IV. Environmental Impact Analysis

L.2 Utilities and Service Systems – Wastewater

1. Introduction

This section analyzes the Project's potential impacts on wastewater collection and treatment facilities and infrastructure, including whether such existing infrastructure has sufficient capacity to serve the Project. This analysis utilizes a *Fourth & Central Utility Infrastructure Technical Report: Water, Wastewater, and Energy (*Infrastructure Report*)*, prepared for the Project by KPFF Consulting Engineers, dated May 2023, which is included in Appendix L-1 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 Standards Code
- City of Los Angeles General Plan Framework
- Los Angeles Integrated Resources Plan
- One Water LA 2040 Plan
- Los Angeles Municipal Codes
  - Los Angeles Green Building Code (Ordinance No. 181,480)
  - Water Efficiency Requirements Ordinance (Ordinance No. 180,822)
  - Sewer Capacity Availability Review (LAMC Section 64.15)
  - Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1)
  - Bureau of Engineering Special Order No. SO 06-0691

(1) State

(a) California Green Building Standards Code

The California Green Building Standards Code (CALGreen Code) is set forth in California Code of Regulations (CCR) Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the 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 Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[1] The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for utilities in the City, including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.[2]

(b) Los Angeles Integrated Resources Plan

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

The Final IRP 5-Year Review was released in June 2012, which included 12 projects that were separated into two categories: (1) "Go Projects" for immediate implementation and (2) "Go-If Triggered Projects" for implementation in the future once a trigger is reached.[3] Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the Final IRP 5-Year Review, the Go Projects consisted of six capital improvement projects for which triggers were considered to have been met at the time the IRP EIR was certified. The Go-If Triggered Projects consisted of six capital

1 City of Los Angeles, Ordinance No. 181480.

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

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

improvement projects for which triggers were not considered to have been met at the time the IRP EIR was certified.

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

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management. The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[5] Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

(d) Los Angeles Municipal Code

(i) Los Angeles Green Building Code

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

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

LAMC Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),[6] was adopted in April 2008 and provides standards and a mechanism for evaluating projects for their water conservation features during site plan review. The LA Green Building Code has been subsequently amended to incorporate various provisions of the CALGreen Code. The LA Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the second of which applies to this Project: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings.

(ii) Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),[7] effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

(iii) Sewer Capacity Availability Review

The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a 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.

6 City of Los Angeles, Ordinance No. 181480

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

(v) Bureau of Engineering Special Order

The City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City standards (Bureau of Engineering Special Order No. SO 06-0691). Per the Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period does not exceed one-half of the pipe diameter (D) (i.e., depth-to-diameter ratio or d/D).[8]

b) Existing Conditions

(1) Wastewater Generation

As discussed in Chapter II, *Project Description*, of this Draft EIR, the Project Site is currently occupied by cold storage facilities that include warehouse and wholesale commercial buildings and associated office space, truck loading docks, and surface parking. The existing buildings on the Project Site total approximately 360,734 sf of floor area, which include 357,863 sf of cold storage warehouse and 2,871 of office use.

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 11,081 gallons per day (gpd) or 0.011 million gallons per day (mgd).[9]

(2) Wastewater infrastructure

Sanitary sewer service to and from the Project Site from the surrounding streets is provided by LASAN. The City's 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 reclamation plants.[10]

As described in the Infrastructure Report included in Appendix L-1 of this Draft EIR, there are multiple sanitary sewer mains surrounding the project site with estimated capacities

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

9 The generation rates are based on the LASAN sewerage generation factors. 357,863 sf (cold storage) x 30 gal/1,000 gsf = 10,736 gal/day. 2,871 sf (office) x 120 gal/1,000 gsf = 345 gal/day. 10,736 gallons/day + 345 gal/day = 11,081 gal/day.

10 City of Los Angeles Bureau of Sanitation, Sewers and Pumping Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_afrLoop=16242584085807217&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=tpzy2r0ux_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D16242584085807217%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dtpzy2r0ux_5. Accessed January 2023.

from the online Navigate LA database.[11] A 10-inch vitrified clay pipe (VCP) sewer main in Central Avenue has a calculated capacity of 1.44 cubic feet per second (cfs). Two existing 20-inch VCP sewer mains in Alameda Street flow south and have a calculated capacity of 7.53 cfs and 8.17 cfs.

These sewer mains connect to a network of sewer lines which ultimately convey wastewater to the Hyperion Treatment Plant System.

Additionally, there are several existing sewer laterals that connects to the existing on-site buildings.

(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 (WRP) 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 Water Reclamation Plant (HWRP), the Donald C. Tillman WRP and the Los Angeles-Glendale WRP. The Terminal Island Service Area includes the Terminal Island WRP. The Project Site is located within the Hyperion Service Area, and its wastewater would be conveyed to and treated at the HWRP.

a) Hyperion Sanitary Sewer System

The current treatment capacity of the Hyperion Service Area is approximately 550 mgd which consists of 450 mgd at HWRP, 80 mgd at the Donald C. Tillman WRP, and 20 mgd at the Los Angeles-Glendale WRP.[13,14,15] Based on the One Water LA 2040 Plan - Wastewater Facilities Plan, the average wastewater flow rate in the Hyperion Sanitary Sewer System was 314 mgd in 2016 (consisting of 250 mgd at the Hyperion WRP, 47

11 City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, https://navigatela.lacity.org/navigatela/. Accessed January 2023.

12 LASAN, Clean Water, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_afrLoop=16243295875699712&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=tpzy2r0ux_78#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D16243295875699712%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dtpzy2r0ux_82. Accessed January 2023.

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

14 LASAN, Donald C. Tillman Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=eu61rh3y2_344&_afrLoop=1039495806625525#!. Accessed January 202.

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

mgd at the Donald C. Tillman WRP, and 17 mgd at the Los Angeles-Glendale WRP.[16] The One Water LA 2040 Plan - Wastewater Facilities Plan projects that annual average wastewater flows in the Hyperion Sanitary Sewer System would increase to 323 mgd in 2020, 348 mgd in 2030, and 358 mgd in 2040. All other flow in the Hyperion Sanitary Sewer System, as well as biosolids from the upstream reclamation plants that are returned to the collection system are treated at the HWRP in Playa del Rey. As such, current and project flows to the year 2040 are and would continue to be below the design capacity of approximately 550 mgd for the Hyperion Sanitary Sewer System.

b) Hyperion Water Reclamation Plant

Wastewater generated from the Project Site is currently conveyed via the local collector sanitary sewer directly to the HWRP for treatment. The HWRP has the capacity to treat approximately 450 mgd, but according to LASAN, the HWRP currently treats a daily average of 275 mgd.[17] As such, the HWRP is currently operating at approximately 61 percent of its capacity, with a remaining capacity of approximately 175 mgd. Based on the above, current flows to the HWRP are well below its design capacity of 450 mgd.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.[18] The majority of the treated water from the HWRP is discharged into Santa Monica Bay through a 5-mile-long outfall, terminating at a depth of 200 feet. The remaining effluent is pumped to the West Basin Municipal Water District (WBMWD) for additional treatment dependent upon reuse demand. The discharge is regulated by the HWRP's National Pollution Discharge Elimination System (NPDES) Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use. Accordingly, the HWRP's effluent that is released to Santa

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

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

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?_afrLoop=16246182864863575&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=tpzy2r0ux_758#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D16246182864863575%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dtpzy2r0ux_762. Accessed January 2023.

Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. LASAN also monitors flows into the Santa Monica Bay.[19]

3. Project Impacts

a) Thresholds of Significance

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

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 telecommunication facilities, the construction of which would cause significant environmental effects;[20] or

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold Questions. A project would normally have a significant wastewater impact if:

- *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.*

19 LASAN, Environmental Monitoring, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-em?_afrLoop=16246514096900690&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=tpzy2r0ux_917#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D16246514096900690%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dtpzy2r0ux_921. Accessed January 2023.

20 Electricity and natural gas are addressed in Section IV.C, *Energy*, and Section IV.L.4, *Electric Power, and Natural Gas Infrastructure*, of this Draft EIR; and the Initial Study provided in Appendix A of this Draft EIR for a discussion of hydrology and water quality stormwater and telecommunications facilities.

b) Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Infrastructure Report included as Appendix L-1 of this Draft EIR. The Infrastructure report includes the results of a SCAR included in Appendix L-1 as Exhibit 5. The anticipated wastewater flows to be generated by the Project are based on LASAN sewer generation factors. Given the 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 Infrastructure 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 PDF-WS-1, included in Section IV.L.1, *Utilities and Service Systems – 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 or wastewater treatment or storm water, drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

(1) Impact Analysis

(a) Construction Impacts

During construction of the Project, a negligible amount of wastewater would be generated by construction workers. However, any such wastewater generation would be temporary, only lasting as long as Project construction activities occur. It is anticipated that portable toilets would be provided by a licensed private vendor that would dispose of the wastewater off-site. Such wastewater generation is, therefore, anticipated to result in either no or negligible discharges to the City's wastewater treatment conveyance systems or treatment facilities and would not be discharged through any service connections at or near the Project Site. No such service connections would be established during Project

construction to handle wastewater generated by construction workers. Because there is capacity in the existing sewer infrastructure as shown in the SCAR (see Exhibit 5 of the Infrastructure Report) for the Project, any potential and limited increase is anticipated to be within the capacity of the existing wastewater facilities. The minimal wastewater generation during construction would not require the construction of new or expansion of existing facilities, and, given their small amount, would not exceed the capacity of existing wastewater conveyance and treatment systems.

Construction of the Project would include the construction of all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction relative to the wastewater system for the Project would occur at the Project Site and immediate vicinity. Such activities would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure and would be temporary in nature. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public sewer main. Although no upgrades to the public sewer main lines are anticipated, minor off-site work is required in order to connect to the public sewer main lines. The design of these connections would be developed by a registered engineer and approved by the Bureau of Engineering (BOE) and LASAN, as required. If, during construction, existing sewer lines are found to be substandard or in deteriorated condition, the Project Applicant would be required to make necessary improvements to achieve adequate service under City's Building and Safety Code and the Department of Public Works (LADPW) requirements. All necessary improvements would be verified through the permit approval process of obtaining a sewer connection permit from the City. Further, all construction activities would happen in coordination with the appropriate agencies, including the LADPW, LASAN, and BOE. These agencies would provide input on the Project and would coordinate with the Project Applicant before, during, and after construction activities. This coordination would ensure that the construction of these new improvements would not cause significant environmental effects, and therefore, impacts would be less than significant. When considering impacts resulting from the installation of any required wastewater infrastructure, all impacts would be temporary and would cease to occur once the installation is complete. **Therefore, based on these factors, 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, and impacts would be less than significant.**

(b) Operational Impacts

Table IV.L.2-1, *Wastewater Generation during Project Operation*, shows that the Project would result in an estimated average gross wastewater generation of approximately 588,278 gpd. This estimate does not account for reductions in wastewater generation that would result from required compliance with applicable LAMC requirements or the

Project's water conservation measures, as presented in WS-PDF-1 in Section IV.L.1, *Water Supply*, of this Draft EIR.[21]

TABLE IV.L.2-1
WASTEWATER GENERATION DURING PROJECT OPERATION

Land Use	Average Daily Flow (gpd)[a]	Unit	Quantity	Average Daily Wastewater (gpd)[b]
Office Bldg. w/Cooling Tower	170	KGSF	403,715	68,632
Residential: Apt - Bachelor	75	DU	436	32,700
Residential: Apt - 1 BDR	110	DU	720	79,200
Residential: Apt - 2 BDR	150	DU	323	48,450
Residential: Apt - 3 BDR	190	DU	42	7,980
Restaurant: Full Service Indoor Seat	30	Seat	3,722	111,660
Restaurant: Full Service Outdoor Seat	30	Seat	833	24,990
Gymnasium: Basketball, Volleyball	200	KGSF	11,000	2,200
Hotel: Use Guest Rooms Only	120	Room	68	8,160
Bar: Cocktail, Fixed Set	15	Seat	37	555
Retail Area (less than 100,000 SF)	50	KGSF	45,266	1,132
Health Club/Spa	650	KGSF	8,000	5,200
Lobby Retail Area	50	KGSF	16,232	812
Car Wash: Hand Wash	100	Actual	42	4,200
Bike Parking / Repair - Auto Parking	20	KGSF	1,200	24
Conference Room of Office Bldg.	120	KGSF	41,360	4,963
Pet Grooming (Barber Shop)	120	KGSF	3,500	420
Lounge	50	KGSF	98,481	4,924
Pool	-	Total	182,077	182,077
		Proposed Project Total Flow		**588,278**
			Existing Flow	**11,081**
			Project Net Total Flow	**577,197**

[a] The average daily flow based on LASAN sewerage generation factors.
[b] Average daily water demand = Average daily flow x Quantity
SOURCE: KPFF Consulting Engineers, Infrastructure Report, Table 2, February 2023.

[21] As discussed in Section IV.L.1, *Water Supply*, a water supply assessment (WSA) was prepared for the Project. The WSA provides a higher level of detail by assigning subcategories to the Project's proposed uses and includes typical daily water demand for swimming pools, which allows for an accurate long-term water supply analysis. The Project's wastewater generation is appropriately based on the SCAR and conservatively assigns wastewater to a broader set of land use categories. This, along with the maximum daily swimming pools generation (assuming full drainage), allows for a conservative assessment of impacts to wastewater facilities.

A SCAR was submitted to LASAN to determine whether the existing public infrastructure can accommodate the Project. The SCAR submitted shows an average wastewater flow of up to 588,278 gpd of which 65 percent would discharge to Central Avenue (382,381 gpd) and 35 percent would discharge to Alameda Street (205,897 gpd).

The existing capacity of the 10-inch VCP sewer main in Central Avenue is 1.44 cfs, and up to 382,381 gpd can enter the main per the SCAR, this is roughly 41.1 percent of the capacity of the sewer main in Central Avenue that the Project can discharge. The closest 20-inch VCP sewer main in Alameda Street flows south and have a calculated capacity of 7.53 cfs, and up to 205,897 gpd can enter the main per the SCAR, this is roughly 4.23 percent of the capacity of the main that is allowed to be discharged. Therefore, the sewer main lines serving the Project have adequate capacity to accommodate the Project.

Future detailed gauging and evaluation will be needed as part of the standard permit process to identify a specific sewer connection point and confirm the sewer capacity near the time of Project development. Although not anticipated, if the public sewer lacks sufficient capacity, then the Project would be required to upgrade sewer lines to a point in the sewer system with sufficient capacity. A final approval of the sewer capacity and connection permit would be made at the time of permitting. 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. Furthermore, in accordance with LAMC Sections 64.11 and 64.16.1, the Project would pay the required sewer connection fees to help offset the Project's contribution to the City's wastewater collection infrastructure needs.

Construction of any on- or off-site wastewater infrastructure connections or upgrades would occur as discussed under the Construction impact analysis, above.

Ultimately, this sewage flow would be conveyed to the HWRP, which has sufficient capacity for the Project. As discussed in further detail under Threshold (b), below, the Project's conservative net daily increase in wastewater 0.577 net mgd (0.588 mgd Project – 0.011 mgd Existing) would represent 0.33 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. In addition, with regard to future flows, the Project's 0.577 net mgd plus the projected 2030 flows of 275 mgd to the HWRP would represent 61.2 percent of the HWRP's assumed future capacity of 450 mgd. The calculations provided under Threshold (b) demonstrate that HWRP would have available capacity to treat the Project's wastewater generation.

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

(2) Mitigation Measures

Impacts regarding the relocation or construction of new or expanded wastewater treatment facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding the relocation or construction of new or expanded wastewater treatment facilities were determined to be less than significant. 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

(a) Construction Impacts

As discussed under Threshold (a), with respect to wastewater generation during construction, temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor. Any sewage generated from these facilities would be collected and hauled off-site. Such wastewater generation is, therefore, anticipated to result in either no or negligible discharges to the City's wastewater treatment conveyance systems or treatment facilities and would not be discharged through any service connections at or near the Project Site. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable change to the available wastewater capacity of the Hyperion Sanitary Sewer System or the HWRP, which serve the Project Site. As discussed above, the HWRP's current remaining treatment capacity for dry weather flows is approximately 175 mgd on an average day. **Accordingly, there would be adequate treatment capacity in the Hyperion Sanitary Sewer System and HWRP during Project construction to serve the Project's construction demand in addition to existing commitments, and impacts would be less than significant.**

(b) Operational Impacts

As provided in Table IV.L.2-1, the Project would generate a wastewater flow from the Project Site of 588,278 gpd or of 0.588 mgd, or a net increase of 0.577 net mgd (0.588 mgd Project – 0.011 mgd Existing) when subtracting for existing on-site uses.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2030, the year by which construction of the Project is expected to be completed. Future updates to the

One Water LA 2040 Plan discussed above would provide for improvements beyond 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2030. Thus, based on this conservative assumption, the 2030 effective capacity of the Hyperion Sanitary Sewer System would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2030 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2030, the Project build-out year, would be 275 mgd. Accordingly, the future remaining available capacity in 2030 would be approximately 175 mgd. The Project's net increase in average daily wastewater flow of 0.577 mgd would represent 0.33 percent of the estimated future 2030 remaining available capacity of 175 mgd at the HWRP. In addition, with regard to future flows, the Project's 0.577 net mgd plus the projected 2030 flows of 275 mgd to the HWRP would represent 61.2 percent of the HWRP's assumed future capacity of 450 mgd. Therefore, wastewater generated by the Project, during operation, would be accommodated by the future 2030 capacity of the HWRP.

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

(2) Mitigation Measures

Impacts regarding wastewater treatment facilities and their capacity to serve the Project were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding wastewater treatment facilities and their capacity to serve the Project were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR identified 39 related projects within an approximately two-mile radius of the Project Site. During construction of the related projects, wastewater generation by construction workers would be temporary and would last as long as the related projects' construction activities occur. Portable toilets would be provided and any generated wastewater would be disposed of off-site, and therefore, would be anticipated to result in negligible or no discharges to the City's wastewater treatment conveyance systems or treatment facilities.

(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

Operation of the 39 related projects identified in Chapter III, *Environmental Setting* would cumulatively contribute, in conjunction with the Project, to wastewater generation in the Hyperion Service Area. For purposes of this analysis, wastewater generated by the related projects is assumed to be treated at the HWRP. As shown in **Table IV.L.2-2**, *Operational Cumulative Wastewater Generation*, the estimated cumulative wastewater generation for the Project plus the related projects is approximately 2,936,906 gpd (2.94 mgd). This is conservative, as the related projects' wastewater estimates represents gross generation, rather than net generation after removal of any existing uses and assumes that all the related projects would be constructed. This estimate also does not account for water conservation measures associated with each related project, and therefore likely overstates wastewater generation.

TABLE IV.L.2-2
OPERATIONAL CUMULATIVE WASTEWATER GENERATION

Land Use	Quantity	Generation Rate (gpd/unit)[a]	Total Wastewater Generation (gpd)
Residential[b]	7,660 du	150/du	1,149,000
Office[c]	2,198,635 sf	170/ksf	373,768
Retail (Less than 100 ksf)	344,080 sf	50/ksf	17,204
Restaurant [d]	284,314 sf (18,954 seats)	30/seat	568,620
Hotel	972 rooms	120/room	116,640
School [e]	300 students	9/student	2,700
Commercial	329,253 sf	50/ksf	16,463
Museum	52,204 sf	30/ksf	1,566
Warehouse	316,632 sf	30/ksf	9,499
Event Space[f]	160,724 sf (17,858 seats)	3/seat	53,574
Storage	63,785 sf	30/ksf	1,913
Amenity Space[g]	10,085 sf	50/ksf	1,100
Institutional[h]	10,763 sf	350/ksf	3,767
Health Club/Gym	67,531 sf	650/ksf	43,895
	Total Wastewater Generation by Related Projects		**2,359,709**
	Project Net Operational Wastewater Generation Increase		**577,197**[i]
	Cumulative Wastewater Generation with Project		**2,936,906**[j]

NOTE(S):

du = dwelling unit; ksf = thousand square feet; gpd = gallons per day

[a] Wastewater generation factors are based on LASAN Sewage Generation Factors for Residential and Commercial Categories, dated April 6, 2012.

[b] Rates for residential wastewater generation vary depending on unit type and size. It was assumed that all residential projects would have an average size of two bedrooms.

[c] Office conservatively applies the Office Building with Cooling Tower sewage generation factor.

[d] Restaurant conservative uses Restaurant: Full Service Outdoor/Indoor Seat sewage generation factor. It is assumed that each seat will require approximately 15 square feet.

[e] Elementary/Jr. High School sewage generation factor used as no school type has been determined.

[f] Event Space uses the Auditorium sewage generation factor and includes event space and arts/production space. It is assumed that each seat requires approximately nine square feet.

[g] Amenity Space includes amenity and productions spaces, and is based on Gymnasium sewage generation rate.

[h] Sewage generation rates provided LASAN do not include rates for Institution uses. Therefore, the land use rate of 350 gallons/1,000 square feet of "Banquet Room" is applied.

[i] Project Net Operational Wastewater Generation is from Table IV.L.2-1.

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

SOURCE: ESA, 2023.

Based on LASAN's Average flow projections for the HWRP, it is anticipated that the average flow in 2030 would be approximately 275 mgd.[22] Accordingly, the future remaining available capacity in 2030 would be approximately 175 mgd. The Project's net increase plus the related projects average daily wastewater flow of 2.94 mgd would represent 1.68 percent of the estimated future 2030 remaining available capacity of 175 mgd at the HWRP. In addition, with regard to future flows, the Project and related projects combined sewage generation of 2.94 mgd plus the projected 2030 flows of 275 mgd to the HWRP would represent 61.8 percent of the HWRP's assumed future capacity of 450 mgd. Therefore, wastewater generated by the Project and related projects, during operation, would be accommodated by the future 2030 capacity of the HWRP. **Therefore, Project impacts on wastewater treatment systems would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding wastewater were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts regarding wastewater were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

22 Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 2, Table ES.1, Projected Wastewater Flows.

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