IV. Environmental Impact Analysis

J.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 existing infrastructure has sufficient capacity to serve the Project. This analysis utilizes the *Sunset + Wilcox Utility Infrastructure Technical Report: Wastewater* (Utility Report), dated March 2022, which was prepared by KPFF Consulting Engineers and included in Appendix N of this Draft EIR; the Wastewater Service Information (WWSI) prepared for the Project by the Los Angeles Sanitation and Environment (LASAN), dated May 18, 2020 is included in the Utility Report; and the Water Supply Assessment (WSA) prepared for the Project and approved by the Los Angeles Department of Water and Power (LADWP) in August 2021 and included as Appendix L of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding wastewater at the State and local levels. Described below, these include:

- California Green Building Code
- City of Los Angeles General Plan Framework Element
- Los Angeles Integrated Resources Plan (IRP)
- One Water LA 2040 Plan
- Los Angeles Municipal Code
  - 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 (CALGreen Code) is set forth in California Code of Regulations (CCR) Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush. In addition, maximum flow rates for faucets are established at 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, and 1.8 gpm at 60 psi for kitchen faucets.

(2) Local

(a) City of Los Angeles General Plan Framework Element

The 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]

(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.

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[1] *City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, July 27, 1995.*

[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.*

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.[5] 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.[6] Major challenges addressed in the

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[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, One Water LA 2040 Plan, Volume 1, Summary Report, Final Draft, April 2018.*

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

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),[7] 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: (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),[8] 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.

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[7] *City of Los Angeles, Ordinance No. 181,480.*

[8] *City of Los Angeles, Ordinance No. 180,822.*

LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

(iv) Sewerage Facilities Charge

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

(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).[9]

[9] *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.*

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with three buildings and surface parking. Specifically, the existing buildings on the Project Site comprise approximately 26,261 square feet of floor area consisting of a one-story, 16,932-square-foot commercial building along Sunset Boulevard and Wilcox Street/Cole Place, a one-story, 4,446-square-foot commercial office building along Wilcox Street, and a two-story, 4,883-square-foot commercial office building along Cole Place and De Longpre Avenue.

Existing wastewater generation for the Project Site was calculated using standard wastewater generation rates from the City of Los Angeles Bureau of Sanitation (LASAN). Based on these rates, the total existing average daily wastewater flow is approximately 1,966 gallons per day (gpd),[10] as shown in Table IV.J.2-1 on page IV.J.2-7.

(2) Wastewater Infrastructure

Sanitary sewer service to and from the Project area is owned and operated by the City of Los Angeles. The existing wastewater collection system includes more than 6,700 miles of public sewers, which serves a population of more than 4 million people and conveys approximately 400 million gallons per day to the City's four wastewater treatment and water reclamation plants.[11]

As described in the Utility Report included in Appendix N of this Draft EIR, sanitary sewer service to the Project Site is provided by LASAN from five existing sanitary sewer lines in the vicinity of the Project Site. Specifically, there are two sewer lines in Sunset Boulevard between Wilcox Avenue and Cole Place: one 10-inch line that flows westward with a capacity of 1.286 cubic feet per second (cfs) or 0.8312 million gallons per day (mgd) and one 8-inch sewer line that flows westward with a capacity of 0.709 cfs (0.4589 mgd). Additionally, there is a 12-inch sewer line in Wilcox Avenue between approximately 140 feet south of the center line of Sunset Boulevard and De Longpre Avenue that flows

[10] *It is noted that while LADWP also uses LASAN wastewater generation rates to determine water demand as provided in the Water Supply Assessment prepared for the Project and in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, LADWP used water billing data for estimating existing water usage from the existing onsite uses, resulting in a lower estimate of water consumption than the calculated wastewater generation.*

[11] *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=hgp4yycqp_5&_afrLoop=3961669001041971#!, accessed May 6, 2021.*

Table IV.J.2-1
Estimated Existing Project Site Wastewater Generation

Land Use	Size	Generation Rate[a]	Total (gpd)
Commercial	16,932 sf	50 gpd/1,000 sf	847
Office	9,331 sf	120 gpd/1,000 sf	1,120
Total Estimated Existing			**1,966**

gpd = gallons per day
sf = square feet
[a] *Based on sewage generation rates provided by LASAN (2012).*
Source: Eyestone Environmental, 2022.

southward with a capacity of 5.334 cfs (3.447 mgd) to 5.535 cfs (3.577 mgd). An additional 6-inch sewer line in Cole Place is located between approximately 140 feet south of the center line of Sunset Boulevard to De Longpre Avenue that flows southward with a capacity of 0.840 cfs (0.5196 mgd) to 0.859 cfs (0.5552 mgd). Lastly, there is an 8-inch sewer line in De Longpre Avenue between Wilcox Avenue and Cole Place that flows westward with a capacity of 0.709 cfs (0.4582 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 operates four water reclamation plants and divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.[12] The Hyperion system includes the Hyperion WRP, the Donald C. Tillman WRP and the Los Angeles–Glendale WRP.[13] The Terminal Island Service Area includes the Terminal Island WRP. These treatment facilities remove potential pollutants from sewage in order to protect river and marine environments and public health. The Project Site is located within the Hyperion Service Area and is served by the Hyperion WRP (also identified herein as HWRP).

[12] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed May 6, 2021.*

[13] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed May 6, 2021.*

(a) Hyperion Sanitary Sewer System

As shown in Table IV.J.2-2 on page IV.J.2-9, the existing design capacity of the Hyperion Sanitary Sewer System is approximately 550 mgd (consisting of 450 mgd at the Hyperion WRP, 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 Hyperion WRP, 47 mgd at the Donald C. Tillman WRP, and 17 mgd at the Los Angeles–Glendale WRP).[14] 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 reclamation plants that are returned to the collection system are treated at the HWRP in Playa Del Rey.[15] As such, current and projected 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

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.J.2-2, the HWRP has the capacity to treat approximately 450 mgd. According to LASAN, 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 5-mile outfall pipe at a depth of 190 feet into the Santa Monica Bay and Pacific Ocean.[16]

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

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

[16] *LASAN, Hyperion Virtual Tour, Hyperion Treatment Plant Tour, Ocean Outfall into the Bay, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp/s-lsh-au-h?_adf.ctrl-state=ljvz6q49_596&_afrLoop=8243477885026291#!, accessed May 6, 2021.*

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

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

mgd = million gallons per day

Source: LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241943613187783#!; Donald C. Tillman Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8242084065330158#!; and Los Angeles–Glendale Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8242559400318952#!, accessed May 6, 2021.

and removed as sludge.[17] The treated water from the HWRP is discharged through a 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.[18] 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.[19]

[17] *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&_afrLoop=8243207467760408#!, accessed May 6, 2021.*

[18] *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.*

[19] *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&_afrLoop=8243608662499891#!, accessed May 6, 2021.*

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;[20]

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

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 *L.A. CEQA Thresholds Guide* were 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.[21]

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[20] *Refer to Section IV.J.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.J.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.*

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

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Utility Report and the WWSI included in Appendix N, and the WSA included in Appendix L of this Draft EIR. The anticipated wastewater flows to be generated by the Project are based on 100 percent of the water demand calculated in the WSA (which is based on LASAN rates), minus the 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 are 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.

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.J.1, Utilities and Service System—Water Supply and Infrastructure, of this Draft EIR.

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?[22]

[22] *Refer to Section IV.J.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.J.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a*
(Footnote continued on next page)

(1) Impact Analysis

(a) Construction

As previously described, the Project Site is currently developed with commercial retail and office uses. These uses that are currently generating wastewater would be removed during construction of the Project, thereby temporarily reducing the wastewater generation from the Project Site. During construction, existing sewer laterals would also be capped, and no sewage would enter the public sewer system from the Project Site. 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 on-site. Therefore, since no construction-related wastewater generation would flow to existing wastewater treatment facilities, no impacts would occur to the wastewater infrastructure system on-site due to construction activity.

The Project would require construction of new sewer line connections to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site. The new sewer connections would collect sewage from the Project and connect to the existing public sewer laterals. Construction impacts associated with these new sewer line connections would primarily be confined to trenching for the placement of pipe and connection into the existing main sewer lines. Any off-site work that may affect services to the existing sewer lines in the vicinity of the Project Site would be coordinated with the City of Los Angeles Bureau of Engineering (BOE). BOE will be able to provide for connection requirements, pipe depths, and connection location(s). In addition, as set forth in Project Design Feature TR-PDF-2 included in Section IV.H, 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. As such, construction activities would not have any adverse impact on wastewater conveyance or treatment infrastructure.

Based on the above, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects.

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.

Therefore, no Project construction impacts to the wastewater conveyance or treatment system would occur.

(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.J.2-3 on page IV.J.2-14, the Project would generate a net increase in wastewater flow from the Project Site of approximately 85,943 gpd, or approximately 0.086 mgd.[23] The Project's increase in average daily wastewater flow of 0.086 mgd would represent approximately 0.05 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.

Wastewater flows from the Project would be typical of office and restaurant 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 Project would implement capture and reuse or infiltration 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.[24] 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.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., would ultimately determine the available capacity of the Hyperion Service Area in 2026, the year

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[23] *As described in Section II, Project Description, of this Draft EIR, the Project also includes construction of an equipment area for LADWP. The LADWP equipment area would include electrical distribution equipment and emergency generators and is not a use that would generate wastewater.*

[24] *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.*

Table IV.J.2-3
Estimated Wastewater Generation

Proposed Use	Quantity	Water Use Factor[a] (gpd/unit)	Proposed Wastewater Generation
Total Existing (to be Removed)[b]			**1,966 gpd**
Proposed Uses			
Restaurant	530 seats	30 gpd/seat	15,900 gpd
Office	431,032 sf	0.12 gpd/sf	51,724 gpd
Base Demand Adjustment[c]			1,057 gpd
Total Proposed Uses			***68,681 gpd***
Covered Parking	**379,602 sf**	**0.02**	**250 gpd**
Cooling Tower Total[d]	**1,500 tons**	**21.06**	**31,590 gpd**
Project Total			**100,521 gpd**
Less Existing to Be Removed			-1,966 gpd
Less Required Ordinances Savings[e]			-12,167 gpd
Less Additional Conservation[f]			-445 gpd
Net Additional Water Demand			**85,943 gpd**

afy = acre feet per year

gpd = gallons per day

sf = square feet

[a] *Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates.*

[b] *Refer to Table IV.J.2-1 on page IV.J.2-7.*

[c] *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.*

[d] *Assumed to operate 12 hours/day, 7 days/week and 55 percent of chiller capacity.*

[e] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 186488, 184248, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.*

[f] *Water conservation due to additional conservation commitments agreed by the Applicant. See Table II of the Water Supply Assessment in Appendix L .*

Source: City of Los Angeles, Water Supply Assessment, 2021.

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 2026, the Project's proposed buildout year. Thus, based on this conservative assumption, the 2026 effective capacity of the Hyperion Sanitary Sewer System would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2026 would continue to be 450 mgd.

The Project's net increase in average daily wastewater generation of 0.086 mgd would represent approximately 0.016 percent of the Hyperion Service Area's assumed future capacity of 550 mgd and approximately 0.02 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. Impacts with respect to wastewater treatment capacity would be less than significant.

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 summarized above and detailed in the Utility Report included in Appendix N of this Draft EIR, there are five existing sanitary sewer lines in the vicinity of the Project Site, including: (1) a 10-inch line in Sunset Boulevard between Wilcox Avenue and Cole Place; (2) an 8-inch line in Sunset Boulevard between Wilcox Avenue and Cole Place; (3) a 12-inch line in Wilcox Avenue between Sunset Boulevard and De Longpre Avenue; (4) a 6-inch line in Cole Place between Sunset Boulevard and De Longpre Avenue; and (5) an 8-inch line in De Longpre Avenue between Wilcox Avenue and Cole Place. Based on the WWSI, sewage from the existing 12-inch line in Wilcox Avenue feeds into a 21-inch line on Cole Avenue before discharging into a 20-inch sewer line on Melrose Avenue. Based on estimated flows, LASAN has preliminarily determined that the existing sewer system would be able to accommodate the Project. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, operation of the Project would not require or result in the 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. Therefore, 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 without mitigation. Therefore, no mitigation measures are required or included, and the impact levels 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 0.086 mgd would represent approximately 0.016 percent of the Hyperion Sanitary Sewer System's assumed future capacity of 550 mgd. The WWSI included as Appendix N 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. **Therefore, it is expected that the Project would result in a determination by LASAN that it has adequate treatment capacity to serve the Project's projected demand in addition to LASAN'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 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 levels 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 2026 (i.e., the Project buildout year), would generate wastewater, potentially resulting in cumulative impacts on wastewater conveyance and treatment facilities. Cumulative growth in the greater Project area through 2026 includes specific known development projects, 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 55 is a conservative assumption as some of the related projects may not be built out by 2026 (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 55 are fully built out by 2026.

(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 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 below, 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, which would also serve to reduce wastewater flows. **Therefore, Project impacts would not be cumulatively**

considerable, and cumulative impacts to wastewater facilities 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 55 related projects located in the vicinity of the Project Site. 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 2,075,883 gpd (2.076 mgd), as shown in Table IV.J.2-4 on page IV.J.2-19. Combined with the Project's net increase in wastewater generation of 85,943 gpd (0.086 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 2,161,826 gpd, or 2.162 mgd.

Based on LASAN's average flow projections for the Hyperion Sanitary Sewer System, it is anticipated that the average flow in 2026 would be approximately 338 mgd.[25] In addition, the Hyperion Sanitary Sewer System's total treatment capacity is conservatively estimated to be approximately 550 mgd in 2026, which is the same as its existing capacity.

The Project wastewater flow of approximately 0.086 mgd combined with the specific related projects flow of approximately 2.076 mgd and the forecasted 2026 wastewater flow of 338 mgd for the Hyperion Service Area would result in a total cumulative wastewater flow of approximately 340.162 mgd. Based on the Hyperion Service Area's estimated future capacity of approximately 550 mgd, the Hyperion Service Area would have adequate capacity to accommodate the 340.162 mgd of cumulative wastewater flows. The Project's wastewater flow of approximately 0.086 mgd plus the related projects' wastewater flow of 2.076 mgd would represent 0.39 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.**

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[25] *Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Service Area (which is comprised of the Hyperion Water Reclamation Plant, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles-Glendale Water Reclamation Plant) for 2020 (approximately 323 mgd) and 2030 (approximately 348 mgd). The 2026 value is extrapolated from 2020 and 2030 values: [(348 mgd – 323 mgd) ÷ 10) * 6] + 323 = 338 mgd.*

Table IV.J.2-4
Cumulative Wastewater Generation

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Wastewater Generation (gpd)
1	6225 W. Hollywood Blvd.	Office	214,000 sf	0.12 gpd/sf	25,680
2	6360 W. Hollywood Blvd.	Other[g]	90 rm	120 gpd/rm	10,800
		Other	11,000 sf		—
3	6523 W. Hollywood Blvd.	Office	4,074 sf	0.12 gpd/sf	489
		Other	10,402 sf		—
4	1313 N. Vine St.	Other	44,000 sf		—
		Other	35,231 sf		—
5	1610 N. Highland Ave.	Apartments	248 du	190 gpd/du	47,120
		Retail	12,785 sf	0.025 gpd/sf	320
6	6201 W. Sunset Blvd.	Apartments	731 du	190 gpd/du	138,890
		Other	5,000 sf		—
		Retail	8,000 sf	0.025 gpd/sf	200
		Other	1,000 sf		—
		Retail	13,000 sf	0.025 gpd/sf	325
		Other	1,000 sf		—
7	6230 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Office	13,510 sf	0.12 gpd/sf	1,621
		Other	13,471 sf		—
		Other	N/A		
		Retail	4,700 sf	0.025 gpd/sf	118
8	1525 N. Cahuenga Blvd.	Other[g]	64 rm	120 gpd/rm	7,680
		Office	1,500 sf	0.12 gpd/sf	180
		Other	700 sf		—
9	1718 N. Las Palmas Ave.	Apartments	195 du	190 gpd/du	37,050
		Condominiums	29 du	190 gpd/du	5,510
		Retail	985 sf	0.025 gpd/sf	25

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Wastewater Generation (gpd)
10	1310 N. Cole Ave.	Apartments	375 du	190 gpd/du	71,250
		Other[e]	2,500 sf	0.05 gpd/sf	125
11	6611 W. Hollywood Blvd.	Other[g]	167 rm	120 gpd/rm	20,040
		Other[e]	10,545 sf	0.05 gpd/sf	527
		Other[e]	5,375 sf	0.05 gpd/sf	269
		Other[e]	3,980 sf	0.05 gpd/sf	199
		Other[f]	1,634 sf	0.03 gpd/sf	49
12	6445 W. Sunset Blvd.	Hotel	175 rm	120 gpd/rm	21,000
		Restaurant (11,400 sf)[c]	380 seats	30 gpd/seat	11,400
13	6409 W. Sunset Blvd.	Other[g]	275 rm	120 gpd/rm	33,000
		Retail	1,900 sf	0.025 gpd/sf	48
14	1717 N. Wilcox Ave.	Other[g]	140 rm	120 gpd/rm	16,800
		Retail	3,500 sf	0.025 gpd/sf	88
15	6831 W. Hawthorn Ave.	Apartments	140 du	190 gpd/du	26,600
		Other[e]	1,207 sf	0.05 gpd/sf	60
16	1749 N. Las Palmas Ave.	Apartments	71 du	190 gpd/du	13,490
17	6701 W. Sunset Blvd.	Mixed Use	N/A		
18	6200 W. Sunset Blvd.	Apartments	270 du	190 gpd/du	51,300
		Other[g]	2,500 sf	0.025 gpd/sf	63
		Other	N/A		
		Other (2,500 sf)[h]	58 seats	30 gpd/seat	1,740
19	6332 W. De Longpre Ave.	Apartments	200 du	190 gpd/du	38,000
		Office	298,171 sf	0.12 gpd/sf	35,781
		Restaurant (11,935 sf)[c]	398 seats	30 gpd/seat	11,940
		Restaurant (4,200 sf)[c]	140 seats	30 gpd/seat	4,200

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Wastewater Generation (gpd)
20	6516 W. Selma Ave.	Other[k]	212 du	190 gpd/du	40,280
		Other	2,308 sf		—
		Other	5,305 sf		—
		Other	5,843 sf		—
21	1600 N. Schrader Blvd.	Other[g]	198 rm	120 gpd/rm	23,760
		Other	2,379 sf		—
		Other	3,600 sf		—
22	6421 W. Selma Ave.	Other[k]	114 du	190 gpd/du	21,660
		Other[l]	5,041 sf	0.05 gpd/sf	252
		Other (1,809 sf)[c,h]	60 seats	30 gpd/seat	1,800
23	1601 N. Las Palmas Ave.	Apartments	202 du	190 gpd/du	38,380
		Commercial	14,200 sf	0.05 gpd/sf	710
24	1360 N. Vine St.	Office	463,521 sf	0.12 gpd/sf	55,623
		Restaurant (20,902 sf)[c]	697 seats	30 gpd/seat	20,910
25	1541 N. Wilcox Ave.	Other[g]	190 rm	120 gpd/rm	22,800
		Other	8,500 sf		—
		Other	1,382 sf		—
26	1400 N. Cahuenga Blvd.	Other[g]	220 rm	120 gpd/rm	26,400
		Other	2,723 sf		—
		Other	1,440 sf		—
27	6436 W. Hollywood Blvd.	Apartments	260 du	190 gpd/du	49,400
		Retail	14,220 sf	0.025 gpd/sf	356
		Office	3,580 sf	0.12 gpd/sf	430
28	6400 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Other[e]	4,037 sf	0.05 gpd/sf	202
		Other[e]	3,000 sf	0.05 gpd/sf	150

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Wastewater Generation (gpd)
29	1546 N. Argyle Ave.	Apartments	276 du	190 gpd/du	52,440
		Retail	9,000 sf	0.025 gpd/sf	225
		Other (15,000 sf)[c,h]	500 seats	30 gpd/seat	15,000
		Other[g]	27,000 sf	0.025 gpd/sf	675
30	1533 N. Schrader Blvd.	Other[k]	70 du	190 gpd/du	13,300
31	1545 N. Wilcox Ave.	Retail	14,800 sf	0.025 gpd/sf	370
		Office	16,100 sf	0.12 gpd/sf	1,932
32	1637 N. Wilcox Ave.	Apartments	154 du	190 gpd/du	29,260
		Other[g]	6,586 sf	0.025 gpd/sf	165
33	6753 W. Selma Ave.	Apartments	51 du	190 gpd/du	9,690
		Retail	438 sf	0.025 gpd/sf	11
34	1524 N. Cassil Pl.	Apartments	138 du	190 gpd/du	26,220
		Other[g]	62 rm	120 gpd/rm	7,440
		Other[e]	1,400 sf	0.05 gpd/sf	70
35	1720 N. Vine St.	Apartments	872 du	190 gpd/du	165,680
		Other[k]	133 du	190 gpd/du	25,270
		Other[g]	4,530 sf	0.025 gpd/sf	113
		Other (25,650 sf)[c,h]	855 seats	30 gpd/seat	25,650
		Other	350 per		—
36	1723 N. Wilcox Av.	Other[g]	81 rm	120 gpd/rm	9,720
		Other	N/A		
37	1400 N. Vine St.	Apartments	179 du	190 gpd/du	34,010
		Apartments	19 du	190 gpd/du	3,610
		Retail	16,000 sf	0.025 gpd/sf	400
38	1818 N. Cherokee Ave.	Apartments	65 du	190 gpd/du	12,350
		Apartments	21 du	190 gpd/du	3,990

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Wastewater Generation (gpd)
39	1235 Vine St.	Office	117,000 sf	0.12 gpd/sf	14,040
		Retail	7,800 sf	0.025 gpd/sf	195
40	1708–1732 N. Cahuenga Blvd.	Office	210,500 sf	0.12 gpd/sf	25,260
		Restaurant (6,500 sf)[c]	217 seats	30 gpd/seat	6,510
41	1612 N. McCadden Pl.	Retail	37,000 sf	0.025 gpd/sf	925
		Micro-Units	69 du	75 gpd/du	5,175
42	6517–6533 Lexington Ave.	Single-Family Homes	18 du	230 gpd/du	4,140
43	1400 N. Highland Ave.	Apartments	49 du	190 gpd/du	9,310
		Retail	800 sf	0.025 gpd/sf	20
44	6100 W. Hollywood Blvd.	Apartments	209 du	190 gpd/du	39,710
		Apartments	11 du	190 gpd/du	2,090
		Other[g]	3,270 sf	0.05 gpd/sf	164
45	6630 W. Sunset Blvd.	Apartments	40 du	190 gpd/du	7,600
		Retail	3,474 sf	0.025 gpd/sf	87
46	6350 Selma Ave.	Apartments	290 du	190 gpd/du	55,100
		Commercial	6,576 sf	0.05 gpd/sf	329
47	6140 Hollywood Blvd.	Hotel	102 rm	120 gpd/rm	12,240
		Condominiums	27 du	190 gpd/du	5,130
		Restaurant (11,500 sf)[c]	383 seats	30 gpd/seat	11,490
48	1718 Vine St.	Hotel	216 rm	120 gpd/rm	25,920
49	1719 N. Whitley Ave.	Hotel	156 rm	120 gpd/rm	18,720
50	6677 Santa Monica Blvd.	Apartments	695 du	190 gpd/du	132,050
		Other[e]	4,000 sf	0.05 gpd/sf	200
		Other[e]	5,500 sf	0.05 gpd/sf	275
		Retail	15,400 sf	0.025 gpd/sf	385

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Wastewater Generation (gpd)
51	1118 N. McCadden	Office	17,040 sf	0.12 gpd/sf	2,045
		Other[j]	29,650 sf	0.12 gpd/sf	3,558
		Other[k]	100 du	190 gpd/du	19,000
		Other[k]	92 du	190 gpd/du	17,480
52	6050 W. Sunset Blvd.	Office	859,350 sf	0.12 gpd/sf	103,122
		Other	52,800 sf		—
		Other	169,400 sf		—
53	6220 W. Yucca St.	Apartments	210 du	190 gpd/du	39,900
		Other[g]	136 rm	120 gpd/rm	16,320
		Retail	12,570 sf	0.025 gpd/sf	314
54	1149 N. Gower St.	Apartments	169 du	190 gpd/du	32,110
55	1233 N. Highland Ave.	Apartments	72 du	190 gpd/du	13,680
		Commercial	12,160 sf	0.05 gpd/sf	608
Related Projects Wastewater Generation					**2,075,883**
Project Net Wastewater Generation					**85,943**
Total Wastewater Generation for Related Projects and Project					**2,161,826**

du = dwelling units

per = persons

rm = rooms

sf = square feet

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

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

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

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

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

[d] *Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the most comparable land use rate of 120 gallons per day per room for "Hotel" is applied.*

[e] *Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 50 gallons per 1,000 square feet for "Commercial" is applied.*

[f] *Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 30 gallons per 1,000 square feet for "Museum" is applied.*

[g] *Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 25 gallons per 1,000 square feet for "Retail" is applied for land use size less than 100,000 square feet).*

[h] *Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 30 gallons per seat for "Restaurant" is applied.*

[i] *Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 50 gallons per 1,000 square feet for "Lobby" is applied.*

[j] *Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 120 gallons per 1,000 square feet for "Office" is applied.*

[k] *Sewage generation rates provided by LASAN do not include rates for other uses. Therefore, the land use rate of 190 gallons per dwelling unit for "Residential" is applied.*

Source: Fehr and Peers, 2020, based on data provided by City of Los Angeles Department of Transportation and the City of Los Angeles Department of City Planning; Eyestone Environmental, 2021.

(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 are required or included, and the impact levels remains less than significant.