IV. Environmental Impact Analysis

M.2 Utilities and Service Systems – Wastewater

1. Introduction

This section analyzes the Project's potential 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 *Utility Infrastructure Technical Report: Water, Wastewater, and Energy* (Infrastructure Report) prepared for the Project by KPFF Consulting Engineers and is included as **Appendix M-1** of this Draft EIR.

The data and conclusions in this section regarding the availability of water supply to serve the Project are based on a Water Supply Assessment (WSA) prepared for the Project and adopted by LADWP and included in **Appendix M-2** of this Draft EIR, along with a copy of Resolution No. 021085 approving the WSA. Additional technical information used in the analysis is based on a Utility Infrastructure Technical Report: Water (Infrastructure Report) prepared for the Project by KPFF Consulting Engineers and included in Appendix M-1. As part of the Infrastructure Report, a Request of Wastewater Services Information (WWSI) was prepared for the Project dated April 11, 2023, which contains the results of the LASAN preliminary analysis, the following sewer mains are within the vicinity of the Project Site and is included as Exhibit 4 in Appendix M-1. Additionally, as the Project's development program was refined after the WSA was approved, an updated WSA request letter was submitted to LADWP. LADWP recalculated the Project's water demand based on the Project Description as described in Chapter II of this Draft EIR, and determined the Project's total water demand would not result in a substantial increase to the previous water demand as approved by the Board of Water and Power on November 17, 2020. As such, no additional WSA is required for the refinements to the Project' s development program. The email received from LADWP on May 9, 2023, confirming that no additional WSA is required is included in **Appendix M-3**.

2. Environmental Setting

a) Regulatory Framework

There are several plans, policies, and programs regarding Wastewater at the State and local levels that are applicable to the Project. Described below, these include:

- California Green Building Standards Code
- City of Los Angeles General Plan Framework
- Los Angeles Integrated Resources Plan
- One Water LA 2040 Plan
- Los Angeles Municipal Codes
  - Los Angeles Green Building Code (Ordinance No. 181,480),
  - Water Efficiency Requirements Ordinance (Ordinance No. 180,822)
  - Sewer Capacity Availability Review (SCAR; LAMC Section 64.15)
  - Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1)
  - Bureau of Engineering Special Order No. SO 06-0691

(1) State

(a) California Green Building Standards Code

The California Green Building Standards Code (CALGreen Code) is set forth in California Code of Regulations (CCR) Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the 2022 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 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 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 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,

[1] City of Los Angeles, Ordinance No. 181480.

objectives, and policies for utilities in the City, including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.[2]

(b) Los Angeles Integrated Resources Plan

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

The Final IRP 5-Year Review was released in June 2012, which included 12 projects that were separated into two categories: (1) "Go Projects" for immediate implementation and (2) "Go-If Triggered Projects" for implementation in the future once a trigger is reached.[3] Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the Final IRP 5-Year Review, the Go Projects consisted of six capital improvement projects for which triggers were considered to have been met at the time the IRP EIR was certified. The Go-If Triggered Projects consisted of six capital improvement projects for which triggers were not considered to have been met at the time the IRP EIR was certified.

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

(c) One Water LA 2040 Plan

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

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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.

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

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

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.[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.

(d) Los Angeles Municipal Code

(i) Los Angeles Green Building Code

The City has been pursuing a number of green development initiatives intended to promote energy conservation and reductions in the amount of greenhouse gas emissions generated within the City. While these ordinances do not focus on the provision of sewer services, they do mandate the use of water conservation features in new developments. Examples of such water conservation features include, but are not limited to, low water shower heads, toilets, clothes washers and dishwashers. Because the flow through these fixtures is reduced, residual wastewater passing through is reduced, in turn reducing the demand for sewage conveyance and treatment.

LAMC Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),[6] 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 second 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),[7] effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

(iii) Sewer Capacity Availability Review

The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a SCAR when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge

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 City of Los Angeles, Ordinance No. 181480

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

through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

(iv) Sewerage Facilities Charge

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

(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).[8]

b) Existing Conditions

(1) Wastewater Generation

As discussed in Chapter II, *Project Description*, of this Draft EIR, the Project Site is currently developed with the Existing Hotel Building, Existing Ancillary Hotel Building, Existing Outdoor Pool Area, a parking garage, and other circulation and landscaping facilities associated with the Hilton Universal City Hotel. As the Existing Hotel Building and Existing Ancillary Hotel Building would remain unaffected by construction and operation of the Project, for the purpose of this analysis, the existing wastewater generation considers only those uses that would be removed by as a result of the Project, which include the Existing Outdoor Pool Area and associated facilities. **Table IV.M.2-1**, *Estimated Existing Wastewater Generation*, contains the existing wastewater generation

[8] 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.

of existing uses that will be removed as part of the Project and therefore will not require any additional water demand. Existing wastewater generation for the Existing Outdoor Pool Area was estimated by analyzing the total volume of the pool and standard wastewater generation rates from the City of Los Angeles Bureau of Sanitation (LASAN).

TABLE IV.M.2-1
ESTIMATED EXISTING WASTEWATER GENERATION

Building Use – Existing to be Removed	Generation Rate (GPD/unit)	Units	Quantity	Total Consumption (GPD)
Pool/Spa[a]	7.48	CF[b]	9,101	60,891
Pool Bar/Grill[c]	15	Seat	64	960
Existing Total Wastewater Generation			Total (GPD)	***61,851***

GPD = gallons per day; CF= cubic feet.

[a] Spa/Jacuzzi volume calculated with an estimated 1,809 SF with an assumed average depth of 4.5 ft

[b] Pool and Spa Generation equals to 7.48 gal/1 CF

[c] Pool Bar/Grill units considered as "Bar: Cocktail, Fixed Set" for sewage generation purposes.

SOURCE: KPFF, Infrastructure Report, 2023. Appendix M-1.

(2) Wastewater Infrastructure

(a) Regional

Los Angeles Sanitation and Environment (LASAN) operates and maintains the wastewater treatment, reclamation and collection facilities serving most of the City incorporated areas, including the Project Site, as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. The collection infrastructure consists of over 6,700 miles of local, trunk, mainline and major interceptor sewers, five major outfall sewers, and 46 pumping plants, 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.[9]

(b) Local

The local sanitary sewer system is maintained by LASAN. As described in the Infrastructure Report, included as Appendix M-1 of this Draft EIR, the existing uses on the Project Site currently discharge into a 10-inch sanitary sewer line. This private 10-inch line travels south, then turns via a manhole to a private 12-inch line to the west. This existing private 12-inch line discharges further westerly into a public 15-inch sewer line located within Lankershim Boulevard right-of-way. Both the private 10-inch and 12-inch sanitary sewer lines are

9 LASAN, *Sewers and Pumping Plants*, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_adf.ctrl-state=die4u53h0_5&_afrLoop=2814365992348017#!, accessed June 2023.

located on neighboring NBC Universal (NBCU) property. The Hotel currently has access rights to these two sewer lines pursuant to recorded easements.

Currently, in addition to the existing private 10-inch sewer line serving the Project Site, the existing sanitary sewer manhole also receives flow from a NBCU owned and maintained 12-inch sewer line from the east.

Table IV.M.2-2 provides the approximate flow and design capacity of existing private sewer lines.

TABLE IV.M.2-2
APPROXIMATE FLOW LEVEL AND DESIGN CAPACITY EXISTING PRIVATE SEWER LINES

Pipe Location	Pipe Size (inches)	Estimated d/D (%)	50% Design Capacity (MGD)
South of Project Site flowing southerly[1]	10	8.8	4.09
South of Project Site flowing westerly[2]	12	30.5	2.57

[1] The estimated total existing wastewater generation is 0.13 MGD for the 10-inch sewer line, which includes only the existing Project Site estimated total existing wastewater generation per Table IV.M.2-1 above with an estimated pipe slope of 33.3%.

[2] The estimated total existing wastewater generation is 1.04 MGD for the 12-inch sewer line, which includes the existing Project Site estimated total existing wastewater generation, 0.13 MGD plus the existing NBCU existing total average wastewater generation for Lankershim Boulevard per the 2010 NBC Universal Evolution Plan, Appendix N-2 Wastewater Report (Refer to Exhibit 12), 0.91 MGD with an estimated pipe slope of 5.0%.

[3] d/D Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10

[4] 50% Sewer Design Capacity. Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10 of Appendix M-1.

SOURCE: KPFF, Infrastructure Report, 2023. Appendix M-1.

The local public sanitary sewer service to the Project Site from the surrounding streets is owned and maintained by LASAN. Per the results of the WWSI prepared for the Project, the following sewer mains are within the vicinity of the Project Site:

- **Lankershim Blvd right-of-way (W.C. Fields Drive):** There is a public 15-inch vitrified clay pipe (VCP) sewer line that flows west, which has an existing capacity of 4.75 mgd for the 75 percent design capacity.
- **Lankershim Blvd:** There is a public 21-inch VCP sewer line that flows northeast, which has an existing capacity of 7.04 mgd for the 75 percent design capacity.
- **Lankershim Blvd:** There is a public 18-inch VCP sewer line that flows north which has an existing capacity of 7.61 mgd for the 75 percent design capacity.
- **Lankershim Blvd right-of-way (Los Angeles River):** There is a public 24-inch VCP sewer line that flows east, which has an existing capacity of 4.75 mgd for the 75 percent design capacity at one location and 10.33 mgd in the second location.

- **Vista St:** There is a public 42-inch VCP sewer line that flows south, which has an existing capacity of 22.25 mgd for the 75 percent design capacity.
- **Martel Ave:** There is a public 72-inch VCP sewer line that flows south, which has an existing capacity of 68.63 mgd for the 75 percent design capacity at one location and 456.53 mgd in the second location.

Refer to Table IV.M.2-4, Estimated Sewer Capacity Analysis, below for the existing flow rates and design capacity for each public line.

(3) Wastewater Treatment

LASAN is responsible for the operation of wastewater treatment facilities within the City. The main purpose of these facilities is to remove pollutants from sewage in order to protect public health and the environment. The Project Site is located within the Hyperion System service area, which consists of the Hyperion Water Reclamation Plant (HWRP), the Donald C. Tillman Water Reclamation Plant (TWRP), and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). The wastewater generated by the existing uses within the Project Site currently flows to the HWRP. The existing design capacity of the Hyperion Service Area is approximately 550 mgd (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant) and the existing average daily flow for the system is approximately 300 mgd.[10,11]

(a) Hyperion Sanitary Sewer System

The current treatment capacity of the Hyperion Service Area is approximately 550 mgd which consists of 450 mgd at HWRP, 80 mgd at the Donald C. Tillman WRP, and 20 mgd at the Los Angeles-Glendale WRP.[12,13,14] 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 Hyperion WRP, 47 mgd at the Donald C. Tillman WRP, and 17 mgd at the Los Angeles-Glendale WRP.[15]

10 City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2019.

11 City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=oep8lwkld_4&_afrLoop=28344654751341747#, Accessed December 2022.

12 LASAN, Hyperion Water Reclamation Plant Treatment Process, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=if0l71qhd_1072&_afrLoop=5425639494018926#!. Accessed May 2023.

13 LASAN, Donald C. Tillman Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=eu61rh3y2_344&_afrLoop=1039495806625525#!. Accessed May 2023.

14 LASAN, Los Angeles-Glendale Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=eu61rh3y2_344&_afrLoop=1039463772479031. Accessed May 2023.

15 LASAN, One Water LA 2040 Plan – Volume 2: Wastewater Facilities Plan, Table ES-1, April 2018.

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. All other flow in the Hyperion Sanitary Sewer System, as well as biosolids from the upstream reclamation plants that are returned to the collection system are treated at the HWRP in Playa del Rey. As such, current and project flows to the year 2040 are and would continue to be below the design capacity of approximately 550 mgd for the Hyperion Sanitary Sewer System.

(b) Hyperion Water Reclamation Plant

Wastewater generated from the Project Site is currently conveyed via the local collector sanitary sewer directly to the HWRP for treatment. The HWRP has the capacity to treat approximately 450 mgd, but according to LASAN, the HWRP currently treats a daily average of 275 mgd.[16] As such, the HWRP is currently operating at approximately 61 percent of its capacity, with a remaining capacity of approximately 175 mgd. Based on the above, current flows to the HWRP are well below its design capacity of 450 mgd.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.[17] The majority of the treated water from the HWRP is discharged into Santa Monica Bay through a 5-mile-long outfall, terminating at a depth of 200 feet. The remaining effluent is pumped to the West Basin Municipal Water District (WBMWD) for additional treatment dependent upon reuse demand. The discharge 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. 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.[18]

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16 LASAN, Hyperion Water Reclamation Plant Treatment Process, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=if0l71qhd_1072&_afrLoop=5425639494018926#!. Accessed January 2023.

17 LASAN, Treatment Process, https://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?_afrLoop=16246182864863575&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=tpzy2r0ux_758#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D16246182864863575%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dtpzy2r0ux_762. Accessed May 2023.

18 LASAN, Environmental Monitoring, https://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?_afrLoop=16246514096900690&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=tpzy2r0ux_917#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D16246514096900690%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dtpzy2r0ux_921. Accessed May 2023.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to wastewater if it would:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction of which would cause significant environmental effects;[19] or

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

In assessing impacts related to wastewater in this section, the City used Appendix G as the thresholds of significance. The factors identified below from the City's 2006 L.A. CEQA Thresholds Guide, as appropriate and relevant, were used to assist in analyzing the Appendix G thresholds. The L.A. CEQA Thresholds Guide states that the determination of significant 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 be constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

b) Methodology

The analysis of impacts to wastewater infrastructure is based on the analysis in the Infrastructure Report (included as Appendix M-1 of this Draft EIR) and the WSA (included as Appendix M-2 of this Draft EIR). The anticipated wastewater flows to be generated by the Project are based on 100 percent of the water demand calculated in the WSA (based on LASAN rates), minus the existing uses to be removed on the Project Site that generate wastewater.

19 Water supply is addressed in Section IV.M.1 of this Draft EIR. Electrical and natural gas are addressed in Section IV.D, *Energy*, of this Draft EIR. Stormwater drainage is addressed in more detail in Section IV.G, *Hydrology and Water Quality*, of this Draft EIR. Telecommunications is addressed in more detail in Chapter VI, *Other CEQA Considerations*, of this Draft EIR.

Pursuant to LAMC Section 64.15, LASAN's Wastewater Engineering Division made a preliminary analysis of the local and regional sewer conditions to determine if available wastewater conveyance and treatment capacity exists for future development of the Project Site. LASAN's approach consisted of the study of a worst-case scenario envisioning peak demands from the relevant facilities occurring simultaneously on the wastewater system. A combination of flow gauging data and computed results from the City's hydrodynamic model were used to project current and future impacts due to additional sewer discharge. This analysis is based on the findings of the LASAN preliminary analysis. Refer to Exhibit 4 of Appendix M-1 for WWSI Response Letter prepared by LASAN providing additional context and evaluation, showing feasibility in accommodating the Project.

To evaluate potential impacts to relative 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.

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 WS-PDF-1, included in Section IV.M.1, *Utilities and Service Systems – Water Supply*, of this Draft EIR, which would provide specific water efficiency features for the Project plumbing features, landscape and irrigation, and pools.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction Impacts

As described in Subsection IV.M.2.2.b)(1) above, the Project Site is currently developed, and there are existing uses within the Existing Outdoor Pool Area that would be removed during Project construction, temporarily reducing wastewater generation. Wastewater generation would occur incrementally throughout construction of the Project as a result of construction workers on-site. However, temporary facilities, such as portable toilets and hand wash areas, would be provided by the construction contractor. Any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Therefore, construction activities for the Project

would not result in wastewater generation as construction workers would typically utilize portable toilets and handwash 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 and would not result in the need for new or expanded wastewater treatment facilities. Accordingly, there would be adequate treatment capacity in the Hyperion Sanitary Sewer System and HWRP during Project construction to serve the Project's projected demand in addition to existing commitments per the WWSI.

In addition, construction of the Project would include all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Although not anticipated, if existing sewer lines are found to be substandard or in deteriorated condition, the Project Applicant would be required to make necessary improvements to achieve adequate service under City's Building and Safety Code and the LADPW requirements. Construction relative to the wastewater system for the Project would occur at the Project Site and immediate vicinity. Such construction activities, if required, would be minimal and confined to trenching to place the connections or upgrade lines below the ground's surface and would be temporary in nature. The design of these connections would be developed by a registered engineer and approved by the City's Bureau of Engineering (BOE). All necessary improvements would be verified through the City's permit approval process of obtaining a sewer connection permit from the City. Further, all construction activities that would happen in coordination with the appropriate agencies, including LASAN and BOE. These agencies would provide input on the Project and would coordinate with the Project Applicant before, during, and after construction activities. Finally, the Project would implement a Construction Management Plan to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of wastewater lines would impede such access.

Based on the above, 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, and therefore, impacts would be less than significant.

Based on the above, 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, and impacts would be less than significant.

(b) Operational Impacts

Table IV.M.2-3, *Estimated Proposed Wastewater Generation Increase*, shows that the Project would generate a net increase of 171,645 gallons per day (GPD), or approximately 0.17 mgd. Pursuant to LAMC Section 64.15, LASAN Wastewater Engineering Services Division (WESD) made a preliminary analysis of the local and regional sewer conditions

to determine if available wastewater conveyance and treatment capacity exists for future development of the Project Site. LASAN's approach consisted of the study of a worst-case scenario envisioning peak demands from the relevant facilities occurring simultaneously on the wastewater system. The Project's estimated proposed wastewater generation is equal to less than 0.04 percent of the HWRP's total capacity of 450 mgd and 0.09 percent of the available capacity, where the Project's wastewater would be treated.

TABLE IV.M.2-3
ESTIMATED PROPOSED WASTEWATER GENERATION INCREASE

Building Use – Proposed	Generation Rate (GPD/unit)	Units	Quantity	Total Consumption (GPD)
Hotel[a]	120	GR	395	47,400
Restaurant: Full Service Indoor Seat[b]	30	Seats	719	21,570
Health Club/Spa[c]	650	KGSF	11,296	7,342
Auto Parking[d]	20	KGSF	66,879	1,338
Meeting Room Addition[e]	120	KGSF	3,400	408
Spa/Jacuzzi/Pool[f]	7.48	CF[g]	20,781	155,442
Proposed Total Wastewater Generation			GPD	*233,500*
Existing Wastewater to be Removed			GPD	*(61,855)*
Net Increase in Wastewater Generation			GPD	***171,645***

CF= cubic feet, GR= guest rooms, GPD= gallons per day, KGSF= 1,000 gross square feet.

NOTE: The average daily flow based on 100% of City of Los Angeles sewerage generation factors.

[a] Hotel units considered as "Hotel: Use Guest Rooms Only " for sewage generation purposes.

[b] Restaurant units considered "Restaurant: Full Service Indoor Seat" for sewage generation purposes.

[c] Health Club and Spa units considered "Health Spa/Club "for sewage generation purposes.

[d] Auto Parking units considered "Auto Parking " for sewage generation purposes.

[e] Meeting Room Addition units considered "Office Building " for sewage generation purposes.

[f] Pool generation calculated using provided pool dimensions with an assumed depth of 4.5 feet. Pool and spa total generation volumes are based on LASAN Sewage Generation Factors (and not evapotranspiration) to assess the potential impact on wastewater infrastructure of a full drainage of the water feature scenario.

[g] Pool and Spa Generation equals to 7.48 gal/1 CU. FT, per WWSI.

SOURCE: KPFF, Infrastructure Report, 2023. Appendix M-1.

Therefore, based on the results of the WWSI from LASAN, the existing City of Los Angeles sewer system is able to accommodate the total flow for the Project.

Additionally, a sewer capacity analysis was performed to determine the impact of the Project's anticipated sewage generation as shown in Table IV.M.2-3 above. The analysis impact of the Project's anticipated sewage generation were computed using FlowMaster

(refer to Exhibit 10 for Sewer Analysis Calculations in Appendix M-1 of this Draft EIR). The existing sewer gauging information from LASAN and the anticipated sewer analysis capacity is summarized in **Table IV.M.2-4**, *Estimated Existing Sewer Capacity* below, which shows the flow rates of each existing sewer line with the Project's wastewater generation compared to the design capacity of each line to determine if replacement lines would be required.

TABLE IV.M.2-4
ESTIMATED EXISTING SEWER CAPACITY ANALYSIS

Pipeline Diameter[a]	Pipe Location[b]	Gauging d/D[c] (%)	Existing[d] (mgd)	50% Design Capacity[e] (mgd)	75% Design Capacity[f] (mgd)	Existing Plus Project[g] (mgd)	d/D (%) with Project[h]
15	Lankershim Blvd. R/W	14	0.23	2.73	4.98	0.46	19.6
21	Lankershim Blvd.	21	0.83	4.31	7.87	1.06	23.2
18	Lankershim Blvd.	13	0.31	4.34	7.92	0.54	16.9
24	Lankershim Blvd. R/W	28	2.18	6.37	11.62	2.41	34.1
24	Lankershim Blvd. R/W	42	7.00	9.50	17.33	7.23	42.8
42	Vista St.	57	47.40	38.19	69.65	47.63	57.2
72	Martel Ave.	53	104.79	95.09	173.42	105.02	53.1
72	Martel Ave.	60	1277.77	950.95	1734.30	1278.00	60.0

mgd= million gallons per day.

[a] Pipe diameter size, per the Hilton Universal City Project – Request for WWSI. Refer to Exhibit 4

[b] Pipe location, per the Hilton Universal City Project – Request for WWSI. Refer to Exhibit 4.

[c] Current gauging d/D, per the Hilton Universal City Project – Request for WWSI. Refer to Exhibit 4

[d] Current discharge. Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10.

[e] 50% Sewer Design Capacity, per the Hilton Universal City Project – Request for WWSI. Refer to Exhibit 4.

[f] 75% Sewer Design Capacity. Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10.

[g] Sewer Capacity Discharge including Existing plus Project. Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10.

[h] Sewer Capacity analysis d/D including Existing plus Project. Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10.

SOURCE: KPFF, Utility Infrastructure Technical Report, 2023. Appendix M-1.

The City established design criteria for new sewer infrastructure to have peak dry weather flow not exceed one-half of the pipe diameter (d/D of 0.5 percent) per Special Order No SO 06-0691. The new onsite sewer lines would be designed to meet this requirement. However, for existing sewer infrastructure, based on the City's Sewer Design Manual Part

F 200 and SSMP, the trigger flow in a sanitary sewer is the quantity of flow that, once reached, would initiate the planning for a relief or new replacement sewer. Currently, this trigger flow is considered when the depth of flow reaches three-fourths of the pipe diameter, or a d/D of 75 percent. As depicted in Table IV.M.2-4, the Project combined with any existing flow remaining, does not trigger a need for sewer replacement or relief, as the d/D does not exceed 75 percent for the existing public 15-inch sewer main line, for which the existing plus Project estimated 0.46 mgd would not exceed the 75 percent design capacity of 4.98 mgd. Therefore, the existing sewer infrastructure has sufficient capacity to handle the Project's sewer generation and impacts to sewer infrastructure would be less than significant.

Per the WWSI, as is typical in the City, further detailed gauging and evaluation will be needed as part of the Project's permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for the Project's sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the HWRP, which has sufficient capacity for the Project. The HWRP is currently treating approximately 260 MGD and operating at approximately 57.8-percent of its capacity, which has available capacity of 190 mgd. From Table IV.M.2-3 above, the Project's proposed net wastewater generation is approximately 171,645 GPD, which is approximately 0.17 mgd. This is equal to less than 0.04 percent of the HWRP's capacity and 0.09 percent of the HWRP's available capacity where the Project's wastewater would be treated. Therefore, Project operational impacts to sewer infrastructure would be less than significant.

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.

(2) Mitigation Measures

Project impacts with regard to wastewater treatment facilities would be less than significant. No mitigation measures are required.

(3) Level of Significance After Mitigation

Project impacts related to wastewater treatment facilities were determined to be less than significant. Therefore, no mitigation measures are required.

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 under Threshold (a), based on the short-term, limited, and temporary nature of the construction activities as well as operational wastewater generation that would below the 75 percent design capacity of the existing sewer lines in the Project vicinity, the Project would not constrain existing and projected wastewater treatment and infrastructure capacity. In addition, the Project would obtain approval from LASAN to discharge the Project's proposed wastewater flows to the existing sewer systems and would comply with relevant design requirements, and applicable plumbing and sanitation requirements. The Project also includes water conservation measures (see WS-PDF-1) that would reduce wastewater generation including flow rate limits on plumbing features, specifications on landscaping and irrigation, and leak detection and filters for the pools. The Project's net increase in wastewater generation of 0.17 mgd represents approximately 0.04 percent of the HWRP's capacity of 450 mgd and 0.09 percent of the current available capacity of the HWRP where the Project's wastewater would be treated. The WWSI included in Appendix M-1 of this Draft EIR confirms the HWRP has capacity to serve the Project based on the estimated 0.09 percent of available capacity that would be added. **Therefore, the wastewater treatment provider for the Project has confirmed that it has adequate capacity to serve the Project's projected demand in addition to their existing commitments, and impacts would be less than significant.**

(2) Mitigation Measures

Project impacts related to wastewater treatment capacity would be less than significant. No mitigation measures are required.

(3) Level of Significance After Mitigation

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

e) Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analyses on wastewater infrastructure is the vicinity of the Project Site and the Hyperion Service Area, respectively. Chapter III, *Environmental Setting*, of this Draft EIR, identifies fifteen related projects, fourteen of which are in the City and one of which is in the County of Los Angeles. All 15 related projects are served by LASAN and are located within the Hyperion Service Area.

As described above under Thresholds (a) and (b), the Project would result in a net increase in wastewater generation and development of the Project in conjunction with the related projects would result in an increase in demand for sanitary sewer service by LASAN due to the development of new land uses that would generate wastewater within the Hyperion Service Area. The analysis provided in Threshold (a) above shows LASAN's

existing and planned capacity has adequate capacity to serve the Project. Similar to the Project, related projects connecting to the same sewer system would be required to obtain a sewer connection permit and submit a SCAR to the Bureau of Sanitation as part of the related project's development review. Impact determinations for each related project would be provided following the completion of the SCAR analysis. 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.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. Based on information from LASAN, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (mgd) and the existing average daily flow for the system is approximately 260 mgd.[20] The estimated wastewater generation of the Project is approximately 0.08 percent of the average daily wastewater flow for the HWRP. It is expected that the related projects would also be required to adhere to the LASAN's annual wastewater flow increase allotment.

In addition to the public sewer lines, analyzed in Table IV.M.2-4 above in Threshold (a), the Project would connect to the existing private 10-inch sewer line on the south side of the Project Site, which currently receives flow from the existing Hotel (and will continue to) and flows southerly into the existing private 12-inch sewer line that flows westerly to the existing City 15-inch sewer main on Lankershim Boulevard. The existing private 12-inch sewer also receives flow from another private 12-inch sewer line from the neighboring NBCU property. A sewer capacity analysis was performed to determine the impact of the Project's and NBCU's current and future (the full NBCU Evolution Plan [Related Project No. 1] buildout scenario combined with Project growth) anticipated sewage generation and capacity (see Exhibit 10 for these Sewer Analysis Calculations). The existing sewer gauging information from LASAN and the anticipated sewer capacity analysis for the Project and NBCU is summarized in **Table IV.M.2-5**, *Estimated Existing Sewer Capacity Analysis (Project plus NBC Universal Evolution Plan [Related Project No. 1])*, below. To provide a conservative analysis, a full NBC Universal Evolution Plan buildout was assumed.

As depicted in Table IV.M.2-5 above, the Project's plus NBCU's buildout, combined with any existing flow remaining, does not trigger a need for sewer replacement or relief, as the d/D does not exceed 75 percent for the private 10-inch and 12-inch sewer lines, nor the existing public 15-inch sewer main line. The Project with full NBCU buildout would result in 0.29 mgd for the 10-inch sewer line that is below the 75 percent design capacity of 7.45 mgd. The Project with full NBCU buildout would also result in 2.86 mgd for the 12-inch line which is below the 75 design capacity of 4.69 mgd. As shown in Table IV.M.2-5, the same is true for the Project and NBCU estimated sewer generation for all public sewer lines. Therefore, the existing sewer infrastructure has sufficient capacity to handle the Project's and NBCU's current and future sewer generation.

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

TABLE IV.M.2-5
ESTIMATED EXISTING SEWER CAPACITY ANALYSIS
(PROJECT PLUS NBC UNIVERSAL EVOLUTION PLAN [RELATED PROJECT NO.1])

Pipe Diameter[a] (inches)	Pipe Location[b]	Current Gauging d/D[c] (%)	Existing[d] (mgd)	50% Design Capacity[e] (mgd)	75% Design Capacity[f] (mgd)	Existing Plus Project + NBCU[g] (mgd)	d/D (%) with Project + NBCU[h]
10	South of Project Site flowing southerly[i]	8.8	0.13	4.09	7.45	0.29	12.9
12	South of Project Site flowing westerly[j]	30.5	1.04	2.57	4.69	2.86	53.2
15	Lankershim Blvd R/W	14	0.23	2.73	4.98	2.12	48.2
21	Lankershim Blvd.	21	0.83	4.31	7.87	2.72	38.6
18	Lankershim Blvd.	13	0.31	4.34	7.92	2.20	34.3
24	Lankershim Blvd R/W	28	2.18	6.37	11.62	4.07	38.9
24	Lankershim Blvd R/W	42	7.00	9.50	17.33	8.89	48.1
42	Vista St.	57	47.4	38.19	69.65	49.29	58.5
72	Martel Ave.	53	104.79	95.09	173.42	106.68	53.6
72	Martel Ave.	60	1277.77	950.95	1734.3	1279.66	60.1

mgd = million gallons per day.

[a] Pipe diameter size, per the Hilton Universal City Project – Request for WWSI. Refer to Exhibit 4.

[b] Pipe location, per the Hilton Universal City Project – Request for WWSI. Refer to Exhibit 4.

[c] Current gauging d/D, per the Hilton Universal City Project – Request for WWSI. Refer to Exhibit 4

[d] Current discharge. Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10.

[e] 50% Sewer Design Capacity, per the Hilton Universal City Project – Request for WWSI. Refer to Exhibit 4.

[f] 75% Sewer Design Capacity. Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10.

[g] Sewer Capacity Discharge including Existing plus Project and the NBCU cumulative project total average wastewater generation for Lankershim Boulevard per the 2010 NBC Universal Evolution Plan, Appendix N-2 Wastewater Report, Table 3. Refer to Exhibit 12. The Project's proposed wastewater generation is approximately 0.23 mgd and the NBCU's proposed wastewater generation is approximately 1.66 mgd. Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10.

[h] Sewer Capacity analysis d/D including Existing plus Project and the NBCU cumulative project total average wastewater generation for Lankershim Boulevard per the 2010 NBC Universal Evolution Plan, Appendix N-2 Wastewater Report, Table 3. Refer to Exhibit 12. The Project's proposed wastewater generation is approximately 0.23 mgd and the NBCU's proposed wastewater generation is approximately 1.66 mgd. Sewer Analysis Calculations per software FlowMaster. Refer to Exhibit 10. BOE Special Order No. SO 06-0691 requires that proposed sewer lines be designed so that the peak dry weather flow depth during their planning period does not exceed one-half of the pipe diameter (d/D = 50%) for sewers less than 18 inches. The City SSMP establishes a standard d/D of 0.75 (d/D = 75%) or greater for identifying existing sewers in need of replacement or relief.

[i] There is no anticipated proposed wastewater generation from NBCU. The estimated total existing wastewater generation to remain is 0.069 MGD plus the net total increase wastewater generation for the Project of 0.17 MGD, for the 10-inch sewer line. Estimated pipe slope of 33.3%.

[j] The estimated total existing wastewater generation to remain is 0.069 MGD plus the net total increase wastewater generation for the Project of 0.17 mgd and net total increase wastewater generation for NBCU of 1.66 mgd per the 2010 NBC Universal Evolution Plan, Appendix N-2 Wastewater Report, Table 3. Refer to Exhibit 12, for the 12-inch sewer line. Estimated pipe slope of 5.0%.

SOURCE: KPFF, Utility Infrastructure Technical Report, 2023. Appendix M-1.

As shown in **Table IV.M.2-6,** *Estimated Cumulative Wastewater Generation for Related Projects 2 Through 15*, the estimated average wastewater dry weather flow generation associated with Related Projects 2 through 5 is up to 128,439 GPD or approximately 0.13 mgd. As indicated in Table IV.M.2-5 above, Related Project No. 1 (NBC Universal Evolution Plan) would result in an increase of 1.66 mgd. The Project would contribute an additional 171,645 GPD of wastewater, or 0.17 mgd of wastewater dry weather flow. The estimated generation for the Project and the related projects would result in a combined total of approximately 1.96 mgd of average wastewater dry weather flow. This represents approximately 0.36 percent of the Hyperion Service Area's design capacity of 550 mgd. These estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures for the related projects or the Project.

Based on these forecasts, the Project's and related projects' increase in wastewater generation would be adequately accommodated within the Hyperion Service Area. Therefore, Project impacts on the wastewater treatment system would not be cumulatively considerable, and cumulative impacts would be less than significant.

TABLE IV.M.2-6
ESTIMATED CUMULATIVE WASTEWATER GENERATION
FOR RELATED PROJECTS 2 THROUGH 15

Land Uses	Quantity	Water Factor	Estimated Water Demand (GPD)[a]
Multi-Family Residential	796 du	150 GPD/du[b]	119,400
Single-Family Residential	(9 du)	185 GPD/du[c]	(1,665)
Affordable Housing	23 du	150 GPD/du[d]	3,450
Assisted Living[e]	(58 beds)	70 GPD/bed	(4,060)
Other Commercial/Retail	21.55 ksf	50 GPD/ksf	1,078
Car Wash	1.10 ksf	Actual[f]	3,500
Office[g]	(29.20) ksf	170 GPD/ksf	(4,964)
Restaurant[h]	6.37 ksf/25 seats[i]	30/seat	750
Hotel	165 rooms	120 GPD/room	19,800
Supermarket[l]	53.26 ksf	50 GPD/ksf	2,663
Convenience Store[m]	2.56 ksf	25 GPD/ksf	64
Health/Fitness Club	(17.81 ksf)	650 GPD/ksf	(11,577)
		Subtotal Related Projects	**128,439**
		Project Subtotal	**171,645**
	Related Projects + Project Water Demand Total		***300,084***

TABLE IV.M.2-6
ESTIMATED CUMULATIVE WASTEWATER GENERATION
FOR RELATED PROJECTS 2 THROUGH 15

Land Uses	Quantity	Water Factor	Estimated Water Demand (GPD)[a]

ksf = thousand square feet; du = dwelling units; GPD = gallons per day; afy = acre-feet per year. 1 afy = 892.75 GPD.

NOTE: parenthesis indicate removal of a use and subtraction of the water demand.

[a] Totals may not add up due to rounding.

[b] All multi-family residential units assume an average of 2 bedrooms per unit and, as such, uses the consumption factor for a 2-bedroom unit.

[c] Single family residential units assume an average of 3 bedrooms per unit.

[d] LASAN does not include a separate generation factor for affordable housing, as such, the same generation factor applied to multi-family residential is applied.

[e] Assisted Living uses Rest Home factor.

[f] Car Wash assumes 35 gallons of water used per vehicle and approximately 100 cars per day.

[g] Office uses the Office Building with Cooling Tower factor.

[h] Assumes full service indoor seating restaurant factor.

[i] Restaurant area assumes 60% of the area is used for patron seating, and 15sf per seat, for a total of approximately 25 seats.

[j] Assumes regular use indoor filing areas factor.

[k] Entertainment uses the Commercial Use factor.

[l] Supermarket uses the Retail (greater than 100,000 sf) factor.

[m] Convenience Store uses the Retail (less than 100,000 sf) factor.

SOURCE: ESA, 2023; City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power. 2012. *Water Integrated Resources Plan 5-Year Review FINAL Documents*. June 2012.

(2) Mitigation Measures

Cumulative impacts with regard to wastewater would be less than significant. Therefore, no mitigation measure 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 are required or included, and the impact level remains less than significant.