IV. Environmental Impact Analysis

O.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 Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Report) prepared for the Project by KPFF Consulting Engineers, and 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 (LAMC Section 64.15)
- Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1)
- Bureau of Engineering Special Order No. SO 06-0691

(1) State

(a) California Green Building Standards Code

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

(b) Los Angeles Integrated Resources Plan

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

The Final IRP 5-Year Review was released in June 2012, which included 12 projects that were separated into two categories: (1) "Go Projects" for immediate implementation and

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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.*

(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, Final Draft, April 2018.*

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

(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.

Los Angeles Municipal Code (LAMC) Chapter IX, Article 9, the Los Angeles 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 Los Angeles Green Building Code was subsequently amended to incorporate various provisions of the CALGreen Code. The Los Angeles Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the second and third of which apply to the 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),[8] effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

(iii) Sewer Capacity Availability Review

The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate

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

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

10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

(iv) Sewerage Facilities Charge

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

(v) Bureau of Engineering Special Order

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

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with 1,179,110 square feet of studio-related uses, including 359,730 square feet of sound stages; 255,510 square feet of production support; 450,060 square feet of production office; and 113,810 square feet of general office.

[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.*

Existing wastewater generation at the Project Site was calculated based on LADWP's water demand estimates presented in the Water Supply Assessment (WSA) prepared for the Project. Specifically, since LADWP estimates water demand using land use-based wastewater generation rates from LA Sanitation & Environment (LASAN), water demand and wastewater generation are generally assumed to be equal for purposes of this analysis. Accordingly, the total average daily wastewater flow associated with the existing uses to be removed as part of the Project is estimated to be 18,284 gallons per day (gpd), as shown in Table IV.O.2-2 on page IV.O.2-14, in the analysis below.

(2) Wastewater Infrastructure

The sanitary sewer system serving the Project Site and vicinity is owned and operated by the City. 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.[10]

The Project Site currently has a sewer wye (i.e., a plumbing connection shaped like a "Y") in Radford Avenue and the public alley south of the Project Site. A public sewer also traverses the Project Site in the North Lot through an easement east of Woodbridge Street. As described in Table 1.2 of the Utility Report, existing sewer lines serving the Project Site include an existing 8-inch vitrified clay pipe (VCP) line in Radford Avenue north of Woodbridge Street and an 8-inch VCP line in Radford Avenue south of Woodbridge Street that both connect to a 57-inch concrete sewer main in Radford Avenue/Woodbridge Street. The Project Site is also served by a 10-inch VCP line in Radford Avenue that connects to Guerin Street and an 8-inch concrete line in the public alley. The flows originating from the Project Site are collected and conveyed through 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 Sanitary Sewer System and the Terminal Island Service Area.[11] The Hyperion Sanitary Sewer System includes 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 May 1, 2024.*

[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 May 1, 2024.*

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 Sanitary Sewer System and is served by the HWRP.

(a) Hyperion Sanitary Sewer System

As shown in Table IV.O.2-1 on page IV.O.2-8, the existing design capacity of the Hyperion Sanitary Sewer System is approximately 550 mgd consisting of 450 mgd at the HWRP, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant. Based on the One Water LA 2040 Plan—Wastewater Facilities Plan, the average wastewater flow rate in the Hyperion Sanitary Sewer System was 314 mgd in 2016, consisting of 250 mgd at the HWRP, 47 mgd at the Donald C. Tillman Water Reclamation Plant, and 17 mgd at the Los Angeles—Glendale Water Reclamation Plant.[14] The One Water LA 2040 Plan—Wastewater Facilities Plan projects that annual average wastewater flows in the Hyperion Sanitary Sewer System will increase to 348 mgd in 2030 and 358 in 2040. As such, current and projected flows are below the design capacity of approximately 550 mgd for the Hyperion Sanitary Sewer System.

(b) Hyperion Water Reclamation Plant

As discussed above, wastewater generated from the Project Site is conveyed via the local collector sanitary sewer system directly to the HWRP for treatment. As shown in Table IV.O.2-1, the HWRP has the capacity to treat approximately 450 mgd of wastewater for full secondary treatment.[15] Based on One Water LA, the HWRP is estimated to currently treat 263.6 mgd.[16] As such, the HWRP is currently operating at approximately 59 percent of its capacity with a remaining available capacity of approximately 186.4 mgd. Therefore, the current flows to the HWRP are well below its design capacity of approximately 450 mgd.

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[12] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed May 1, 2024.*

[13] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed May 1, 2024.*

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

[15] *LASAN, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=ezplbkvkn_159&_afrLoop=18041533112304852#!, accessed May 7, 2024.*

[16] *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 HWRP for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2024 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 4] + 256 = 263.6 mgd.*

Table IV.O.2-1
Existing Capacity within the Hyperion Sanitary Sewer System

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

mgd = million gallons per day

[a] *Publicly available data on the treatment capacity of the Los Angeles—Glendale Water Reclamation Plant states the Plant's capacity is both 20 mgd and 80 mgd. In order to provide a conservative analysis, the lowest published number is used in this analysis.*

Source: LASAN, Treatment Process, https://sanitation.lacity.gov/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=d5m08neu4_78&_afrLoop=3774714768063932#!, accessed December 19, 2024; LASAN, Donald C. Tillman Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=hbj4dbu8e_82&_afrLoop=6456378016053351#!, accessed May 7, 2024; LASAN, Los Angeles-Glendale Water Reclamation Plant Brochure, April 2019.

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.[17] These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.[18] The treated water from the HWRP is discharged through a 5-mile outfall pipe at a depth of 190 feet into the Santa Monica Bay and Pacific Ocean.[19] The discharge from the HWRP into the Santa Monica Bay is regulated by the HWRP's National Pollution Discharge Elimination System (NPDES) Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a

[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=s0mxg9mov_772&_afrLoop=10868549010994331#!, accessed May 1, 2024.*

[18] *LASAN, Treatment Process, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-tp?_adf.ctrl-state=6jxqihq40_254&_afrLoop=5327479722838415#!, accessed May 1, 2024.*

[19] *LASAN, Hyperion Virtual Tour, Hyperion Treatment Plant Tour, Ocean Outfall into the Bay, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp/s-lsh-au-h?_adf.ctrl-state=ljvz6q49_596&_afrLoop=8243477885026291#!, accessed May 1, 2024.*

recreational beneficial use.[20] Accordingly, the HWRP's effluent that is released to the Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. LASAN also monitors flows into the Santa Monica Bay.[21]

3. Project Impacts

a. Thresholds of Significance

In accordance with 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;***[22] ***or***

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

In assessing impacts related to wastewater in this section, the City used Appendix G as the thresholds of significance. The factors identified below from the *L.A. CEQA Thresholds Guide* were used where applicable and relevant to assist in analyzing the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following factors to evaluate wastewater impacts:

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

[21] *LASAN, Environmental Monitoring, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-em?_adf.ctrl-state=ljvz6q49_793&_afrLoop=8243608662499891#!, accessed May 1, 2024.*

[22] *Refer to Section IV.O.1, Utilities and Service Systems—Water, of this Draft EIR, for a discussion of water impacts; Section IV.O.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of this Draft EIR, for a discussion of electric power and natural gas impacts; Section VI, Other CEQA Considerations, of this Draft EIR, 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 would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.[23]

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Utility Report, included as Appendix M of this Draft EIR; a SCAR prepared for the Project by LASAN and included as Exhibit 3 of the Utility Report; and the Project water demand estimates in LADWP's WSA, included in its entirety in Appendix Q of this Draft EIR. As previously discussed, the existing wastewater generation for the Project Site was calculated based on LADWP's water demand estimates as part of the WSA prepared for the Project. Since LADWP estimates water demand using land use–based wastewater generation rates from LASAN, projected water demand and wastewater generation are generally assumed to be equal for the purposes of this analysis (except for landscape irrigation, cooling towers, and where otherwise noted below). Per the WSA, the existing water usage associated with floor area to be removed as part of the Project was estimated by applying a ratio of the demolished area to the average of the five-year water billing record from October 2018 to September 2023. This same assumption was used for wastewater. 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 are based on information provided by LASAN and included in the Utility Report.

To evaluate potential impacts relative to wastewater treatment capacity, this analysis evaluates whether adequate treatment capacity within the HWRP would be available to accommodate the Project based on the estimate of the Project's wastewater generation and data from LASAN. For the assessment of cumulative impacts on wastewater treatment, the projected cumulative wastewater generation is compared to the estimated available capacity of the Hyperion Sanitary Sewer System.

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

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.O.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?[24]

(1) Impact Analysis

(a) Construction

With respect to wastewater generation during construction, as discussed in the Utility Report, wastewater generation would occur incrementally throughout construction of the Project as a result of construction workers on-site. Temporary facilities for construction workers, such as portable toilets and hand wash areas, would be provided by the construction contractor. Wastewater 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 public sewer system that serves the Project Site. In addition, any wastewater generated during construction would be less than the wastewater anticipated to be generated by the Project during operation, which, as evaluated below, can be accommodated by the existing infrastructure. Therefore, while the wastewater hauled off-site would eventually be deposited at the HWRP, the amount generated during construction activities would be a fraction of what is currently generated by the existing uses to be removed. 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.

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[24] *Refer to Section IV.O.1, Utilities and Service Systems—Water, of this Draft EIR for a discussion of water impacts; Section IV.O.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications 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 Section IV.I, Hydrology and Water Quality, of this Draft EIR for a discussion of stormwater impacts.*

The Project would also require the installation of new sewer line connections to connect the proposed structures to the off-site public sewer mains in the streets surrounding the Project Site, as well as on-site sewer infrastructure. The new sewer infrastructure 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 lines below the surface to connect 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), who 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.M, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic effects that might result from trenching and installation of new sewer infrastructure. The Construction Traffic Management Plan would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction period. In addition, installation of required sewer infrastructure 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 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.

Refer also to the construction analyses in other sections of this Draft EIR (e.g., Sections IV.B, Air Quality, and IV.K, Noise) regarding potential impacts associated with construction of the proposed wastewater infrastructure improvements.

(b) Operation

As described in Section II, Project Description, of this Draft EIR, the Project would establish the Radford Studio Center Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 55-acre Project Site. The Specific Plan would establish standards to regulate land use, massing, design, and development and permit up to 2,200,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated ingress/egress, circulation, parking, landscaping, and open space improvements. The Specific Plan would provide limited development flexibility by allowing for exchanges between certain categories

of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, floor area from any permitted land use category may be exchanged for additional sound stage and production support uses as long as the limitations set forth in the Specific Plan are met. In particular, the maximum sound stage or production support floor area cannot exceed 575,000 square feet each, and the total permitted floor area cannot exceed 2,200,000 square feet. For more information about the land use exchange component of the Specific Plan, see Section IV.J, Land Use and Planning, of this Draft EIR.

As discussed above, the Utility Report evaluated wastewater generation based on rates used in the WSA that was adopted by the LADWP Board. As shown in Table IV.O.2-2 on page IV.O.2-14, the proposed uses would generate approximately 504,604 gpd of wastewater. In addition, when accounting for existing uses to be removed, the Project would generate a net increase of approximately 486,320 gpd of wastewater when compared with existing conditions. These calculations conservatively do not account for the Project's estimated water savings committed to by the Applicant of approximately 791 gpd (refer to Project Design Feature WAT-PDF-1 in Section IV.M.1 Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR).

With regard to the permitted land use exchange for additional sound stage and production support uses, such potential exchanges would result in a reduction in wastewater generation. Specifically, as shown in Table IV.O.2-2, sound stages and production support uses have a lower rate of wastewater generation per square foot than the other permitted uses (i.e., general office, production office, and retail uses). As the proposed development program (refer to Table II-1 in Section II, Project Description) that is evaluated in Table IV.O.2-2 results in the greatest amount of wastewater, additional analysis of the potential land use exchanges is not required.

It is anticipated that the Project would involve multiple connections to the public sewer system. During the course of design and permitting, the exact locations of the points of connection would be determined. As shown in the Utility Report, it anticipated that, for the North Lot, one percent of the wastewater generated by the proposed uses (5,046 gpd) would discharge into the 8-inch sewer main in Radford Avenue north of the Woodbridge Street easement and another one percent (5,046 gpd) would discharge into the 8-inch sewer main in Radford Avenue south of the Woodbridge Street easement. For the South Lot, two scenarios were analyzed for the remainder of the flow (494,512 gpd): (1) 98 percent of the flow to the 10-inch sewer in Radford Avenue that connects to Guerin Street and (2) 76 percent of the flow to the 10-inch sewer in Radford Avenue that connects to Guerin Street and 22 percent of the flow to the 8-inch main in the public alley. The approved SCAR included in the Utility Report confirms that the existing sewer mains have sufficient capacity to accommodate these flows, and the response to the Wastewater Service Information (WWSI) also includes data to support this conclusion. As such, the Project would not result

Table IV.O.2-2
Estimated Wastewater Generation

Land Use	Quantity/ Floor Area	Sewer Generation Rate (gpd/unit)[a]	Demand (gpd)
Existing to Be Removed			
Sound Stage	136,310 sf		
Production Support	170,370 sf		
Production Office	297,110 sf		
General Office[b]	42,330 sf		
Total Existing Generation to be Removed[b]			***18,824***
Proposed New Construction			
Sound Stage	226,580 sf	0.05	11,329
Production Support	214,860 sf	0.05	10,743
Production Office	572,050 sf	0.17[f]	97,249
General Office[b]	628,520 sf	0.17[f]	106,848
Retail/Restaurant[d]	833 seats	30.00	24,990
Mobility Hub(s)[e]	54,200 sf	0.05	2,710
Covered Parking[g]	1,736,730 sf	0.02	34,735
Sewer Ejector[h]			216,000
Wastewater Generation Proposed Uses			*504,604*
Less Existing to be Removed			(18,284)
Net Additional Wastewater Generation			**486,320**

sf = square feet

gpd = gallons per day

[a] *The average daily flow based on 100% of City of Los Angeles sewerage generation factors.*

[b] *The WSA and Utility Report analyze creative office. However, the same demand rate is used regardless of the specific office use.*

[c] *Per the WSA, the existing water usage associated with floor area to be removed as part of the Project was estimated by applying a ratio of the demolished area to the average of the five-year water billing record from October 2018 to September 2023. This same number was conservatively used for the wastewater analysis.*

[d] *Conservatively assumes 1 seat per 30 sf, or 833 seats per 25,000 sf. Retail/Restaurant is assumed to be 100% Restaurant for a conservative water demand estimate.*

[e] *Mobility Hub areas are not included in the total floor area.*

[f] *LASAN uses a factor of 170 gpd to account for the cooling towers.*

[g] *The WSA assumes cleaning of parking areas 12 times per year with a total daily average of 1,142 gpd. The SCAR provides a more conservative factor of 0.02 gpd per sf.*

[h] *Estimated required sewer ejector pump discharge from areas that cannot connect to the City sewer mains by gravity.*

Source: KPFF, Utility Technical Report for Radford Studio Center Project, January 2025. Refer to Appendix M of this Draft EIR.

in a demand for new off-site wastewater infrastructure other than the new connections to the existing sewer lines. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and a 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. Thus, potential impacts associated with the need for new or expanded sewer lines would be less than significant.

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 the current average wastewater flows are estimated to be 263.6 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 186.4 mgd. As shown in Table IV.O.2-2 on page IV.O.2-14, the Project could generate a net increase of approximately 486,320 gpd of wastewater over existing conditions or approximately 0.49 mgd. The Project's increase in average daily wastewater flow of approximately 0.49 mgd would represent approximately 0.26 percent of the current estimated remaining available capacity of 186.4 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 and the need for new or expanded wastewater treatment facilities would be less than significant.

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.O.2-2 on page IV.O.2-14, the Project would generate a net increase in wastewater flow from the Project Site of approximately 486,320 gpd or approximately 0.49 mgd. The Project's increase in average daily wastewater flow of 0.49 mgd would represent approximately 0.28 percent of the current estimated remaining available capacity of 186.4 mgd at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP.

Various factors, such as future development of new treatment plants, upgrades and improvements to existing treatment capacity, and development of new technologies, would ultimately determine the available capacity of the Hyperion Sanitary Sewer System in 2028, the year by which construction of the Project is expected to be completed. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2028. Thus, based on this conservative assumption, the 2028 effective capacity of the Hyperion Sanitary Sewer System would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2028 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2028, the earliest Project buildout year, would be approximately 271.2 mgd.[25] Accordingly, the future remaining available capacity in 2028 would be approximately 178.8 mgd. The Project's increase in average daily wastewater flow of 0.49 mgd would represent approximately 0.27 percent[26] of the estimated future remaining available capacity of 178.8 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 0.49 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61 percent[27] of the HWRP's capacity of 450 mgd. Furthermore, as previously discussed, the WWSI 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.

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[25] *Los Angeles Department of Water and Power, One Water LA 2040 Plan-Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the HWRP for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2028 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 8] + 256 = 271.2 mgd.*

[26] *[(0.49 ÷ 178.8 mgd] x 100 = ~0.27%*

[27] *[(0.49 + 275 mgd) ÷ 450 mgd] x 100 = ~61%*

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.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable Project Design Features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, with a later buildout date, the results of the conservative analyses for wastewater generation completed for the Project would remain unchanged, as a long-term buildout scenario would not affect the maximum generation conditions evaluated above. While future years could generate greater service area demands, LASAN would continue to evaluate the need for infrastructure upgrades and expansion based on long-term growth and demand projections. Additionally, the One Water LA 2040 Plan—Wastewater Facilities Plan projects an available capacity of 92 mgd at the HWRP and 192 mgd in the broader Hyperion Sanitary Sewer System in 2040, which would provide more than sufficient capacity to accommodate the Project in the future. As such, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis of 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 of wastewater treatment facilities is the Hyperion Sanitary Sewer System. The Project, in conjunction with the related projects and growth forecasted in the Hyperion Sanitary Sewer System through 2028 (i.e., the Project's earliest buildout year), would generate wastewater, requiring conveyance and treatment.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth associated with the 13 related projects is a conservative assumption as some of the related projects may not be built out by 2028, 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 13 are fully built out by 2028.

(a) Wastewater Infrastructure

All 13 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 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 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 related projects in the LASAN service area would be required to comply with applicable water conservation programs, including the 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, cumulative impacts resulting from the Project and related projects related to the construction or expansion of wastewater infrastructure 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 Sanitary Sewer System. Forecasted growth from the related projects would generate an average daily wastewater flow of approximately 422,314 gpd or approximately 0.42 mgd, as shown in Table IV.O.2-3 on page IV.O.2-20. Combined with the Project's net increase in wastewater generation of approximately 486,320 gpd (0.49 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 908,634 gpd or 0.91 mgd.

Based on LASAN's average flow projections for the Hyperion Sanitary Sewer System, it is anticipated that the average flow in 2028 would be approximately 343 mgd.[28] In addition, the Hyperion Sanitary Sewer System's total treatment capacity is conservatively estimated to be approximately 550 mgd in 2028, which is the same as its existing capacity.

The Project and related projects' combined wastewater flow of approximately 0.91 mgd and the forecasted 2028 wastewater flow of 343 mgd for the Hyperion Sanitary Sewer System would result in a total wastewater flow of approximately 343.91 mgd. Based on the Hyperion Sanitary Sewer System's estimated future capacity of approximately 550 mgd, the sanitary sewer system is expected to have adequate capacity to accommodate the wastewater flow of approximately resulting from the Project, related projects, and forecasted growth through 2028. The 0.91 mgd of combined wastewater flows associated with the related projects plus the Project would represent approximately 0.17 percent of the Hyperion Sanitary Sewer System's existing design capacity of 550 mgd.

Therefore, cumulative impacts related to wastewater treatment resulting from the Project and related projects would be less than significant.

[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 Sanitary Sewer System (which is comprised of the HWRP, 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 2028 value is extrapolated from 2020 and 2030 values: [(348 mgd – 323 mgd) ÷ 10) * 8] + 323 = 343 mgd.*

Table IV.O.2-3
Cumulative Wastewater Generation

No.	Project Name	Project Location	Description	Size	Generation Factor (gpd)[a]	Total Wastewater Generation (gpd)
1.	Mixed Use	4021 Radford Ave.	Residential, Including 6 Affordable Units	54 du	190/du	10,260
			Commercial	3,474 sf	0.025/sf	87
2.	Mixed Use	11611 Ventura Blvd.	Assisted Living	140 du	190/du	26,600
			Senior Independent Living	62 du	190/du	11,780
3.	Commercial	11601 Ventura Blvd.	Commercial	10,568 sf	0.025/sf	264
4.	Studio City Crossing Market/Retail	11265 Ventura Blvd.	Supermarket	37,079 sf	0.025/sf	927
			Retail	1,581 sf	0.025/sf	40
5.	Condominium	11331 Ventura Blvd.	Condominiums	62 du	190/du	11,780
6.	Mixed-Use	12548 Ventura Blvd.	Residential	28 du	190/du	5,320
			Restaurant	Approx. 1105 seats	30/seat	33,150
7.	Apartments	11433 Albers St.	Residential	62 du	190/du	11,780
			Retail	10,747 sf	0.025/sf	269
			Commercial	5,100 sf	0.025/sf	128
8.	Mixed-Use	12582 Ventura Blvd.	Residential	34 du	190/du	6,460
			Commercial	5,100 sf	0.025/sf	128
9.	Harvard-Westlake River Park Project	4141 Whitsett Ave.	17.2 acre Recreational and Sports Facility	N/A	N/A	191,923[b]
10.	Mixed-Use	11311 Camarillo St.	Residential, Including 6 Affordable Units	60 du	190/du	11,400
			Retail	2,826 sf	0.025/sf	71
11.	Sportsmen's Lodge	12833 Ventura Blvd.	Residential, Including 78 Affordable Units	520	190/du	98,800
			Commercial	45,945 sf	0.025	1,149

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

No.	Project Name	Project Location	Description	Size	Generation Factor (gpd)[a]	Total Wastewater Generation (gpd)
12	BOE Bikeway and Greenway River Improvements	N/A	Pedestrian and Bicycle Improvements and BMPs along LA River/Tujunga Wash	N/A	N/A	N/A
13	DWP Trunkline South	N/A	Pump Station and Water Pipe	N/A	N/A	N/A
Total Related Projects						**422,314**
Total Project						**486,320**
Total Related Projects + Project						**908,634**

du = dwelling unit

gpd = gallons per day

sf = square feet

[a] *LASAN wastewater generation rates (2012).*

[b] *Total wastewater generation is based on the City of Los Angeles, Harvard-Westlake River Park Project Draft Environmental Impact Report, dated March 2022, and includes removal of the existing uses and implementation of the applicable mitigation measures.*

Source: Eyestone Environmental, 2025.

(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.