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 *Buena Vista Water and Sewer Infrastructure Report* (Water and Sewer Report), dated December 2024, which was prepared by Fuscoe Engineering, Inc. and included in Appendix M.1 of this Draft EIR; and the Water Supply Assessment (WSA) prepared for the Project and approved by the Los Angeles Department of Water and Power (LADWP) in August 2024 and included as as Attachment F of Appendix M.1 of the Water and Sewer Report.

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 Code

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

(2) Local

(a) City of Los Angeles General Plan Framework

The Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.[1] The Framework Element sets forth a comprehensive citywide long-range growth strategy and defines citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for utilities in the City, including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.[2]

(b) Los Angeles Integrated Resources Plan

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

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

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

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

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

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

(c) One Water LA 2040 Plan

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

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

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

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

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

(d) Los Angeles 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 of which applies to this Project: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings.

(ii) Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),[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. 181480.*

[8] *City of Los Angeles, Ordinance No. 180822.*

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 Section 64.11 requires 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. 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 comprised of approximately 8.08 acres[10] and is partially developed, with portions of the Project Site currently used for transportation operations and maintenance-related facilities, bus parking and construction staging. The Project would require demolition of the existing

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[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.*

[10] *The Project Site is currently comprised of 8.08 acres. The Project involves the dedication of a three-foot-wide strip along North Broadway to the City resulting in a net acreage of 7.87 acres.*

structures, including an approximately 12,800-square-foot auto repair building on the southern portion of the South Parcel, and a 2,132-square-foot restaurant addition within the southwestern portion of the South Parcel, for a total of 14,932 square feet of building demolition. In addition, the Project would require removal of a vehicle shelter/wash bay, trash enclosure, foundation remnants, as well as associated parking areas, outdoor storage areas, utility infrastructure, retaining walls, and fencing. To provide for a conservative analysis, it is assumed that the existing wastewater generation from the existing uses on-site is zero.

(2) Wastewater Infrastructure

Sanitary sewer service that serves the Project area 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.[11]

As described in the Water and Sewer Report included in Appendix M.1 of this Draft EIR, there is an existing sewer main along North Broadway, which flows southwesterly, beginning with an 8-inch main adjacent to the northern portion of the Project Site. The 8-inch main transitions into a 10-inch main as it crosses Solano Avenue, which then transitions into a 12-inch main as it crosses Savoy Street. The 12-inch main continues in a southwesterly direction beyond the limits of the Project Site. There is also an existing 15-inch main along North Spring Street flowing in a southwesterly direction. Each of these sewer mains that are adjacent to the Project Site connect to a network of sewer lines that ultimately convey wastewater to the City's Hyperion Water Reclamation Plant (HWRP).

Based on available record data from the City, there are currently six existing sewer laterals connecting from the City's public sewer system to the Project Site. Two of these laterals serve the northeastern half of the Project Site connecting to the 10-inch main in North Broadway between Savoy Street and Solano Avenue. The southwestern half of the Project Site is served by three laterals connecting to the 12-inch main in North Broadway between Bishops Road and Cottage Home Street. Lastly, one lateral connecting to the 15-inch main in Spring Street serves the southern portion of the Project Site at the existing driveway entrance.

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[11] *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 September 25, 2024.*

(3) Wastewater Treatment

LASAN is responsible for the operation of wastewater treatment facilities in the City. The main purpose of these treatment facilities is to remove potential pollutants from sewage in order to protect river and marine environments and public health. LASAN operates four water reclamation plants 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.[12] The Hyperion Sanitary Sewer System includes the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant.[13] The Terminal Island Service Area includes the Terminal Island Water Reclamation Plant.[14] 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.[15] 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 mgd 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

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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 September 25, 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 September 25, 2024.*

[14] *LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afrLoop=8241807351592071#!, accessed September 25, 2024.*

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

Table IV.O.2-1
Design 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 30, 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 December 30, 2024; LASAN, Los Angeles-Glendale Water Reclamation Plant Brochure, April 2019.

for full secondary treatment.[16] Based on One Water LA, the HWRP is estimated to currently treat 263.6 mgd of wastewater.[17] 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.

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.[18] 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

[16] *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 September 25, 2024.*

[17] *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.*

[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=s0mxg9mov_772&_afrLoop=10868549010994331#!, accessed September 25, 2024.*

and removed as sludge.[19] 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.[20] The discharge from the HWRP into the Santa Monica Bay is regulated by the HWRP's National Pollution Discharge Elimination System (NPDES) Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use.[21] 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.[22]

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, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects;[23] 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***

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[19] *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 September 25, 2024.*

[20] *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 September 25, 2024.*

[21] *California Regional Water Quality Control Board, Los Angeles Region, Order No. R4- 2023-0033, 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 March 17, 2023 through April 30,2028.*

[22] *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 September 25, 2024.*

[23] *Refer to Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure of this Draft EIR for a discussion of water supply impacts; Section IV.H, Hydrology and Water Quality, of this Draft EIR, for a discussion of stormwater impacts; and Sections IV.D, Energy, and IV.O.4, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts as well as energy and telecommunications infrastructure.*

***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:

- 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.[24]

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Water and Sewer Report, included as Appendix M.1, and the WSA included as Attachment F of the Water and Sewer Report. 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 are based on information provided by LASAN and included in the Water and Sewer Report. As discussed above, existing wastewater generation from the Project Site has conservatively assumed to be zero.

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.

[24] *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, which would also result in a reduction in wastewater generation. Such conservation features are included in Project Design Feature WAT-PDF-1, included in Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

During construction, existing sewer laterals would be capped, and no sewage would enter the public sewer system from the Project Site. Temporary facilities, including portable toilets and hand wash stations, would be provided by the contractor for construction crews. Wastewater generated from these facilities would be collected and hauled offsite and would not be discharged into the public sewer system on-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. Thus, wastewater generation from Project construction is not anticipated to cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

The Project would also require construction of new sewer line connections to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site, as well as on-site sewer infrastructure. The new sewer connections would collect wastewater from the Project and connect to the existing public sewer laterals. Construction impacts associated with these new sewer line connections would primarily be confined to trenching for the placement of pipe and connection into the existing main sewer

[25] *Refer to Section IV.O.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of water supply impacts; Section IV.H, Hydrology and Water Quality, of this Draft EIR, for a discussion of stormwater impacts; and Sections IV.D, Energy, and IV.O.4, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts as well as energy and telecommunications infrastructure.*

lines. Any off-site work that may affect services to the existing sewer lines in the vicinity of the Project Site would be coordinated with the City of Los Angeles Bureau of Engineering (BOE), who would provide for 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 impacts that might result from trenching and installation of new sewer infrastructure. The Construction Traffic Management Plan would ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. 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 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.

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

(b) Operation

According to the Water and Sewer Report and consistent with the Project's WSA, the Project's estimated sewer flows were based on BOE's sewage generation factors for residential and commercial categories. As shown in Table IV.O.2-2 on page IV.O.2-13, based on the proposed uses of the Project and generation factors, the Project would generate an increase in wastewater flow from the Project Site of approximately 391,163 gpd, or approximately 0.391 mgd, of wastewater. These calculations are conservative as they do not account for the Project's estimated water savings committed to by the Applicant of approximately 10,808 gpd (refer to Project Design Feature WAT-PDF-1 in Section IV.O.1 Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR). These calculations also conservatively assume that the complete volume of the pools is discharged into the public sewer system daily.

A SCAR (Refer to Attachment C of the Water and Sewer Report) was submitted to the BOE to determine whether the existing wastewater infrastructure can accommodate the Project. As stated therein, BOE has analyzed the Project demands in conjunction with existing conditions and forecasted growth and has approved the Project to discharge up to

Table IV.O.2-2
Estimated Wastewater Generation

Proposed Use	Quantity	Sewer Generation Rate[a] (gpd/unit)	Proposed Wastewater Generation
Residential: Studios	144 du	75 gpd/du	10,800 gpd
Residential Apartment: 1 BDR	468 du	110 gpd/du	51,480 gpd
Residential Apartment: 2 BDR	307 du	150 gpd/du	46,050 gpd
Residential Apartment: 3 BDR	60 du	190 gpd/du	11,400 gpd
Residential Apartment: 4 BDR[a]	7 du	230 gpd/du	1,610 gpd
Retail	15,000 sf	0.025 gpd/sf	375 gpd
Restaurant[a]	1,587 seats	30 gpd/seat	47,610 gpd
Office	2,250 sf	0.12 gpd/sf	270 gpd
Residential Fitness	2,400 sf	0.65 gpd/sf	1,560 gpd
Residential Outdoor Fitness Area	2,500 sf	0.65 gpd/sf	1,625 gpd
Residential Community Center	28 occ	3 gpd/occ	84 gpd
Residential Lounge Areas	17,640 sf	0.05 gpd/ sf	882 gpd
Residential Outdoor Amphitheater	100 seats	3 seat/ sf	300 gpd
Residential Recreation Facilities			100 gpd
Covered Parking	565,660 sf	0.02 gpd/sf	11,313 gpd[d]
Sewer Ejector			57,600 gpd
Pools[b, c]	148,104 sf	1 gpd/ sf	148,104 gpd
Total Wastewater Demand			**391,163 gpd**

BDR = bedroom
du = dwelling units
gpd = gallons per day
occ = occupants
sf = square feet

[a] *Conservatively assumes Live-work units are equivalent to 4-bedroom Apartments.*

[b] *Pools vary in size; one pool is larger and therefore has a higher water consumption value per unit.*

[c] *In comparison to the WSA, the SCAR calculations for the pool is based on a worst case scenario, where the complete volume of the pools is discharged into the public sewer system. This evaluation is required in the SCAR analysis and is not intended to match the water use as shown in the WSA.*

[d] *The SCAR calculations conservatively assume that the parking areas are cleaned daily. The WSA includes a more practical assumption that the parking areas would be cleaned 12 times per year.*

Source: Los Angeles Department of Water and Power, Water Supply Assessment for the Buena Vista Project, prepared on August 15, 2024, Table I.; Fuscoe Engineering, Inc, Water and Sewer Infrastructure Report, December 16, 2024.

391,163 gpd into the City's wastewater system by connecting to the existing sewer line along North Broadway. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit

for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Thus, potential impacts associated with the need for new or expanded sewer lines would be less than significant.

With regard to wastewater treatment capacity, 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 estimated to be 263.6 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 186.4 mgd. The Project's estimated wastewater generation of 391,163 gpd (0.391 mgd), would comprise less than 0.2 percent of the remaining available capacity in 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 construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, Project impacts 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 are 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 discussed above, the Project would generate an increase in average daily wastewater generation of approximately 0.391 mgd. As described above, the HWRP has a capacity of 450 mgd, and current average wastewater flows are estimated to be 263.6 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 186.4 mgd. The Project's estimated wastewater generation of 0.391 mgd would comprise less than 0.2 percent of the remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2034, the earliest Project buildout year, would be approximately 274.9 mgd.[26] Accordingly, the future remaining available capacity of the HWRP in 2034 would be approximately 175.1 mgd. The Project's increase in average daily wastewater flow of 0.391 mgd would represent approximately 0.22 percent[27] of the estimated future remaining available capacity of 175.1 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 increase in average daily wastewater generation of 0.391 mgd plus the future average flows of approximately 274.9 mgd to the HWRP would represent approximately 61 percent[28] of the HWRP's capacity of 450 mgd. Therefore, there is adequate treatment capacity to serve the Project's projected demand in addition to LASAN's existing commitments.

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

(2) Mitigation Measures

Project impacts with regard to wastewater treatment capacity would be less than significant. Therefore, no mitigation measures are required.

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[26] *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 2040 (approximately 283 mgd). The 2034 value is extrapolated from these values: [(283 mgd – 256 mgd) ÷ 20) * 14] + 256 = 274.9 mgd.*

[27] *[(0.391 ÷ 175.1 mgd] x 100 = ~0.22%*

[28] *[(0.391 + 274.9 mgd) ÷ 450 mgd] x 100 = ~61%*

(3) Level of Significance After Mitigation

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

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2034, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program would continue to 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 remaining capacity of 167 mgd at the HWRP and 174 mgd in the broader Hyperion Sanitary Sewer System in 2040, which would provide more than sufficient capacity to accommodate the Project in the future.[29] 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 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 service area for the Hyperion Sanitary Sewer System. The Project, in conjunction with growth forecasted in the Hyperion Sanitary Sewer System through 2034 (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 2034 includes specific known development projects, as well as general ambient growth projected to occur.

[29] *One Water LA – Wastewater Facilities Plan, Table 2.1, Page 2-5, January 2018.*

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 25 is a conservative assumption as some of the related projects may not be built out by 2034 (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 the related projects are fully built out by 2034.

(a) Wastewater Infrastructure

All 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 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 1,345,541 gpd or approximately 1.35 mgd, as shown in Table IV.O.2-3 on page IV.O.2-18. Combined with the Project's increase in wastewater generation of approximately 391,163 gpd (0.39 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 1,736,704 gpd or 1.74 mgd.

Table IV.O.2-3
Cumulative Wastewater Generation

No.[c]	Project	Land Use	Size[d]	Generation Factor[a,b]	Total Wastewater Generation (gpd)[e]
1	1101 N. Main Condos	Apartments	318 du	190 gpd/du	60,420
2	Mixed-Use 511 N. Grand Ave.	Apartments	299 du	190 gpd/du	56,810
		Retail	8,000 sf	0.025 gpd/sf	200
3	Hill Mixed Use Project 708 N. Hill St.	Apartments	162 du	190 gpd/du	30,780
		Retail	5,000 sf	0.025 gpd/sf	125
4	Alpine Mixed-Use 211 W. Alpine St.	Apartments	160 du	190 gpd/du	30,400
		Retail	2,499 sf	0.025 gpd/sf	62
5	College Station Mixed-Use 129 W. College St., 924 N. Spring St.	Apartments	725 du	190 gpd/du	137,750
		Commercial	51,600 sf	0.05 gpd/sf	2,580
6	Ferrante 1000 W. Temple St.	Apartments	1,500 du	190 gpd/du	285,000
		Retail	30,000 sf	0.025 gpd/sf	750
7	1201 N Broadway Mixed-Use 1201 N. Broadway	Apartments	118 du	190 gpd/du	22,420
		Office/Commercial	8,800 sf	0.12 gpd/sf	1,056
8	169 N Avenue 21	Residential	95 du	190 gpd/du	18,050
		Affordable Housing	5 du	190 gpd/du	950
		Hotel	100 rm	120 gpd/ rm	12,000
		Retail	4,946 sf	0.025 gpd/sf	124
9	643-655 N Spring Street 643-655 N. Spring St.	Apartments	294 du	190 gpd/du	55,860
		Hotel	149 rm	120 gpd/rm	17,880
		Commercial	15,878 sf	0.05 gpd/sf	794
10	Data Center	Data Center	179,900 sf	0.12 gpd/sf	21,588
11	942 N. Broadway	Residential	169 du	190 gpd/du	32,110
		Affordable Housing	9 du	190 gpd/du	1,710
		Restaurant and Office Space	35,805 sf	0.12 gpd/sf	4,297

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

No.[c]	Project	Land Use	Size[d]	Generation Factor[a,b]	Total Wastewater Generation (gpd)[e]
12	6445 W. Sunset Blvd.	Apartments	737 du	190 gpd/du	140,030
		Hotel	180 rm	120 gpd/rm	21,600
		Hotel Retail	10,000 sf	0.025 gpd/sf	250
		Hotel Restaurant	10,000 sf (approx. 333 seats)	30 gpd/seat	10,000
		Office	48,000 sf	0.12 gpd/sf	5,760
		Retail/Gym/Grocery	50,000 sf	0.025 gpd/sf	1,250
		Restaurant	25,000 sf (approx. 833 seats)	30 gpd/seat	25,000
13	843 N Spring St MU	Office and Restaurant Space	100,517 sf	0.12 gpd/sf	12,062
14	Mixed-Use 1457 N. Main St.	Live Work	244 du	190 gpd/du	46,360
		Retail	9,829 sf	0.025 gpd/sf	246
15	Clean Water Campus Project	Office	150,000 sf	0.12 gpd/sf	18,000
16	Stadium Way and Chavez Ravine Apartments 959 E. Stadium Way.	Apartments	237 du	190 gpd/du	45,030
		Affordable Housing	30 du	190 gpd/du	5,700
17	Pagoda Hotel 995 N. Broadway	Hotel	101 rm	120 gpd/ rm	12,120
		Restaurant	6,211 sf (approx. 207 seats)	30 gpd/seat	6,211
18	1101 N. Broadway	Hotel	92 rm	120 gpd/rm	11,040
		Restaurant	1,713 sf (approx. 57 seats)	30 gpd/seat	1,713
		Café (grab and go)/Retail	895 sf	0.025 gpd/sf	22
		Café	978 sf (approx. 33 seats)	30 gpd/seat	978

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

No.[c]	Project	Land Use	Size[d]	Generation Factor[a,b]	Total Wastewater Generation (gpd)[e]
19	1635 N. Main St.	Office	140,000 sf	0.12 gpd/sf	16,800
		Retail	5,000 sf	0.025 gpd/sf	125
		Restaurant	8,000 sf (approx. 267 seats)	30 gpd/seat	8,000
20	TRJLA Mixed-Use 717 N. Hill St.	Apartments	411 du	190 gpd/du	78,090
		Affordable Housing	39 du	190 gpd/du	7,410
		Retail	17,140 sf	0.025 gpd/sf	429
21	College St Residential Project 871 N. Figueroa Ter.	Apartments	153 du	190 gpd/du	29,070
		Affordable Housing	17 du	190 gpd/du	3,230
22	950 Stadium Way Residential 950 E. Stadium Way	Apartments	57 du	190 gpd/du	10,830
		Affordable Housing	8 du	190 gpd/du	1,520
23	310 W. College Street	Office	224,597 sf	0.12 gpd/sf	26,952
		Retail	4,110 sf	0.025 gpd/sf	103
		Restaurant	5,894 sf (approx. 196 seats)	30 gpd/seat	5,894
Related Projects Wastewater Generation					**1,345,541**
Project Total Wastewater Generation					**391,163**
Total Wastewater Generation for Related Projects and Project					**1,736,704**

du = dwelling units

per = persons

rm = rooms

sf = square feet

[a] *This analysis is based on sewage generation rates provided by BOE's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, updated June 10, 2019.*

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

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

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

[c] *Related Project Nos. 24 and 25 would generate limited wastewater, if any, that would utilize the same lines as the Project. As such, they are not included in this analysis.*

[d] *Restaurant use demand is based on number of seats. Number of seats for restaurant uses were estimated based on one seat per 30 square feet.*

[e] *The number of seats in the description reflects a rounded number to the nearest seat and the calculations reflect the precise number.*

Source: Gibson Transportation, based on data provided by City of Los Angeles Department of Transportation and the City of Los Angeles Department of City Planning; Eyestone Environmental, 2025.

Based on LASAN's average flow projections for the Hyperion Sanitary Sewer System, it is anticipated that the average flow in 2034 would be approximately 347.5 mgd.[30] In addition, the Hyperion Sanitary Sewer System's total treatment capacity is conservatively estimated to be approximately 550 mgd in 2034, which is the same as its existing capacity.

The Project and related projects' combined wastewater flow of approximately 1.74 mgd and the forecasted 2034 wastewater flow of 347.5 mgd for the Hyperion Sanitary Sewer System would result in a total wastewater flow of approximately 349.24 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 1.74 mgd resulting from the Project, related projects, and forecasted growth through 2034. The 1.74 mgd of combined wastewater flows associated with the related projects plus the Project would represent approximately 0.32 percent of the Hyperion Sanitary Sewer System's existing design capacity of 550 mgd. Thus, there is adequate treatment capacity to serve the Project and related projects' projected demand in addition to LASAN's existing commitments.

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

(2) Mitigation Measures

Cumulative impacts with regard to wastewater would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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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 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 2040 (approximately 358 mgd). The 2034 value is extrapolated from 2020 and 2040 values: [(358 mgd – 323 mgd) ÷ 20) * 14] + 323 = 347.5 mgd.*