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 existing infrastructure has sufficient capacity to serve the Project. This analysis is based on the TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy (Utility Report) prepared by KPFF, included as Appendix O of this Draft EIR.[1]

2. Environmental Setting

a. Regulatory Framework

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

- California Green Building Standards Code
- City of Los Angeles General Plan Framework Element
- Los Angeles Integrated Resources Plan
- 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)

[1] KPFF Consulting Engineers, TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy, March 2022.

- 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 Code

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

(2) Local

(a) City of Los Angeles General Plan Framework Element

The General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[2] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for utilities in the City, including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.[3]

(b) Los Angeles Integrated Resources Plan

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

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

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

The Final IRP 5-Year Review was released in June 2012, which included 12 projects that were separated into two categories: (1) "Go Projects" for immediate implementation; and (2) "Go-If Triggered Projects" for implementation in the future once a trigger is reached.[4] Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the Final IRP 5-Year Review, the Go Projects consisted of six capital improvement projects for which triggers were considered to have been met at the time the IRP EIR was certified. The Go-If Triggered Projects consisted of six capital improvement projects for which triggers were not considered to have been met at the time the IRP EIR was certified.

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

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.[6] The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[7] Major challenges addressed in the

4 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.

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

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

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

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),[8] was adopted in April 2008 and provides standards and a mechanism for evaluating projects for their water conservation features during site plan review. The LA Green Building Code has been subsequently amended to incorporate various provisions of the CALGreen Code. The LA Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the second and third of which apply to this Project: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings.

(ii) Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),[9] effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

(iii) Sewer Capacity Availability Review

The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system.

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

[9] 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).[10]

[10] City of Los Angeles Department of Public Works, Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with approximately 743,680 square feet of studio-related uses, including approximately 95,540 square feet of sound stage uses; 325,450 square feet of production support uses, such as storage and mills; 163,090 square feet of production office space; and 159,600 square feet of general office space. Existing wastewater generation at the Project Site was calculated based on LADWP's water demand estimates presented in the Water Supply Assessment (WSA) prepared for the Project.[11] Specifically, since LADWP estimates water demand using land use-based wastewater generation rates from the Department of Public Works, Bureau of Sanitation (referred to as LA Sanitation & Environment or LASAN), water demand and wastewater generation are generally assumed to be equal for purposes of this analysis. Accordingly, the total average daily wastewater flow associated with the existing uses to be removed as part of the Project is estimated to be 29,745 gallons per day (gpd), as shown in Table IV.M.2-2 and Table IV.M.2-3 on pages IV.M.2-14 and IV.M.2-16, respectively, in the analysis below. The total existing generation at the Project Site is an estimated 44,662 gpd based on existing water usage on-site.

(2) Wastewater Infrastructure

The sanitary sewer system serving the Project area is owned and operated by the City of Los Angeles. The existing wastewater collection system includes more than 6,700 miles of public sewers, which serves a population of more than four million people and conveys approximately 400 million gallons per day (mgd) to the City's four wastewater treatment and water reclamation plants.[12]

As described in the Utility Report, there is an existing 8-inch sewer line within the sidewalk along Beverly Boulevard, a 27- to 30-inch sewer line north of the Beverly Boulevard centerline, and a 10- to 12-inch sewer line along the southern property line. The existing 8-inch line within the sidewalk along the northern property line of the Project Site connects to a 30-inch sewer line in Beverly Boulevard west of Orange Grove Avenue. This line runs south to a primary line in La Cienega Boulevard. Per LASAN and the initial WWSI, it appears that the gauge readings of the current flow levels (d/D) are less than 25 percent. The 12-inch sewer line along the southern property line flows west to a 12-inch

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11 LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021, per City of Los Angeles Resolution No. 022 050.

12 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 January 31, 2022.

main line in Fairfax Avenue. This sewer main flows south to a primary 15-inch line in Wilshire Boulevard, which discharges into a 48-inch sewer line in Crescent Heights Boulevard. According to the WWSI, the current flow levels (measured as depth/diameter [d/D] and calculated as a percentage) in the 12-inch line in Fairfax Avenue cannot be determined. However, the flow levels in the 15-inch line in Wilshire Boulevard and the 48-inch line in Crescent Heights Boulevard are 39 percent and 33 percent, respectively. Sewer flows originating from the Project Site are collected and conveyed through a network of sewer lines for treatment at the Hyperion Water Reclamation Plant (HWRP).

(3) Wastewater Treatment

LASAN is responsible for the operation and maintenance of wastewater treatment facilities in the City. The main purpose of these treatment facilities is to remove potential pollutants from sewage in order to protect river and marine environments and public health. LASAN divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.[13] The Hyperion Service Area is serviced by the Hyperion Sanitary Sewer System, which consists of the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant.[14] The Terminal Island Service Area is served by the Terminal Island Treatment Plant.[15] The Project Site is located within the Hyperion Service Area.

(a) Hyperion Sanitary Sewer System

As shown in Table IV.M.2-1 on page IV.M.2-8 the existing design capacity of the Hyperion Sanitary Sewer System is approximately 550 mgd (consisting of 450 mgd at the HWRP, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant). Based on the One Water LA 2040 Plan—Wastewater Facilities Plan, the average wastewater flow rate in the Hyperion Sanitary Sewer System was 314 mgd in 2016 (consisting of 250 mgd at the HWRP, 47 mgd at the Donald C. Tillman Water Reclamation Plant, and 17 mgd at the Los Angeles–Glendale Water Reclamation Plant).[16] The One Water LA 2040 Plan—Wastewater Facilities Plan projects that annual average wastewater flows in the Hyperion Sanitary Sewer System will increase to 348 mgd in 2030 and 358 in 2040. Based on a

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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 January 31, 2022.

14 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 January 31, 2022.

15 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 January 31, 2022.

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

Table IV.M.2-1
Existing Capacity of Hyperion Sanitary Sewer System

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

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 January 31, 2022.

straight-line interpolation of this data, flows in 2021 (i.e., existing conditions) are estimated at 326 mgd. As such, current and projected flows are below the design capacity of approximately 550 mgd for the Hyperion Sanitary Sewer System.

(b) Hyperion Water Reclamation Plant

As discussed above, wastewater generated from the Project Site is conveyed via the local collector sanitary sewer system directly to the HWRP for treatment. As shown in Table IV.M.2-1, the HWRP has the capacity to treat approximately 450 mgd of wastewater for full secondary treatment and currently treats on average approximately 275 mgd.[17] As such, the HWRP is currently operating at approximately 61 percent of its capacity with a remaining available capacity of approximately 175 mgd.

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

[17] LASAN, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6jxqihq40_254&_afrLoop=532734071872364 2#!, accessed January 31, 2022.

and removed as sludge.[18] The treated water from the HWRP is discharged through a 5-mile outfall pipe at a depth of 190 feet into the Santa Monica Bay and Pacific Ocean.[19] The discharge from the HWRP into the 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.[20] Accordingly, the HWRP's effluent that is released to the Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. LASAN also monitors flows into the Santa Monica Bay.[21]

3. Project Impacts

a. Thresholds of Significance

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

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

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*****.***

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18 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?_adf.ctrl-state=6jxqihq40_254&_afrLoop=5327479722838415#!, accessed January 31, 2022.

19 LASAN, Hyperion Virtual Tour, Hyperion Treatment Plant Tour, Ocean Outfall into the Bay, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp/s-lsh-au-h?_adf.ctrl-state=ljvz6q49_596&_afrLoop=8243477885026291#!, accessed January 31, 2022.

20 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.

21 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 January 31, 2022.

22 Refer to Section IV.M.1, Utilities and Service Systems—Water, of this Draft EIR for a discussion of water impacts; Section IV.G, Hydrology and Water Quality, of this Draft EIR for a discussion of stormwater impacts; and Section IV.C, Energy, of this Draft EIR for a discussion of electric power, natural gas, and telecommunications impacts.

For this analysis the Appendix G thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G thresholds.

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

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.[23]

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Utility Report, the Wastewater Service Information (WWSI) reports included in Exhibit 4 of the Utility Report, and the WSA, which are included in Appendices O and N of this Draft EIR, respectively. As previously discussed, the existing wastewater generation for the Project Site was calculated based on LADWP's water demand estimates as part of the WSA prepared for the Project. Since LADWP estimates water demand using land use–based wastewater generation rates from LASAN, projected water demand and wastewater generation are generally assumed to be equal for the purposes of this analysis (except for landscape irrigation, cooling towers and where otherwise noted below). Per the WSA, the existing water usage associated with floor area to be removed as part of the Project was estimated by applying a ratio of the demolished area to the average of the five-year water billing record from January 2015 to December 2019. The water billing records from 2020 and 2021 were excluded at LADWP's discretion due to potential effects on operations related to the COVID-19 pandemic. Based on 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 potential impacts to the sanitary sewers and the City's downstream sewers and treatment plants. Data regarding the existing physical features and capacity of the system is based on information provided by LASAN and included in the Utility Report.

[23] The Wastewater Facilities Plan referenced in the L.A. CEQA Thresholds Guide has since been superseded by the Integrated Resources Plan/One Water LA 2040 Plan.

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

No Project design features are proposed with regard to wastewater. However, the Project would include water conservation features that would result in a reduction in wastewater. Such conservation features are included in Project Design Feature WAT-PDF-1, provided in Section IV.M.1, Utilities and Service System—Water Supply and Infrastructure, of this Draft EIR.

In addition, per Project Design Feature GHG-PDF-1 set forth in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would incorporate efficiency and conservation features capable of achieving the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold rating or equivalent green building standards. These measures include, but are not limited to, the following: use of Energy Star appliances (e.g., water heaters) consistent with CCR Title 20 (Appliance Efficiency Regulations); reducing indoor water use by at least 20 percent; plumbing fixtures (water closets and urinals) and fittings (faucets) that exceed LAMC performance requirements; and weather-based irrigation system and water-efficient landscaping with use of drought tolerant plants in up to 60 percent of the proposed landscaping.

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?[24]

[24] Refer to Section IV.M.1, Utilities and Service Systems—Water, of this Draft EIR for a discussion of water impacts; Section IV.G, Hydrology and Water Quality, of this Draft EIR for a discussion of stormwater impacts; Section IV.C, Energy, of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations, of this Draft EIR for a discussion of telecommunications facility impacts.

(1) Impact Analysis

(a) Construction

The Project would include the 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 wastewater from the Project Site 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 from 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 would establish the appropriate connection requirements, pipe depths, and connection location(s). In addition, as set forth in Project Design Feature TR-PDF-1 included in Section IV.K, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts that might result from trenching and installation of new sewer line connections. 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. All infrastructure installation impacts would be 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.

With respect to wastewater generation during construction, as discussed in the Utility Report, wastewater generation would occur incrementally throughout construction of the Project as a result of construction workers on-site. However, such use would be temporary and less than the wastewater anticipated to be generated by the Project during operation, which, as evaluated below, can be accommodated by the existing infrastructure. In addition, construction workers would typically utilize portable restrooms, which would not contribute directly to the wastewater system that serves the Project Site but would eventually be deposited at the Hyperion Treatment Plant, which has the capacity to treat the sewer generation flows anticipated to be generated from the Project during construction. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

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

(b) Operation

As described in Section II, Project Description, of this Draft EIR, the Project would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the modernization and expansion of media production facilities within the approximately 25-acre Television City studio. The proposed Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated circulation improvements, parking, landscaping, and open space. The Specific Plan would provide development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, floor area from any permitted land use category may be exchanged for additional sound stage and production support uses as long as the limitations set forth in the Specific Plan are met. In particular, the total permitted floor area on-site must not exceed 1,874,000 square feet, and the sitewide floor area ratio must not exceed 1.75:1. For more information about the land use exchange component of the Specific Plan, see Section IV.H, Land Use and Planning, of this Draft EIR.

Two WWSI reports (see Exhibit 4 of the Utility Report attached as Appendix O of this Draft EIR) were obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. In preparing the WWSI reports, LASAN analyzed the Project's wastewater demands in conjunction with existing conditions and forecasted growth and provided the current sewer gauging information for the relevant sewer lines downstream of the Project Site. The WWSI reports conservatively do not account for the Project's estimated water savings (66,815 gpd) from compliance with applicable regulatory requirements or the additional water conservation commitments committed to by the Applicant of approximately 3,556 gpd (refer to Project Design Feature WAT-PDF-1 in Section IV.M.1 Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR). One WWSI report analyzed the available capacity in the existing 8-inch sewer line within the sidewalk along Beverly Boulevard, which connects to the 27- to 30-inch sewer line north of the Beverly Boulevard centerline west of Orange Grove Avenue, for a portion of the Project wastewater discharge, and the other WWSI report analyzed the available capacity in the existing 10- to 12-inch line along the southern property line.

Table IV.M.2-2 on page IV.M.2-14 shows the estimated wastewater generation associated with the proposed development program, while Table IV.M.2-3 on page IV.M.2-16 details a development mix under the land use exchange program that would generate the maximum potential wastewater generation for the Project (i.e., a maximum generation scenario). As shown in Table IV.M.2-3, the Project could generate an estimated maximum

Table IV.M.2-2
Estimated Project Wastewater Generation—Proposed Development Program

Land Use	Quantity/ Floor Area	Wastewater Generation Rate (gpd/unit)[a]	Wastewater Generation (gpd)
Existing Uses to be Removed			
Sound Stages	41,360 sf		
Production Support	302,340 sf		
Production Office	98,490 sf		
General Office	53,670 sf		
Total Existing to be Removed			***29,745[b]***
Proposed Project[c]			
Sound Stages	295,820 sf	0.050	14,791
Production Support	80,890 sf	0.050	4,045
Production Office	635,400 sf	0.170[d]	108,018
General Office	594,070 sf	0.170[d]	100,992
Retail[e]	15,000 sf	0.025	375
Restaurant[e]	334 seats	30.000	10,020
Basecamp[f]	194,600 sf	0.030	5,838
Mobility Hub[g]	36,000 sf	0.050	1,800
Covered Parking[h]	1,503,600 sf	0.02	989
Project Wastewater Generation			***246,868[i]***
Less Existing to be Removed			(29,745)
Net Additional Wastewater Generation (Project – Existing)			**217,123**

sf = square feet

gpd = gallons per day

[a] *Rate source: LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, available at https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart.*

[b] *Based on LADWP's estimate of water use associated with the existing development to be removed as part of the Project, since water demand and wastewater generation are assumed to be equal for purposes of this analysis. This estimate was derived by applying a ratio of the demolished area to the average of the five-year water billing record from January 2015 to December 2019 (at LADWP's discretion, the water billing records from 2020 and 2021 were excluded due to potential effects on operations related to the COVID-19 pandemic). For a conservative estimate, it is assumed that the plumbing fixtures for the existing uses to remain would not be replaced, and thus such water use and related wastewater generation would remain unchanged. Additionally, as discussed in the WSA, up to an estimated 6,608 square feet of existing production office space and 38,068 square feet of existing general office space which would remain may ultimately be converted to basecamp/parking uses, which would result in a lower net additional water demand.*

[c] *The proposed uses do not include the existing floor areas that would remain, consistent with the data presented in the WSA.*

[d] *Based on LASAN's office building with cooling tower rate. This rate is higher than that used to calculate water demand in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this*

Table IV.M.2-2 (Continued)
Estimated Project Wastewater Generation—Proposed Development Program

Land Use	Quantity/ Floor Area	Wastewater Generation Rate (gpd/unit)[a]	Wastewater Generation (gpd)

Draft EIR since the cooling tower water was calculated separately therein.

[e] *5,000 square feet of the retail uses are assumed to consist of restaurant uses with 334 seats for a conservative estimate. Seat count based on one seat per 15 square feet, as detailed in the WSA.*

[f] *Basecamp areas are dedicated to media production uses, parking, loading, and storage, where mobile facilities related to production are temporarily staged. Basecamp areas are not included in the total floor area.*

[g] *The proposed Mobility Hub area is not included in the total floor area.*

[h] *Automobile parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, assuming cleaning 12 times per year.*

[i] *The existing uses on-site generate total estimated wastewater flows of 44,662 gpd based on water billing records obtained by LADWP. When accounting for the existing uses to be removed, the existing uses to remain under the Project result in estimated wastewater generation of 14,917 gpd. Thus, the total wastewater generation generated by the Project under the proposed development program, including the existing uses to remain, would be 261,785 gpd.*

Source: LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021; and KPFF, TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy, Table 5, March 2022.

new wastewater generation of approximately 247,243 gpd,[25] for a net increase of 217,498 gpd over existing conditions, or approximately 0.22 mgd, not including water savings from compliance with applicable regulatory requirements and additional water saving features as set forth in Project Design Feature WAT PDF-1.

Based on LASAN's data, the Utility Report concluded that the existing capacity of the sewer lines in Beverly Boulevard and along the southern property line would have sufficient capacity to accommodate the Project's wastewater flows. Given the topography of the Project Site, it is anticipated that the Project would discharge all wastewater flow to the 12-inch main line along the southern property line, which could be adequately accommodated per the LASAN findings. Alternatively, the Project's net increase in wastewater flow may be directed to a combination of the sewer lines in Beverly Boulevard and along the southern property line, which could also be accommodated per LASAN.

As discussed in the Utility Report, based on the City of Los Angeles Sewer Design Manual Part F, the trigger flow in a sanitary sewer is the quantity of flow that, once reached, would initiate planning for a relief or replacement sewer. Currently, this trigger

[25] When accounting for the existing uses to remain, the Project's total wastewater flow under the maximum generation scenario would be approximately 262,160 gpd.

Table IV.M.2-3
Estimated Project Wastewater Generation—Maximum Generation Scenario

Land Use	Quantity/ Floor Area	Wastewater Generation Rate (gpd/unit)[a]	Wastewater Generation (gpd)
Existing Uses to be Removed			
Sound Stages	41,360 sf		
Production Support	302,340 sf		
Production Office	98,490 sf		
General Office	53,670 sf		
Total Existing to be Removed			***29,745[b]***
Proposed Project[c]			
Sound Stages	295,820 sf	0.050	14,791
Production Support	80,890 sf	0.050	4,045
Additional Sound Stages or Production Support[d]	15,000 sf	0.050	750
Production Office	635,400 sf	0.170[e]	108,018
General Office	594,070 sf	0.170[e]	100,992
Restaurant[f]	334 seats	30.000	10,020
Basecamp[g]	194,600 sf	0.030	5,838
Mobility Hub[h]	36,000 sf	0.050	1,800
Covered Parking[i]	1,503,600 sf	0.020	989
Project Wastewater Generation			***247,243[j]***
Less Existing to be Removed			(29,745)
Net Additional Wastewater Generation (Project – Existing)			**217,498**

sf = square feet

gpd = gallons per day

[a] *Rate source: LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, available at https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart.*

[b] *Based on LADWP's estimate of water use associated with the existing development to be removed as part of the Project, since water demand and wastewater generation are assumed to be equal for purposes of this analysis. This estimate was derived by applying a ratio of the demolished area to the average of the five-year water billing record from January 2015 to December 2019 (at LADWP's discretion, the water billing records from 2020 and 2021 were excluded due to potential effects on operations related to the COVID-19 pandemic). For a conservative estimate, it is assumed that the plumbing fixtures for the existing uses to remain would not be replaced, and thus such water use and related wastewater generation would remain unchanged. Additionally, as discussed in the WSA, up to an estimated 6,608 square feet of existing production office space and 38,068 square feet of existing general office space which would remain may ultimately be converted to basecamp/parking uses, which would result in a lower net additional water demand.*

[c] *The proposed uses do not include the existing floor areas that would remain, consistent with the data presented in the WSA.*

[d] *Assumes an additional 15,000 square feet of sound stages and/or production support would be developed in exchange for 15,000 square feet of retail uses in order to yield the maximum wastewater*

Table IV.M.2-3 (Continued)
Estimated Project Wastewater Generation—Maximum Generation Scenario

Land Use	Quantity/ Floor Area	Wastewater Generation Rate (gpd/unit)[a]	Wastewater Generation (gpd)

generation under the proposed land use exchange program.

[e] *Based on LASAN's office building with cooling tower rate. This rate is higher than that used to calculate water demand in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR since the cooling tower water was calculated separately therein.*

[f] *5,000 square feet of the retail uses are assumed to consist of restaurant uses with 334 seats for a conservative estimate. Seat count based on one seat per 15 square feet, as detailed in the WSA.*

[g] *Basecamp areas are dedicated to media production uses, parking, loading, and storage, where mobile facilities related to production are temporarily staged. Basecamp areas are not included in the total floor area.*

[h] *The proposed Mobility Hub area is not included in the total floor area.*

[i] *Automobile parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, assuming cleaning 12 times per year.*

[j] *The existing uses on-site generate total estimated wastewater flows of 44,662 gpd based on water billing records obtained by LADWP. When accounting for the existing uses to be removed, the existing uses to remain under the Project result in estimated wastewater generation of 14,917 gpd. Thus, the total wastewater generation generated by the Project under the maximum generation scenario, including the existing uses to remain, would be 262,160 gpd.*

Source: LADWP, Water Supply Assessment for the TVC 2050 Project, adopted October 12, 2021; and KPFF, TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy, Table 6, March 2022.

flow is considered when the depth of flow reaches three-fourths of the pipe diameter or a d/D of 75 percent. When including the Project's wastewater flows, the d/D of the 12-inch main line in Fairfax Avenue, the primary 15-inch line in Wilshire Boulevard, and the 48-inch line in Crescent Heights Boulevard would be 27.1 percent, 44.3 percent, and 33.3 percent, respectively. Therefore, the Project's additional wastewater flows are not anticipated to exceed the trigger flow in any of the local sewer lines serving the Project Site.

The Project's wastewater flows would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. As previously discussed, 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 Hyperion Treatment Plant is approximately 175 mgd, which is sufficient to accommodate the Project's net increase of approximately 0.22 mgd.

Based on the above, operation of the Project would not require the relocation or construction of new or expanded wastewater conveyance or treatment facilities, the construction or relocation of which could cause significant environmental effects, and thus would result in a less than significant impact associated with the construction or expansion of wastewater facilities.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to the construction and expansion of wastewater facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As provided in Table IV.M.2-3 on page IV.M.2-16, the Project would generate a net increase in wastewater flow from the Project Site of approximately 217,498 gpd under the maximum generation scenario, or approximately 0.22 mgd. The Project's increase in the average daily wastewater flow of approximately 0.22 mgd would represent approximately 0.13 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Furthermore, future iterations of the IRP, such as the One Water LA 2040 Plan, would provide for wastewater treatment infrastructure improvements beyond 2040, as needed, to serve future population needs. Lastly, the Project's operational wastewater generation of approximately 0.22 mgd associated with the maximum generation scenario under the land use exchange would represent an even smaller proportion of the 550 mgd design capacity of the Hyperion Sanitary Sewer System. Therefore, there would be adequate treatment capacity to serve the Project's projected demand in addition to LASAN's existing commitments.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring and Reporting Program (MMRP) throughout the term of the Development Agreement. The Specific Plan and MMRP would continue to regulate development of the Project site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, with a later buildout date, the results of the conservative analyses for wastewater generation completed for the Project would remain unchanged, as a long-term buildout scenario would not affect the maximum generation conditions evaluated above. While future years could generate greater service area demands, LASAN would continue to evaluate the need for infrastructure upgrades and expansion based on long-term growth and demand projections. Additionally, the One Water LA 2040 Plan—Wastewater Facilities Plan projects an available capacity of 92 mgd at the HWRP and 192 mgd in the broader Hyperion Sanitary Sewer System in 2040, which would provide more than sufficient capacity to accommodate the Project in the future. As such, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis on wastewater conveyance infrastructure is the portion of the Hyperion Sanitary Sewer System that includes the Project Site and those related projects that would potentially utilize the same conveyance infrastructure as the Project. The geographic context for the cumulative impact analysis on wastewater treatment infrastructure is the greater Hyperion Sanitary Sewer System which flows to the HWRP. The Project, in conjunction with the related projects and growth forecasted in the Hyperion Sanitary Sewer System's service area

through 2026 (i.e., the Project's earliest buildout year), would generate wastewater requiring conveyance and treatment.[26]

As listed in Section III, Environmental Setting, of this Draft EIR, the projected growth associated with Related Project Nos. 1 through 68 is a conservative assumption regarding future development, as some of the related projects may not be built out by 2026, may never be built, or may be approved and built at reduced densities. To provide a conservative analysis, the future baseline forecast assumes that Related Project Nos. 1 through 68 would be fully built out by 2026, unless otherwise noted. Although Related Project Nos. 26 through 67 are located in the cities of West Hollywood and Beverly Hills, which are served by local sewer lines owned and operated by agencies other than LASAN, all of the related projects are located in the Hyperion Service Area.

(a) Wastewater Infrastructure

Of the 68 related projects described above, 26 are located within the LASAN service area. As with the Project, new development projects occurring in the Project Site vicinity would be required to coordinate with LASAN via a sewer capacity availability request to determine adequate sewer capacity. In addition, new development projects would 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 located in the City of Los Angeles would 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 anticipated to be generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements, similar to the Project. Furthermore, as with the Project, each of the 26 related projects in the LASAN service area would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. In addition, as with the Project, related projects would be required to implement construction management plans to ensure that adequate and safe access remains available during construction activities. Such construction management plans would also ensure that appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would be implemented, as necessary, to ensure emergency access and traffic flow is maintained on adjacent streets. **Therefore, the Project and related projects would not result in significant cumulative impacts related to the construction or expansion of wastewater infrastructure. As**

[26] Project buildout may occur in one phase, with a total construction period of approximately 32 months. Construction could begin as soon as 2023 and end as soon as 2026. However, as previously discussed, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043.

such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

(b) Wastewater Treatment

Although Related Project Nos. 26 through 67 are located in the cities of West Hollywood and Beverly Hills, which are served by local sewer lines owned and operated by each respective city, all of the related projects are located in the Hyperion Service Area. 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. Forecasted growth from the related projects would generate an average daily wastewater flow of approximately 3,503,499 gpd or approximately 3.50 mgd, as shown in Table IV.M.2-4 on page IV.M.2-22. Combined with the Project's estimated net increase in wastewater generation of 217,498 gpd (0.22 mgd) under the maximum generation scenario, this equates to a cumulative increase in average daily wastewater flow of approximately 3,720,997 gpd or 3.72 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.[27] 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's wastewater flow of approximately 0.22 mgd under the maximum generation scenario combined with the wastewater flow from related projects of approximately 3.50 mgd and the forecasted 2026 wastewater flow of 338 mgd for the Hyperion Sanitary Sewer System would result in a total wastewater flow of approximately 341.72 mgd. Based on the Hyperion Sanitary Sewer System's estimated future capacity of approximately 550 mgd, the Sanitary Sewer System is expected to have adequate capacity to accommodate the wastewater flow of approximately 341.72 mgd aggregated from the Project under the maximum generation scenario, related projects, and forecasted growth by 2026. The 3.72 mgd of combined wastewater flows associated with the related projects plus the Project under the maximum generation scenario would represent approximately 0.68 percent of the Hyperion Sanitary Sewer System's existing design capacity of 550 mgd.

[27] 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.M.2-4
Cumulative Wastewater Generation

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
City of Los Angeles					
1	Beverly & Fairfax Mixed-Use 7901 W. Beverly Blvd.	Apartments	71 du	190 gpd/du	13,490
		Retail	11,454 sf	0.05 gpd/sf	573
2	Museum Square Office 5757 W. Wilshire Blvd.	Office	253,962 sf	0.12 gpd/sf	30,475
3	Academy Museum of Motion Pictures 6067 W. Wilshire Blvd.	Retail	5,000 sf	0.05 gpd/sf	250
		Restaurant	4,000 sf	30 gpd/seat[c]	4,000
		Museum	208,000 sf	0.03 gpd/sf	6,240
4	Jewish Family Service 320 N. Fairfax Ave.	Office	28,341 sf	0.12 gpd/sf	3,401
5	Edin Park 8001 W. Beverly Blvd.	Retail	12,685 sf	0.05 gpd/sf	634
		Restaurant	15,245 sf	30 gpd/seat[c]	15,245
6	1556–1564 Hi Point Street 1556 S. Hi Point St.	Apartments	45 du	190 gpd/du	8,550
7	Unified Elder Care Facility/Mixed-Use 8052 W. Beverly Blvd.	Synagogue	5,000 sf	3/gpd/seat[c,d]	143
		Apartments	102 du	190 gpd/du	19,380
		Medical Office	15,000 sf	0.12 gpd/sf	1,800
		Retail	1,000 sf	0.05 gpd/sf	50
8	8000 Beverly Mixed-Use 8000 W. Beverly Blvd.	Apartments	48 du	190 gpd/du	9,120
		Restaurant	7,400 sf	30 gpd/seat[c]	7,400
9	LACMA Renovation 5905 W. Wilshire Blvd.	(Museum)	(392,871 sf)	0.03 gpd/sf	(11,786)
		Museum	387,500 sf	0.03 gpd/sf	11,625
10	Third Street Mixed-Use 8000 W. 3rd St.	Apartments	45 du	190 gpd/du	8,550
		Affordable Housing	5 du	190 gpd/du	950
		Retail	6,252 sf	0.05 gpd/sf	313

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

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
11	7951 Beverly Mixed-Use 7951 W. Beverly Blvd.	Apartments	51 du	190 gpd/du	9,690
		Affordable Housing	6 du	190 gpd/du	1,140
		Restaurant	6,294 sf	30 gpd/seat[c]	6,294
		Retail	1,142 sf	0.05 gpd/sf	57
12	830-840 Fairfax Avenue 800 S. Fairfax Ave.	Apartments	209 du	190 gpd/du	39,710
		Restaurant	1,600 sf	30 gpd/seat[c]	1,600
		Small Restaurant	750 sf	30 gpd/seat[c]	750
13	Third & Fairfax Mixed-Use 6300 W. 3rd St.	Apartments	331 du	190 gpd/du	62,890
		Retail	13,412 sf	0.05 gpd/sf	671
		Restaurant	7,500 sf	30 gpd/seat[c]	7,500
		Supermarket	63,082 sf	0.05 gpd/sf	3,154
14	Wilshire & Crescent Heights Mixed-Use 6245 W. Wilshire Blvd.	Apartments	158 du	190 gpd/du	30,020
		Condominiums	4 du	190 gpd/du	760
		Bank	4,200 sf	0.05 gpd/sf	210
		Coffee Shop	6,850 sf	25/gpd/seat[c]	5,708
15	Apartments 350 N. Hayworth Ave.	Apartments	18 du	190 gpd/du	3,420
		Affordable Housing	2 du	190 gpd/du	380
16	Apartments 400 N. Vista St.	(Apartments)	(6 units)	190 gpd/du	(1,140)
17	DOCS Surgical Hospital 6000 W. San Vicente Blvd.	Office	47,026 sf	0.12 gpd/sf	5,643
18	333 La Cienega Boulevard Project 333 S. La Cienega Blvd.	Apartments	145 du	190 gpd/du	27,550
		Supermarket	27,685 sf	0.05 gpd/sf	1,384
		Restaurant	3,370 sf	30 gpd/seat[c]	3,370
19	627 South La Brea Avenue 623–671 S. La Brea Ave.	Apartments	121 du	190 gpd/du	22,990
		Retail	13,037 sf	0.05 gpd/sf	652
		Hotel	125 rm	120 gpd/rm	15,000

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

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
20	Wilshire & La Jolla Tower 6401–6419 Wilshire Blvd.	Apartments	90 du	190 gpd/du	17,100
		Retail	5,100 sf	0.05 gpd/sf	255
21	Mid-City Vons 1430 S. Fairfax Ave.	Supermarket	55,920 sf	0.05 gpd/sf	2,796
22	La Brea Gateway 915 N. La Brea Ave.	Apartments	179 du	190 gpd/du	34,010
		Supermarket	33,500 sf	0.05 gpd/sf	1,675
23	Mixed-Use 5411 W. Wilshire Blvd.	Apartments	310 du	190 gpd/du	58,900
		Affordable Housing	38 du	190 gpd/du	7,220
		Retail	9,288 sf	0.05 gpd/sf	464
		Restaurant	4,346 sf	30 gpd/seat[c]	4,346
		Cafe	1,000 sf	25/gpd/seat[c,e]	833
24	904–932 North La Brea Mixed-Use 904 N. La Brea Ave.	Apartments	169 du	190 gpd/du	32,110
		Retail	37,057 sf	0.05 gpd/sf	1,853
25	656 S. San Vicente Medical Office 656 S. San Vicente Blvd.	Medical Office	140,305 sf	0.12 gpd/sf	16,837
		Drugstore	1,000 sf	0.05 gpd/sf[f]	50
		Restaurant	4,000 sf	30 gpd/seat[c]	4,000
City of West Hollywood					
26	900 Fairfax Avenue 900 Fairfax Ave.	Residential	6 du	190 gpd/du	1,140
		Retail	930 sf	0.05 gpd/sf	47
		Restaurant	2,318 sf	30 gpd/seat[c]	2,318
27	Mixed-Use 7965–7985 Santa Monica Blvd.	Restaurant	8,600 sf	30 gpd/seat[c]	8,600
		Entertainment	3,200 sf	0.72 gpd/sf[g]	2,304
		Retail	4,400 sf	0.05 gpd/sf	220
		Office	62,800 sf	0.12 gpd/sf	7,536

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

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
28	Mixed-Use 8816 Beverly Blvd.	Restaurant	22,000 sf	30 gpd/seat[c]	22,000
		Design Showroom	25,000 sf	0.12 gpd/sf	3,000
		Medical Office	77,000 sf	0.12 gpd/sf	9,240
		Research and Development	9,000 sf	0.25 gpd/sf[h]	2,250
29	Mixed-Use 8650 Melrose Ave.	Retail	14,571 sf	0.05 gpd/sf	729
		Apartments	7 du	190 gpd/du	1,330
30	Mixed-Use 645 Robertson Blvd.	Hotel	241 rm	120 gpd/rm	28,920
		Restaurant	33,300 sf	30 gpd/seat[c]	33,300
		Retail	18,130 sf	0.05 gpd/sf	907
		Design Showroom	10,325 sf	0.12 gpd/sf[i]	1,239
		Nightclub	3,780 sf	0.72 gpd/sf[j]	2,722
31	Faith Plating 7143 Santa Monica Blvd.	Residential	166 du	190 gpd/du	31,540
		Retail/Restaurant	9,300 sf	30 gpd/seat[c,k]	9,300
32	7811 Santa Monica Boulevard 7811 Santa Monica Blvd.	Hotel	74 rm	120 gpd/rm	8,880
		Apartment	74 du	190 gpd/du	14,060
		Commercial	3,446 sf	0.05 gpd/sf	172
33	Mixed-Use 8555 Santa Monica Blvd.	Apartment	97 du	190 gpd/du	18,430
		Live/Work	12 du	190 gpd/du	2,280
		Restaurant	282,000 sf	30 gpd/seat[c]	282,000
		Retail	15,680 sf	0.05 gpd/sf	784
		Office	6,080 sf	0.12 gpd/sf	730
34	Retail 605 West Knoll Dr.	Retail	7,270 sf	0.05 gpd/sf	364
35	8612 Melrose Avenue 8612 Melrose Ave.	Restaurant	9,998 sf	30 gpd/seat[c]	9,998

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

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
36	8713 Beverly Boulevard 8713 Beverly Blvd.	Residential	30 du	190 gpd/du	5,700
		Art Gallery/Retail/Office	9,391 sf	0.12 gpd/sf	1,127
37	1040 North La Brea 1040 N. La Brea	Restaurant	5,240 sf	30 gpd/seat[c]	5,240
		Residential	8 du	190 gpd/du	1,520
		Hotel	91 rm	120 gpd/rm	10,920
38	7617 Santa Monica Boulevard 7617 Santa Monica Blvd.	Residential	71 du	190 gpd/du	13,490
		Retail	4,821 sf	0.05 gpd/sf	241
		Restaurant	4,419 sf	30 gpd/seat[c]	4,419
39	1001 Fairfax Avenue 1001 Fairfax Ave.	Condominium	35 du	190 gpd/du	6,650
		Retail	900 sf	0.05 gpd/sf	45
		Restaurant	900 sf	30 gpd/seat[c]	900
40	910 Wetherly Drive 910 Wetherly Dr.	Affordable Housing	93 du	190 gpd/du	17,670
41	9001 Santa Monica Boulevard 9001 Santa Monica Blvd.	Condominium	42 du	190 gpd/du	7,980
		Restaurant with Alcoholic Beverage Service	9,800 sf	30 gpd/seat[c]	9,800
		Retail	9,850 sf	0.05 gpd/sf	493
42	9040–9098 Santa Monica Boulevard 9040–9098 Santa Monica Blvd.	Condominium	76 du	190 gpd/du	14,440
		Retail	82,000 sf	0.05 gpd/sf	4,100
		Office	137,000 sf	0.12 gpd/sf	16,440
43	8497 Sunset Boulevard 8497 Sunset Blvd.	Apartments	9,775 du	190 gpd/du	1,857,250
		Commercial Space	11,520 sf	0.05 gpd/sf	576
44	8430 Sunset Boulevard 8430 Sunset Blvd.	Condominium	125 du	190 gpd/du	23,750
		Commercial	35,000 sf	0.05 gpd/sf	1,750

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

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
45	8920 Sunset Boulevard 8920 Sunset Blvd.	Retail	10,000 sf	0.05 gpd/sf	500
		Restaurant	2,000 sf	30 gpd/seat[c]	2,000
		Creative Office	46,009 sf	0.12 gpd/sf	5,521
		Arts Club	7 mem	11 gpd/mem[l]	77
		Museum	2,000 sf	0.03 gpd/sf	60
46	9034 Sunset Boulevard 9034 Sunset Blvd.	Hotel	237 rm	120 gpd/rm	28,440
		Restaurant	11,000 sf	30 gpd/seat[c]	11,000
		Residential	10 du	190 gpd/du	1,900
47	1250 Fairfax Avenue 1250 Fairfax Ave.	Apartments	53 du	190 gpd/du	10,070
48	Mixed Use 8899 Beverly Blvd.	Residential	81 du	190 gpd/du	15,390
		Retail	19,775 sf	0.05 gpd/sf	989
		Restaurant	4,394 sf	30 gpd/seat[c]	4,394
		Office	11,000 sf	0.12 gpd/sf	1,320
49	417 Robertson Boulevard 417 Robertson Blvd.	Retail	8,000 sf	0.05 gpd/sf	400
50	8850 Sunset Boulevard 8850 Sunset Blvd.	Residential	41 du	190 gpd/du	7,790
		Hotel	115 rm	120 gpd/rm	13,800
		Restaurant	29,000 sf	30 gpd/seat[c]	29,000
		Night Club	5,000 sf	0.72 gpd/sf[j]	3,600
City of Beverly Hills					
51	55 North La Cienega Boulevard 55 N. La Cienega Blvd.	Hotel	216 rm	120 gpd/rm	25,920
		Ancillary Restaurant/Retail Uses	13,568 sf	30 gpd/seat[c,k]	13,568
52	8600 Wilshire Boulevard 8600 Wilshire Blvd.	Residential	18 du	190 gpd/du	3,420
		Retail	6,355 sf	0.05 gpd/sf	318

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

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
53	257 North Canon Drive 257 N. Canon Dr.	Retail	15,899 sf	0.05 gpd/sf	795
		Office	26,196 sf	0.12 gpd/sf	3,144
54	100 North Crescent Drive 100 N. Crescent Dr.	Restaurant	4,330 sf	30 gpd/seat[c]	4,330
		Screening Room	2,489 sf	3 gpd/seat[m]	249
		Office	154,336 sf	0.12 gpd/sf	18,520
55	325 North Maple Drive 325 N. Maple Dr.	Office	44,147 sf	0.12 gpd/sf	5,298
		Restaurant/Retail	3,200 sf	30 gpd/seat[c,k]	3,200
		Post Office	7,300 sf	0.12 gpd/sf	876
56	9212 Olympic Boulevard 9212 Olympic Blvd.	Restaurant/Retail	6,900 sf	30 gpd/seat[c,k]	6,900
		Commercial Office	13,344 sf	0.12 gpd/sf	1,601
57	9200 Wilshire Boulevard 9200 Wilshire Blvd.	Residential	54 du	190 gpd/du	10,260
		Commercial	14,000 sf	0.05 gpd/sf	700
58	8633 Wilshire Boulevard 8633 Wilshire Blvd.	Office	25,565 sf	0.12 gpd/sf	3,068
59	140 S Lasky Drive 140 S Lasky Dr.	Hotel	66 rm	120 gpd/rm	7,920
		Restaurant	1,845 sf	30 gpd/seat[c]	1,845
60	9120 Olympic Boulevard 9120 Olympic Blvd.	Private School (K–8)	80,719 sf	9 gpd/stu[c]	24,216
61	9230 Olympic Boulevard 9230 Olympic Blvd.	Restaurant	1,359 sf	30 gpd/seat[c]	1,359
		Office	16,804 sf	0.12 gpd/sf	2,016
62	370 North Rodeo Drive 370 N. Rodeo Dr.	Retail	15,250 sf	0.05 gpd/sf	763
63	468 North Rodeo Drive 468 N. Rodeo Dr.	Retail	8,807 sf	0.05 gpd/sf	440
		Museum	16,411 sf	0.03 gpd/sf	492
		Hotel	115 rm	120 gpd/rm	13,800
64	9220 North Santa Monica Boulevard 9220 N. Santa Monica Blvd.	Office	114,202 sf	0.12 gpd/sf	13,704

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

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
65	9900–9908 S Santa Monica Boulevard 9900–9908 S Santa Monica Blvd.	Condominium	25 du	190 gpd/du	4,750
		Retail	13,036 sf	0.05 gpd/sf	652
66	9111 Wilshire Boulevard 9111 Wilshire Blvd.	Office	112,400 sf	0.12 gpd/sf	13,488
		Hotel	154 rm	120 gpd/rm	18,480
67	9900 Wilshire Boulevard 9900 Wilshire Blvd.	Condominium	370 du	190 gpd/du	70,300
		Retail/Restaurant	40,460 sf	30 gpd/seat[c,k]	40,460
		(Gas Station)	(14 pumps)	430 gpd/pump	(6,020)
		(Hotel)	(139 rm)	120 gpd/rm	(16,680)
Infrastructure Projects					
68	Metro D (Purple) Line Extension	Provide extended rail service with seven new transit stations from Metro Wilshire/Western Station to Metro Westwood/Veterans Administration Hospital Station by year 2027. Construction of the first phase (Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega Stations) is anticipated to be completed and in operation by Year 2023. The Metro D Line Wilshire/Fairfax Station will be located south of the Project Site.		N/A. No comparable generation factor.	N/A
Related Projects Wastewater Generation					**3,503,499 gpd (3.50 mgd)**
Project Net Additional Wastewater Generation under the maximum generation scenario					**217,498 gpd (0.22 mgd)**
Total Cumulative Wastewater Generation (Project + Related Projects)					**3,720,997 gpd (3.72 mgd)**

( ) = to be removed/demolished

ac = acres

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

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)

du = dwelling units

mem = members

rm = rooms

sf = square feet

stu = student

mem = member

[a] *Rate source (except where otherwise noted): LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, available at https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart.*

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

[c] *Assumes 30 square feet per seat or student.*

[d] *Two seatings assumed per week (Friday night and Saturday morning services).*

[e] *Sewage generation rates provided by LASAN do not include a rate for "Cafe" uses. Therefore, the most comparable land use rate of 25 gallons per seat per day for "Coffee House: Serves Prepared Food" is applied.*

[f] *Sewage generation rates provided by LASAN do not include a rate for "Drugstore" uses. Therefore, the most comparable land use rate of 50 gallons per day per 1,000 square feet for "Store: Retail)" is applied.*

[g] *Sewage generation rates provided by LASAN do not include a rate for "Entertainment" uses. Therefore, the most comparable land use rate of 720 gallons per day per 1,000 square feet for "Bar: Cocktail, Public Table Area" is applied.*

[h] *Sewage generation rates provided by LASAN do not include a rate for "Research and Development" uses. Therefore, the most comparable land use rate of 250 gallons per day per 1,000 square feet for "Medical: Lab in Hospital" is applied.*

[i] *Sewage generation rates provided by LASAN do not include a rate for "Design Showroom" uses. Therefore, the most comparable land use rate of 120 gallons per day per 1,000 square feet for "Conference Room of Office Bldg." is applied.*

[j] *Sewage generation rates provided by LASAN do not include a rate for "Nightclub" uses. Therefore, the most comparable land use rate of 720 gallons per day per 1,000 square feet for "Bar: Cocktail, Public Table Area" is applied.*

[k] *Where uses are categorized as retail/restaurant, the generation factor for restaurant is used to provide a conservative analysis.*

[l] *Sewage generation rates provided by LASAN do not include a rate for "Arts Club" uses. Therefore, the most comparable land use rate of 11 gallons per day per student for "School: Arts/Dancing/Music" is applied to each member.*

[m] *Sewage generation rates provided by LASAN do not include a rate for "Screening Room" uses. Therefore, the most comparable land use rate of*

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

No.	Project Name and Address	Description	Unit/Area	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
three gallons per day per seat for "Studio: Film/TV—Audience Viewing Room" is applied.					
Source: Eyestone Environmental, 2021.					

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

(2) Mitigation Measures

Cumulative impacts related to wastewater generation, treatment, and infrastructure would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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