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 existing infrastructure has sufficient capacity to serve the Project. This analysis is based on the 6000 Hollywood Boulevard Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Report) prepared by KPFF and is included as Appendix M 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); and
- 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

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). Construction of wastewater storage facilities at the Donald C. Tillman Water Reclamation Plant (Go Project 1) has been completed. In addition, Go Project 6, involving the design of the North East Interceptor Sewer Phase II, is no longer being pursued.[4]

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to citywide recycled water supply, wastewater treatment, and stormwater management.[5] The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.[6] Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

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

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

[5] *City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.*

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

(d) Los Angeles Green Building Code

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

LAMC Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),[7] was adopted in April 2008 and provides standards and a mechanism for evaluating projects for their water conservation features during site plan review. The LA Green Building Code has been subsequently amended to incorporate various provisions of the CALGreen Code. The LA Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the first and second of which applies to this Project: (1) low-rise residential buildings; and (2) non-residential and high-rise residential buildings.

(i) Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),[8] effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

(ii) Sewer Capacity Availability Review

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

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

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

system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

(iii) 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.

(iv) Bureau of Engineering Special Order

The City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City standards (Bureau of Engineering Special Order No. SO 06-0691). Per the Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period does not exceed one-half of the pipe diameter (D) (i.e., depth-to-diameter ratio or d/D).[9]

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied primarily by an automotive dealership for Toyota that includes a showroom, parts storage structure, auto repair facility with five service bays, and surface parking. The existing structures total approximately 31,833 square feet. The existing wastewater generated by these uses is based on the existing water use estimate presented in the Water Supply Assessment (WSA) prepared for the Project. Specifically, as part of the preparation of the WSA, LADWP estimated average daily water use based on water billing

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

data over a five-year period. For purposes of this analysis, it is assumed that water use and wastewater generated are equal since the water used by the existing uses would primarily flow through the on-site plumbing and into the sewer lines for conveyance. Accordingly, as provided in the WSA, the total existing wastewater generated on the Project Site is estimated to be 2,298 gallons per day (gpd), as shown in Table IV.L.2-2 on page IV.L.2-13 in the analysis below.

(2) Wastewater Infrastructure

Sanitary sewer service to and from the Project Site and surrounding area is owned and operated by the City of Los Angeles. The existing wastewater collection system includes more than 6,700 miles of public sewers, which serves a population of more than four million people and conveys approximately 400 million gallons per day (mgd) to the City's four wastewater treatment and water reclamation plants.[10]

As described in the Utility Report, there is a 8-inch sewer main in Hollywood Boulevard and an 8-inch sewer main in Carlton Way. 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.[11] The Hyperion Service Area includes the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant.[12] The Terminal Island Service Area includes the Terminal Island Treatment Plant.[13] The Project Site is located within the Hyperion Service Area and is served by the HWRP.

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[10] *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 2, 2023.*

[11] *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 2, 2023.*

[12] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed August 2, 2023.*

[13] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed August 2, 2023.*

(a) Hyperion Service Area

As shown in Table IV.L.2-1 on page IV.L.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).[14] The One Water LA 2040 Plan—Wastewater Facilities Plan projects that annual average wastewater flows in the Service Area will 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.[15] 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.L.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.[16] As such, the HWRP is currently operating at approximately 61 percent of its capacity with a remaining available capacity of approximately 175 mgd. Based on the above, the current flows to the HWRP are well below its design capacity of approximately 450 mgd.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.[17] The treated water from the HWRP is discharged through a 5-mile

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

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

[16] *LASAN, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6jxqihq40_254&_afrLoop=5327340718723642#!, accessed August 2, 2023.*

[17] *LASAN, Treatment Process, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tp?_adf.ctrl-state=6jxqihq40_254&_afrLoop=5327479722838415#!, accessed August 2, 2023.*

Table IV.L.2-1
Existing Capacity of 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 2, 2023.

outfall pipe at a depth of 190 feet into the Santa Monica Bay and Pacific Ocean.[18] The discharge from the HWRP into Santa Monica Bay is regulated by the HWRP's National Pollution Discharge Elimination System (NPDES) Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use.[19] Accordingly, the HWRP's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. LASAN also monitors flows into the Santa Monica Bay.[20]

[18] *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 2, 2023.*

[19] *California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2017-0045, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean, effective April 1, 2017 through March 31, 2022.*

[20] *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 2, 2023.*

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;[21] ***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**.**

In assessing impacts related to wastewater in this section, the City used Appendix G as the thresholds of significance. The factors identified below from the *2006 LA. CEQA Thresholds Guide* were used where applicable and relevant to assist in analyzing the Appendix G Thresholds.

The *2006 L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following factors to evaluate wastewater impacts:

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.[22]

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

[22] *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.*

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Utility Report and the WSA included in Appendices M and L of this Draft EIR, respectively. As previously discussed, LADWP prepared a WSA for the Project. As part of the WSA, LADWP estimates water demand using land use-based wastewater generation rates from LASAN. The anticipated wastewater flows to be generated by the Project are based on the water demand calculated in the WSA minus water for landscaping as well as an adjustment for cooling towers, as noted in Table IV.L.2-2 on page IV.L.2-13, below. 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 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 HWRP and the overall Hyperion Service Area 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, which would result in a reduction in wastewater. Such conservation features are included in Project Design Feature WAT-PDF-1, included in Section IV.L.1, Utilities and Service System—Water Supply and Infrastructure, of this Draft EIR.

d. Analysis of Project Impacts

Threshold (a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?[23]

[23] *Refer to Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of water impacts; Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of energy infrastructure impacts; and Section VI, Other CEQA*

(Footnote continued on next page)

(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, the existing wastewater generation associated with the existing uses would cease during construction of the Project. Existing sewer laterals would be capped during construction, and no sewage would enter the public sewage system from the Project Site. Temporary facilities for construction workers, including portable toilets and handwash stations, would be provided by the construction contractor. Sewage generated from these facilities would be collected and hauled offsite and would not be discharged directly into the local 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 HWRP, the amount generated would likely be reduced compared to what is currently generated by the Project Site. As such, the HWRP has sufficient capacity to treat the sewer generation flows anticipated to be generated from the Project Site during construction and the 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 buildings to the existing off-site public sewer mains along 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. Project construction impacts associated with the installation of new sewer line connections would primarily be confined to trenching in order to place the new sewer line connections below surface for connection into the existing off-site sewer public infrastructure. Any offsite work that may affect services to the existing sewer lines in the vicinity of the Project Site would be coordinated with the City of Los Angeles Bureau of Engineering (BOE). BOE 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.J, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts that might result from trenching and installation of new sewer line connections. The Construction Traffic Management Plan would ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. Overall, installation of required sewer infrastructure as part of the Project would be generally confined

Considerations, as well as the Initial Study included in Appendix A of this Draft EIR for a discussion of stormwater and telecommunications facility impacts.

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 conveyance or treatment facilities, the construction or relocation of which could cause significant environmental effects. Project construction impacts to the wastewater conveyance or treatment system would be less than significant.

(b) Operation

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

As shown in Table IV.L.2-2 on page IV.L.2-13, the Project could generate an increase of approximately 230,753 gpd of wastewater. When accounting for existing uses to be removed as well as additional water conservation features, which would also serve to reduce wastewater flows, the Project would generate a net increase of approximately 206,538 gpd of wastewater over existing conditions, or approximately 0.207 mgd. The Project's increase in average daily wastewater flow of approximately 0.207 mgd would represent approximately 0.12 percent of the remaining available capacity of 175 mgd 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 SCAR and a WWSI request (see Appendix M of this Draft EIR) were obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. In preparing the SCAR and WWSI, LASAN analyzed the Project's wastewater demands in conjunction with existing conditions and forecasted growth and has provided current sewer gauging information for the relevant sewer lines downstream of the Project. Based on LASAN's data and the Project's estimated net wastewater generation, the Utility Report concluded that the existing capacity of the sewer lines serving the Project Site would have sufficient capacity to accommodate the Project's wastewater flows.

Table IV.L.2-2
Estimated Wastewater Generation

Land Use	No. of Units/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)
Existing Uses to Be Removed			
Automotive Dealership	31,833 sf	—	2,298[b]
Total Existing to be Removed			***2,298***
Proposed			
Residential: Studio Apartment	52 du	75 gpd/du	3,900
Residential: 1 bd Apartment	212 du	110 gpd/du	23,320
Residential: 2 bd Apartment	47 du	150 gpd/du	7,050
Residential: 2 bd Townhouse	26 du	150 gpd/du	3,900
Residential: 3 bd Townhouse	13 du	190 gpd/du	2,470
Office	136,000 sf	0.17 gpd/sf[c]	23,120
Retail/Restaurant	752 seats[d]	30 gpd/seats	22,560
Covered Parking	390,979 sf	0.02 gpd/sf	7,820
Sewer Ejector			108,000
Pool			28,613
Project Total Wastewater Generation			**230,753**
Less Required Ordinances Savings[e]			(21,733)
Less Existing to be Removed			(2,298)
Less Additional Conservation[f]			(184)
Net Additional Wastewater Generation (Proposed – Existing)			**206,538**

du = dwelling units

bd = bedroom

sf = square feet

gpd = gallons per day

[a] *Rate Source: LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

[b] *The existing wastewater generation is based on the existing water demand estimated by LADWP based on LADWP billing data from June 2018 to May 2023. See Table I of the Water Supply Assessment prepared for the Project included in Appendix L of this Draft EIR.*

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

[d] *Assumes all of the proposed 22,542 square feet of commercial uses would consist of restaurant uses for a conservative estimate, as evaluated by LADWP in the Water Supply Assessment prepared for the Project included in Appendix L of this Draft EIR. Seat count is estimated at 30 sf/seat, as assumed by LADWP in the Water Supply Assessment.*

[e] *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. Includes water savings from residential and non-residential uses and cooling (excludes water savings associated*

Table IV.L.2-2 (Continued)
Estimated Wastewater Generation

Land Use	No. of Units/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)

with landscaping and pool), as identified in Table I of the Water Supply Assessment prepared for the Project included in Appendix L *of this Draft EIR.*

[f] *Water conservation due to additional conservation commitments agreed by the Applicant. See Table II of the WSA. Includes water conservation from residential and non-residential uses only (excluding water conservation associated with landscaping).*

Source: LADWP, Water Supply Assessment—6000 Hollywood Boulevard Project, adopted November 14, 2023.

Based on the City of Los Angeles Sewer Design Manual Part F, the trigger flow in a sanitary sewer is the quantity of flow that, once reached, would initiate planning for a relief or replacement sewer. Currently, this trigger flow is considered when the depth of flow reaches three-fourths of the pipe diameter or a d/D of 75 percent. When including the Project's wastewater flows, the d/D of the 8-inch water main in Hollywood Boulevard and an 8-inch water main in Carlton Way would be 98 percent and two percent, respectively. Therefore, the Project's additional wastewater flows are not anticipated to exceed the trigger flow in any of the local sewer lines serving the Project Site. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, operation of the Project would not require or result in the 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 wastewater conveyance and treatment facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to the construction and expansion of wastewater conveyance and 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.

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.L.2-2 on page IV.L.2-13, the Project would generate a net increase in wastewater flow from the Project Site of approximately 206,538 gpd, or approximately 0.207 mgd. The Project's increase in the average daily wastewater flow of approximately 0.207 mgd would represent approximately 0.12 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the exiting 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., would ultimately determine the available capacity of the Hyperion Service Area in 2029, 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 2029, the Project's proposed buildout year. Thus, based on this conservative assumption, the 2029 effective capacity of the Hyperion Service Area would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2029 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2029, the Project build-out year, would be approximately 273.1 mgd.[24] Accordingly, the future remaining available capacity in 2029 of the HWRP would be

[24] *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 2029 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 9] + 256 = 273.1 mgd.*

approximately 176.9 mgd (450 mgd – 273.1 mgd). The Project's increase in average daily wastewater flow of 0.207 mgd would represent approximately 0.12 percent[25] of the estimated future remaining available capacity of 176.9 mgd at the HWRP. Therefore, the estimated 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 0.207 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.2 percent[26] of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.207 mgd plus the projected flows of approximately 273.1 mgd to the HWRP would represent approximately 60.7 percent[27] of the HWRP's assumed future capacity of 450 mgd. Therefore, there is adequate treatment capacity to serve the Project's projected demand in addition to LASAN's existing and future commitments.

Based on the above, there is adequate treatment capacity to serve the Project's projected demand in addition to existing and future 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

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.

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[25] *(0.207 mgd ÷ 176.9 mgd) x 100 = 0.12%*

[26] *[(0.207 mgd + 275 mgd) ÷ 450 mgd] x 100 = 61.2%*

[27] *[(0.207 mgd + 273.1 mgd) ÷ 450 mgd] x 100 = 60.7%*

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 the related projects that would potentially utilize the same sewer conveyance 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 other growth forecasted in the Hyperion Service Area through 2029 (i.e., the Project buildout year), would generate wastewater, requiring conveyance and treatment. Cumulative growth in the greater Project area through 2029 includes specific known development projects, as well as general ambient growth projected to occur.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 15 is a conservative assumption, as some of the related projects may not be built out by 2029 (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 15 are fully built out by 2029.

(a) Wastewater Infrastructure

As with the Project, new development projects occurring in the Project Site vicinity would be required to coordinate with LASAN via a SCAR 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 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 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, like 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 help to reduce the wastewater flow to the sewer system. 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 rights-of-way. **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 15 related projects identified in Section III, Environmental Setting, of this Draft EIR, 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 836,923 gpd or approximately 0.84 mgd, as shown in Table IV.L.2-3 on page IV.L.2-19. Combined with the Project's net increase in wastewater generation of 206,538 gpd (0.207 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 1,043,461 gpd, or 1.05 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that the average flow in 2029 would be approximately 273.1 mgd.[28] The HWRP's total treatment capacity is conservatively estimated to be approximately 450 mgd in 2029, which is the same as its existing capacity. The Project-related wastewater flow of approximately 0.207 mgd combined with the related projects' flow of approximately 0.84 mgd would result in a total cumulative wastewater flow of approximately 1.05 mgd. The 1.05 mgd of cumulative wastewater would represent approximately 0.2 percent of the HWRP's existing design capacity of 450 mgd. As such, based on the HWRP's estimated future capacity of approximately 450 mgd, the HWRP would have adequate capacity to accommodate the 1.05 mgd of cumulative wastewater flows. 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.[29]

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.

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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 2029 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 9] + 256 = 273.1 mgd.*

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

Table IV.L.2-3
Cumulative Wastewater Generation

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Wastewater Generation (gpd)
1	6400 Sunset Boulevard	Apartments	200 du	190 gpd/du	38,000
		Commercial	7,000 sf	0.05 gpd/sf	350
2	6350 Selma Avenue	Apartments	260 du	190 gpd/du	49,400
		Commercial	6,790 sf	0.05 gpd/sf	340
3	6050 Sunset Boulevard[c]	Office	560,692 sf	0.12 gpd/sf	67,283
		Production Support	28,250 sf	0.12 gpd/sf	3,390
		Soundstages	30,000 sf	0.12 gpd/sf	3,600
		Mill Space	7,000 sf	0.12 gpd/sf	840
4	6061 Sunset Boulevard[d]	Office	489,863 sf	0.12 gpd/sf	58,784
		Restaurant/Event Space	19,915 sf	30 gpd/seat	19,915
		Screening Room	14,256 sf	0.025 gpd/sf	356
5	1360 Vine Street[e]	Residential (Residential Option)	429 du	190 gpd/sf	81,510
		Grocery Store (Residential Option)	44,000 sf	0.025 gpd/sf	1,100
		Retail (Residential Option)	5,000 sf	0.025 gpd/sf	125
		Reuse of Bungalows as restaurant units (Residential Option)	600 seats	30 gpd/seat	18,000
		Reuse of Bungalows as residential units (Residential Option)	12 du	150 gpd/du	1,800
6	6407 Sunset Boulevard	Hotel	275 rm	120 gpd/rm	33,000
		Retail	1,900 sf	0.025 gpd/sf	48
7	6100 Hollywood Boulevard	Apartments	220 du	190 gpd/sf	41,800
		Retail	3,270 sf	0.025 gpd/sf	82
8	1546 Argyle Avenue[f]	Apartments	276 du	190 gpd/du	52,440
		Retail (Option 2)	27,000 sf	0.025 gpd/sf	675
9	6200 Yucca Street	Apartments	269 du	190 gpd/sf	51,110
		Retail	7,760 sf	0.025 gpd/sf	194

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Wastewater Generation (gpd)
10	1720 Vine Street	Apartments	872 du	190 gpd/du	165,680
		Senior Affordable Units	133 du	190 gpd/du	25,270
		Commercial	30,176 sf	0.05 gpd/sf	1,509
11	6360 Hollywood Boulevard	Hotel	57 rm	120 gpd/sf	6,840
12	1400 Vine Street	Apartments	198 du	190 gpd/sf	37,620
		Retail	16,000 sf	0.025 gpd/sf	400
13	6007 West Sunset Boulevard[g]	Apartments	109 du	190 gpd/sf	20,710
		Other	14,657 sf	0.025 gpd/sf	366
14	1725 North Bronson Avenue	Apartments	129 du	190 gpd/sf	24,510
15	6266 West Sunset Boulevard	Apartments	153 du	190 gpd/sf	29,070
		Retail	13,026 sf	0.025 gpd/sf	326
Related Total Wastewater Generation					**836,923**
Project Net Wastewater Generation					**206,538**
Related + Project Total					**1,043,461**

du = dwelling units

gpd = gallons per day

per = persons

rm = rooms

sf = square feet

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

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

[c] *The "Office Building" rate of 120 gallons per day/1,000 square feet was used for the proposed production support uses, soundstages, and mill space. LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

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

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

[d] *The "Retail Area (less than 100,000 sf)" rate of 25 gallons per day / 1,000 square feet was used for the proposed screening room. LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

[e] *For a conservative analysis, only the water demand for the Residential Option is included as it is greater than the water demand for the Office Option.*

[f] *For a conservative analysis, only the water demand for Option 2 is included as it is greater than the water demand for Option 1.*

[g] *The "Retail Area (less than 100,000 sf)" rate of 25 gallons per day / 1,000 square feet was used for the uses designated as "other". LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

Source: Eyestone Environmental, 2024.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related to wastewater conveyance and 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.