tujunga Ave.	Apartments	30 du	150/du	4,500
		Retail	4,970 sf	0.05/sf	249
		Office	2,962 sf	0.12/sf	355
9.	Apartments 11410 W. Burbank Blvd.	Apartments	84 du	150/du	12,600
10.	Mixed-Use 5444 N. Vineland Ave.	Self-Storage Space	96,444 sf	0.05/sf	4,822
		Office	10,000 sf	0.12/sf	1,200
11.	Fitness Studio 5200 N. Lankershim Blvd.	Health/Fitness Club	2,690 sf	0.65/sf	1,749
12.	Condominium 11525 Chandler Blvd.	Condominiums	60 du	150/du	9,000
13.	Apartments 5633 Farmdale Ave.	Apartments	26 du	150/du	3,900

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

No.	Project	Land Use	Size	Generation Factor^a	Total Wastewater Generation (gpd)
14.	Camellia Court Apartments 5610 Camellia Ave.	Apartments	62 du	150/du	9,300
15.	Self Storage 5260 N. Vineland Ave.	Self Storage	81,300 sf	0.05/sf	4,065
16.	Apartments 5147 Bakman Ave.	Apartments	33 du	150/du	4,950
17.	Apartments 5110 N. Bakman Ave.	Apartments	51 du	150/du	7,650
18.	Apartments 11246 W. Otsego St.	Apartments	70 du	150/du	10,500
19.	NoHo Millennium 5107 Lankershim Blvd.	Apartments	287 du	150/du	43,050
		Market	23,733 sf	0.05/sf	1,187
		Office	1,267 sf	0.12/sf	152
20.	Apartments 11106 Hartsook St.	Apartments	61 du	150/du	9,150
21.	Apartments 11029–11035 Hartsook St.	Apartments	53 du	150/du	7,950
22.	Apartments 5050 N. Bakman Ave.	Apartments	40 du	150/du	6,000
23.	Mixed Use 10821 Magnolia Blvd.	Retail	4,075 sf	0.05/sf	204
		Apartments	40 du	150/du	6,000
24.	School 11600 Magnolia Blvd.	Additional Students	78 stu	11/stu	858
25.	Apartments 5755 N. Tujunga Ave.	Apartments	33 du	150/du	4,950
26.	Apartments 11155 W. Huston St.	Apartments	24 du	150/du	3,600
27.	Wesley School 4832 Tujunga Ave.	Additional Students	91 stu	11/stu	1,001

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

No.	Project	Land Use	Size	Generation Factor^a	Total Wastewater Generation (gpd)
28.	Apartments 11443 Riverside Dr.	Apartments	29 du	150/du	4,350
29.	Mixed Use 11311 Camarillo St.	Apartments	60 du	150/du	9,000
		Retail	3,000 sf	0.05/sf	150
30.	Apartments 10804 W. Blix St.	Apartments	21 du	150/du	3,150
31.	Mixed Use 10850 Riverside Dr.	Apartments	179 du	150/du	26,850
		Retail	5,694 sf	0.05/sf	285
32.	Cohen Apartments 10601 Riverside Dr.	Apartments	82 du	150/du	12,300
		Retail	13,327 sf	0.05/sf	666
33.	Apartments 11036 Moorpark St.	Apartments	96 du	150/du	14,400
34.	Gas Station 4377 Vineland Ave.	Expansion of Existing Facilities	1,818 sf	0.05/sf	91
Related Projects Wastewater Generation					340,933
Project Net Wastewater Generation					482,898
Total Wastewater Generation for Related Projects and Project					823,831
<p><i>du = dwelling units</i> <i>emp = employees</i> <i>rm = rooms</i> <i>sf = square feet</i> <i>stu = students</i> ^a Generation rates are based on 100 percent LASAN sewerage generation factors. Source: Eyestone Environmental, 2022.</p>					

Based on LASAN's average flow projections for the Hyperion Sanitary Sewer System, it is anticipated that the average flow in 2037 would be approximately 355 mgd.³³ In addition, the Hyperion Sanitary Sewer System's total treatment capacity is conservatively estimated to be approximately 550 mgd in 2037, which is the same as its existing capacity.

The Project wastewater flow of approximately 0.483 mgd combined with the specific related projects flow of approximately 0.341 mgd would result in a total cumulative wastewater flow of approximately 0.824 mgd. Based on the Hyperion Service Area's estimated future capacity of approximately 550 mgd, the Hyperion Service Area is expected to have adequate capacity to accommodate the 0.824 mgd of cumulative wastewater flows. The 0.824 mgd of cumulative wastewater would represent 0.15 percent of the Hyperion Service Area's existing design capacity of 550 mgd. **Therefore, Project impacts on the 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 were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

³³ LADWP, *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 2030 (approximately 348 mgd) and 2040 (approximately 358 mgd). The 2037 value is extrapolated from 2030 and 2040 values: $[(358 \text{ mgd} - 348 \text{ mgd}) \div 10] * 7 + 348 = 355 \text{ mgd}$.