

## **IV. Environmental Impact Analysis**

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### **I.2 Utilities and Service Systems— Wastewater**

#### **1. Introduction**

This section of the Draft EIR analyzes the potential impacts of the Project with regard to the existing wastewater infrastructure and treatment facilities that serve the Project Site. The analysis describes the existing wastewater system (including local and regional conveyance and treatment facilities), calculates the wastewater to be generated by the Project, and evaluates whether sufficient capacity is available and would be available to meet the Project's estimated wastewater generation. The analysis is based, in part, on *1546 Argyle Avenue: Utility Infrastructure Technical Report: Water, Wastewater, Dry Utilities* (Utility Report), dated February 21, 2019, which was prepared by Kimley-Horn and included in Appendix L of this Draft EIR, as well as information provided by the City of Los Angeles Bureau of Sanitation (LASAN) in their response to the Request for Wastewater Service Information (WWSI), which is included with the Utilities Report.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) State**

###### *(a) California Green Building Code*

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

## (2) Local

### *(a) City of Los Angeles General Plan Framework*

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

### *(b) City of Los Angeles Integrated Resources Plan*

The City of Los Angeles Integrated Resources Plan (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 (2) "Go-If Triggered Projects" for implementation in the future once a trigger is reached.<sup>1</sup> 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.

The following is a description of the six Go Projects:

1. Construct wastewater storage facilities at Donald C. Tillman Water Reclamation Plant that will provide the needed wet weather wastewater storage and operational storage.
2. Construct wastewater storage at the Los Angeles Glendale Water Reclamation Plant that will allow operations to be more efficient while increasing its ability to provide consistent recycled water flows to customers.

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<sup>1</sup> *City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, Water Integrated Resources Plan 5-Year Review FINAL Documents, June 2012.*

3. Construct recycled water storage at Los Angeles Glendale Water Reclamation Plant that will allow the Los Angeles Glendale Water Reclamation Plant to deliver recycled water to customers at times when wastewater flows are low (i.e., during the night.)
4. Construct solids handling and truck loading facility at the Hyperion Treatment Plant that will provide more efficient operations and will also meet future solids handling production.
5. Construct Glendale–Burbank Interceptor Sewer that will provide relief and additional capacity in the near future to prevent overflows and spills.
6. Construct North East Interceptor Sewer Phase II that will relieve the section of the North Outfall Sewer south of the Los Angeles Glendale Water Reclamation Plant and convey additional wastewater from the Glendale–Burbank Interceptor Sewer to provide additional capacity in the near future to prevent overflows and spills.

The following is a description of the six Go-If Triggered Projects:

1. Upgrades at the Donald C. Tillman Water Reclamation Plant to advanced treatment (current capacity) may be triggered by regulations and/or a decision to reuse recycled water for groundwater replenishment (advanced treatment may be necessary in order to meet all applicable requirements).
2. Expansion of the Donald C. Tillman Water Reclamation Plant to 100 million gallons per day (mgd) with advanced treatment may be triggered if an increase in population, regulations, and/or a decision to replenish groundwater basins takes place. At that time, the Donald C. Tillman Water Reclamation Plant could be expanded to 100 mgd with advanced treatment.
3. Upgrades of the Los Angeles Glendale Water Reclamation Plant to advanced treatment (current capacity) may be triggered by regulations, downstream sewer capacity, and/or management's decision to reuse. At that time, advanced treatment at current capacity could be required.
4. Design/construction of secondary clarifiers at the Hyperion Treatment Plant to provide operational performance at 450 mgd may be triggered if the optimization of existing secondary clarifiers is unsuccessful.
5. Design/construction of up to 12 digesters at Hyperion Treatment Plant may be triggered if an increased biosolids production in the service area takes place. At that time, additional digesters will be required at Hyperion Treatment Plant.

6. Design/construction of Valley Spring Lane Interceptor Sewer may be required to provide additional sewer conveyance capacity between the Donald C. Tillman Water Reclamation Plant and the Valley Spring Lane/Forman Avenue Diversion structure if flow triggers are met.

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.<sup>2</sup>

As discussed above, the IRP addressed the anticipated water, wastewater, and stormwater needs of the City through the year 2020. As 2020 approaches, the City is now developing the One Water LA 2040 Plan, which builds on the premise of the IRP to maximize water resources and to develop a framework for managing the City's watersheds, water resources, and water facilities.<sup>3</sup> As with the IRP, such efforts would be organized in phases. Phase I of the One Water LA 2040 Plan includes developing initial planning baselines and guiding principles for water management and citywide facilities planning in coordination with City departments, other agencies, and stakeholders.<sup>4</sup> Phase II includes development of technical studies and an updated facilities plan for stormwater and wastewater. The final draft of One Water LA has been completed, and work on its Programmatic Environmental Impact Report (PEIR) will begin soon.<sup>5</sup>

### (c) Sewer System Management Plan

On May 2, 2006, the State Water Resources Control Board adopted the Statewide General Waste Discharge Requirements for publicly owned sanitary sewer systems that are greater than 1 mile in length and that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in California. Under the Statewide

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

<sup>3</sup> City of Los Angeles, *One Water LA Plan*, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-es-owla-au?\\_adf.ctrl-state=3s41u47kd\\_4&\\_afLoop=19192846888885768#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-owla-au?_adf.ctrl-state=3s41u47kd_4&_afLoop=19192846888885768#!), accessed March 25, 2019.

<sup>4</sup> City of Los Angeles, *One Water LA Plan, Plan Development*, [www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla/s-lsh-es-owla-au/s-lsh-es-owla-au-aowla-pd?\\_adf.ctrl-state=f0cxqccpz\\_68&\\_afLoop=28963541793939404#!](http://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla/s-lsh-es-owla-au/s-lsh-es-owla-au-aowla-pd?_adf.ctrl-state=f0cxqccpz_68&_afLoop=28963541793939404#!), accessed March 25, 2019.

<sup>5</sup> *One Water LA, Plan Documents*, [https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-es-owla-r?\\_adf.ctrl-state=rnwk2mfka\\_5&\\_afLoop=3595575820503671#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-owla-r?_adf.ctrl-state=rnwk2mfka_5&_afLoop=3595575820503671#!), accessed February 20, 2019.

General Waste Discharge Requirements, the owners of such systems must comply with the following requirements: (1) acquire an online account from the State Water Board and report all sanitary sewer overflows online; and (2) develop and implement a written plan referred to as a Sewer System Management Plan to control and mitigate sanitary sewer overflows and make it available to any member of the public upon request in writing.

In accordance with the Statewide General Waste Discharge Requirements, the City of Los Angeles acquired online accounts from the State Water Board and began reporting sanitary sewer overflows by the due date of January 2, 2007. The City's original Sewer System Management Plan was adopted by the City's Board of Public Works and certified with the State Water Resources Control Board on February 18, 2009.<sup>6</sup> The City's Sewer System Management Plans were last updated in February 2017, which confirmed the City's Sewer System Management Plans are in full compliance with the Statewide General Waste Discharge Requirements and are effective.<sup>7</sup>

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

*(d) City Infrastructure 2010–2011 Report Card*

The City Infrastructure 2010–2011 Report Card was developed to analyze the current conditions of key infrastructure and provide recommendations on how to maintain and strengthen the infrastructure. Seven key components of each infrastructure system were considered, including capacity, condition, funding, future need, operation and maintenance, public safety, and resilience. With regards to wastewater infrastructure, the report graded the wastewater collection infrastructure and wastewater treatment plants with a Grade B-, in which "minor changes required in one or more of the above areas to enable the infrastructure system to be fit for its current and anticipated future purposes." The recommended grade is a B+ for wastewater collection infrastructure and a B for wastewater treatment plants.

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<sup>6</sup> *City of Los Angeles Sewer System Management Plan: City of LA Regional Sanitary Sewer System, February 2017.*

<sup>7</sup> *City of Los Angeles, LASAN, Sewer System Management Plan, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-s-ssmp?\\_adf.ctrl-state=vgfzogpgx\\_4&\\_afLoop=6053591728402158#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-s-ssmp?_adf.ctrl-state=vgfzogpgx_4&_afLoop=6053591728402158#!), accessed December 28, 2018.*

<sup>8</sup> *City of Los Angeles, Sewer System Management Plan: Hyperion Sanitary Sewer System, February 2017.*

Based on the City Infrastructure 2010–2011 Report Card, to obtain a “B” grade, it is recommended that the City improve the wastewater treatment and reclamation facilities where opportunities exist in order to meet projected increase in flows, enhance efficiencies, and continue to protect the public and the environment. As indicated in the City Infrastructure 2010–2011 Report Card, based on the Wastewater Capital Improvement Program, 468 miles of sewers are listed to be rehabilitated, and approximately 207 miles have been completed. The remaining 262 miles of sewers listed in the Wastewater Capital Improvement Program are planned to be completed by 2018.<sup>9</sup>

*(e) City of Los Angeles Municipal Code*

Los Angeles Municipal Code (LAMC) Sections 64.11 and 64.12 require approval of a sewer permit prior to connection to the sewer system. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength as well as volume. The determination of wastewater strength for each applicable project is based on City guidelines for the average wastewater concentrations of biological oxygen demand and suspended solids, for each type of land use. Fees paid to the Sewerage Facilities Charge are deposited in the City’s Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

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

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

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<sup>9</sup> *City of Los Angeles, Department of Public Works, Infrastructure 2010–2011 Report Card.*

## b. Existing Conditions

### (1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with six buildings used for retail, office, and warehouse uses, totaling 61,816 square feet of floor area. There is also a surface parking lot. As shown in Table IV.1.2-2 on page IV.1.2-14 later in this section, based on the standard wastewater generation rates from LASAN, the existing uses on the Project Site generate a total average daily wastewater flow of approximately 3,151 gallons per day (gpd).

### (2) Wastewater Infrastructure

Sanitary sewer service to and from the Project area is owned and operated by the City of Los Angeles. The existing wastewater collection system includes more than 6,700 miles of public sewers, which serves a population of more than 4 million people and conveys approximately 400 mgd to the City's four wastewater treatment and water reclamation plants.<sup>10</sup>

As described in the Utility Report, there is an existing 12-inch reinforced concrete pipe (RCP) main along Argyle Avenue flowing south, an 8-inch vitrified clay pipe (VCP) main along Argyle Avenue flowing south, and an 8-inch VCP main along Selma Avenue flowing east. Sewer flows originating from the Project Site are collected and conveyed through a network of sewer lines for treatment at the Hyperion Water Reclamation Plant (HWRP).

### (3) Wastewater Treatment

LASAN is responsible for operating and maintaining four treatment and water reclamation plants: the HWRP, the Donald C. Tillman Water Reclamation Plant, the Terminal Island Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant.<sup>11</sup> These treatment facilities remove potential pollutants from sewage in order to protect river and marine environments and public health.

<sup>10</sup> LASAN, *Sewers*, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?\\_adf.ctrl-state=w3f8ikamv\\_4&\\_afLoop=18666739916391336#!](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_adf.ctrl-state=w3f8ikamv_4&_afLoop=18666739916391336#!), accessed December 28, 2018.

<sup>11</sup> LASAN, *Clean Water*, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?\\_adf.ctrl-state=i4fxxch6u\\_2716&\\_afLoop=3942844394071857&\\_afWindowMode=0&\\_afWindowId=null#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D3942844394071857%26\\_afWindowMode%3D0%26\\_afd.ctrl-state%3D117xyol7e\\_425](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=i4fxxch6u_2716&_afLoop=3942844394071857&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D3942844394071857%26_afWindowMode%3D0%26_afd.ctrl-state%3D117xyol7e_425), accessed December 28, 2018.

LASAN divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.<sup>12</sup> The Hyperion Service Area is served by the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant. The Project Site is located within the Hyperion Service Area.

*(a) Hyperion Service Area*

As shown in Table IV.1.2-1 on page IV.1.2-9, the existing design capacity of the Hyperion Service Area is approximately 550 mgd (consisting of 450 mgd at the HWRP, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant).<sup>13</sup> Current flows to the treatment plants that comprise the Hyperion Service Area total approximately 338.2 mgd (consisting of 275 mgd<sup>14</sup> to the HWRP, 46 mgd to the Donald C. Tillman Water Reclamation Plant, and 17.2 mgd to the Los Angeles–Glendale Water Reclamation Plant).<sup>15</sup> Current flows are below the design capacity of approximately 550 mgd for the Hyperion Service Area.

*(b) Hyperion Water Reclamation Plant*

As discussed above, wastewater generated from the Project Site is conveyed via the local collector sanitary sewer system directly to the HWRP for treatment. As shown in Table IV.1.2-1, the HWRP has the capacity to treat approximately 450 mgd of wastewater for full secondary treatment. The HWRP currently treats a daily average of approximately 275 mgd.<sup>16</sup> As such, the HWRP is currently operating at approximately 61 percent of its capacity, with a remaining available capacity of approximately 175 mgd. Based on the above, current flows to the HWRP is well below its design capacity of approximately 450 mgd.

<sup>12</sup> LASAN, *Clean Water*, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?\\_adf.ctrl-state=i4fxxch6u\\_2716&\\_afLoop=3942844394071857&\\_afWindowMode=0&\\_afWindowId=null#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D3942844394071857%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3D117xyol7e\\_425](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=i4fxxch6u_2716&_afLoop=3942844394071857&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D3942844394071857%26_afWindowMode%3D0%26_adf.ctrl-state%3D117xyol7e_425), accessed December 28, 2018.

<sup>13</sup> LASAN, *Wastewater System Fact Sheet*, [www.lacitysan.org/san/sandocview?docname=QA001435](http://www.lacitysan.org/san/sandocview?docname=QA001435), accessed December 28, 2018.

<sup>14</sup> LASAN, *Water Reclamation Plants, Hyperion Water Reclamation Plant*, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=117xyol7e\\_1625&\\_afLoop=3944129627110139#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=117xyol7e_1625&_afLoop=3944129627110139#!), accessed December 28, 2018.

<sup>15</sup> *Per Phone Communication with Abraham Razon, Environmental Engineer, LASAN, March 21, 2016.*

<sup>16</sup> LASAN, *Water Reclamation Plants, Hyperion Water Reclamation Plant*, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=vm8qwyl80\\_4&\\_afLoop=18606279438697733#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyl80_4&_afLoop=18606279438697733#!), accessed December 28, 2018.



**Table IV.1.2-1  
Existing Capacity of Hyperion Service Area**

	<b>Design Capacity (mgd)</b>
Hyperion Water Reclamation Plant	450
Donald C. Tillman Water Reclamation Plant	80
Los Angeles–Glendale Water Reclamation Plant	20
<b>Total</b>	<b>550</b>
<i>mgd = million gallons per day</i>	
<i>Source: LASAN, Wastewater System Fact Sheet, <a href="http://www.lacitysan.org/san/sandocview?docname=QA001435">www.lacitysan.org/san/sandocview?docname=QA001435</a>, accessed December 28, 2018.</i>	

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 solids are allowed to either settle to the bottom of tanks or float on the surface. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.<sup>17</sup> The treated water from the HWRP is discharged through an outfall pipe 5 miles into the Santa Monica Bay and Pacific Ocean.<sup>18</sup> The discharge of effluent from the HWRP into Santa Monica Bay is regulated by the HWRP's 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.<sup>19</sup> Accordingly, the HWRP's effluent that is released is continually monitored to ensure that it meets or exceeds prescribed standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay.<sup>20</sup>

<sup>17</sup> LASAN, *Water Reclamation Plants, Hyperion Water Reclamation Plant*, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=vm8qwvj80\\_4&\\_afLoop=18606279438697733#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwvj80_4&_afLoop=18606279438697733#!), accessed December 28, 2018.

<sup>18</sup> LASAN, *Water Reclamation Plants, Hyperion Water Reclamation Plant*, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=vm8qwvj80\\_4&\\_afLoop=18606279438697733#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwvj80_4&_afLoop=18606279438697733#!), accessed December 28, 2018.

<sup>19</sup> LASAN, *Water Reclamation Plants, Hyperion Water Reclamation Plant*, [www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=vm8qwvj80\\_4&\\_afLoop=18606279438697733#!](http://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwvj80_4&_afLoop=18606279438697733#!), accessed December 28, 2018.

<sup>20</sup> LASAN, *Santa Monica Bay Shoreline Monitoring Municipal Separate Storm Sewer System Report, July 2005–June 2006*.

### 3. Environmental Impacts

#### a. Thresholds of Significance

##### (1) State CEQA Guidelines Appendix G

In accordance with Appendix G of the CEQA Guidelines, a 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.<sup>21</sup>***

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

##### (2) 2006 L.A. CEQA Thresholds Guide

The *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:

- 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.<sup>22</sup>

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<sup>21</sup> Refer to Section IV.1.1, *Utilities and Service Systems—Water Supply and Infrastructure of this Draft EIR for a discussion of wastewater impacts; the Project's Initial Study included as Appendix A of this Draft EIR and Section VI, Other CEQA Considerations, of this Draft EIR, for a discussion of stormwater impacts; Section IV.J, Energy Conservation and Infrastructure of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts.*

<sup>22</sup> *The Wastewater Facilities Plan referenced in the L.A. City CEQA Thresholds Guide has since been superseded by the Integrated Resources Plan.*

In assessing impacts related to wastewater in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds.

## b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Utility Report included in Appendix L of this Draft EIR. The Utility Report calculates the anticipated wastewater flows to be generated by the Project using wastewater generation factors provided by LASAN. Given the existing capacity of the Project Site's sanitary sewer system and the Project Site's future demand, an assessment was made of the impacts to the sanitary sewers and the City's downstream sewers and treatment plants. Data regarding the existing physical features and capacity of the system is based on information provided by LASAN in the WWSI.

To evaluate potential impacts relative to wastewater treatment capacity, this analysis evaluates whether adequate treatment capacity within the Hyperion Service Area would be available to accommodate the Project based on the estimate of the Project's wastewater generation and data from LASAN. For the assessment of cumulative impacts on wastewater treatment, the projected cumulative wastewater generation is compared to the estimated available capacity of the Hyperion Service Area in 2023, the Project's buildout year.

## c. Analysis of Project Impacts

### (1) Project Design Features

The Project would include water conservation features, which would also result in a reduction in wastewater. Such conservation features are included in Project Design Feature WAT-PDF-1, included in Section IV.1.1, Utilities and Service System—Water Supply and Infrastructure, of this Draft EIR.

### (2) Project Impacts

***Threshold (a): Would the Project 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?***<sup>23</sup>

***(a) Construction***

The Project would require construction of new on-site wastewater infrastructure to serve the proposed development. Construction activities associated with the installation of new or relocated sewer line connections would be confined to trenching in order to place the sewer lines below surface. Such activities would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Vehicular and pedestrian access within and immediately surrounding the Project Site may be temporarily affected during installation of sewer line connections. However, as discussed in Section IV.G, Transportation, of this Draft EIR, during construction of the Project, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to reduce impacts to pedestrian and traffic flow from temporary off-site utility work. The Construction Traffic Management Plan would ensure that adequate and safe pedestrian access, vehicle travel, and emergency vehicle access remains available within and near the Project Site during construction activities. Additionally, any partial street closures would be temporary in nature and would not be anticipated to result in a substantial inconvenience to motorists or pedestrians, who would have additional options for navigating around the construction site(s). Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. In addition, activities related to the installation of any required wastewater infrastructure would be coordinated through LASAN, so as not to interrupt existing service to other users.

With respect to wastewater generation during construction, existing sewer laterals will be capped and no sewage will enter the public sewer system. Temporary facilities (such as portable toilet and hand wash areas) will be provided by the contractor at the Project Site. Sewage from these facilities will be collected and hauled offsite and not discharged into the public sewer system. As such, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows. Thus, wastewater generation associated with construction of the Project would not exceed

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<sup>23</sup> Refer to Section IV.1.1, Utilities and Service Systems—Water Supply and Infrastructure of this Draft EIR for a discussion of wastewater impacts; the Project's Initial Study included as Appendix A of this Draft EIR and Section VI, Other CEQA Considerations, of this Draft EIR, for a discussion of stormwater impacts; Section IV.J, Energy Conservation and Infrastructure of this Draft EIR for a discussion of electric power and natural gas impacts; and Section VI, Other CEQA Considerations for a discussion of telecommunications facility impacts.

wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB) or substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the IRP.

**Based on the above, construction activities would not have any adverse impact on wastewater conveyance or treatment infrastructure. In addition, most construction impacts associated with the installation of on-site wastewater facilities and off-site connections are expected to be confined to trenching and would be temporary in nature. As such, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project construction impacts to the wastewater conveyance or treatment system would be less than significant.**

*(b) Operation*

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. As described above, the HWRP has a capacity of 450 mgd, and current wastewater flow levels are at approximately 275 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table IV.1.2-2 on page IV.1.2-14, the Project would generate a maximum net increase in wastewater flow from the Project Site of approximately 46,027 gpd, or approximately 0.046 mgd with the Retail/Restaurant Option. This increase in average daily wastewater flow of 0.046 mgd would represent approximately 0.03 percent of the current 175 mgd remaining available capacity of the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP, and impacts would be less than significant.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2023, the year by which construction of the Project is expected to be completed. While it is anticipated that future iterations of the IRP would provide for improvements beyond 2023 to serve future population needs, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2023. Thus, based on this conservative assumption, the 2023 effective capacity of the Hyperion Service Area would continue to be approximately 550 mgd. Similarly, the capacity of the HWRP in 2023 will continue to be 450 mgd.

The Project's net increase in average daily wastewater generation of 0.046 mgd would represent approximately 0.008 percent of the Hyperion Service Area's assumed future capacity of 550 mgd and approximately 0.01 percent of the HWRP's design capacity

**Table IV.1.2-2  
Estimated Project Wastewater Generation**

Land Use	No. of Units/ Floor Area	Generation Rate <sup>a</sup>	Sewage Generation Demand (gpd)
<b>Existing</b>			
Retail	14,000 sf	0.025 gpd/sf	350
Office	15,182 sf	0.12 gpd/sf	1,822
Warehouse	32,634 sf	0.03 gpd/sf	979
<i>Total Existing</i>			<b>3,151</b>
<b>Retail/Restaurant Option<sup>b</sup></b>			
Residential Apt: Bachelor	46 du	75 gpd/du	3,450
Residential Apt: 1 BD	196 du	110 gpd/du	21,560
Residential Apt: 2 BD	34 du	150 gpd/du	5,100
Retail	9,000 sf	0.025 gpd/sf	225
Restaurant	600 seats	30 gpd/seat	18,000
Lounge Area	16,865 sf	0.05 gpd/sf	843
<i>Total Proposed by Project</i>			<b>49,178</b>
<b>Total Net Water Demand (Proposed – Existing to Be Removed)</b>			<b>46,027</b>
<p><i>du = dwelling units</i>  <i>gpd = gallons per day</i>  <i>sf = square feet</i>  All totals have been rounded and may not sum due to rounding.</p> <p><sup>a</sup> This analysis is based on sewage generation rates provided LASAN (2012).</p> <p><sup>b</sup> For purposes of this analysis, estimated Project wastewater demand is based on the Retail/Restaurant Option. This yields a more conservative estimate than the Grocery Store Option, which would generate an estimated total 32,310 gpd of wastewater, resulting in a net generation of 29,159 gpd.</p> <p>Source: Kimley-Horn, 2019.</p>			

of 450 mgd. In addition, the Project's net increase in average daily wastewater generation of 0.046 mgd plus the current flows of approximately 275 mgd to the HWRP would represent approximately 61 percent of the HWRP's estimated future capacity of 450 mgd. The Project's net increase in average daily wastewater generation of 0.046 mgd plus the current flows of approximately 338.2 mgd to the Hyperion Service Area would represent approximately 61.5 percent of the Hyperion Service Area's estimated future capacity of 550 million gallons per day. Thus, the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant.

In accordance with the wastewater reduction requirements for new non-residential and high-rise residential construction set forth in LAMC Chapter IX, Article 9, Section 99.05.303.4, the Project would be required to demonstrate a 20-percent reduction in potable water demand to comply with the City of Los Angeles Green Building Code. To provide a conservative analysis, the estimate of the Project's wastewater flow does not account for this required reduction. Thus, the analysis below likely overstates the Project's potential impacts on wastewater treatment and conveyance facilities.

As previously discussed, wastewater generated from the Project Site would be conveyed via the local collector sanitary sewer system to the HWRP for treatment. The discharge of effluent from the HWRP into Santa Monica Bay is regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As LASAN monitors the treated wastewater, wastewater generated from the Project Site would not exceed wastewater treatment requirements of LARWQCB.

Furthermore, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. As described in the Utility Report, there are three existing sanitary sewer connections to the Project Site from Argyle Avenue and Selma Avenue. Specifically, the Project proposes one sewer connection to the existing 8-inch sewer main on Argyle Avenue and one sewer connection to the 8-inch sewer main on Selma Avenue. A WWSI included as Exhibit 7 of the Utility Report (see Appendix L of this Draft EIR) was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. Based on the current approximate flow levels and design capacities in the sewer system, and the Project's estimated wastewater flow, the City determined that the existing 8-inch sewer mains on Argyle Avenue and Selma Avenue may have adequate capacity to accommodate the additional demand generated by the Project, future growth and existing demand. 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 the event the public sewer has insufficient capacity, the Project would be required to install sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit would be made at that time. All 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, 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. Thus, the Project's operational impacts with respect to wastewater treatment and infrastructure capacity would be less than significant, and mitigation measures are not required.**

***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?***

As discussed above, construction and operation of the Project would not exceed wastewater treatment requirements of the LARWQCB. In addition, based on the temporary nature of construction of new on-site infrastructure and minor off-site work associated with connections to the public main line, as well as operational wastewater generation, the Project would not constrain existing and future scheduled wastewater treatment and infrastructure capacity. Furthermore, LASAN has confirmed that the local sewer system might be able to handle the increased flow from the Project, and the Project would comply with relevant design requirements as well as applicable sanitation and plumbing standards. 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 the event the public sewer has insufficient capacity, the Project would be required to install sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit would be made at that time. All 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, it is expected that LASAN would make a determination that it has adequate treatment capacity to serve the Project's projected demand in addition to LASAN's existing commitments.

## 4. Cumulative Impacts

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 2023 (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 2023 includes specific known development projects, growth that maybe projected as a result of the land use designation and policy changes contained in the Hollywood Community Plan Update, as well as general ambient growth projected to occur.

As identified in Section III, Environmental Setting, of this Draft EIR a total of 108 related projects are located in the vicinity of the Project Site. In addition, Related Project No. 109, the Hollywood Community Plan Update, is identified.



As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 108 is a conservative assumption, as some of the related projects may not be built out by 2023 (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 108 are fully built out by 2023, unless otherwise noted. Related Project No. 109 is the Hollywood Community Plan Update, which once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2023, well before the Community Plan Update's horizon year. Moreover, 2023 is a similar projected buildout year as many of the 108 related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Community Plan Update upon its adoption.

### **a. Wastewater Generation**

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 108 related development projects located in the Project vicinity. Assuming that each of these related projects would connect to some or all of the City sewers serving the Project Site, forecasted growth from the related projects would generate an average daily wastewater flow of approximately 4,662,646 gpd or approximately 4.67 mgd, as shown in Table IV.1.2-3 on page IV.1.2-18. Combined with the Project's net increase in wastewater generation of 46,027 gpd (0.046 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 4,708,673 gpd, or 4.71 mgd.

### **b. Wastewater Treatment**

Based on the LASAN's average flow projections for the Hyperion Service Area, it is anticipated that the average flow in 2023 would be approximately 377.56 mgd.<sup>24</sup> In addition, the Hyperion Service Area's total treatment capacity would be approximately 550 mgd in 2023, which is the same as its existing capacity.

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<sup>24</sup> *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit 4D. Based on a straight-line interpolation of the projected flows for the Hyperion Service Area between Fiscal Year (FY) 2019/2020 (374,000 AFY) and FY 2024/2025 (456,000 AFY). The 2023 extrapolated value is calculated using FY 2019/2020 and FY 2024/2025 projections to find the average increase between years, and then applying that annual increase to 2023:  $[(456,000 \text{ AFY} - 374,000 \text{ AFY}) \div 5] \times 3 + 374,000 \text{ AFY} = 423,200 \text{ AFY} \approx 377.56 \text{ mgd}$ .*

**Table IV.1.2-3  
Cumulative Wastewater Generation**

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Size</b>	<b>Generation Factor<sup>a,b</sup></b>	<b>Total Daily Wastewater Generation (gpd)</b>
1	Paseo Plaza Mixed-Use 5651 W. Santa Monica Blvd.	Condominiums	375 du	190 gpd/du	71,250
		Retail	377,900 sf	0.050 gpd/sf	18,895
2	BLVD 6200 Mixed-Use 6200 W. Hollywood Blvd.	Live/Work Units	28 du	190 gpd/du	5,320
		Apartments	1,014 du	190 gpd/du	192,660
		Retail	175,000 sf	0.050 gpd/sf	8,750
3	Sunset Bronson Studios 5800 W. Sunset Blvd.	Office	404,799 sf	0.120 gpd/sf	48,576
4	Yucca Street Condos 6230 W. Yucca St.	Apartments	114 du	190 gpd/du	21,660
		Commercial	2,697 sf	0.050 gpd/sf	135
5	Hollywood 959 959 N. Seward St.	Office	241,568 sf	0.120 gpd/sf	28,988
6	Archstone Hollywood Mixed-Use Project 6911 W. Santa Monica Blvd.	Apartments	231 du	190 gpd/du	43,890
		High-Turnover Restaurant (5,000 sf)	200 seats	30 gpd/seat	6,000
		General Retail	10,000 sf	0.025 gpd/sf	250
7	Temple Israel of Hollywood 7300 W. Hollywood Blvd.	Temple Renovation <sup>c</sup>			0
8	Mixed-Use 5245 W. Santa Monica Blvd.	Apartments	49 du	190 gpd/du	9,310
		Retail	32,272 sf	0.025 gpd/sf	807
9	Selma Hotel 6417 W. Selma Ave.	Hotel	180 rm	120 gpd/rm	21,600
		Restaurant (12,840 sf)	514 seats	30 gpd/seat	15,408
10	Hollywood Production Center 1149 N. Gower St.	Apartments	57 du	190 gpd/du	10,830
11	Hollywood Gower Mixed-Use 6100 W. Hollywood Blvd.	Apartments	220 du	190 gpd/du	41,800
		Restaurant (3,270 sf)	131 seats	30 gpd/seat	3,924
12	Mixed-Use Office/Retail 936 N. La Brea Ave.	Office	88,750 sf	0.120 gpd/sf	10,650
		Retail	12,000 sf	0.025 gpd/sf	300

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Size</b>	<b>Generation Factor<sup>a,b</sup></b>	<b>Total Daily Wastewater Generation (gpd)</b>
13	Pantages Theater Office 6225 W. Hollywood Blvd.	Office	210,000 sf	0.120 gpd/sf	25,200
14	Selma & Vine Office Project 1601 N. Vine St.	Office	100,386 sf	0.120 gpd/sf	12,046
		Commercial	2,012 sf	0.050 gpd/sf	101
15	Argyle Hotel Project 1800 N. Argyle Ave.	Hotel	225 rm	120 gpd/rm	27,000
16	Seward Street Office Project 956 N. Seward St.	Office	126,980 sf	0.120 gpd/sf	15,238
17	Hotel & Restaurant Project 6381 W. Hollywood Blvd.	Hotel	80 rm	120 gpd/rm	9,600
		Restaurant (15,290 sf)	612 seats	30 gpd/seat	18,348
18	Emerson College Project (Student Housing) 1460 N. Gordon St.	Student Housing	224 du	190 gpd/du	42,560
		Faculty/Staff Housing	16 du	190 gpd/du	3,040
		Retail	6,400 sf	0.025 gpd/sf	160
19	Television Center (TVC Expansion) 6300 W. Romaine St.	Office	114,725 sf	0.120 gpd/sf	13,767
		Gym	40,927 sf	0.200 gpd/sf	8,185
		Dance Studio	38,072 sf	0.050 gpd/sf	1,904
20	Hollywood Center Studios Office 6601 W. Romaine St.	Office	106,125 sf	0.120 gpd/sf	12,735
21	Selma Community Housing 1603 N. Cherokee Ave.	Affordable Apartments	66 du	190 gpd/du	12,540
22	Hudson Building 6523 W. Hollywood Blvd.	Restaurant (10,402 sf)	416 seats	30 gpd/seat	12,482
		Office	4,074 sf	0.120 gpd/sf	489
		Storage	890 sf	0.030 gpd/sf	27
23	La Brea Gateway 915 N. La Brea Ave.	Supermarket	33,500 sf	0.025 gpd/sf	838
		Apartments	179 du	190 gpd/du	34,010
24	Target Retail Shopping Center Project 5520 W. Sunset Blvd.	Discount Store	163,862 sf	0.050 gpd/sf	8,193
		Shopping Center	30,887 sf	0.025 gpd/sf	772

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Size</b>	<b>Generation Factor<sup>a,b</sup></b>	<b>Total Daily Wastewater Generation (gpd)</b>
25	Residential 712 N. Wilcox Ave.	Apartments	103 du	190 gpd/du	19,570
26	Mixed-Use 1600-1610 N. Highland Ave.	Apartments	248 du	190 gpd/du	47,120
		Retail	12,785 sf	0.025 gpd/sf	320
27	Millennium Hollywood Mixed-Use Project 1740 N. Vine St.	Apartments	492 du	190 gpd/du	93,480
		Hotel	200 rm	120 gpd/rm	24,000
		Office	100,000 sf	0.120 gpd/sf	12,000
		Fitness Club	35,000 sf	0.650 gpd/sf	22,750
		Retail	15,000 sf	0.025 gpd/sf	375
		Restaurant (34,000 sf)	1,360 seats	30 gpd/seat	40,800
28	Paramount Pictures 5555 W. Melrose Ave.	Production Office	635,500 sf	0.120 gpd/sf	76,260
		Office	638,100 sf	0.120 gpd/sf	76,572
		Retail	89,200 sf	0.025 gpd/sf	2,230
		Stage <sup>d</sup>	21,000 sf	0.050 gpd/sf	1,050
		Support Uses <sup>d</sup>	1,900 sf	0.050 gpd/sf	95
29	Apartments 1411 N. Highland Ave.	Apartments	76 du	190 gpd/du	14,440
		Commercial	2,500 sf	0.050 gpd/sf	125
30	Apartment Project 1824 N. Highland Ave.	Apartments	118 du	190 gpd/du	22,420
31	Hotel 1133 N. Vine St.	Hotel	112 rm	120 gpd/rm	13,440
		Café	661 sf	0.720 gpd/sf	476
32	The Lexington Mixed-Use 6677 W. Santa Monica Blvd.	Apartments	695 du	190 gpd/du	132,050
		Commercial	24,900 sf	0.050 gpd/sf	1,245

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

No.	Project	Description	Size	Generation Factor <sup>a,b</sup>	Total Daily Wastewater Generation (gpd)
33	Columbia Square Mixed-Use 6121 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Office	422,610 sf	0.120 gpd/sf	50,713
		Retail/Restaurant <sup>e</sup> (41,300 sf)	1,652 seats	30 gpd/seat	49,560
		Hotel	125 rm	120 gpd/rm	15,000
34	Mixed-Use (High Line West) 5550 W. Hollywood Blvd.	Apartments	280 du	190 gpd/du	53,200
		Retail	12,030 sf	0.025 gpd/sf	301
35	Tutoring Center 927 N. Highland Ave.	School <sup>f</sup>	100 stu	11 gpd/stu	1,100
			18 emp	11 gpd/emp	198
36	Las Palmas Residential (Hollywood Cherokee) 1718 N. Las Palmas Ave.	Apartments	224 du	190 gpd/du	42,560
		Retail	985 sf	0.025 gpd/sf	25
37	Mixed-Use 6915 Melrose Ave.	Condominiums	13 du	190 gpd/du	2,470
		Retail	6,250 sf	0.025 gpd/sf	156
38	Sunset & Vine Mixed-Use 1538 N. Vine St.	Apartments	306 du	190 gpd/du	58,140
		Retail	68,000 sf	0.025 gpd/sf	1,700
39	Condos & Retail 5663 Melrose Ave.	Condominiums	96 du	190 gpd/du	18,240
		Retail	3,350 sf	0.025 gpd/sf	84
40	6250 Sunset (Nickelodeon) 6250 W. Sunset Blvd.	Apartments	200 du	190 gpd/du	38,000
		Retail	4,700 sf	0.025 gpd/sf	118
41	Hollywood Central Park Hollywood Freeway (US-101)	Park <sup>g</sup> (14.35 acres)	625,086 sf	0.098 gpd/sf	60,972
		Amphitheater	500 seats	3 gpd/seat	1,500
		Inn	5 rm	120 gpd/rm	600
		Community Center <sup>h</sup>	30,000 sf	0.350 gpd/sf	10,500
		Banquet Space	15,000 sf	0.350 gpd/sf	5,250
		Commercial	29,000 sf	0.050 gpd/sf	1,450
		Apartments (Low Income)	15 du	190 gpd/du	2,850

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

No.	Project	Description	Size	Generation Factor <sup>a,b</sup>	Total Daily Wastewater Generation (gpd)
42	Movietown 7302 W. Santa Monica Blvd.	Apartments	371 du	190 gpd/du	70,490
		Office	7,800 sf	0.120 gpd/sf	936
		Restaurant (5,000 sf)	200 seats	30 gpd/seat	6,000
		Commercial	19,500 sf	0.050 gpd/sf	975
43	Mixed-Use 5901 Sunset Blvd.	Office	274,000 sf	0.120 gpd/sf	32,880
		Supermarket	26,000 sf	0.025 gpd/sf	650
44	Mixed-Use 7107 Hollywood Blvd.	Apartments	410 du	190 gpd/du	77,900
		Restaurant (5,000 sf)	200 seats	30 gpd/seat	6,000
		Retail	5,000 sf	0.025 gpd/sf	125
45	John Anson Ford Theater 2580 Cahuenga Blvd. East	Theater	311 seats	3 gpd/seat	933
		Restaurant (5,400 sf)	216 seats	30 gpd/seat	6,480
		Office <sup>i</sup> (30 emp)	7,500 sf	0.120 gpd/sf	900
46	1717 Bronson Avenue 1717 N. Bronson Ave.	Apartments	89 du	190 gpd/du	16,910
47	Sunset + Wilcox 1541 N. Wilcox Ave.	Hotel	200 rm	120 gpd/rm	24,000
		Restaurant (9,000 sf)	360 seats	30 gpd/seat	10,800
48	Mixed-Use 1350 N. Western Ave.	Apartments	200 du	190 gpd/du	38,000
		Guest Rooms <sup>l</sup>	4 du	75 gpd/du	300
		Retail/Restaurant <sup>e</sup> (5,500 sf)	220 seats	30 gpd/seat	6,600
49	Palladium Residences 6201 W. Sunset Blvd.	Apartments (37 Affordable)	731 du	190 gpd/du	138,890
		Retail/Restaurant <sup>e</sup> (24,000 sf)	960 seats	30 gpd/seat	28,800
50	5600 West Hollywood Boulevard 5600 W. Hollywood Blvd.	Apartments	33 du	190 gpd/du	6,270
		Commercial	1,289 sf	0.050 gpd/sf	64
51	5750 Hollywood 5750 Hollywood Blvd.	Apartments	161 du	190 gpd/du	30,590
		Commercial	4,747 sf	0.050 gpd/sf	237

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Size</b>	<b>Generation Factor<sup>a,b</sup></b>	<b>Total Daily Wastewater Generation (gpd)</b>
52	925 La Brea Avenue 925 La Brea Ave.	Retail	16,360 sf	0.025 gpd/sf	409
		Office	45,432 sf	0.120 gpd/sf	5,452
53	904 La Brea Avenue 904 La Brea Ave.	Apartments	169 du	190 gpd/du	32,110
		Retail	37,057 sf	0.025 gpd/sf	926
54	2014 Residential 707 N. Cole Ave.	Apartments	84 du	190 gpd/du	15,960
55	Cahuenga Boulevard Hotel 1525 N. Cahuenga Blvd.	Hotel	64 rm	120 gpd/rm	7,680
		Rooftop Restaurant/Lounge <sup>e</sup> (700 sf)	28 seats	30 gpd/seat	840
		Restaurant (3,300 sf)	132 seats	30 gpd/seat	3,960
56	Academy Square 1341 Vine St.	Office	285,719 sf	0.120 gpd/sf	34,286
		Apartments	200 du	190 gpd/du	38,000
		Restaurant (16,135 sf)	645 seats	30 gpd/seat	19,362
57	Hotel 6500 Selma Ave.	Hotel	70 rm	120 gpd/rm	8,400
		Restaurant (4,320 sf)	173 seats	30 gpd/seat	5,184
58	Hotel 1921 Wilcox Ave.	Hotel	122 rm	120 gpd/rm	14,640
		Restaurant (4,225 sf)	169 seats	30 gpd/seat	5,070
59	Sunset Mixed-Use 7500–7510 W. Sunset Blvd.	Apartments	213 du	190 gpd/du	40,470
		Restaurant (10,000 sf)	400 seats	30 gpd/seat	12,000
		Retail	20,000 sf	0.025 gpd/sf	500
60	Mixed-Use 901 N. Vine St.	Apartments	70 du	190 gpd/du	13,300
		Commercial	3,000 sf	0.050 gpd/sf	150
61	Apartments 525 N. Wilton Pl.	Apartments	88 du	190 gpd/du	16,720
62	Hardware Store 4905 W. Hollywood Blvd.	Retail	36,600 sf	0.025 gpd/sf	915

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Size</b>	<b>Generation Factor<sup>a,b</sup></b>	<b>Total Daily Wastewater Generation (gpd)</b>
63	Mixed-Use 1233 N. Highland Ave.	Apartments	72 du	190 gpd/du	13,680
		Commercial	12,160 sf	0.050 gpd/sf	608
64	Mixed-Use 1310 N. Cole Ave.	Apartments	369 du	190 gpd/du	70,110
		Office	2,570 sf	0.120 gpd/sf	308
65	Restaurant Addition (to existing 7,838-sf restaurant) 135 N. Western Ave.	Restaurant (4,066 sf)	163 seats	30 gpd/seat	4,879
66	TAO Restaurant 6421 W. Selma Ave.	Quality Restaurant (17,607 sf)	704 seats	30 gpd/seat	21,128
67	Hollywood Crossroads 1540-1552 Highland Ave.	Residential	950 du	190 gpd/du	180,500
		Hotel	308 rm	120 gpd/rm	36,960
		Office	95,000 sf	0.120 gpd/sf	11,400
		Commercial Retail	185,000 sf	0.050 gpd/sf	9,250
68	Wilcox Hotel 1717 N. Wilcox Ave.	Hotel	133 rm	120 gpd/rm	15,960
		Retail	3,580 sf	0.025 gpd/sf	90
69	Faith Plating 7143 Santa Monica Blvd.	Residential	145 du	190 gpd/du	27,550
		Retail/Restaurant <sup>c</sup> (7,858 sf)	314 seats	30 gpd/seat	9,430
70	Apartments 5460 W. Fountain Ave.	Apartments	75 du	190 gpd/du	14,250
71	Mixed-Use 6220 W. Yucca St.	Hotel	210 rm	120 gpd/rm	25,200
		Apartments	136 du	190 gpd/du	25,840
		Restaurant (6,980 sf)	279 seats	30 gpd/seat	8,376
72	SunWest Project (Mixed-Use) 5525 W. Sunset Blvd.	Apartments	293 du	190 gpd/du	55,670
		Commercial	33,980 sf	0.050 gpd/sf	1,699
73	Hollywood De Longpre Apartments 5632 De Longpre Ave.	Apartments	185 du	190 gpd/du	35,150



**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

No.	Project	Description	Size	Generation Factor <sup>a,b</sup>	Total Daily Wastewater Generation (gpd)
74	Ivar Gardens Hotel 6409 W. Sunset Blvd.	Hotel	275 rm	120 gpd/rm	33,000
		Retail	1,900 sf	0.025 gpd/sf	48
75	Selma Hotel 6516 W. Selma Ave.	Hotel	212 rm	120 gpd/rm	25,440
		Bar/Lounge <sup>k</sup>	3,855 sf	0.720 gpd/sf	2,776
		Rooftop Bar/Event Space <sup>k</sup>	8,500 sf	0.720 gpd/sf	6,120
76	Melrose Crossing Mixed-Use 7000 Melrose Ave.	Apartments	40 du	190 gpd/du	7,600
		Retail	6,634 sf	0.025 gpd/sf	166
77	Mixed-Use 1657 N. Western Ave.	Apartments	91 du	190 gpd/du	17,290
		Retail	15,300 sf	0.025 gpd/sf	383
78	McCadden Campus (LGBT) 1118 N. McCadden Pl.	Youth/Senior Housing	45 du	190 gpd/du	8,550
		Social Service Support <sup>l</sup>	50,325 sf	0.120 gpd/sf	6,039
		Office	17,040 sf	0.120 gpd/sf	2,045
		Retail/Restaurant <sup>e</sup> (1,885 sf)	75 seats	30 gpd/seat	2,262
		Emergency Housing	40 beds	70 gpd/bed	2,800
		Transitional Living	60 beds	70 gpd/bed	4,200
79	4900 Hollywood Mixed-Use 4900 W. Hollywood Blvd.	Apartments	150 du	190 gpd/du	28,500
		Retail	13,813 sf	0.025 gpd/sf	345
80	citizenM Hotel 1718 Vine St.	Hotel	216 rm	120 gpd/rm	25,920
		Restaurant (4,354 sf)	174 seats	30 gpd/seat	5,225
81	Apartments 1749 Las Palmas Ave.	Apartments	70 du	190 gpd/du	13,300
		Retail	3,117 sf	0.025 gpd/sf	78
82	Mixed-Use 1868 N Western Ave.	Apartments	96 du	190 gpd/du	18,240
		Retail	5,546 sf	0.025 gpd/sf	139
83	6400 Sunset Mixed-Use 6400 Sunset Blvd.	Apartments	232 du	190 gpd/du	44,080
		Restaurant (7,000 sf)	280 seats	30 gpd/seat	8,400

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Size</b>	<b>Generation Factor<sup>a,b</sup></b>	<b>Total Daily Wastewater Generation (gpd)</b>
84	6200 West Sunset Boulevard 6200 W. Sunset Blvd.	Apartments	270 du	190 gpd/du	51,300
		Quality Restaurant (1,750 sf)	70 seats	30 gpd/seat	2,100
		Pharmacy	2,300 sf	0.025 gpd/sf	58
		Retail	8,070 sf	0.025 gpd/sf	202
85	747 North Western Avenue 747 N. Western Ave.	Apartments	44 du	190 gpd/du	8,360
		Retail	7,700 sf	0.025 gpd/sf	193
86	6630 West Sunset Boulevard 6630 W. Sunset Blvd.	Apartments	40 du	190 gpd/du	7,600
87	1001 North Orange Drive 1001 N. Orange Dr.	Office	53,537 sf	0.120 gpd/sf	6,424
88	Sunset & Western 5420 W. Sunset Blvd.	Apartments	735 du	190 gpd/du	139,650
		Commercial	95,820 sf	0.050 gpd/sf	4,791
89	Hollywood & Wilcox 6430–6440 W. Hollywood Blvd.	Apartments	260 du	190 gpd/du	49,400
		Office	3,580 sf	0.120 gpd/sf	430
		Retail	11,020 sf	0.025 gpd/sf	276
		Restaurant (3,200 sf)	128 seats	30 gpd/seat	3,840
90	Mixed-Use 4914 W. Melrose Ave.	Live/Work Units	45 du	190 gpd/du	8,550
		Retail	3,760 sf	0.025 gpd/sf	94
91	Hospital Seismic Retrofit 1300 N. Vermont Ave.	Office	30,933 sf	0.120 gpd/sf	3,712
92	Onni Group Mixed-Use Development 1360 N. Vine St.	Condominiums	429 du	190 gpd/du	81,510
		Grocery Store	55,000 sf	0.025 gpd/sf	1,375
		Retail	5,000 sf	0.025 gpd/sf	125
		Restaurant (8,988 sf)	360 seats	30 gpd/seat	10,786
93	1600 Schrader 1600 Schrader Blvd.	Hotel	168 rm	120 gpd/rm	20,160
		Restaurant (5,979 sf)	239 seats	30 gpd/seat	7,175

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Size</b>	<b>Generation Factor<sup>a,b</sup></b>	<b>Total Daily Wastewater Generation (gpd)</b>
94	Mixed-Use 5939 W. Sunset Blvd.	Apartments	299 du	190 gpd/du	56,810
		Office	38,440 sf	0.120 gpd/sf	4,613
		Restaurant (5,064 sf)	203 seats	30 gpd/seat	6,077
		Retail	3,739 sf	0.025 gpd/sf	93
95	Melrose & Beachwood 5570 W. Melrose Ave.	Apartments	52 du	190 gpd/du	9,880
		Commercial	5,500 sf	0.050 gpd/sf	275
96	Montecito Senior Housing 6650 W. Franklin Ave.	Senior Apartments	68 du	190 gpd/du	12,920
97	The Chaplin Hotel Project 7219 W. Sunset Blvd.	Hotel	93 rm	120 gpd/rm	11,160
		Restaurant (2,800 sf)	112 seats	30 gpd/seat	3,360
98	Godfrey Hotel 1400 N. Cahuenga Blvd.	Hotel	221 rm	120 gpd/rm	26,520
		Restaurant (3,000 sf)	120 seats	30 gpd/seat	3,600
99	6140 Hollywood 6140 Hollywood Blvd.	Hotel	102 rm	120 gpd/rm	12,240
		Condominiums	27 du	190 gpd/du	5,130
		Restaurant (11,460 sf)	458 seats	30 gpd/seat	13,752
100	Selma–Wilcox Hotel 6421 W. Selma Ave.	Hotel	114 rm	120 gpd/rm	13,680
		Restaurant (1,993 sf)	80 seats	30 gpd/seat	2,392
101	Apartments 1601 N. Las Palmas Ave.	Apartments	86 du	190 gpd/du	16,340
102	1723 North Wilcox Residential 1723 N. Wilcox Ave.	Apartments	68 du	190 gpd/du	12,920
		Retail	3,700 sf	0.025 gpd/sf	93
103	Select @ Los Feliz (Mixed-Use) 4850 W. Hollywood Blvd.	Apartments	101 du	190 gpd/du	19,190
		Restaurant (10,000 sf)	400 seats	30 gpd/seat	12,000
104	7445 Sunset Grocery 7445 W. Sunset Blvd.	Specialty Grocery Store	32,416 sf	0.025 gpd/sf	810

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

<b>No.</b>	<b>Project</b>	<b>Description</b>	<b>Size</b>	<b>Generation Factor<sup>a,b</sup></b>	<b>Total Daily Wastewater Generation (gpd)</b>
105	1719 Whitley Hotel 1719 N. Whitley Ave.	Hotel	156 rm	120 gpd/rm	18,720
106	Kaiser Hospital Redevelopment 1317–1345 N. Vermont/1328 N. New Hampshire/4760 Sunset/1505 N. Edgemont/1526 N. Edgemont/1517 N. Vermont/1424–1430 N. Alexandria	Hospital Expansion	211,992 sf	0.250 gpd/sf	52,998
107	1276 North Western Avenue 1276 N. Western Ave.	Apartments	75 du	190 gpd/du	14,250
108	NBC Universal Evolution Plan 100 Universal City Plaza	Studio	307,949 sf	0.050 gpd/sf	15,397
		Studio Offices	647,320 sf	0.120 gpd/sf	77,678
		Office	495,406 sf	0.120 gpd/sf	59,449
		Entertainment <sup>m</sup>	337,895 sf	0.350 gpd/sf	118,263
		Entertainment Retail	39,216 sf	0.025 gpd/sf	980
		Hotel <sup>n</sup> (900,000 sf)	1,385 rm	120 gpd/rm	166,154
109	Hollywood Community Plan Update South of City of Burbank, City of Glendale, and SR 134; west of Interstate 5; north of Melrose Avenue; south of Mulholland Drive, City of West Hollywood, Beverly Hills, including land south of the City of West Hollywood and north of Rosewood Ave. between La Cienega Blvd. and La Brea Ave.	Based on preliminary information available from the City, the draft Hollywood Community Plan Update will propose updates to land use policies and the land use diagram. The proposed changes would primarily increase commercial and residential development potential in and near the Regional Center Commercial portion of the community and along selected corridors in the Community Plan area. The decreases in development potential would be primarily focused on low to medium scale multi-family residential neighborhoods to conserve existing density and intensity of those neighborhoods.			
<b>Related Projects Wastewater Generation</b>					<b>4,662,646</b>
<b>Project Wastewater Generation for Retail/ Restaurant Option</b>					<b>46,027</b>

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

No.	Project	Description	Size	Generation Factor <sup>a,b</sup>	Total Daily Wastewater Generation (gpd)
<b>Total Wastewater Generation for Related Projects and Retail/Restaurant Option</b>					<b>4,708,673</b>
<p><i>du = dwelling units</i>  <i>sf = square feet</i>  <i>stu = students</i>  <i>emp = employees</i>  <i>per = persons</i>  <i>rm = rooms</i>  <i>N/A = Information is not available</i></p> <p><i>Totals calculated have been rounded to the nearest whole number and may not sum due to rounding.</i></p> <p><sup>a</sup> <i>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.</i></p> <p><sup>b</sup> <i>This analysis conservatively assumes that all dwelling units are 3-bedroom units. In addition, the analysis for restaurant uses is based on the assumption of 1 seat per 25 square feet according to Kimley-Horn.</i></p> <p><sup>c</sup> <i>Information for this related project is not available. Therefore, wastewater generation is not calculated.</i></p> <p><sup>d</sup> <i>Sewage generation rates provided by LASAN do not include rates for stage or support area uses. Therefore, due to the nature of this related project, the most comparable land use rate of 50 gallons per day per 1,000 square feet for "Studio: Film/TV/Recording" is applied.</i></p> <p><sup>e</sup> <i>This related project does not distinguish square footage between these uses. Therefore, to provide a conservative analysis, this related project is assumed to include only restaurant uses.</i></p> <p><sup>f</sup> <i>Sewage generation rates provided by LASAN do not include rates per employee for school uses. Therefore, it is assumed that the most comparable land use rate per employee is equivalent to the rate per student for "School" uses.</i></p> <p><sup>g</sup> <i>Sewage generation rates provided by LASAN do not include rates for parks uses per acre. Therefore, the wastewater generation rate for park uses is assumed to be equivalent to that of landscaping needs. The wastewater generation rate for landscaping is based on calculations from Los Angeles Department of Water and Power, Water Supply Assessment—6AM Project, August 30, 2017.</i></p> <p><sup>h</sup> <i>Sewage generation rates provided by LASAN do not include rates for community center uses per square foot. Therefore, the most comparable land use rate of 350 gallons per day per 1,000 square feet for "Banquet Room" is applied.</i></p>					

**Table IV.1.2-3 (Continued)  
Cumulative Wastewater Generation**

No.	Project	Description	Size	Generation Factor <sup>a,b</sup>	Total Daily Wastewater Generation (gpd)
<p><sup>i</sup></p>					<p><sup>i</sup> Sewage generation rates provided by LASAN do not include rates per employee. Therefore, the rate of 4 employees per 1,000 square feet is applied, based on Section IV.N.(1) Water Consumption of the Draft EIR for Village at Playa Vista Draft EIR, August 2003.</p> <p><sup>j</sup> This related project's guest room uses are assumed to be equivalent to studio uses. Therefore, the rate of 75 gallons per day per dwelling unit for "Residential: Apt—Bachelor" is applied.</p> <p><sup>k</sup> This related project does not distinguish square footage between these uses. Therefore, to provide a conservative analysis, this related project is assumed to include only bar uses.</p> <p><sup>l</sup> Sewage generation rates provided by LASAN do not include rates for social service support uses. Therefore, the most comparable land use rate of 120 gallons per day per 1,000 square feet for "Office Building" is applied.</p> <p><sup>m</sup> Sewage generation rates provided by LASAN do not include rates for entertainment uses. Therefore, the most comparable land use rate of 350 gallons per day per 1,000 square feet for "Banquet Room" is applied.</p> <p><sup>n</sup> For hotel uses, a square footage rate of 650 square feet per room is applied. Source: deRoos, J. A. (2011), <i>Planning and Programming a Hotel</i> [Electronic version], retrieved December 28, 2018, from Cornell University, School of Hospitality Administration site, <a href="http://scholarship.sha.cornell.edu/articles/310">http://scholarship.sha.cornell.edu/articles/310</a>.</p> <p>Source: Eyestone Environmental, 2019, and Kimley Horn, 2019.</p>

The Project wastewater flow of approximately 0.046 mgd combined with the specific related projects flow of approximately 4.67 mgd and the forecasted 2023 wastewater flow of 377.56 mgd for the Hyperion Service Area would result in a total cumulative wastewater flow of approximately 382.28 mgd. Based on the Hyperion Service Area's estimated future capacity of approximately 550 mgd, the Hyperion Service Area is expected to have adequate capacity to accommodate the cumulative wastewater flow of approximately 382.28 mgd from the Project and related projects, and forecasted growth by 2023. The 382.28 mgd of cumulative wastewater would represent approximately 69.5 percent of the Hyperion Service Area's existing design capacity of 550 mgd. **Therefore, Project impacts on wastewater treatment systems would not be cumulatively considerable, and cumulative impacts on wastewater treatment systems would be less than significant.**

### c. Wastewater Infrastructure

As with the Project, new development projects occurring in the vicinity of the Project Site would be required to coordinate with LASAN via a WWSI to determine adequate sewer capacity. In addition, new development projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements. Furthermore, similar to the Project, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. **Therefore, Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts on wastewater infrastructure would be less than significant.**

## 5. Mitigation Measures

Project-level and cumulative impacts with regard to wastewater would be less than significant with compliance with regulatory measures and implementation of project design features. Therefore, no mitigation measures are required.

## 6. Level of Significance After Mitigation

Project-level and cumulative impacts related to wastewater would be less than significant without mitigation.