IV. Environmental Impact Analysis

N.2 Utilities and Service Systems—Wastewater

1. Introduction

This section of the Draft EIR analyzes the potential impacts of the Project with regard to the existing wastewater infrastructure and wastewater treatment facilities that serve the Project Site. The analysis describes the existing wastewater system (including local and regional conveyance and treatment facilities), calculates the wastewater to be generated by the Project, and evaluates whether sufficient capacity would be available to meet the Project's estimated wastewater generation. The analysis is based, in part, on the *1111 Sunset Utility Technical Report: Water, Wastewater, and Energy* (Utility Report), dated February 2021, which was prepared by KPFF Consulting Engineers and included in Appendix S.2 of this Draft EIR, as well as the Water Supply Assessment (WSA) prepared for the Project by the Los Angeles Department of Water and Power (LADWP) in February 2019 and included as Appendix S.1 of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

The California Green Building Standards Code, commonly referred to as the CALGreen Code, is set forth in California Code of Regulations Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all water closets (i.e., flush toilets) are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush (or 0.125 gallon per flush for wall-mounted urinals). In addition, maximum flow rates for faucets are established at: 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads; 1.2 gpm at 60 psi for residential lavatory faucets and 0.5 gpm at 60 psi for nonresidential lavatory faucets; and 1.8 gpm at 60 psi for kitchen faucets.

(2) Local

(a) City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework guides the update of the community plan and Citywide elements, thereby providing a Citywide strategy for long-term growth. As such, it addresses state and federal mandates to plan for the future. Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework identifies goals, objectives, and policies for utilities in the City. Goal 9A of Chapter 9 is to provide for adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

(b) City of Los Angeles Integrated Resources Plan

The City of Los Angeles Integrated Resources Plan (City's IRP) addresses the facility needs of the City's wastewater program, recycled water, and urban runoff/ stormwater management through the year 2020.[1] The City's IRP preparation process began in 1999 in two phases. Phase I of the City's IRP addressed the anticipated water, wastewater, and stormwater needs of the City through the year 2020 using comprehensive, basin-wide water resources planning. During this initial phase, which took place from 1999 to 2001, gaps in the existing water system's capability to serve future populations, as projected by the Southern California Association of Governments (SCAG), were examined and different Preliminary Alternatives to address these gaps were created. Phase II of the City's IRP, which took place from 2002 to 2006, involved the selection and comparison of four Preliminary Alternatives all aimed at ensuring implementation of the appropriate infrastructure, policies, and programs to reliably serve Los Angeles to 2020 and beyond. Within Phase II of the City's IRP, a Financial Plan, a Public Outreach Program, and a five-volume Facilities Plan were also developed. The Facilities Plan contains alternative development options and a Capital Improvement Program, as well as wastewater, water, and runoff management strategies. The Capital Improvement Program provides anticipated capital, operation, maintenance, project timing, and implementation strategies for tracking and monitoring triggers.[2]

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[1] *The IRP replaced the City's 1991 Wastewater Facilities Plan.*

[2] *City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, Water Integrated Resources Plan 5-Year Review FINAL Documents, June 2012; City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, City of Los Angeles Integrated Resources Plan Summary Report, December 2006; City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, City of Los Angeles Integrated Resources Plan: Planning for Wastewater, Recycled Water and Storm Water Management: A Visionary Strategy for the Right Facilities, in the Right Place, at the Right Time, Executive Summary, December 2006.*

The Los Angeles City Council certified the IRP Final Environmental Impact Report (EIR) prepared within Phase II on November 14, 2006, and adopted a final alternative, the Approved Alternative (Alternative 4), from the four Preliminary Alternatives. The City's Final IRP 5-Year Review was released in June 2012. According to the City's Final IRP 5-Year Review, Alternative 4 included 12 projects that were separated into two categories: (1) "Go Projects" for immediate implementation; and (2) "Go-If Triggered Projects" for implementation in the future once a trigger is reached.[3] Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the City's 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 City's 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 City's IRP EIR was certified.

Since the implementation of the City's 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 City's 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.

As discussed above, the City's IRP addressed the anticipated water, wastewater, and stormwater needs of the City through the year 2020. As 2020 approaches, the City has developed the One Water LA 2040 Plan, which builds on the premise of the City's IRP as a collaborative approach to develop an integrated framework for managing the City's water resources, watersheds, and water facilities in an environmentally, economically, and socially beneficial manner.[4] As with the City's IRP, such efforts would be organized in phases. Phase I of the One Water Los Angeles 2040 Plan includes developing initial planning baselines and guiding principles for water management and citywide facilities planning in coordination with City departments, other agencies, and stakeholders, and was completed in 2015. Phase II includes development of technical studies and an updated facilities plan for stormwater and wastewater. The Final One Water LA 2040 Plan was

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

[4] *LASAN, About One Water Los Angeles, CA www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla/s-lsh-es-owla-au?_adf.ctrl-state=le24zdn44_5&_afrLoop=8232048882336511#!, accessed February 17, 2021.*

completed in April 2018. A year-long Programmatic Environmental Impact Report process began in 2019.[5]

(c) Sewer System Management Plan

On May 2, 2006, the State Water Resources Control Board adopted the Statewide General Waste Discharge Requirements for publicly owned sanitary sewer systems greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in California. Under the Statewide General Waste Discharge Requirements, the owners of such systems must comply with the following requirements: (1) acquire an online account from the State Water Board and report all sanitary sewer overflows online; and (2) develop and implement a written plan referred to as a Sewer System Management Plan to control and mitigate sanitary sewer overflows and make it available to any member of the public upon request in writing.

In accordance with the Statewide General Waste Discharge Requirements, the City of Los Angeles acquired online accounts from the State Water Board and began reporting sanitary sewer overflows by the due date of January 2, 2007. The City's original Sewer System Management Plan was adopted by the City's Board of Public Works and certified with the State Water Resources Control Board on February 18, 2009.[6] The City's Sewer System Management Plans were last updated in January 2019 upon completion of a biennial audit, which confirmed the City's Sewer System Management Plans are in full compliance with the Statewide General Waste Discharge Requirements and are effective.[7]

The goal of the Sewer System Management Plan for the Hyperion Service Area, in which the Project Site is located (as discussed below), is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system.[8] In addition, the Sewer System Management Plan will help to reduce and prevent sanitary sewer overflows as well as mitigate any sanitary sewer overflows that do occur.

(d) City of Los Angeles Municipal Code

Los Angeles Municipal Code (LAMC) Sections 64.11 and 64.12 require approval of a sewer permit prior to connection to the sewer system. New connections to the sewer

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[5] *LASAN, One Water LA Plan, Plan Development, www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla/s-lsh-es-owla-au/s-lsh-es-owla-au-aowla-pd?_adf.ctrl-state=z9jk0jw1s_58&_afrLoop=4815983545377571#!, accessed February 17, 2021.*

[6] *LASAN, Sewer System Management Plan: Hyperion Sanitary Sewer System, January 2019.*

[7] *LASAN, Sewer System Management Plan: Hyperion Sanitary Sewer System, January 2019.*

[8] *LASAN, Sewer System Management Plan: Hyperion Sanitary Sewer System, January 2019.*

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 strength for each applicable project is based on City guidelines for the average wastewater concentrations of biological oxygen demand and suspended solids, for each type of land use. Fees paid to the Sewerage Facilities Charge 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.

Section 64.15 of the LAMC requires that the City perform a Sewer Capacity Availability Review when: (1) a sewer permit is required to connect to the City's sewer collection system; (2) additional discharge is proposed into an existing public sewer connection; or (3) a future sewer connection or future development is proposed that would generate 10,000 gallons or more of sewage per day. A Sewer Capacity Availability Review determines if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

In addition, the City of Los Angeles Bureau of Engineering Special Order No. SO06-0691 sets forth design criteria for sewer systems requiring hat trunk, interceptor, outfall, and relief sewers (i.e. sewers that are 18 inches or greater in diameter) be designed for a planning period of 60 to 100 years, and lateral sewers (sewers that are less than 18 inches in diameter) be designed for a planning period of 100 years. The order also requires that sewers be designed so that the peak dry weather flow depth, during their planning period, shall not exceed 50 percent of the pipe diameter.

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, a portion of the Project Site is currently developed with the Elysian apartment building, and four vacant structures, most recently used as church facilities. The Project Site also includes surface parking and circulation areas generally located on the eastern half of the Project Site. While the Elysian apartment building is located within the Project Site, it is not part of the Project and it would remain on the Project Site. As such, the wastewater generation from the Elysian apartment building is not considered in this analysis. In addition, as the remaining structures on the Project Site are vacant, there is no wastewater generation associated with those structures.

(2) Wastewater Infrastructure

Sanitary sewer service to and from the Project area is owned and operated by the City of Los Angeles. The existing wastewater collection system includes more than 6,700 miles of public sewers, which serves a population of more than four million people and conveys approximately 400 million gallons per day (mgd) to the City's four wastewater treatment and water reclamation plants.[9]

As described in the Utility Report, there is an existing 8-inch vitrified clay pipe sewer main within Sunset Boulevard and an additional sewer main within White Knoll Drive. Wastewater flows from the Sunset Boulevard sewer main also flow downward to an 8-inch sewer main on Beaudry Avenue. As provided in the Utility Report, based on the City's sewer wye maps, there are 13 sewer wyes[10] on Sunset Boulevard and eight sewer wyes with one lateral on Alpine Street/White Knoll Drive. 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 of wastewater treatment facilities in the City. The main purpose of these treatment facilities is to remove potential pollutants from sewage in order to protect river and marine environments and public health. LASAN divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.[11] The Hyperion Service Area is serviced by the Hyperion Sanitary Sewer System, which consists of the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant.[12] The Terminal Island Service Area is served by the Terminal Island Treatment Plant.[13] The Project Site is located within the Hyperion Service Area.

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[9] *LASAN, Sewers, 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 February 17, 2021.*

[10] *A wye is a fitting with three openings which allows one pipe to be joined to another.*

[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 February 17, 2021.*

[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 February 17, 2021.*

[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 February 17, 2021.*

(a) Hyperion Sanitary Sewer System

As shown in Table IV.N.2-1 on page IV.N.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 would increase to 323 mgd in 2020, 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.N.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.[15] As such, the HWRP is currently operating at approximately 61 percent of its capacity with a remaining available capacity of approximately 175 mgd.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.[16] The treated water from the HWRP is discharged through a

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

[15] *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 February 17, 2021.*

[16] *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 February 17, 2021.*

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

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

mgd = million gallons per day

Source: LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=ljvz6q49_5&_afrLoop=824194361318 7783#!; 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=8242 084065330158#!; 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 February 17, 2021.

5-mile outfall pipe at a depth of 190 feet into the Santa Monica Bay and Pacific Ocean.[17] 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.[18] 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.[19]

[17] *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 February 17, 2021.*

[18] *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.*

[19] *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 February 17, 2021.*

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;[20] ***or***

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

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

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

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- 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.[21]

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

[21] *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, the Wastewater Service Information (WWSI) included as an Appendix to the Utility Report, and the WSA included in Appendices S.2 and S.1 of this Draft EIR, respectively. The anticipated wastewater flows to be generated by the Project are based on 100 percent of the water demand calculated in the WSA since LADWP uses the City Department of Public Works, Bureau of Sanitation's (LASAN) wastewater generation rates to calculate water demand. Given 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 Hyperion Sanitary Sewer System would be available to accommodate the Project based on the estimate of the Project's wastewater generation and data from LASAN. For the assessment of cumulative impacts on wastewater treatment, the projected cumulative wastewater generation is compared to the estimated available capacity of the Hyperion Sanitary Sewer System.

c. Project Design Features

Project Design Feature WAS-PDF-1: The Project Applicant shall provide for the upsizing of the existing 8-inch sewer line on Beaudry Avenue, or equivalent infrastructure improvements determined by LA Sanitation, to ensure adequate capacity is available to serve the estimated sewer flows of the Project.

Project Design Feature WAS-PDF-2: During operation of the Project, the proposed swimming pools shall not be drained concurrently. In addition, the largest swimming pool shall be drained over a minimum span of two days.

The Project would also include water conservation features, which would also result in a reduction in wastewater. Such conservation features are included in Project Design Feature WAT-PDF-1, included in Section IV.N.1, Utilities and Service System—Water Supply and Infrastructure, of this Draft EIR.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. Both development scenarios are evaluated in the following analysis.

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?[22]

(1) Impact Analysis

(a) Construction

With respect to wastewater generation during construction, as set forth in the Utility Report, existing sewer laterals will be capped during construction and no sewage would enter the public sewer system (except for sewer services needed for the Elysian apartment building). Temporary facilities, such as portable toilet and hand wash areas, would be provided by the construction contractor. Any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Therefore, construction activities for the Project would not result in wastewater generation as construction workers would typically utilize portable restrooms and hand wash areas,

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

which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities. **Therefore, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project construction impacts to the wastewater conveyance or treatment system would be less than significant.**

(b) Operation

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

As described above, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario.

The Mixed Use Development Scenario would include:

- Up to 737 residential units;
- Up to 180 hotel rooms;
- Up to 48,000 square feet of office space; and
- Up to 95,000 square feet of general commercial floor area.

The No-Hotel Development Scenario would include:

- Up to 827 residential units;
- Up to 48,000 square feet of office space; and
- Up to 95,000 square feet of general commercial floor area.

A WWSI (see Exhibit 2 of Appendix S.2 of this Draft EIR) was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. In preparing the WWSI, 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. While the Water Supply Assessment prepared for the Project states that there will be at most 224,374 gpd sewer demand[23] (under the Mixed Use Development Scenario) for the Project, the WWSI analyzed a maximum flow of 367,414 gpd due to a conservative assumption that the Project's largest pool would be discharged to the sewer system over a one day span. Note that in accordance with Project Design Feature WAS-PDF-2, the largest pool would be drained over a minimum span of two days. Additionally, the WWSI conservatively does not account for the additional water conservation commitments committed to by the Applicant of approximately 80,000 gpd (refer to Project Design Feature WAT-PDF-1 in Section IV.N.1 Utilities and Service Systems—Wastewater).

As shown in Table IV.N.2-2 on page IV.N.2-14, when accounting for the water conservation commitments required by the Applicant (Project Design Feature WAT-PDF-1) and draining of the largest pool over a two-day span (Project Design Feature WAS-PDF-2), the Mixed Use Development would generate a net increase in wastewater flow from the Project Site of approximately 259,033 gpd, or approximately 0.26 mgd.[24] As shown in Table IV.N.2-3 on page IV.N.2-16, the No-Hotel Development Scenario would generate a net increase in wastewater flow from the Project Site of approximately 224,109 gpd, or 0.22 mgd.[25]

KPFF has determined that with implementation of Project Design Feature WAS-PDF-1, Project flows can be accommodated by the existing sewer infrastructure system. Specifically, as discussed in the Utility Report, the Project would install required sewer connections to the existing sewer mains on Sunset Boulevard and White Knoll Drive. As previously noted, the wastewater flows in the Sunset Boulevard sewer main travel downstream to the 8-inch sewer main on Beaudry Avenue. The existing capacity of the sewer mains on Sunset Boulevard and White Knoll Drive would have sufficient capacity to accommodate the Project's proposed wastewater flows. However, based on consultation with LA Sanitation, it has been determined that two existing 8-inch sewer lines along Beaudry Avenue (4941516849415183A and 4941518349415195A) have negligible additional capacity. As such, the Project would require construction of expanded sewer conveyance facilities. As provided above in Subsection 3.c, Project Design Features, the Project includes Project Design Feature WAS-PDF-1, which would require the upsizing of the existing 8-inch lines on Beaudry Avenue, or equivalent improvement, as determined by LA Sanitation, to ensure adequate sewer capacity is available in the vicinity of the Project Site to meet the requirements of the Project. Construction impacts associated with the new sewer connections and the expanded sewer line would primarily be confined to trenching

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[23] *LADWP, Water Supply Assessment—1111 Sunset Project, February 12, 2019.*

[24] *259,033 gpd ÷ 1,000,000 mgd = 0.2590 (~0.26 mgd)*

[25] *224,109 gpd ÷ 1,000,000 mgd = 0.2241 (~0.22 mgd)*

Table IV.N.2-2
Mixed Use Development Scenario: Estimated Wastewater Generation[a]

Land Use	No. of Units/ Floor Area	Sewer Generation Rate (gpd/unit)[b]	Demand (gpd)
Existing to Be Removed			
Vacant Buildings	114,600 sf	N/A	0
Total Existing[c]			***0***
Proposed			
Residential Units			
Residential: 1 bd	368 du	110	40,480
Residential: 2 bd	369 du	150	55,350
Base Demand Adjustment[d]			10,898
Total Residential Units	***737 du***		***106,728***
Residential Amenities			
Lobby	3,800 sf	0.05	190
Outdoor Deck, Patio, Lounge, etc.[e]	11,397 sf	0.05	570
Lounge	2,000 sf	0.05	100
Health Club	6,050 sf	0.65	3,933
Pool	3,303 sf		34,969[f]
Total Residential Amenities			***39,762***
Hotel			
Hotel Room	180 rm	120	21,600
Base Demand Adjustment[d]			1,956
Total Hotel			***23,556***
Hotel Amenities			
Lobby	1,800 sf	0.05	90
Full Service Restaurant[g]	1,333 seats	30	39,990
Meeting Space	4,200 sf	0.35	1,470
Pool	1,870 sf	—	176
Water Feature	2,044 sf	—	192
Total Hotel Amenities			***41,918***
Commercial			
Grocery	27,300 sf	0.05	1,365
Health Club/Spa	14,500 sf	0.65	9,425
Retail	8,200 sf	0.025	205
Full Service Restaurant[g]	1,667 seats	30	50,010
Office	48,000 sf	0.12	5,760
Water Feature	1,517 sf	—	142
Base Demand Adjustment[d]			249
Total Commercial			***67,156***
Landscaping[h]	***103,556 sf***	—	***9,673***
Covered Parking[i]	**686,860 sf**	**0.02**	**452**
Cooling Tower Total	**2,500 tons**	**21.06**	**52,650**
Subtotal Wastewater Generation			**341,896**

Table IV.N.2-2 (Continued)
Mixed Use Development Scenario: Estimated Wastewater Generation

Land Use	No. of Units/ Floor Area	Sewer Generation Rate (gpd/unit)[b]	Demand (gpd)
Less Required Ordinances Savings[j]			(71,493)
Proposed Wastewater Generation			**270,403**
Less Existing to be Removed			0
Less Additional Conservation[k]			(11,370)
Net Additional Wastewater Generation (Proposed – Existing – Additional Conservation)			**259,033**

du = dwelling units

bd = bedroom

sf = square feet

gpd = gallons per day

[a] *This scenario refers to the "Main Option" represented in the WSA Table 1-A.*

[b] *Based on 2012 LASAN Sewer Generation Rates.*

[c] *The existing vacant buildings have no wastewater generation.*

[d] *Base Demand Adjustment is the estimated savings due to Ordinance No. 180,822 accounted for in the current version of LASAN Sewer Generation Rates.*

[e] *The total area available is used to provide a conservative estimate and assumed to have a wastewater generation similar to lobby waiting area but may not have any.*

[f] *Per the WWSI dated January 6, 2021 (see Exhibit 2 of Appendix S.2 of this Draft EIR), the pool flow was noted to be 69,938 gpd. It was determined that the pool shall be drained in the span of two days instead of one day to minimize impact on existing sewer infrastructure, therefore the pool daily flow is reduced to 34,969 gpd. Refer to Project Design Feature WAS-PDF-2.*

[g] *Restaurant space is assumed to be all full-service restaurant and assumed to be equivalent to 15 sf per seat for a conservative estimate.*

[h] *Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance. The project's hydrozone plan will not be developed until the project enters more detailed design phase, upon full entitlements. General generic and estimated hydrozone areas are given in the WSA. Residential and non-residential landscape use is assumed to be a 50/50 split. Overhead spray is assumed as a conservative estimate.*

[i] *Auto parking water uses are based on LASAN Generation Rates table, and 12 times/year cleaning assumption.*

[j] *The proposed development would conform to City of Los Angeles Ordinance No. 184248, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen) 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code.*

[k] *Water conservation due to additional conservation commitments agreed to by the Applicant. Table II-C of the WSA provides a detailed breakdown of these conservation commitments and is included in Appendix S.1 of this Draft EIR. Also refer to Project Design Feature WAT-PDF-1.*

Source: LADWP, Water Supply Assessment—1111 Sunset Project, February 12, 2019.

Table IV.N.2-3
No-Hotel Development Scenario: Estimated Wastewater Generation[a]

Facility	No. of Units/ Floor Area	Sewer Generation Rate (gpd/unit)[b]	Demand (gpd)
Existing to Be Removed			
Vacant Buildings	114,600 sf	N/A	0
Total Existing[c]			***0***
Proposed			
Residential Units			
1-Bedroom Apartments	413 du	110	45,430
2-Bedroom Apartments	414 du	150	62,100
Base Demand Adjustment[d]			12,228
Total Residential Units	***827 du***		***119,758***
Residential Amenities			
Lobby	3,800 sf	0.05	190
Outdoor Deck, Patio, Lounge, etc.[e]	11,397 sf	0.05	570
Lounge	2,000 sf	0.05	100
Health Club	6,050 sf	0.65	3,933
Pool	3,303 sf	—	32,089[f]
Total Residential Amenities			***36,882***
Commercial			
Grocery	27,300 sf	0.05	1,365
Health Club/Spa	14,500 sf	0.65	9,425
Retail	18,200 sf	0.025	455
Full Service Restaurant[g]	2,333 seats	30	69,990
Office	48,000 sf	0.12	5,760
Water Feature	1,517 sf	—	142
Base Demand Adjustment[d]			249
Total Commercial			***67,157***
Landscaping[h]	**103,556 sf**	**—**	**9,673**
Parking[i]	**686,860 sf**	**20**	**452**
Cooling Tower Total	**2,500 tons**	**21.06 ton**	**52,650**
Subtotal Wastewater Generation			**306,801**
Less Required Ordinances Savings[j]			**(70,966)**
Proposed Wastewater Generation			**235,835**
Less Existing to be Removed			**0**
Less Additional Conservation[k]			**(11,726)**
Net Additional Wastewater Generation (Proposed – Existing – Additional Conservation)			**224,109**

Table IV.N.2-3 (Continued)
No-Hotel Development Scenario: Estimated Wastewater Generation

Facility	No. of Units/ Floor Area	Sewer Generation Rate (gpd/unit)[b]	Demand (gpd)

du = dwelling units

sf = square feet

gpd = gallons per day

[a] *This scenario generally refers to the "Option Set 1" represented in the WSA Table 1-B, included as Appendix S.1 of this Draft EIR. Note that this table has been updated to account for 95,000 square feet of commercial uses for the No-Hotel Development Scenario.*

[b] *Based on 2012 LASAN Sewer Generation Rates.*

[c] *The existing vacant buildings have no wastewater generation.*

[d] *Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.*

[e] *The total area available is used to provide a conservative estimate and assumed to have water use similar to lobby waiting area but may not have any.*

[f] *Per the WWSI dated January 6, 2021 (see Exhibit 2 of Appendix S.2 of this Draft EIR), the pool flow was noted to be 69,938* gpd*. It was determined that the pool shall be drained in the span of two days instead of one day to minimize impact on existing sewer infrastructure, therefore the pool daily flow is reduced to 34,969* gpd*. Refer to Project Design Feature WAS-PDF-2.*

[g] *Restaurant space is assumed to be all full-service restaurant and assumed to be equivalent to 15 sf/seat for a conservative water demand estimate. Each number was estimated using the proposed square footage and the factor of 1 seat/30 sf for the restaurant space.*

[h] *Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance. The project's hydrozone plan will not be developed until the project enters more detailed design phase, upon full entitlements. General generic and estimated hydrozone areas are given in the WSA. Residential and non-residential landscape use is assumed to be a 50/50 split. Overhead spray is assumed as a conservative estimate*

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

[j] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green.*

[k] *Water conservation due to additional conservation commitments agreed by the Owner, Palisades. Refer to Project Design Feature WAT-PDF-1.*

Source: LADWP, Water Supply Assessment—1111 Sunset Project, February 12, 2019.

for the placement of pipes. Installation of the new sewer connections and expanded line would occur on-site and off-site. Any off-site work that may affect services to the existing sewer line will be coordinated with the City of Los Angeles Bureau of Engineering (BOE), who will be able to provide for connection requirements, pipe depths, and connection location(s). In addition, as set forth in Project Design Feature TR-PDF-1 included in Section IV.L, Transportation, of this Draft EIR, a Construction Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control

measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways.

Based on the above, operation of the Project would not result in significant environmental effects associated with the construction of expanded wastewater facilities.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

As provided in Table IV.N.2-2 on page IV.N.2-14, the Mixed Use Development Scenario would generate a net increase in wastewater flow from the Project Site of approximately 259,033 gpd or 0.26 mgd.[26] The Mixed Use Development Scenario's increase in average daily wastewater flow of 0.26 mgd would represent approximately 0.15[27] percent of the current estimated 175 mgd of remaining available capacity at the HWRP. As shown in Table IV.N.2-3 on page IV.N.2-16, the No-Hotel Development Scenario would generate a net increase in wastewater flow from the Project Site of approximately 224,109 gpd or 0.22 mgd.[28] The No-Hotel Development Scenario's increase in average daily wastewater flow of 0.22 mgd would represent approximately 0.13 percent[29]

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[26] *259,033 gpd ÷ 1,000,000 mgd = 0.2590 (~0.26 mgd)*

[27] *259,033 gpd ÷ 175,000,000 mgd) x 100 = 0.1480 (~0.15%)*

[28] *224,109 gpd ÷ 1,000,000 mgd = 0.2241 (~0.22 mgd)*

[29] *224,109 gpd ÷ 175,000,000 mgd) x 100 = 0.1280 (~0.13%)*

of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the wastewater generated under both development scenarios would be accommodated by the existing capacity of the Hyperion Treatment Plant.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2028, 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 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 Project build-out year, would be approximately 271.2 mgd.[30] Accordingly, the future remaining available capacity in 2028 would be approximately 178.8 mgd. The Mixed Use Development Scenario's increase in average daily wastewater flow of 0.26 mgd would represent approximately 0.14 percent[31] of the estimated future remaining available capacity of 178.8 mgd at the HWRP. The No-Hotel Development Scenario's increase in average daily wastewater flow of 0.22 mgd would represent approximately 0.13 percent[32] of the estimated future remaining available capacity of 178.8 mgd at the HWRP. Therefore, wastewater generated under both development scenarios, during operation, would be accommodated by the future capacity of the HWRP.

Additionally, the Mixed Use Development Scenario's net increase in average daily wastewater generation of 0.26 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.2 percent[33] of the HWRP's capacity of 450 mgd. With regard to future flows, the Mixed Use Development Scenario's net increase of 0.26 mgd plus the projected flows of approximately 271.2 mgd to the HWRP would also represent approximately 60.3 percent[34] of the HWRP's assumed future

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30 *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 2028 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 8] + 256 = 271.2 mgd.*

31 *[(259,033 gpd ÷ 178.8 mgd] x 100 = ~14%*

32 *[(224,109 gpd ÷ 178.8 mgd] x 100 = ~13%*

33 *[(259,033 gpd + 275 mgd) ÷ 450 mgd] x 100 = ~61.2%*

34 *[(259,033 gpd + 271.2 mgd) ÷ 450 mgd] x 100 = ~60.3%*

capacity of 450 mgd. The No-Hotel Development Scenario's net increase in average daily wastewater generation of 0.22 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.2 percent[35] of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.22 mgd plus the projected flows of approximately 271.2 mgd to the HWRP would also represent approximately 60.3 percent[36] of the HWRP's assumed future capacity of 450 mgd.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis on the wastewater conveyance system is the area that includes the Project Site and the related projects that would potentially utilize the same infrastructure as the Project. The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. The Project, in conjunction with growth forecasted in the Hyperion Service Area through 2028 (i.e., the Project buildout year), would generate wastewater, potentially resulting in cumulative impacts on wastewater conveyance and treatment facilities. Cumulative growth in the greater Project area through 2028 includes specific known development projects, as well as general ambient growth projected to occur.

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[35] *[(224,109 gpd + 275 mgd) ÷ 450 mgd] x 100 = ~61.2%*

[36] *[(224,109 gpd + 271.2 mgd) ÷ 450 mgd] x 100 = ~60.3%*

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 89 is a conservative assumption, as some of the related projects may not be built out by 2028 (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 89 are fully built out by 2028, unless otherwise noted.

(a) Wastewater Infrastructure

As with the Project, new development projects occurring in the Project Site vicinity would be required to coordinate with LA Sanitation via a sewer capacity availability request to determine adequate sewer capacity. In addition, new development projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LA Sanitation to construct the necessary improvements, similar to the Project. 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. 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 right-of-ways. **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

Development of the Project, in conjunction with the related projects, would result in an increase in the demand for sanitary sewer service in the Hyperion Service Area. As identified in Section III, Environmental Setting, of this Draft EIR, there are 89 related projects located in the Project vicinity. Assuming that each of these related projects would connect to some or all of the City sewers serving the Project Site, forecasted growth from the related projects would generate an average daily wastewater flow of approximately 6,468,221 gpd or approximately 6.5 mgd, as shown in Table IV.N.2-4 on page IV.N.2-22. Combined with the Mixed Use Development Scenario's net increase in wastewater

Table IV.N.2-4
Cumulative Wastewater Generation

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
1	Bus Maintenance & Inspection Facility 454 E. Commercial St.	Bus Maintenance Facility (87,120 sf)	2 ac	0.050 gpd/sf	4,356
2	Tenten Wilshire Expansion (the Icon) 1027 W. Wilshire Blvd.	Condominium	402 du	190 gpd/du	76,380
		Retail	47,280 sf	0.025 gpd/sf	1,182
3	Da Vinci Apartments 327 N. Fremont Ave.	Apartment	600 du	190 gpd/du	114,000
		Retail	30,000 sf	0.025 gpd/sf	750
4	1101 North Main Condos 1101 N. Main St.	Condominium	316 du	190 gpd/du	60,040
5	5th & Olive (formerly Park Fifth Project) 437 S. Hill St.	Condominium	660 du	190 gpd/du	125,400
		Restaurant	16,309 sf	30 gpd/seat	16,309
6	Beverly + Lucas Project 1430 W. Beverly Blvd	Apartment	157 du	190 gpd/du	29,830
		Commercial	3,500 sf	0.025 gpd/sf	88
7	Wilshire Grand Project 900 W. Wilshire Bl.	Hotel	889 rm	120 gpd/rm	106,680
		Office	368,299 sf	0.12 gpd/sf	44,196
		Retail/Restaurant	34,765 sf	30 gpd/seat	34,765
		Ancillary Space[c]	46,170 sf	0.120 gpd/sf	5,540
8	Mixed Use 1435 W. 3rd St.	Apartment	122 du	190 gpd/du	23,180
		Retail	3,500 sf	0.025 gpd/sf	88

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
9	Grand Avenue Project 100 S. Grand Ave.	Condominium	968 du	190 gpd/du	183,920
		Apartment	242 du	190 gpd/du	45,980
		Hotel	225 rm	120 gpd/rm	27,000
		Retail	152,150 sf	0.050 gpd/sf	7,608
		Office	650,000 sf	0.12 gpd/sf	78,000
		Restaurant	52,000 sf	30 gpd/seat	52,000
		Supermarket	53,000 sf	0.025 gpd/sf	1,325
		Health Club	24,000 sf	0.65 gpd/sf	15,600
		Event Facility[d]	250 seat	3 gpd/seat	750
10	La Civic Center 150 N. Los Angeles St.	Office	712,500 sf	0.12 gpd/sf	85,500
		Retail	35,000 sf	0.025 gpd/sf	875
		Child Care	2,500 sf	9 gpd/ch	22,500
11	Residential 1329 W. 7th St.	Apartment	87 du	190 gpd/du	16,530
12	Mixed Use 534 S. Main St.	Apartment	160 du	190 gpd/du	30,400
		Retail	18,000 sf	0.025 gpd/sf	450
		Restaurant	3,500 sf	30 gpd/seat	3,500
		Fast Food	3,500 sf	30 gpd/seat	3,500
13	Retail/Restaurant 201 S. Broadway	Retail/Restaurant	27,765 sf	30 gpd/seat	27,765
14	Mixed Use 400 S. Broadway	Apartment	450 du	190 gpd/du	85,500
		Retail	6,904 sf	0.025 gpd/sf	173
		Bar	5,000 sf	0.72 gpd/sf	3,600
15	Mixed Use 601 S. Main St.	Apartment	452 du	190 gpd/du	85,880
		Retail	25,000 sf	0.025 gpd/sf	625

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
16	La Plaza Cultura Village 527 N. Spring St.	Apartment	345 du	190 gpd/du	65,550
		Retail	23,000 sf	0.025 gpd/sf	575
		Specialty Retail	21,000 sf	0.025 gpd/sf	525
		Restaurant	11,000 sf	30 gpd/seat	11,000
17	Mixed Use 1335 W. 1st St.	Apartment	102 du	190 gpd/du	19,380
		Retail	3,463 sf	0.025 gpd/sf	87
18	Residential 401 N. Boylston St	Apartment	101 du	190 gpd/du	19,190
19	Apartments 1218 W. Ingraham St.	Apartment	80 du	190 gpd/du	15,200
20	Mixed Use 1145 W. 7th St.	Condominium	241 du	190 gpd/du	45,790
		Retail	7,291 sf	0.025 gpd/sf	182
21	Apartments 118 S. Astronaut E.S. Onizuka St.	Apartment	77 du	190 gpd/du	14,630
22	Stadium Way and Chavez Ravine Apartments 959 E. Stadium Way	Apartment	158 du	190 gpd/du	30,020
23	Mixed Use 700 W. Cesar E. Chavez Ave.	Apartment	300 du	190 gpd/du	57,000
		Retail	8,000 sf	0.025 gpd/sf	200
24	Metro Emergency Security Operations Center 410 N. Center St.	Office	110,000 sf	0.12 gpd/sf	13,200
25	Medallion Phase 2 300 S. Main St.	Apartment	471 du	190 gpd/du	89,490
		Restaurant	27,780 sf	30 gpd/seat	27,780
		Retail	5,190 sf	0.025 gpd/sf	130

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
26	Apartments 340 N. Patton St.	Apartment	43 du	190 gpd/du	8,170
27	Giannini Place (Nomad Hotel) 649 S. Olive St.	Hotel	241 rm	120 gpd/rm	28,920
28	Sapphire Mixed Use (Revised) 1111 W. 6th St.	Apartment	362 du	190 gpd/du	68,780
		Retail	25,805 sf	0.025 gpd/sf	645
29	Sunset Everett Mixed Use 1185 W. Sunset Blvd.	Apartment	214 du	190 gpd/du	40,660
		Single-Family Home	6 du	230 gpd/du	1,380
		Condominium	6 du	190 gpd/du	1,140
30	Hotel & Apartments 675 S. Bixel St.	Apartment	422 du	190 gpd/du	80,180
		Hotel	126 rm	120 gpd/rm	15,120
		Retail	4,874 sf	0.025 gpd/sf	122
31	Spring St. Hotel 633 S. Spring St.	Hotel	176 rm	120 gpd/rm	21,120
		Bar	5,290 sf	0.72 gpd/sf	3,809
		Restaurant	8,430 sf	30 gpd/seat	8,430
32	Everett Street (1013) Project 1013 Everett St.	Apartment	49 du	190 gpd/du	9,310
33	Hill Mixed Use Project 708 N. Hill St.	Apartment	162 du	190 gpd/du	30,780
		Retail	5,000 sf	0.025 gpd/sf	125
34	Alpine Mixed Use 211 W. Alpine St.	Apartment	122 du	190 gpd/du	23,180
		Retail	7,500 sf	0.025 gpd/sf	188
35	Beaudry Ave & 2nd Street Mixed Use Project 130 S. Beaudry Ave.	Apartment	220 du	190 gpd/du	41,800
		Other[e]	9,000 sf	0.120 gpd/sf	1,080

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
36	College Station Mixed Use 129 W. College St., 924 N. Spring St.	Apartment	770 sf	190 gpd/du	146,300
		Commercial	51,390 sf	0.025 gpd/sf	1,285
37	Apartments 422 S. Lake St.	Apartment	80 du	190 gpd/du	15,200
38	Title Insurance Building	Office	320,000 sf	0.12 gpd/sf	38,400
39	Mitsui Fudosan (Eighth and Figueroa Tower) 744 S. Figueroa St.	Apartment	436 du	190 gpd/du	82,840
		Restaurant	3,750 sf	30 gpd/seat	3,750
		Retail	3,750 sf	0.025 gpd/sf	94
40	945 West 8th Street 845 W. 8th St.	Apartment	781 du	190 gpd/du	148,390
		Commercial	6,700 sf	0.025 gpd/sf	168
41	Brooks Building 644 S. Broadway	Apartment	30 du	190 gpd/du	5,700
		Bar	2,500 sf	0.72 gpd/sf	1,800
42	Ferrante 1000 W. Temple St.	Apartment	1,500 du	190 gpd/du	285,000
		Retail	30,000 sf	0.025 gpd/sf	750
43	Marionette Lofts 1345 W. 1st St.	Apartment	102 du	190 gpd/du	19,380
44	Budokan of Los Angeles 237 S. Los Angeles St.	Sports Center[f]	43,453 sf	0.200 gpd/sf	8,691
45	643–655 North Spring Street 643-655 N. Spring St.	Apartment	281 du	190 gpd/du	53,390
		Hotel	142 rm	120 gpd/rm	17,040
		Commercial	17,003 sf	0.025 gpd/sf	425
		Restaurant	2,532 sf	30 gpd/seat	2,532
46	1201 North Broadway Mixed Use 1201 N. Broadway	Apartment	118 du	190 gpd/du	22,420
		Office	9,000 sf	0.12 gpd/sf	1,080

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
47	Sunset Flats Mixed Use 2225 W. Sunset Blvd.	Condominium	65 du	190 gpd/du	12,350
		Retail/Restaurant	15,550 sf	30 gpd/seat	15,550
48	Mixed Use 1924 W. Temple St.	Condominium	205 du	190 gpd/du	38,950
		Apartment	46 du	190 gpd/du	8,740
		Retail	19,103 sf	0.025 gpd/sf	478
49	Barlow Hospital Replacement & Master Plan 2000 Stadium Way	Condominium	888 du	190 gpd/du	168,720
		Hospital	56 beds	70 gpd/bed	3,920
		Retail	15,000 sf	0.025 gpd/sf	375
50	LA Hotel 1625 W. Palo Alto St.	Hotel	89 rm	120 gpd/rm	10,680
51	Urban View Lofts Project 495 S. Hartford Ave.	Apartment	220 du	190 gpd/du	41,800
52	1316 Court & 1323 Colton Apartments 1316 W. Court St.	Apartment	60 du	190 gpd/du	11,400
53	433 South Main Street 433 S. Main St.	Condominium	196 du	190 gpd/du	37,240
		Retail	5,300 sf	0.025 gpd/sf	133
		Restaurant	900 sf	30 gpd/seat	900
54	Tribune (L.A. Times) South Tower Project 222 W. 2nd St.	Condominium	107 du	190 gpd/du	20,330
		Office	534,044 sf	0.12 gpd/sf	64,085
		Retail	7,200 sf	0.025 gpd/sf	180
55	Elysian Park Lofts 1030–1380 N. Broadway	Apartment	920 du	190 gpd/du	174,800
		Restaurant	16,147 sf	30 gpd/seat	16,147

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
56	Mixed Use (Times Mirror Square) 100 S. Broadway	Apartment	1,127 du	190 gpd/du	214,130
		Office	285,088 sf	0.12 gpd/sf	34,211
		Supermarket	50,000 sf	0.025 gpd/sf	1,250
		Restaurant	75,589 sf	30 gpd/seat	75,589
57	Apartments 1246 W. Court St.	Apartment	54 du	190 gpd/du	10,260
58	1018 West Ingraham Street 1018 W. Ingraham St.	Apartment	43 du	190 gpd/du	8,170
		Retail	7,400 sf	0.025 gpd/sf	185
59	8th/Grand/Hope Project 754 S. Hope St.	Condominium	409 du	190 gpd/du	77,710
		Retail	7,329 sf	0.025 gpd/sf	183
60	4th & Spring Hotel 361 S. Spring St.	Hotel	315 rm	120 gpd/rm	37,800
		Meeting Space[g]	2,000 sf	0.12 gpd/sf	240
61	Mixed Use 1800 Beverly Blvd.	Apartment	243 du	190 gpd/du	46,170
		Restaurant	3,500 sf	30 gpd/seat	3,500
62	425 South Union Apartments 425 S. Union Ave.	Apartment	33 du	190 gpd/du	6,270
63	1301 Colton Apartments 1301 Colton St.	Apartment	29 du	190 gpd/du	5,510
64	Apartments 1301 W. Sunset Blvd.	Apartment	45 du	190 gpd/du	8,550
65	1346 Court Apartments 1346 W. Court St.	Apartment	43 du	190 gpd/du	8,170
66	Kaiser Medical Center 765 W. College St.	Medical Office Building	100,000 sf	0.25 gpd/sf	25,000

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
67	Alameda District Plan Union Station Terminal Annex	Apartment	22 du	190 gpd/du	4,180
		Office	7,443,200 sf	0.12 gpd/sf	893,184
		Retail	645,000 sf	0.050 gpd/sf	32,250
		Hotel	750 rm	120 gpd/rm	90,000
		Restaurant	20,000 sf	30 gpd/seat	20,000
		Museum	70,000 sf	0.03 gpd/sf	2,100
68	Hellman/Banco Building 354 S. Spring St.	Apartment	212 du	190 gpd/du	40,280
69	Foreman and Clark Building 701 S. Hill St.	Apartment	165 du	190 gpd/du	31,350
		Restaurant	11,902 sf	30 gpd/seat	11,902
		Restaurant	14,032 sf	30 gpd/seat	14,032
70	Data Center 900 N. Alameda St.	Data Center[h]	179,900 sf	0.12 gpd/sf	21,588
71	Equity Residential Mixed Use 340 S. Hill St.	Apartment	406 du	190 gpd/du	77,140
		Affordable Apartment	22 du	190 gpd/du	4,180
		Office	2,980 sf	0.12 gpd/sf	358
		Retail	2,630 sf	0.025 gpd/sf	66
72	Mixed Use (Lifan Tower) 1235 W. 7th St.	Apartment	303 du	190 gpd/du	57,570
		Retail	5,960 sf	0.025 gpd/sf	149
73	Apartments 459 S. Hartford Ave.	Affordable Apartment	101 du	190 gpd/du	19,190
74	Hotel 1011 N. Broadway	Hotel	92 rm	120 gpd/rm	11,040
75	708 South New Depot Street Residential 708 S. New Depot St.	Apartment	33 du	190 gpd/du	6,270

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
76	Mixed Use 1322 W. Maryland St.	Apartment	47 du	190 gpd/du	8,930
		Retail	760 sf	0.025 gpd/sf	19
77	5th & Hill 323 W. 5th St.	Hotel	190 rm	120 gpd/rm	22,800
		Meeting Room[i]	6,100 sf	0.12 gpd/sf	732
		Apartment	31 du	190 gpd/du	5,890
		Restaurant	29,200 sf	30 gpd/seat	29,200
78	Restaurant & Retail 1455 N. Alvarado St.	Restaurant	5,050 sf	30 gpd/seat	5,050
		Retail	2,984 sf	0.025 gpd/sf	75
79	Men's Central Jail Replacement 441 E. Bauchet St.	Prison	3,885 beds	175 gpd/inmate	679,875
80	Residential 2335 W. Temple St.	Apartment	71 du	190 gpd/du	13,490
81	Restaurant & Theater 2139 W. Sunset Bl.	Restaurant and Theater	5,979 sf	30 gpd/seat	5,979
82	Restaurants 1453 N. Alvarado St.	Restaurant	7,300 sf	30 gpd/seat	7,300
83	Apartments 740 S. Hartford Ave.	Apartment	80 du	190 gpd/du	15,200
84	Condominiums 742 S. Hartford Ave.	Condominium	42 du	190 gpd/du	7,980
85	Apartments & Retail 1324 W. Wilshire Blvd.	Apartment	50 du	190 gpd/du	9,500
		Retail	5,730 sf	0.025 gpd/sf	143
86	Community Center 445 W. Cottage Home St.	Community Center[j]	8,530 sf	0.350 gpd/sf	2,986
87	Apartments 418 N. Alvarado St.	Apartment	73 du	190 gpd/du	13,870

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

No.	Project	Land Use	Size	Generation Factor[a,b]	Total Daily Wastewater Generation (gpd)
88	Condominiums 1100 W. Temple St.	Condominium	53 du	190 gpd/du	10,070
89	Mixed Use 1150 W. Wilshire Blvd.	Condominium	140 du	190 gpd/du	26,600
		Retail/Restaurant	9,115 sf	30 gpd/seat	9,115
Related Projects Wastewater Generation					**6,468,221**
Mixed Use Development Scenario Net Wastewater Generation					**259,033**
Total Wastewater Generation for Related Projects and Mixed Use Development Scenario					**6,727,254**
Related Projects Wastewater Generation					**6,468,221**
No-Hotel Development Scenario Net Wastewater Generation					**224,109**
Total Wastewater Generation for Related Projects and No-Hotel Development Scenario					**6,692,330**

ac = acre

du = dwelling units

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] *This related project does not specify this use. Therefore, the most comparable rate for non-residential uses typical of mixed use projects for "Office" is applied.*

[d] *Sewage generation rates provided by LASAN do not include a rate for "Event Facility" uses. Therefore, the most comparable land use rate of 3 gallons per seat for "Auditorium" is applied.*

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

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

[e] *This related project does not specify this use. Therefore, the most comparable rate for non-residential uses typical of mixed use projects for "Office" is applied.*

[f] *Sewage generation rates provided by LASAN do not include rates for sports center uses. Therefore, the most comparable land use rate of 200 gallons per day per 1,000 square feet for "Gymnasium" is applied.*

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

[h] *Sewage generation rates provided by LASAN do not include a rate for "Data Center" uses. Therefore, the most comparable land use rate of 120 gallons per 1,000 square feet for "Office Building" is applied.*

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

[j] *Sewage generation rates provided by LASAN do not include a rate for "Community Center" uses. Therefore, the most comparable land use rate of 350 gallons per 1,000 square feet for "Banquet Room" is applied.*

Source: Eyestone Environmental, 2021.

generation of 259,033 gpd (0.26 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 6,727,254 gpd, or 6.7 mgd. The No-Hotel Development Scenario's net increase in wastewater generation of 224,109 gpd (0.22 mgd) equates to a cumulative increase in average daily wastewater flow of approximately 6,692,330 gpd, or 6.7 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.[37] 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 Mixed Use Development Scenario's wastewater flow of approximately 0.26 mgd combined with the wastewater flow from related projects of approximately 6.5 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 349.7 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 349.7 mgd aggregated from the Mixed Use Development Scenario, related projects, and forecasted growth by 2028. The 6.7 mgd of cumulative plus the Mixed Use Development Scenario's wastewater flow would represent approximately 1.22 percent of the Sanitary Sewer System's existing design capacity of 550 mgd.

The No-Hotel Development Scenario's wastewater flow of approximately 0.22 mgd combined with the wastewater flow from related projects of approximately 6.5 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 349.7 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 349.7 mgd aggregated from the Project, related projects, and forecasted growth by 2028. The 6.7 mgd of cumulative plus the No-Hotel Development Scenario's wastewater flow would represent approximately 1.22 percent of the Sanitary Sewer System's existing design capacity of 550 mgd.

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[37] *Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Service Area (which is comprised of the Hyperion Water Reclamation Plant, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles-Glendale Water Reclamation Plant) for 2020 (approximately 323 mgd) and 2030 (approximately 348 mgd). The 2028 value is extrapolated from 2020 and 2030 values: [(348 mgd – 323 mgd) ÷ 10) * 8] + 323 = 343 mgd.*

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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