

IV. Environmental Impact Analysis

K.2 Utilities and Service Systems— Wastewater

1. Introduction

This section analyzes the Project's potential impacts on wastewater collection and treatment facilities and infrastructure, including whether existing infrastructure has sufficient capacity to serve the Project. This analysis utilizes the *Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas* (Utility Report), dated June 2026, prepared by KPFF Consulting Engineers and included in Appendix H of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding wastewater at the state and local levels that apply to the Project. Described below, these include:

- California Green Building Standards Code
- City of Los Angeles General Plan Framework Element
- Los Angeles Integrated Resources Plan
- One Water LA 2040 Plan
- Los Angeles Green Building Code (Ordinance No. 181,480)
- Water Efficiency Requirements Ordinance (Ordinance No. 180,822)
- Sewer Capacity Availability Review (LAMC Section 64.15)
- Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1)
- Bureau of Engineering Special Order No. SO 06-0691

(1) State

(a) California Green Building Standards Code

The California Green Building Standards Code (CALGreen Code) is set forth in California Code of Regulations (CCR) Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the 2025 CALGreen Code (effective January 1, 2026), all flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallons per flush. In addition, maximum flow rates for faucets are established at 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, 0.5 gpm at 60 psi for non-residential lavatory faucets, and 1.8 gpm at 60 psi for kitchen faucets.

(2) Local

(a) City of Los Angeles General Plan Framework Element

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

(b) Los Angeles Integrated Resources Plan

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

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

¹ City of Los Angeles, Ordinance No. 181,480.

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

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

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

(c) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to citywide recycled water supply, wastewater treatment, and stormwater management.⁵ The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan was 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.

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

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

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

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

(d) Los Angeles Municipal Code

(i) Los Angeles Green Building Code

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

Los Angeles Municipal Code (LAMC) Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),⁷ was adopted in April 2008 and provides standards and a mechanism for evaluating projects for their water conservation features during site plan review. The LA Green Building Code was subsequently amended to incorporate various provisions of the CALGreen Code. The LA Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the second and third of which apply to the Project: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings.

(e) 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.

(f) 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

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

(v) Bureau of Engineering Special Order

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

b. Existing Conditions

(1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with commercial buildings along Wilshire Boulevard and surface parking areas to the south of these buildings. The existing buildings are connected and range from one to two stories and include approximately 48,229 square feet of commercial uses. The existing wastewater generated by these uses is based on the water use estimate presented

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.

in the Water Supply Assessment (WSA) prepared for the Project.¹⁰ Specifically, as part of the WSA, LADWP estimated average daily water use based on water billing data over a five-year period. For purposes of this analysis, it is assumed that water use and wastewater generated are equal since the water used by the existing uses would primarily flow through the on-site plumbing and into the sewer lines for conveyance. Accordingly, the total average daily wastewater flow associated with the existing uses to be removed as part of the Project is estimated to be 172 gallons per day (gpd), as shown in Table IV.K.2-2 on page IV.K.2-14, in the analysis later in this section.

(2) Wastewater Infrastructure

Sanitary sewer service to and from the Project Site vicinity is owned and operated by the City. The City's existing wastewater collection system includes more than 6,700 miles of public sewers, five major outfall sewers, and 46 pumping plants.¹¹ This infrastructure serves a population of more than four million people and conveys approximately 400 million gpd of sewage to the City's four wastewater treatment and water reclamation plants.¹²

As described in the Utility Report included in Appendix H of this Draft EIR, sanitary sewer service to the Project Site is provided by LASAN from three existing sanitary sewer lines in the vicinity of the Project Site and nine laterals from these sewer lines to the existing on-site buildings. Specifically, sewer service is provided by an 18-inch concrete sewer line in Wilshire Boulevard, an 8-inch Vitrified Concrete Pipe (VCP) sewer line in Cloverdale Avenue, and an 8-inch concrete sewer line in Detroit Alley, running east toward through the site before turning south on onto Detroit Avenue. Based on the City Bureau of Engineering's online Navigate LA database, the Utility Report indicates that the above-mentioned sewer lines along Wilshire Boulevard, Cloverdale Avenue, and Detroit Street have capacities of 4.13828 cubic feet per second (cfs); 2,674,640 gpd), 0.70968 cfs (458,678 gpd), and 1.41935 cfs (917,350 gpd), respectively. 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).¹³

¹⁰ Los Angeles Department of Water and Power, *Water Supply Assessment for the Wilshire and Cloverdale Project*, prepared on August 10, 2023. Included in Appendix H of this Draft EIR.

¹¹ KPFF Consulting Engineers, *Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas*, June 2026. Appendix H of this Draft EIR, p. 10.

¹² 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&_afLoop=3961669001041971#!, accessed June 8, 2026.

¹³ KPFF Consulting Engineers, *Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas*, June 2026. Appendix H of this Draft EIR.

(3) Wastewater Treatment

LASAN is responsible for the operation and maintenance of wastewater treatment facilities in the City. The main purpose of these treatment facilities is to remove potential pollutants from sewage in order to protect river and marine environments and public health. LASAN operates four water reclamation plants and divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.¹⁴ The Hyperion system includes the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant.¹⁵ The Terminal Island Service Area includes the Terminal Island Treatment Plant. These treatment facilities remove potential pollutants from sewage in order to protect river and marine environments and public health.¹⁶ The Project Site is located within the Hyperion Service Area and is served by the HWRP.¹⁷

(a) Hyperion Sanitary Sewer System

As shown in Table IV.K.2-1 on page IV.K.2-8, the existing design capacity of the Hyperion Sanitary Sewer System is approximately 550 million gallons per day (mgd) consisting of 450 mgd at the Hyperion WRP, 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).¹⁸ The One Water LA 2040 Plan—Wastewater Facilities Plan projects that annual average wastewater flows in the Hyperion Sanitary Sewer System will increase to 348 mgd in 2030 and 358 in 2040. Based on a straight-line interpolation of this data, flows in 2026 are estimated at 338 mgd.¹⁹ As such, current and projected flows through at least the year 2040 would continue to be below the approximately 550 mgd design capacity of the Hyperion Sanitary Sewer System.

¹⁴ LASAN, *Clean Water*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afLoop=8241807351592071#!, accessed June 8, 2026.

¹⁵ LASAN, *Clean Water*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afLoop=8241807351592071#!, accessed June 8, 2026.

¹⁶ LASAN, *Clean Water*, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=ljvz6q49_5&_afLoop=8241807351592071#!, accessed June 8, 2026.

¹⁷ KPFF Consulting Engineers, *Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas*, June 2026. Appendix H of this Draft EIR.

¹⁸ LASAN, *One Water LA 2040 Plan—Volume 2: Wastewater Facilities Plan*, January 2018, Table, page ES.1.

¹⁹ The 2026 value is extrapolated from 2020 and 2030 values: $[(348 \text{ mgd} - 323 \text{ mgd}) \div 10] * 6 + 323 \text{ mgd} = \sim 338 \text{ mgd}$

**Table IV.K.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 ^a
Total	550
<i>mgd = million gallons per day</i> ^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. The figure of 80 mgd appears to be an error and therefore, 20 mgd is used in this analysis. Source: LASAN, Water Reclamation Plants, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=12ml5rsygx_5&_afLoop=5417271177465139#!, accessed June 8, 2026. 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&_afLoop=6456378016053351#!, accessed June 8, 2026; City of Glendale, Glendale 2018 Wastewater Change Petition, Initial Study/Mitigated Negative Declaration, August 2018.	

(b) Hyperion Water Reclamation Plant

As discussed above, wastewater generated from the Project Site is conveyed via the local collector sanitary sewer system directly to the HWRP for treatment. As shown in Table IV.K.2-1, the HWRP has the capacity to treat approximately 450 mgd of wastewater for full secondary treatment and currently treats on average approximately 275 mgd.²⁰ As such, the HWRP is currently operating at approximately 61 percent of its capacity with a remaining capacity of approximately 175 mgd. Based on the above, current flows to the HWRP are well below its design capacity of approximately 450 mgd.

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

²⁰ LASAN, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=e2plbkvkn_159&_afLoop=18041533112304852#!, accessed June 8, 2026.

removed as sludge.²¹ The treated water from the HWRP is discharged through a 5-mile outfall pipe at a depth of 190 feet into the Santa Monica Bay and Pacific Ocean.²² The discharge from the HWRP into Santa Monica Bay is regulated by the HWRP's National Pollution Discharge Elimination System (NPDES) Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use.²³ Accordingly, the HWRP's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. LASAN also monitors flows into the Santa Monica Bay.²⁴

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Require or result in the relocation or construction of new or expanded water, 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;²⁵ or

Threshold (b): (Not) result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to

²¹ LASAN, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=e3plbkvkn_159&_afLoop=18041533112304852#!, accessed June 8, 2026.

²² LASAN, Hyperion Virtual Tour, Hyperion Treatment Plant Tour, Ocean Outfall into the Bay, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp/s-lsh-au-h?_adf.ctrl-state=hbj4dbu8e_668&_afLoop=6456466102258922#!, accessed June 8, 2026.

²³ Los Angeles Regional Water Quality Control Board, 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 May 1, 2023, through April 30, 2028.

²⁴ LASAN, Environmental Monitoring, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-em?_adf.ctrl-state=ljvz6q49_793&_afLoop=8243608662499891#!, accessed June 8, 2026.

²⁵ Refer to Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure of this Draft EIR for a discussion of water supply impacts; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts; and the Project's Initial Study included as Appendix A of this Draft EIR, for a discussion of stormwater and telecommunications facility impacts.

serve the project's projected demand in addition to the provider's existing commitments.

In assessing impacts related to wastewater in this section, the City used Appendix G as the thresholds of significance. The factors identified below from the 2006 *L.A. CEQA Thresholds Guide* were used where applicable and relevant to assist in analyzing the Appendix G thresholds. The 2006 *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following criteria 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.²⁶

b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on: the Utility Report included as Appendix H of this Draft EIR; a SCAR prepared for the Project by LASAN and included as Exhibit 3 of the Utility Report; and the Project water demand estimates in LADWP's WSA which is included in its entirety and included as Exhibit H of the Utility Report.

As part of the WSA, LADWP estimated water demand using land use–based wastewater generation rates from LASAN. The anticipated wastewater flows to be generated by the Project are based on the water demand calculated in the WSA minus an adjustment for cooling towers, as noted below.²⁷ Based on the existing capacity of the sanitary sewer system in the vicinity of the Project Site and the Project Site's future wastewater generation, an assessment was then made in the Utility Report (based, in part, on the SCAR) of the potential impacts to the sanitary sewers and the City's downstream sewers and treatment

²⁶ *The Wastewater Facilities Plan referenced in the 2006 L.A. CEQA Thresholds Guide has since been superseded by the Integrated Resources Plan.*

²⁷ *Wastewater generation compared to water demand for cooling towers is minimal, and to provide for a more accurate projection of wastewater generation, the wastewater generation rate for office uses the sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012) for office with cooling tower of 170 gallons per square foot per day rather than the cooling tower water demand included in the approved WSA.*

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 at the HWRP would be available to accommodate the Project based on the estimate of the Project's wastewater generation and data from LASAN. For the assessment of cumulative impacts on wastewater treatment, the projected cumulative wastewater generation is compared to the estimated available capacity of the Hyperion Sanitary Sewer System.

c. Project Design Features

No project design features are proposed with regard to wastewater. However, the Project would include water conservation features that would result in a reduction in wastewater. Such conservation features are included in Project Design Feature WAT-PDF-1, provided in Section IV.K.1, Utilities and Service System—Water Supply and Infrastructure, of this Draft EIR. The analysis below conservatively does not include these water conservation features.

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?*²⁸**

(1) Impact Analysis

(a) Construction

As described in Section II, Project Description, of this Draft EIR, the Project would involve the removal of 6,137 square feet of rear additions to existing commercial uses on-site. As such, wastewater generation associated with the existing on-site commercial uses would decrease during construction of the Project. Temporary facilities, including portable toilet and hand wash stations, would be provided by the construction contractor for construction crews. Sewage from these facilities would be collected and hauled off-site and

²⁸ Refer to Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of water supply impacts; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of electric power and natural gas impacts; and the Project's Initial Study included as Appendix A of this Draft EIR, for a discussion of stormwater and telecommunications facility impacts.

not discharged into the public sewer system serving the Project Site. Therefore, Project construction would not contribute directly to the wastewater system that serves the Project Site, and in fact would result in a net reduction of sewage from the Project Site during the construction period. As such, while the sewage hauled off-site would eventually be deposited at the HWRP, the amount generated would likely be reduced compared what is currently generated at the Project Site, and would be substantially less than the amount of sewage that would be generated during Project operation which, as indicated in the “Operation” subsection below, the HWRP has the capacity to treat. 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.²⁹

The Project would also require the installation of new on-site sewer line connections to connect the proposed Residential Tower to the existing off-site public sewer mains along the streets surrounding the Project Site. The new sewer connections would collect wastewater from the Project Site and convey the wastewater to the existing public sewer main lines. Project construction impacts associated with the installation of new sewer line connections would primarily be confined to trenching in order to place the new sewer line connections below surface for connection into the existing off-site sewer public infrastructure, the potential impacts of which are already analyzed as part of the construction analyses throughout this Draft EIR. 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 LASAN and City’s Bureau of Engineering (BOE). BOE would be able to provide connection requirements, pipe depths, and connection location(s). In addition, as set forth in Project Design Feature TR-PDF-1 included in Section IV.I, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts that might result from trenching and installation of new sewer line connections. The Construction Traffic Management Plan would ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. Overall, installation of required sewer infrastructure as part of the Project would be generally confined to limited off-site areas in order to connect on-site sewer connections to sewer lines in the surrounding streets, would be of a relatively short-term duration, and would cease to occur once the installation is complete. Any off-site work that may affect the public streets and public right-of-way areas in the vicinity of the Project Site would be coordinated with the Los Angeles Bureau of Street Services. As such, construction activities associated with the installation of the required sewer infrastructure would not have a significant adverse impact on wastewater conveyance or treatment infrastructure.

Based on the above, Project construction would not require or result in the relocation or construction of new or expanded wastewater conveyance or treatment

²⁹ KPFF Consulting Engineers, *Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas*, June 2026. Appendix H of this Draft EIR, p. 34.

facilities to the degree that such construction or relocation would cause significant environmental effects. Therefore, Project construction impacts to the wastewater conveyance or treatment system would be less than significant.

(b) Operation

As shown in Table IV.K.2-2 on page IV.K.2-14, the Project could generate a net average increase in wastewater flow from the Project Site of approximately 190,879 gpd, or approximately 0.19 mgd. However, it is noted that this estimate is extremely conservative in that it does not account for required ordinance savings or the Project's additional water conservation commitments included in its Water Supply Assessment, and because it assumes the pool would be drained once a day which would not occur. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance system for treatment at the HWRP. As described above, the HWRP has a capacity of 450 mgd, and current average wastewater flows are at approximately 275 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. The Project's increase in average daily wastewater flow of 0.19 mgd would represent approximately 0.11 percent of the current 175 mgd remaining available capacity of HWRP.³⁰ Therefore, the Utility Report concludes that the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Additionally, as stated in the One Water LA 2040 Plan, the HWRP has sufficient capacity to manage wastewater flows through the year 2040.

The LAMC includes regulations that require the City to assure available sewer capacity for new projects. 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. As indicated previously, a SCAR (Exhibit 3 of the Utility Report) was submitted to evaluate the ability of the existing local wastewater conveyance system to accommodate the Project's estimated wastewater flow. In preparing the SCAR, LASAN analyzed the Project's wastewater demands in conjunction with existing conditions and forecasted growth, and has approved the maximum allowable capacity of 191,051 gpd. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

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

³⁰ $(0.19 \text{ mgd} \div 175 \text{ mgd}) \times 100 = 0.11\%$

**Table IV.K.2-2
Estimated Average Project Wastewater Generation**

Land Use	Quantity/ Floor Area	Wastewater Generation Rate (gpd/unit)	Generation (gpd)
Existing Uses to be Removed			
Retail	20,001 sf		
Restaurant	18,870 sf		
Office	9,358 sf		
Total Existing Generation to be Removed			172 ^a
Proposed Uses			
Residential Apartment: 1 BDR	206 du	110	22,660
Residential Apartment: 2 BDR	208 du	150	31,200
Residential Apartment Penthouse: 3 BDR	5 du	190 ^d	950
Swimming Pool ^b			61,411
Restaurant	2,449 seats	30	73,470
Office Building with Cooling Tower ^c	8,000	0.17	1,360
Subtotal Project Wastewater Generation	—	—	191,051
Net Average Project Wastewater Generation (Proposed – Existing)	—	—	190,879
Maximum Wastewater Generation Approved by SCAR^d			191,051

sf = square feet

gpd = gallons per day

^a The existing water demand for all existing uses on-site are based on LADWP billing data from May 2018 to April 2023. For a conservative water estimate, the existing buildings will be partially removed and partially retained and reconfigured. For a conservative water demand estimate, all existing plumbing fixtures are assumed to be removed as part of the Project.

^b Current City of LA methodology requires the listing of the total volume of pools, spas, and water features in the case of draining for maintenance in one given day for SCAR capacity. It is not anticipated that these volumes would be drained daily.

^c Wastewater generation compared to water demand for cooling towers is minimal, and to provide for a more accurate projection of wastewater generation, the wastewater generation rate for office uses the sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012) for office with cooling tower of 170 gallons per square foot per day rather than the cooling tower water demand included in the approved WSA.

^d The SCAR, approved October 27, 2025, is based on LASAN, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, <https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart>, accessed June 8, 2026.

Source: LADWP, Water Supply Assessment for the Wilshire and Cloverdale Project, prepared on August 10, 2023 and LASAN, Sewer Capacity Availability Request, October 23, 2025.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

Threshold (b): Would the Project (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?

(1) Impact Analysis

As shown in Table IV.K.2-2 on page IV.K.2-14, the Project would generate a net increase in wastewater flow from the Project Site of approximately 190,879 gpd (approximately 0.19 mgd). The Project's increase in average daily wastewater flow of 0.095 mgd would represent approximately 0.11 percent of the current 175 mgd remaining available capacity of HWRP. Therefore, the Utility Report concludes that Project-generated wastewater would be accommodated by the existing capacity of the HWRP.³¹ Additionally, as stated in the One Water LA 2040 Plan, the HWRP has sufficient capacity to manage wastewater flows through the year 2040.³²

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., would ultimately determine the available capacity of the Hyperion Service Area in 2029, the year by which construction of the Project is expected to be completed. Future iterations of the IRP, such as the One Water LA 2040 Plan discussed above, would provide for improvements beyond 2020 through 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2029, the Project's proposed buildout year. Thus, based on this conservative assumption, the 2029 effective capacity of the Hyperion Sanitary Sewer System would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2029 would continue to be

³¹ KPFF Consulting Engineers, *Wilshire and Cloverdale Utility Infrastructure Technical Report: Water, Wastewater, Energy, and Gas*, June 2026. Appendix H of this Draft EIR.

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

450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2029, the Project build-out year, would be approximately 273.1 mgd.³³ Accordingly, the future remaining available capacity in 2029 of the HWRP would be approximately 176.9 mgd. The Project's net increase in average daily wastewater generation of 0.19 mgd would represent approximately 0.11 percent³⁴ of the HWRP's design capacity of 176.9 mgd. Therefore, the estimated wastewater generated during operation of the Project would be accommodated by the future capacity of the HWRP.

Additionally, the Project's net increase in average daily wastewater generation of 0.19 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.2 percent³⁵ of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.19 mgd plus the projected flows of approximately 176.9 mgd to the HWRP would also represent approximately 39.4 percent³⁶ of the HWRP's assumed future capacity of 450 mgd. Therefore, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments.

Based on the above, it is expected that the Project would result in a determination by LASAN that it has adequate treatment capacity to serve the Project's projected demand in addition to LASAN'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.

³³ *Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2029 value is extrapolated from 2020 and 2030 values: $[(275 \text{ mgd} - 256 \text{ mgd}) \div 10] \times 9 + 256 = 273.1 \text{ mgd}$.*

³⁴ $(0.19 \div 176.9 \text{ mgd}) \times 100 = 0.11\%$.

³⁵ $[(0.19 \text{ mgd} + 275 \text{ mgd}) \div 450 \text{ mgd}] \times 100 = 61.2\%$.

³⁶ $[(0.19 + 176.9) \div 450 \text{ mgd}] \times 100 = 39.4\%$.

(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 levels 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 2029 (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 2029 includes specific known development projects, as well as general ambient growth projected to occur.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 5 is a conservative assumption as some of the related projects may not be built out by 2029 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 5 are fully built out by 2029.

(a) Wastewater Infrastructure

As with the Project, new development projects occurring in the Project Site vicinity would be required to coordinate with LASAN via a SCAR to determine adequate sewer capacity pursuant to LAMC Section 64.15. In addition, new development projects would be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City would be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements. As with the Project, each related project would be required to obtain its own CEQA clearance and evaluate potential construction impacts associated with any proposed expansion or new facilities. Furthermore, like the Project, each related project would be required to comply with applicable water conservation programs, including the City's Green Building Code,

which would also help to reduce the wastewater flow to the sewer system. In addition, as with the Project, related projects would be required to implement construction traffic management plans to ensure that adequate and safe access remains available during construction activities. Such construction management plans would also ensure that appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would be implemented, as necessary, to ensure emergency access and traffic flow is maintained on adjacent rights-of-way. Lastly, as indicated in the Project-level analysis under Threshold (a) above, the Project would result in less than significant impacts to wastewater conveyance infrastructure. **Therefore, the Project and related projects would not result in significant cumulative impacts related to the construction or expansion of wastewater conveyance infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Wastewater Treatment Capacity

Development of the Project, in conjunction with the related projects, would result in an increase in the demand for sanitary sewer service in the Hyperion Service Area. As identified in Section III, Environmental Setting, of this Draft EIR, there are five related projects located in the vicinity of the Project Site. 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 558,864 gpd (0.56 mgd), as shown in Table IV.K.2-3 on page IV.K.2-19. Combined with the Project's wastewater generation of 190,879 gpd (0.19 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 749,743 gpd (approximately 0.75 mgd).³⁷

Based on LASAN's average flow projections for the HWRP, it is anticipated that the average flow in 2029 would be approximately 273.1 mgd.³⁸ In addition, the Hyperion Service Area's total treatment capacity is conservatively estimated to be approximately 550 mgd in 2029, which is the same as its existing capacity, while the HWRP's total treatment capacity is conservatively estimated to be approximately 450 mgd in 2029, again which is the same as its existing capacity. The total cumulative wastewater flow of approximately 0.75 mgd which would represent approximately 0.16 percent of the HWRP's existing design capacity of 450 mgd. As such, the HWRP would have adequate capacity to accommodate Project plus cumulative wastewater flows. Additionally, as stated above and in the One Water LA

³⁷ As noted above, this estimate is extremely conservative in that it does not account for water usage savings required by ordinance or the Project's additional water conservation commitments included in its Water Supply Assessment, and because it assumes the Project's pool would be drained once a day, which would not occur.

³⁸ Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2029 value is extrapolated from 2020 and 2030 values: $[(275 \text{ mgd} - 256 \text{ mgd}) \div 10] * 9 + 256 = 273.1 \text{ mgd}$.

**Table IV.K.2-3
Cumulative Wastewater Generation**

No.	Project	Land Use	Size	Generation Factor^a	Total Wastewater Generation (gpd)
1	Mirabel Transit Priority Project 688 S Cochran Ave (5411 Wilshire Blvd)	Multi-Family	348 du ^b	190 gpd/du	66,120
		Retail	5,000 sf	0.025 gpd/sf	125
		Other	6,000 sf (400 seats)	30 gpd/seat ^d	12,000
2	Wilshire Courtyard Project (Residential Option) ^c 5700 Wilshire Blvd	Studio	16 du	75 gpd/du	1,200
		1-Bedroom	1,089 du	110 gpd/du	119,790
		1-Bedroom + Den/2-Bedroom	1,394 du	150 gpd/du	209,100
		3-Bedroom	87 du	190 gpd/du	16,530
		Grocery	31,977 sf	0.05 gpd/sf	1,599
		Restaurant	24,427 sf (1,628 seats)	30 gpd/seat	48,840
3	629 La Brea Ave	Multi-Family	121 du	190 gpd/du	22,990
		Retail	13,000 sf	0.025 gpd/sf	325
		Hotel	125 rm	120 gpd/rm	15,000
4	5001 Wilshire Blvd	Multi-Family	243 du	190 gpd/du	46,170
		Retail	11,000 sf	0.025 gpd/sf	275
5	Metro D Line Extension ^e				
Related Projects Wastewater Generation					558,864
Project Net Wastewater Generation					190,879
Total Wastewater Generation for Related Projects and Project					749,743
^a <i>du = dwelling units</i> ^b <i>rm = rooms</i> ^c <i>sf = square feet</i>					

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

No.	Project	Land Use	Size	Generation Factor ^a	Total Wastewater Generation (gpd)
^a This analysis is based on sewage generation rates provided by LASAN's Sewerage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, revised June 10, 2019. ^b This analysis conservatively assumes that all dwelling units are 3-bedroom units. ^c This related project also includes an office option; however, in order to provide a conservative analysis, wastewater generation is estimated based on the residential option, which would result in greater water demand and wastewater generation. ^d LASAN's sewage generation factor for restaurants assumed for "Other" land uses to provide a conservative analysis. ^e The Metro D Line extension station will generate only very limited wastewater as it includes only restrooms. As such, it is not included in the analysis. Source: Eyestone Environmental, 2026.					

2040 Plan, the HWRP has sufficient capacity to manage wastewater flows through at least the year 2040.³⁹ **Therefore, Project impacts on the wastewater treatment systems would not be cumulatively considerable, and cumulative impacts 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 levels remains less than significant.

³⁹ *Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 1, page ES-20.*