IV. Environmental Impact Analysis

K.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 Utility Technical Report (Utility Report) prepared for the Project by Langan Engineering and Environmental Services, Inc., and is included as Appendix L of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding wastewater at the State and local levels that apply to the Project. 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 Green Building Code (Ordinance No. 181,480)
- Water Efficiency Requirements Ordinance (Ordinance No. 180,822)
- Sewer Capacity Availability Review (SCAR; LAMC Section 64.15)
- Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1)
- Bureau of Engineering Special Order No. SO 06-0691

(1) State

(a) California Green Building Code

The California Green Building Standards Code (CALGreen Code) is set forth in California Code of Regulations (CCR) Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the 2022 CALGreen Code (effective January 1, 2023), all flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.125 gallon per flush for wall-mounted and 0.5 gallon per flush for floor-mounted. In addition, maximum flow rates for faucets are established at 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, 0.5 gpm at 60 psi for non-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;

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[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.*

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

Since the implementation of the IRP, new programs and projects, which have resulted in a substantial decrease in wastewater flows, have affected the Go Projects and Go-If Triggered Projects. Based on the Final IRP 5-Year Review, two of the Go Projects have been moved to the Go-If Triggered category (Go Project 2 and Go Project 3), and two have been deferred beyond the 2020 planning window of the IRP (Go Project 4 and Go Project 5).[4] 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 One

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

[4] *City of Los Angeles, Department of Public Works, Bureau of 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.*

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 non-residential category 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),[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. LAMC Section 64.15 requires that the City perform a SCAR when an applicant seeks a sewer

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[8] *City of Los Angeles, Ordinance No. 181480.*

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

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]

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with two single-story warehouse structures that are currently being used for storage and distribution purposes with accompanying surface parking areas. The existing

[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.*

warehouse structures comprise approximately 311,000 square feet. Based on the Utility Report prepared for the Project included in Appendix L of this Draft EIR, which applies LASAN wastewater generation rates to the existing uses, the existing warehouse uses generate a total average daily wastewater flow of approximately 9,330 gallons per day (gpd).[11] However, for conservative purposes, the existing wastewater flow considered in the impact analysis below is based on LADWP billing data, which shows a wastewater flow of approximately 515 gallons per day.[12]

(2) Wastewater Infrastructure

The sanitary sewer system serving the Project Site and vicinity is owned and operated by the City of Los Angeles. The City's 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.[13]

As described in the Utility Report, the Project Site is served by an existing 8-inch line on 6th Street that feeds into a 22-inch line on Alameda Street before discharging into a 40-inch sewer line on Alameda Street. 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 operates four water reclamation plants and divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.[14] The Hyperion Service Area includes the Hyperion Water Reclamation Plant, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water

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[11] *Based on LASAN's 2012 Sewage Generation Factors for Residential and Commercial Categories. The "Warehouse" rate of 30 gallons per day / 1,000 square feet was applied to the square footage of the existing uses.*

[12] *Table I of the Project's Water Supply Assessment prepared by LADWP, included in Appendix K of this Draft EIR.*

[13] *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 August 22, 2023.*

[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 August 22, 2023.*

Reclamation Plant.[15] The Terminal Island Service Area includes the Terminal Island Treatment Plant.[16] The Project Site is located within the Hyperion Service Area and is served by the HWRP.

(a) Hyperion Service Area

As shown in Table IV.K.2-1 on page IV.K.2-8, the existing design capacity of the Hyperion Service Area 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 Service Area 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).[17] The One Water LA 2040 Plan–Wastewater Facilities Plan projects that annual average wastewater flows in the Hyperion Service Area would increase to 323 mgd in 2020, 348 mgd in 2030, and 358 mgd in 2040. Based on a straight-line interpolation of this data, flows in 2023 are estimated at 331 mgd.[18] As such, current and projected flows are below the design capacity of approximately 550 mgd for the Hyperion Service Area.

(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.K.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.[19] As such, the HWRP is currently operating at approximately 61 percent of its capacity with a remaining available capacity of approximately 175 mgd. Therefore, the current flows to HWRP are well below its design capacity of approximately 450 mgd.

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[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 August 22, 2023.*

[16] *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 August 22, 2023.*

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

[18] *The 2023 value is extrapolated from 2020 and 2030 values: [(348 mgd – 323 mgd) ÷ 10) * 3] + 323 mgd = ~ 331 mgd.*

[19] *LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6jxqihq40_254&_afrLoop=5327340718723642#!, accessed August 22, 2023.*

Table IV.K.2-1
Existing Capacity within the Hyperion Service Area

	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 August 23, 2023.

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.[20] 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.[21] 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.[22] 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.[23] Accordingly, the HWRP's effluent that is released to the Santa

[20] *LASAN, Treatment Process, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tp?_adf.ctrl-state=s0mxg9mov_772&_afrLoop=10868549010994331#!, accessed August 22, 2023.*

[21] *LASAN, Treatment Process, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tp?_adf.ctrl-state=6jxqihq40_254&_afrLoop=5327479722838415#!, accessed August 22, 2023.*

[22] *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 August 22, 2023.*

[23] *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*

(Footnote continued on next page)

Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. LASAN also monitors flows into the Santa Monica Bay.[24]

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;[25] ***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**.**

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

Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean, effective April 1, 2017 through March 31, 2022.

[24] *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 August 22, 2023.*

[25] *Refer to Section IV.K.1, Utilities and Service Systems—Water, of this Draft EIR for a discussion of water impacts; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas impacts; Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts; and the Initial Study prepared for the Project included in Appendix A of this Draft EIR for a discussion of stormwater impacts.*

- 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.[26]

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Utility Report, and the Wastewater Service Information (WWSI) included as Appendix C to the Utility Report. The anticipated wastewater flows to be generated by the Project are based on LASAN wastewater generation rates. 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.

To evaluate potential impacts relative to wastewater treatment capacity, this analysis evaluates whether adequate treatment capacity within the Hyperion Water Reclamation Plant 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 Service Area.

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 water conservation features are included in Project Design Feature WAT-PDF-1, included in Section IV.K.1, Utilities and Service System—Water Supply and Infrastructure, of this Draft EIR.

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities,

[26] *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.*

the construction or relocation of which could cause significant environmental effects?[27]

(1) Impact Analysis

(a) Construction

As described in Section II, Project Description, of this Draft EIR, the Project would involve removal of all existing uses on-site. As such, any existing wastewater generation associated with the existing uses would cease during construction of the Project. Existing sewer laterals would also be capped during construction, and no sewage would enter the public sewer system from the Project Site. Temporary facilities for construction workers, such as portable toilets and hand wash areas, would be provided by the construction contractor. Sewage generated from these facilities would be collected and hauled off-site and would not be discharged directly into the public sewer system. As such, Project construction would not contribute directly to the wastewater system that serves the Project Site. In addition, any sewage generated during construction would be offset by the removal of the existing on-site uses. Therefore, while the sewage hauled off-site would eventually be deposited at the Hyperion Water Reclamation Plant, the amount generated would likely be reduced compared what is currently generated by the Project Site, and as demonstrated below, the Hyperion Water Reclamation Plant has sufficient capacity to treat the sewer generation flows anticipated to be generated from the Project Site during construction. Thus, wastewater generation from Project construction is not anticipated to cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

The Project would also require the installation of new on-site sewer line connections to connect the proposed structures to the off-site public sewer mains in the streets surrounding the Project Site. The new sewer connections would collect wastewater from the Project Site and convey the wastewater to the existing public sewer main lines. Construction impacts associated with the installation of new sewer line connections would primarily be confined to trenching in order to place the sewer line connections below surface for connections to the existing off-site public infrastructure. 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.I, Transportation, of

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[27] *Refer to Section IV.K.1, Utilities and Service Systems—Water, of this Draft EIR for a discussion of water impacts; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of electric power and natural gas impacts; Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts; and the Initial Study prepared for the Project included in Appendix A of this Draft EIR for a discussion of stormwater impacts.*

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. Overall, installation of required sewer infrastructure as part of the Project would be generally confined to limited off-site areas in order to connect on-site sewer connections to sewer lines in surrounding streets, would be of a relatively short-term duration, and would cease to occur once the installation is complete. As such, construction activities associated with the installation of the required sewer infrastructure would not have an adverse impact on wastewater conveyance or treatment infrastructure.

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

(b) Operation

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. As described above, the HWRP has a capacity of 450 mgd, and current average wastewater flows are at approximately 275 mgd. Accordingly, the remaining available capacity at the Hyperion Water Reclamation Plant is approximately 175 mgd.

As shown in Table IV.K.2-2 on page IV.K.2-13, the Project could generate a net increase of approximately 53,587 gpd of wastewater over existing conditions, or approximately 0.054 mgd. The Project's increase in average daily wastewater flow of approximately 0.054 mgd would represent approximately 0.031 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP, and impacts with respect to treatment capacity would be less than significant.

A WWSI report (see Appendix L of this Draft EIR) was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. In preparing the WWSI report, 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. Based on LASAN's data, the Utility Report concluded that the existing capacity of the sewer lines in 6th Street and Alameda Street might have sufficient capacity to accommodate the Project's wastewater flows. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and a

Table IV.K.2-2
Estimated Wastewater Generation

Land Use	No. of Units/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)
Proposed Uses			
Studios	299,012 sf	0.050 gpd/sf	14,951
Production Support	69,192 sf	0.050 gpd/sf	3,460
General Office	299,407 sf[c]	0.120 gpd/sf	35,929
General Retail	4,000 sf	0.025 gpd/sf	100
Restaurant	4,000 sf	0.3 gpd/sf	3,990
Basecamp	120,222 sf[d]	0.03	3,607
Covered Parking			187[e]
Total Proposed New Wastewater Generation			*62,224*
Less Required Ordinances Savings[f]			(7,554)
Less Existing to be Removed	*311,000 sf*	[b]	(515)
Less Additional Conservation[g]			(568)
Net Additional Wastewater Generation			**53,587**

sf = square feet

gpd = gallons per day

[a] *The proposed uses are based on 2012 LASAN Sewer Generation Rates. The "Commercial Use" rate was used for both the studios and production support uses, the "Office Building" rate was used for the proposed office uses, the "Retail Area (less than 100,000 sf)" rate was used for the potential general retail uses, and the "Coffee House" rate was used for the potential restaurant use.*

[b] *Based on LADWP billing data from October 2018 to September 2023.*

[c] *As provided in Table II-1 in Section II, Project Description, of this Draft EIR, the proposed office uses comprise a total of 307,407 square feet, inclusive of the potential 8,000 square feet of retail uses. As such, when subtracting the potential 8,000 square feet of retail uses, the office uses would comprise 299,407 square feet.*

[d] *While basecamp areas are not included in the Project's total floor area, these areas are accounted for in the Project's estimated wastewater generation.*

[e] *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.*

[f] *The proposed land uses would comply with City of Los Angeles Ordinance No. 186,488, Ordinance No. 184,248, the 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code. Excludes water savings associated with landscaping.*

[g] *Water conservation due to additional conservation commitments agreed by the Applicant. See Table II of the WSA. Excludes water conservation associated with landscaping.*

Source: LADWP, Water Supply Assessment for the East End Studios Arts District Los Angeles Project, adopted January 9, 2024; Langan, Utility Technical Report for East End Studios Arts District Campus, July 16, 2024. Refer to Appendix L of this Draft EIR.

connection permit for the Project during the Project's permitting process. If the public sewer is determined to lack sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. 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. Ultimately, project-related sewage flow would be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Project. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

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

(2) Mitigation Measures

Project-level impacts related to the construction or expansion of existing 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 or expansion of existing 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.K.2-2 on page IV.K.2-13, the Project would generate a net increase in wastewater flow from the Project Site of approximately 53,587 gpd or 0.054 mgd. The Project's increase in average daily wastewater flow of 0.054 mgd would represent approximately 0.031 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Additionally, as stated in the One Water LA 2040 Plan, the HWRP has sufficient capacity to manage wastewater flows through the year 2040.

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 2026, 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 2026. Thus, based on this conservative assumption, the 2026 effective capacity of the Hyperion Service Area would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2026 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2026, the Project build-out year, would be approximately 267.4 mgd.[28] Accordingly, the future remaining available capacity in 2026 would be approximately 182.6 mgd. The Project's increase in average daily wastewater flow of 0.054 mgd would represent approximately 0.03 percent[29] of the estimated future remaining available capacity of 182.6 mgd at the HWRP. Therefore, wastewater generated during operation of the Project would be accommodated by the future capacity of the HWRP.

Additionally, the Project's net increase in average daily wastewater generation of 0.054 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.12 percent[30] of the HWRP's capacity of 450 mgd. Furthermore, as previously discussed, the WWSI (see Appendix L of this Draft EIR) confirmed the HWRP would have sufficient capacity to serve the Project. Therefore, there is adequate treatment capacity to serve the Project's projected demand in addition to LASAN's existing commitments.

Based on the above, 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.

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[28] *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 Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2026 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 6] + 256 = 267.4 mgd.*

[29] *[(0.054 ÷ 182.6 mgd] x 100 = ~0.03%*

[30] *[(0.054 + 275 mgd) ÷ 450 mgd] x 100 = ~61.12%*

(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. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis on the wastewater conveyance infrastructure is the area that includes the Project Site and those related projects that would potentially utilize the same infrastructure as the Project. The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. The Project, in conjunction with the related projects and growth forecasted in the Hyperion Service Area through 2026 (i.e., the Project's earliest buildout year), would generate wastewater, requiring conveyance and treatment. Cumulative growth in the greater Project area through 2026 includes specific known development projects, as well as general ambient growth projected to occur.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth associated with Related Project Nos. 1 through 21 is a conservative assumption, as some of the related projects may not be built out by 2026 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 21 are fully built out by 2026.

(a) Wastewater Infrastructure

All 21 related projects 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 pursuant to LAMC Section 64.15. 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. Furthermore, as with the Project, each of the 21 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 such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Wastewater Treatment Capacity

Development of the Project, in conjunction with the related projects, would result in an increase in the demand for sanitary sewer service in the Hyperion Service Area. Forecasted growth from the related projects would generate an average daily wastewater flow of approximately 1,250,231 gpd or approximately 1.25 mgd, as shown in Table IV.K.2-3 on page IV.K.2-18. Combined with the Project's net increase in wastewater generation of 53,587 gpd (0.054 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 1,303,818 gpd or 1.30 mgd.

Table IV.K.2-3
Cumulative Wastewater Generation

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
1	1525 E. Industrial St.	Mixed Use	336,304 sf	N/A	N/A
		Live/Work	344 du	190 gpd/du	65,360
		Leasing/Amenity Area	7,458 sf	0.05 gpd/sf	373
		Creative Office Uses	24,774 sf	0.12 gpd/sf	2,973
		Restaurant	4,042 sf (135 seats)	30 gpd/seat	4,050
2	1340 E 6th Street	Apartments	170 du	190 gpd/du	32,300
		Retail	16,518 sf	0.025 gpd/sf	413
3	668 S. Alameda St.	Live/Work	475 du	190 gpd/du	90,250
		Grocery Store	15,105 sf	0.025 gpd/sf	378
		Retail and Studio Space	27,063 sf	0.025 gpd/sf	677
		Restaurant	27,063 sf (902 seats)	30 gpd/seat	27,060
		Gallery	700 sf	0.03 gpd/sf	21
4	527 S. Colyton St.	Live/Work	475 du	190 gpd/du	90,250
		Retail/Restaurant	12,396 sf (413 seats)	30 gpd/seat	12,390
		Leasable Arts/Production Space	12,396 sf	0.12 gpd/sf	1,488
		Production Space	512 sf	0.12 gpd/sf	61
5	1800 E. 7th St	Residential	122 du	190 gpd/du	23,180
		Commercial	9,500 sf	0.05 gpd/sf	475
		Amenity Space	5,885 sf	0.05 gpd/sf	294
6	1100 E. 5th St.	Live/Work	220 du	190 gpd/du	41,800
		Open Space	22,275 sf		
7	676 S. Mateo St.	Live/Work	185 du	190 gpd/du	35,150

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
		Commercial	23,380 sf	0.05 gpd/sf	1,169
8	520 S. Mateo St.	Live/Work	475 du	190 gpd/du	90,250
		Restaurant	10,000 sf (333 seats)	30 gpd/seat	9,990
		Retail	10,000 sf	0.025 gpd/sf	250
		Office	105,000 sf	0.12 gpd/sf	12,600
9	1129 & 1101 E. 5th Street, 445-457 S. Colyton St., 450-456 S. Seaton St.	Live/Work Condominiums	129 du	190 gpd/sf	24,510
		Hotel	113 rm	120 gpd/rm	13,560
		Commercial	81,326 sf	0.05 gpd/sf	4,066
10	400 S. Alameda St.	Hotel	66 rm	120 gpd/rm	7,920
		Restaurant	3,800 sf (127 seats)	30 gpd/seat	3,810
		Specialty Retail	840 sf	0.025 gpd/sf	21
		Screening Room	890 sf	0.12 gpd/sf	107
11	2053 E. 7th St.	Hotel	103 rm	120 gpd/rm	12,360
12	655 S. Mesquit St.	Office	188,954 sf	0.12 gpd/sf	22,674
		Commercial	4,325 sf	0.05 gpd/sf	216
13	405 S. Hewitt St.	Commercial Office	311,682 sf	0.12 gpd/sf	37,402
		Ground Floor Restaurant	8,149 sf (272 seats)	30 gpd/seat	8,160
		Museum	7,800 sf	0.03 gpd/sf	234
14	656 Stanford Ave.	Apartments	82 du	190 gpd/du	15,580
15	670 S. Mesquit St.	Hotel	236 rm	120 gpd/rm	28,320
		Multi-Family Residential Housing	208 du	190 gpd/du	39,520

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
		Arts District Central Market (food hall)/Grocery/Retail	136,152 sf	0.05 gpd/sf	6,808
		Restaurant	89,577 sf (2,986 seats)	30 gpd/seat	89,580
		Studio/Event/Gallery/Space/Museum	93,617 sf	0.03 gpd/sf	2,809
		Gym	62,148 sf	0.2 gpd/sf	12,430
16	719 E. 5th St.	Re-Establish Hotel	42 rm	120 gpd/rm	5,040
17	713 E. 5th St.	Apartments	51 du	190 gpd/du	9,690
18	1000 S. Mateo St.	Live/Work	106 du	190 gpd/du	20,140
		Commercial Space	119,845 sf	0.05 gpd/sf	5,992
19	2000 E. 8th St.	Film Production Studio	832,750 sf	0.12 gpd/sf	99,930
20	400 S. Central Avenue	Hotel	68 rm	120 gpd/rm	8,160
		Office	411,113 sf	0.12 gpd/sf	49,334
		Commercial Retail and Restaurant	101,088 sf (3,370 seats)	30 gpd/seat	101,100
21	2045 E. Violet St.	Office	435,100 sf	0.12 gpd/sf	52,212
		Office (Future Expansion Phase)	211,201 sf	0.12 gpd/sf	25,344
Related Total Water Demand					**1,250,231**
Project Total Water Demand					**53,587**
Related + Project Total Water Demand					**1,303,818**

du = dwelling units
rm = rooms
sf = square feet

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

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

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

[b] *This analysis conservatively assumes that all dwelling units are 3-bedroom units. The number of seats for the restaurant uses are estimated based on 1 seat/30 sf.*

Source: Eyestone Environmental, 2024.

Based on LASAN's average flow projections for the Hyperion Service Area, it is anticipated that the average flow in 2026 would be approximately 338 mgd.[31] In addition, the Hyperion Service Area'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 0.054 mgd combined with the wastewater flow from related projects of approximately 1.25 mgd and the forecasted 2026 wastewater flow of 338 mgd for the Hyperion Service Area would result in a total wastewater flow of approximately 339 mgd. Based on the Hyperion Service Area'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 339 mgd aggregated from the Project, related projects, and forecasted growth by 2026. The 1.30 mgd of combined wastewater flows associated with the related projects plus the Project would represent approximately 0.24 percent of the Hyperion Service Area's existing design capacity of 550 mgd. Additionally, as stated above and in the One Water LA 2040 Plan, the HWRP has sufficient capacity to manage wastewater flows through the year 2040.[32]

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.

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[31] *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.*

[32] *Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 1, page ES-20.*