# **IV. Environmental Impact Analysis**

# K.2 Utilities and Service Systems— Wastewater

### 1. Introduction

This section analyzes potential Project impacts on wastewater collection and treatment facilities and infrastructure, including whether such existing infrastructure has sufficient capacity to serve the Project. This analysis utilizes the *Artisan Hollywood Project Utility Infrastructure Technical Report: Wastewater* (Wastewater Utility Report) prepared for the Project by KPFF Consulting Engineers (May 2021) and is included in Appendix K 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. Described below, these include:

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

### (1) State

### (a) California Green Building Code

The California Green Building Standards Code (CALGreen Code), is set forth in California Code of Regulations (CCR) Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all 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 Citywide General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.<sup>1</sup> 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.<sup>2</sup>

### (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;

<sup>&</sup>lt;sup>1</sup> City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, July 27, 1995, https://planning.lacity.org/plans-policies/framework-element, accessed February 19, 2021.

<sup>&</sup>lt;sup>2</sup> 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, http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm, accessed February 19, 2021.

and (2) "Go-If Triggered Projects" for implementation in the future once a trigger is reached.<sup>3</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.

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>4</sup>

### (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.<sup>5</sup> The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.<sup>6</sup> 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.

<sup>&</sup>lt;sup>3</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..

<sup>&</sup>lt;sup>4</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, Project Information Report, North East Interceptor Sewer (NEIS) Phase 2A.

<sup>&</sup>lt;sup>5</sup> City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

<sup>&</sup>lt;sup>6</sup> 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.

LAMC Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),<sup>7</sup> 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 has been 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 first of which applies to this Project: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to residential and non-residential buildings.

#### (ii) Water Efficiency Requirements Ordinance

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),<sup>8</sup> effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

#### (iii) Sewer Capacity Availability Review

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

<sup>&</sup>lt;sup>7</sup> City of Los Angeles, Ordinance No. 181480.

<sup>&</sup>lt;sup>8</sup> City of Los Angeles, Ordinance No. 180822.

proposes a future sewer connection or future development that is anticipated to generate 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 sewagerelated 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).<sup>9</sup>

### **b.** Existing Conditions

### (1) Wastewater Generation

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by a surface parking area located in the northeast portion of the Project Site (Development Area) and six one- and two-story commercial structures located in the southern and western portions of the Project Site. Approximately 4,000 square feet of the

<sup>&</sup>lt;sup>9</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

existing commercial buildings have been vacant since prior to 2018 but is anticipated to be occupied in the future with high-turnover restaurant uses. The existing parking uses within the Development Area do not generate any wastewater flow.

### (2) Wastewater Infrastructure

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

As discussed in the Wastewater Utility Report, included in Appendix K of this Draft EIR, there is an 8-inch vitrified clay pipe (VCP) sewer line in Selma Avenue, and a 12-inch VCP sewer line in Ivar Avenue. Additionally, the sewer main in Selma Avenue has a calculated capacity of 0.38 cubic feet per second (cfs) (517,018 gallons per day) and the sewer main in Ivar Avenue has a calculated capacity of 5.09 cfs (3.28 million gallons per day). Available records indicate that Selma Avenue has three sewer wyes, and Ivar Avenue has four wyes allocated to the Project Site. These sewer mains/lines connect to a network of sewer lines that ultimately convey wastewater to the Hyperion Treatment Plant.

### (3) Wastewater Treatment

LASAN is responsible for the operation of wastewater treatment facilities in the City. The main purpose of these treatment facilities is to remove potential pollutants from sewage in order to protect river and marine environments and public health. LASAN divides the wastewater treatment system of the City into two major service areas: the Hyperion Service Area and the Terminal Island Service Area.<sup>11</sup> The Hyperion Service Area is serviced by the Hyperion Sanitary Sewer System, which consists of the HWRP, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant.<sup>12</sup> The Terminal Island Service Area is served by the Terminal Island Treatment Plant.<sup>13</sup> The Project Site is located within the Hyperion Service Area.

<sup>&</sup>lt;sup>10</sup> LASAN, Sewers and Pumping Plants, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwdcw/s-lsh-wwd-cw-s?\_ adf.ctrl-state=w3f8ikamv\_4&\_afrLoop=18666739916391336#!, accessed February 23, 2021.

<sup>&</sup>lt;sup>11</sup> LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?\_adf.ctrl-state= ljvz6q49\_5&\_afrLoop=8241807351592071#!, accessed February 23, 2021.

<sup>&</sup>lt;sup>12</sup> LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?\_adf.ctrl-state= ljvz6q49\_5&\_afrLoop=8241807351592071#!, accessed February 23, 2021.

<sup>&</sup>lt;sup>13</sup> LASAN, Clean Water, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?\_adf.ctrl-state= ljvz6q49\_5&\_afrLoop=8241807351592071#!, accessed February 23, 2021.

### (a) Hyperion Service Area

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 mgd (consisting of 450 mgd at the HWRP,<sup>14</sup> 80 mgd at the Donald C. Tillman Water Reclamation Plant,<sup>15</sup> and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant<sup>16</sup>). 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).<sup>17</sup> The One Water LA 2040 Plan–Wastewater Facilities Plan projects that annual average wastewater flows in the Hyperion Sanitary Sewer System would increase to 323 mgd in 2020, 348 mgd in 2030, and 358 mgd in 2040. As such, current and projected flows are below the design capacity of approximately 550 mgd for the Hyperion Sanitary Sewer System.

### (b) Hyperion Water Reclamation Plant

As discussed above, wastewater generated from the Project Site is conveyed via the local collector sanitary sewer system directly to the HWRP for treatment. As shown in Table IV.K.2-1, the HWRP has the capacity to treat approximately 450 mgd of wastewater for full secondary treatment and currently treats approximately 275 mgd.<sup>18</sup> As such, the HWRP is currently operating at approximately 61 percent of its capacity with a remaining available capacity of approximately 175 mgd.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary

<sup>&</sup>lt;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=vm8qwyj80\_4&\_afrLoop=18606279438697733#!, accessed February 23, 2021.

<sup>&</sup>lt;sup>15</sup> LASAN, Water Reclamation Plants, Donald C. Tillman Water Reclamation Plant, www.lacitysan.org/san/ faces/wcnav\_externalId/s-lsh-wwd-cw-p-dctwrp?\_adf.ctrl-state=1brav2vyj0\_742&\_afrLoop=41956388671 82484#!, accessed February 23, 2021.

<sup>&</sup>lt;sup>16</sup> LASAN, Water Reclamation Plants, Los Angeles–Glendale Water Reclamation Plant, www.lacitysan.org/ san/faces/wcnav\_externalId/s-lsh-wwd-cw-p-lagwrp?\_adf.ctrl-state=1brav2vyj0\_564&\_afrLoop=41959122 00544472#!, accessed February 23, 2021.

<sup>&</sup>lt;sup>17</sup> LASAN, One Water LA 2040 Plan—Volume 2: Wastewater Facilities Plan, April 2018.

<sup>&</sup>lt;sup>18</sup> LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav\_externalId/s-lsh-wwdcw-p-hwrp?\_adf.ctrl-state=grj40dmqj\_1780&\_afrLoop=3950078628628745#!, accessed February 23, 2021.

	Design Capacity (mgd)
Hyperion Water Reclamation Plant	450
Donald C. Tillman Water Reclamation Plant	80
Los Angeles–Glendale Water Reclamation Plant	20
Total	550
mgd = million gallons per day Source: LASAN, Water Reclamation Plans, www.lacitysa Ish-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-s 6972769757513469#!, accessed March 8, 2021.	

Table IV.K.2-1Existing Capacity of Hyperion Service Area

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>19</sup> 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.<sup>20</sup> The discharge from the HWRP into Santa Monica Bay is regulated by the HWRP's National Pollutant 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.<sup>21</sup> 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.<sup>22</sup>

<sup>&</sup>lt;sup>19</sup> LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav\_externalId/s-lsh-wwdcw-p-hwrp?\_adf.ctrl-state=grj40dmqj\_1780&\_afrLoop=3950078628628745#!, accessed February 23, 2021.

<sup>&</sup>lt;sup>20</sup> 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/s-lshau-h?\_adf.ctrl-state=n6s7owwtf\_1393&\_afrLoop=2808357686568947&\_afrWindowMode=0&\_afrWindow Id=qqkbgsllv#!%40%40%3F\_afrWindowId%3Dqqkbgsllv%26\_afrLoop%3D2808357686568947%26\_afr WindowMode%3D0%26\_adf.ctrl-state%3Dn6s7owwtf\_1397, accessed February 23, 2021.

<sup>&</sup>lt;sup>21</sup> California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, 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, www. lacitysan.org/san/sandocview?docname=cnt010051, accessed February 19, 2021.

<sup>&</sup>lt;sup>22</sup> LASAN, Environmental Monitoring www.lacitysan.org/san/faces/wcnav\_externalId/s-lsh-wwd-wp-ecem?\_adf.ctrl-state=xsmd2kqwx\_131&\_afrLoop=21105064772207683#!, accessed February 23, 2021.

# 3. Project Impacts

### a. Thresholds of Significance

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

- Threshold (a): Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which would cause significant environmental effects; or
- Threshold (b): Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 *L.A. CEQA Thresholds Guide*, as appropriate to assist in answering the Appendix G Thresholds. Refer to Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR for a discussion of potential impacts to water supply and water infrastructure; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR for a discussion of potential impacts to electric power and natural gas; and Section VI, Other CEQA Considerations, and the Initial Study included in Appendix A of this Draft EIR, for a discussion of potential impacts to storm water drainage and telecommunications facilities.

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

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.<sup>23</sup>

<sup>&</sup>lt;sup>23</sup> The Wastewater Facilities Plan referenced in the L.A. City CEQA Thresholds Guide has since been superseded by the Integrated Resources Plan.

### b. Methodology

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Wastewater Utility Report included in Appendix K of this Draft EIR. The Wastewater 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 and included in the Wastewater Utility Report.

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 2025, the Project's buildout year.

### c. Project Design Features

No specific project design features are proposed with regard to wastewater.

## 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?<sup>24</sup>

<sup>&</sup>lt;sup>24</sup> Refer to Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure of this Draft EIR for a discussion of potential water supply and infrastructure impacts; Section IV.K.3, Utilities and Service Systems—Energy Infrastructure of this Draft EIR for a discussion of potential electric power and natural gas impacts; and Section VI, Other CEQA Considerations for a discussion of potential storm water drainage and telecommunications facility impacts.

### (1) Impact Analysis

### (a) Construction

Construction activities for the Project would result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows.

The Project would require new on-site infrastructure to serve the new building. These construction activities would primarily be confined to trenching and would be limited to the on-site wastewater distribution as well as minor off-site work associated with connections to the public main. As discussed in Section IV.I, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-2 to reduce any temporary pedestrian and traffic impacts. 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, when considering impacts resulting from the installation of any required wastewater infrastructure, impacts would be of a relatively short-term duration and would cease to occur once the installation is complete.

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 average wastewater flows are at approximately 275 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table IV.K.2-2 on page IV.K.2-12, the Project would generate a net increase in wastewater flow from the Project Site of approximately 83,949 gallons per day (gpd), or approximately 0.08 mgd. This is a conservative estimate as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code. As discussed in more detail below, this net increase in wastewater would represent

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

Land Use	Units	Generation Rate (gpd/unit)ª	Wastewater Generation (gpd)
Existing			
Surface Parking Lot	32,129 sf	N/A	0
Total Existing Wastewater Flow			0
Proposed	·	·	
Apartment: Bachelor	92 du	75/du	6,900
Apartment: 1 Bed	93 du	110/du	10,230
Apartment: 2 Bed	75 du	150/du	11,250
Apartment: 3 Bed	10 du	190/du	1,900
Lounge <sup>b</sup>	21,817 sf	50/kgsf	1,091
Gym	1,869 sf	200/kgsf	374
Pool <sup>c</sup>	5,465 cu	7.48 gal/cu	40,878
Health Spa	532 sf	650/kgsf	346
Bar	250 sf	720/kgsf	180
Restaurant: High Turnover <sup>d</sup>	260 seats <sup>e</sup>	30/seat	10,800
Total Proposed Wastewater Flow			83,949
Project Net Wastewater Flow (Proposed – Existing)			83,949

cu = cubic feet

du = dwelling units

gpd = gallons per day

kgsf = 1,000 gross square feet

sf = square feet

Note: Some numbers do not add up perfectly due to rounding.

<sup>a</sup> Based on 2012 LASAN Sewer Generation Rates

- <sup>b</sup> Lounge was used for all Project amenity spaces that do not have a designation as specified in LASAN Sewer Generation Factors.
- <sup>c</sup> Pool volume obtained from Architectural Floor Plan. Includes pools located on Level 4 and Level 25.
- <sup>d</sup> Includes 6,790 square feet of proposed floor area and 4,000 of existing vacant floor area. Conservatively assumes that all of the new and existing vacant commercial square footage would be occupied by high-turnover restaurant uses.
- <sup>e</sup> Assumes 30 square feet per person.
- Source: KPFF Consulting Engineers, Artisan Hollywood Project Utility Infrastructure Technical Report: Wastewater, May 2021; Eyestone Environmental, 2021.

approximately 0.048 percent<sup>25</sup> of the current 175 mgd of remaining available capacity of the HWRP.

A Wastewater Service Information (WWSI) response, included in the Wastewater Utility Report (see Exhibit 1 of Appendix K.2 of this Draft EIR), was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. 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 capacity of the sewer system might be able to accommodate the additional wastewater infrastructure demand created by the Project. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. 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 treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, operational impacts to the wastewater conveyance or treatment system would be less than significant.

### (2) Mitigation Measures

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

### (3) Level of Significance After Mitigation

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

# Threshold (b): Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has

<sup>&</sup>lt;sup>25</sup> (83,949 gpd  $\div$  175 mgd) x 100 = 0.048 percent

# 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.2-12, the Project would generate a net increase in wastewater flow from the Project Site of approximately 83,949 gpd, or approximately 0.08 mgd.<sup>26</sup> The Project's increase in average daily wastewater flow of 0.08 mgd would represent approximately 0.048 percent<sup>27</sup> of the current 175 mgd of remaining available capacity of the HWRP. Therefore, wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

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 2025, the year by which construction of the Project is expected to be completed. Future updates to the One Water LA 2040 Plan discussed above would provide for improvements beyond 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2025. Thus, based on this conservative assumption, the 2025 effective capacity of the Hyperion Sanitary Sewer System would continue to be 550 mgd. Similarly, the capacity of the HWRP in 2025 would continue to be 450 mgd. The Project's net increase in average daily wastewater generation of 0.08 mgd would represent approximately 0.015 percent of the HWRP's assumed future capacity of 450 mgd.<sup>28</sup>

Additionally, the Project's net increase in average daily wastewater generation of 0.08 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.13 percent<sup>29</sup> of the HWRP's capacity of 450 mgd. Furthermore, as previously discussed, a WWSI, included in the Wastewater Utility Report (see Exhibit 1 of Appendix K.2 of this Draft EIR), was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. As concluded in the WWSI, HWRP would be able to accommodate the increased flow from the Project.

- <sup>28</sup> (83.949 gpd  $\div$  550 mgd) x 100 = 0.015% and (83.949 gpd  $\div$  450 mgd) x 100 = 0.019%
- <sup>29</sup> [(0.08 mgd + 275 mgd)  $\div$  450 mgd] x 100 = 61.13%

<sup>&</sup>lt;sup>26</sup> 83,949 gpd  $\div$  1 mgd = 0.08 mgd

<sup>&</sup>lt;sup>27</sup> (83,949 gpd  $\div$  175 mgd) x 100 = 0.048%

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

### (2) Mitigation Measures

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

### (3) Level of Significance After Mitigation

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

### e. Cumulative Impacts

### (1) Impact Analysis

The geographic context for the cumulative impact analysis on the wastewater conveyance system is the area that includes the Project Site and the related projects that would potentially utilize the same infrastructure as the Project. The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. The Project, in conjunction with growth forecasted in the Hyperion Service Area through 2025 (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 2025 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 46 is a conservative assumption, as some of the related projects may not be built out by 2025 (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 46 are fully built out by 2025, unless otherwise noted.

#### (a) 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 SCAR to determine adequate sewer

capacity. In addition, new development projects would also be subject to LAMC Section 64.11 and Section 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, similar to the Project. Furthermore, like the Project, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. In addition, as with the Project, related projects would be required to implement construction traffic management plans to ensure that adequate and safe access remains available during construction activities. Such construction traffic management plans would also ensure that appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would be implemented, as necessary, to ensure emergency access and traffic flow is maintained on adjacent right-of-ways. Therefore, the Project and related projects would not result in significant cumulative impacts related to the construction or expansion of wastewater infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

### (b) Wastewater Treatment

Development of the Project, in conjunction with the related projects, would result in an increase in the demand for sanitary sewer service in Hyperion Service Area. As identified in Section III, Environmental Setting, of this Draft EIR, there are 46 related projects located in the Project Site 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 2,065,961 gpd or approximately 2.07 mgd, as shown in Table IV.K.2-3 on page IV.K.2-17. Combined with the Project's net increase in wastewater generation of 83,949 gpd (0.08 mgd), this equates to a cumulative increase in average daily wastewater flow of approximately 2,149,910 gpd, or 2.15 mgd.

Based on LASAN's average flow projections for the Hyperion Sanitary Sewer System, it is anticipated that the average flow in 2025 would be approximately 335.5 mgd.<sup>30</sup>

<sup>&</sup>lt;sup>30</sup> Los Angeles Department of Water and Power, One Water LA 2040 Plan, Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Service Area (which is comprised of the Hyperion Water Reclamation Plant, the Donald C. Tillman Water Reclamation Plant, and the Los Angeles-Glendale Water Reclamation Plant) for 2020 (approximately 323 mgd) and 2030 (approximately 348 mgd). The 2025 value is extrapolated from 2020 and 2030 values: [(348 mgd – 323 mgd) ÷ 10) \* 5] + 323 mgd = 335.5 mgd.

Table IV.K.2-3				
Cumulative Wastewater Generation				

No.	Project Name/Address	Description	Size	Generation Rate <sup>a,b,c</sup>	Total Water Demand (gpd)
1	Cahuenga Boulevard Hotel	Hotel	64 rm	120 gpd/rm	7,680
	1525 N. Cahuenga Blvd.	Rooftop Restaurant/Lounge	700 sf	30 gpd/seat	700
		Restaurant	3,300 sf	30 gpd/seat	3,300
2	Ivar Gardens Hotel	Hotel	275 rm	120 gpd/rm	33,000
	6409 W. Sunset Blvd.	Retail	1,900 sf	0.025 gpd/sf	48
3	6400 Sunset Mixed-Use	Apartments	232 du	190 gpd/du	44,080
	6400 Sunset Blvd.	Restaurant	7,000 sf	30 gpd/seat	7,000
4	6630 West Sunset Boulevard 6630 W. Sunset Blvd.	Apartments	40 du	190 gpd/du	7,600
5	Selma–Wilcox Hotel 6421 W. Selma Ave.	Hotel	114 rm	120 gpd/rm	13,680
		Restaurant	1,993 sf	30 gpd/seat	1,993
6	Thompson Hotel 1541 N. Wilcox Ave.	Hotel	200 rm	120 gpd/rm	24,000
		Restaurant	9,000 sf	30 gpd/seat	9,000
7	Tommie Hotel 6516 W. Selma Ave.	Hotel	212 rm	120 gpd/rm	25,440
		Bar/Lounge	3,855 sf	0.72 gpd/sf	2,776
		Rooftop Bar/Event Space	8,500 sf	0.72 gpd/sf	6,120
8	Godfrey Hotel 1400 N. Cahuenga Blvd.	Hotel	220 rm	120 gpd/rm	26,400
		Restaurant	2,723 sf	30 gpd/seat	2,723
		Bar	1,440 sf	0.72 gpd/sf	1,037
9	Hotel & Restaurant	Hotel	80 rm	120 gpd/rm	9,600
	6381 W. Hollywood Blvd.	Restaurant	15,290 sf	30 gpd/seat	15,290
10	Schrader Hotel Mixed-Use	Hotel	168 rm	120 gpd/rm	20,160
	1600 N. Schrader Blvd.	Restaurant	5,979 sf	30 gpd/seat	5,979
11	CD 13 Schrader Temp Bridge Housing Shelter 1533 Schrader Blvd.	Shelter	70 beds	70 gpd/bed	4,900

No.	Project Name/Address	Description	Size	Generation Rate <sup>a,b,c</sup>	Total Water Demand (gpd)
12	Modera Argyle Mixed-Use	Apartments	276 du	190 gpd/du	52,440
	1546 N. Argyle Ave.	Retail	9,000 sf	0.025 gpd/sf	225
		Restaurant	15,000 sf	30 gpd/seat	15,000
13	Hudson Building	Restaurant	10,402 sf	30 gpd/seat	10,402
	6523 W. Hollywood Blvd.	Office	4,074 sf	0.12 gpd/sf	489
		Storage	890 sf	0.03 gpd/sf	27
14	Wilcox Hotel	Hotel	133 rm	120 gpd/rm	15,960
	1717 N. Wilcox Ave.	Retail	3,580 sf	0.025 gpd/sf	90
15	Palladium Residences 6201 W. Sunset Blvd. <sup>e</sup>	Apartments	731 du	190 gpd/du	138,890
		Retail/Restaurant <sup>d</sup>	24,000 sf	30 gpd/seat 0.025 gpd/sf	18,150
16	Onni Group Mixed-Use Development 1360 N. Vine St.	Office	463,521 sf	0.12 gpd/sf	55,623
		Rehabilitated Uses <sup>e</sup>	8,988 sf	30 gpd/sf	8,988
		Restaurant	11,914 sf	30 gpd/seat	11,914
17	1723 Wilcox 1723 N. Wilcox Ave.	Hotel	81 rm	120 gpd/rm	9,720
		Restaurant	2,236 sf	30 gpd/seat	2,236
18	Pantages Theater Office 6225 W. Hollywood Blvd.	Office	210,000 sf	0.12 gpd/sf	25,200
19	6250 Sunset Mixed-Use (Old Nickelodeon	Apartments	200 du	190 gpd/du	38,000
	Site) 6250 W. Sunset Blvd.	Retail	4,700 sf	0.025 gpd/sf	118
20	Hollywood & Wilcox	Apartments	260 du	190 gpd/du	49,400
	6430–6440 W. Hollywood Blvd.	Office	3,580 sf	0.12 gpd/sf	430
		Retail	11,020 sf	0.025 gpd/sf	276
		Restaurant	3,200 sf	30 gpd/seat	3,200

No.	Project Name/Address	Description	Size	Generation Rate <sup>a,b,c</sup>	Total Water Demand (gpd)
21	Hollywood Center Mixed-Use (Formerly	Apartments	872 du	190 gpd/du	165,680
	Millennium)	Affordable Senior Housing <sup>f</sup>	133 du	110 gpd/du	14,630
	1720 N. Vine St.	Retail	30,176 sf	0.025 gpd/sf	754
22	Mixed-Use	Apartments	369 du	190 gpd/du	70,110
	1310 N. Cole Ave.	Office	2,570 sf	0.12 gpd/sf	308
23	6200 West Sunset Boulevard	Apartments	270 du	190 gpd/du	51,300
	6200 W. Sunset Blvd.	Restaurant	1,750 sf	30 gpd/seat	1,750
		Pharmacy	2,300 sf	0.025 gpd/sf	58
		Retail	8,070 sf	0.025 gpd/sf	202
24	Citizen News 1545 N. Wilcox Ave.	Flexible Event Space	16,100 sf	0.35 gpd/sf	5,635
		Restaurant	14,800 sf	30 gpd/seat	14,800
25	1637 North Wilcox Mixed-Use 1637 N. Wilcox Ave.	Apartments	93 du	190 gpd/du	17,670
		Affordable Housing	61 du	190 gpd/du	11,590
		Commercial	6,586 sf	0.05 gpd/sf	329
26	Mixed-Use	Apartments	200 du	190 gpd/du	38,000
	1524–1538 N. Cassil Pl.	Restaurant	1,400 sf	30 gpd/seat	1,400
27	Academy Square	Office	285,719 sf	0.12 gpd/sf	34,286
	1341 Vine St.	Apartments	200 du	190 gpd/du	38,000
		Restaurant	16,135 sf	30 gpd/seat	16,135
28	citizenM Hotel	Hotel	240 rm	120 gpd/rm	28,800
	1718 Vine St.	Restaurant	5,373 sf	30 gpd/seat	5,373
29	6445 Sunset	Hotel	175 rm	120 gpd/rm	21,000
	6445 Sunset Blvd.	Restaurant	12,500 sf	30 gpd/seat	12,500
30	6360 Hollywood	Hotel	90 rm	120 gpd/rm	10,800
	6360 Hollywood Blvd.	Restaurant	11,000 sf	30 gpd/seat	11,000

No.	Project Name/Address	Description	Size	Generation Rate <sup>a,b,c</sup>	Total Water Demand (gpd)
31	1400 Vine	Residential	179 du	190 gpd/du	34,010
	1400 Vine St.	Affordable Housing	19 du	190 gpd/du	3,610
		Restaurant	16,000 sf	30 gpd/seat	16,000
32	6140 Hollywood	Hotel	102 rm	120 gpd/rm	12,240
	6140 Hollywood Blvd.	Condominium	27 du	190 gpd/du	5,130
		Restaurant	11,460 sf	30 gpd/seat	11,460
33	Hollywood Crossroads	Residential	950 du	190 gpd/du	180,500
	1540–1552 Highland Ave.	Hotel	308 rm	120 gpd/rm	36,960
		Office	95,000 sf	0.12 gpd/sf	11,400
		Commercial/Retail	185,000 sf	0.05 gpd/sf	9,250
34	Hollywood Gower Mixed-Use	Apartments	220 du	190 gpd/du	41,800
	6100 W. Hollywood Blvd.	Restaurant	3,270 sf	30 gpd/seat	3,270
35	Mixed-Use 6220 W. Yucca St.	Hotel	210 rm	120 gpd/rm	25,200
		Apartments	136 du	190 gpd/du	25,840
		Retail	3,450 sf	0.025 gpd/sf	86
		Restaurant	9,120 sf	30 gpd/seat	9,120
36	1719 Whitley Hotel 1719 N. Whitley Ave.	Hotel	156 rm	120 gpd/rm	18,720
37	Sunset Gower Studios	Sound Stage	169,400 sf	0.05 gpd/sf	8,470
	1438 N. Gower St.	Production Support	52,800 sf	0.05 gpd/sf	2,640
		Office	852,830 sf	0.12 gpd/sf	102,340
		Restaurant	6,516 sf	30 gpd/seat	6,516
38	1235 Vine Street Project	Office	109,190 sf	0.12 gpd/sf	13,103
	1235 Vine St.	Restaurant	7,960 sf	30 gpd/seat	7,960
39	Apartments 1601 N. Las Palmas Ave.	Apartments	202 du	190 gpd/du	38,380

No.	Project Name/Address	Description	Size	Generation Rate <sup>a,b,c</sup>	Total Water Demand (gpd)
40	Las Palmas Residential (Hollywood	Residential	224 du	190 gpd/du	42,560
	Cherokee) 1718 N. Las Palmas Ave.	Retail	985 sf	0.025 gpd/sf	25
41	Hotel	Hotel	122 rm	120 gpd/rm	14,640
	1921 Wilcox Ave.	Restaurant	4,225 sf	30 gpd/seat	4,225
42	6753 Selma Mixed-Use 6753 Selma Ave.	Apartments	51 du	190 gpd/du	9,690
		Retail	438 sf	0.025 gpd/sf	11
43	Hotel 1133 N. Vine St.	Hotel	112 rm	120 gpd/rm	13,440
		Café	661 sf	0.28 gpd/sf	185
44	Apartments 1749 Las Palmas Ave.	Apartments	70 du	190 gpd/du	13,300
		Retail	3,117 sf	0.025 gpd/sf	78
45	1708 Cahuenga 1708 N. Cahuenga Blvd.	Office/Commercial	217,269 sf	0.12 gpd/sf	26,072
46	Residential 1818 N. Cherokee Ave.	Apartments	65 du	190 gpd/du	12,350
		Affordable Housing	21 du	190 gpd/du	3,990
Tota	Í				2,065,961
Project					83,949
Rela	ted + Project				2,149,910

du = dwelling units

gpd = gallons per day

rm = rooms

sf = square feet

<sup>a</sup> LASAN's Sewage Factors (2012).

<sup>b</sup> Assumes all restaurant space is full service with 30 sf per seat.

<sup>c</sup> Assumes rate for 3-bedroom units for all dwelling units (with the exception of senior housing).

<sup>d</sup> Assumes 75 percent restaurant and 25 percent retail.

No.	Project Name/Address	Description	Size	Generation Rate <sup>a,b,c</sup>	Total Water Demand (gpd)		
e Tl	e The rehabilitated uses could include residential, restaurant, or office uses. This analysis conservative assumes restaurant uses.						
f As	<sup>f</sup> Assumes rate for 1-bedroom dwelling units.						
Sourc	Source: Gibson Transportation Consulting, Inc., 2020; Eyestone Environmental, 2021.						

In addition, the Hyperion Sanitary Sewer System's total treatment capacity is conservatively estimated to be approximately 550 mgd in 2025, which is the same as its existing capacity.

The Project wastewater flow of approximately 0.08 mgd combined with the wastewater flow from related projects flow of approximately 2.07 mgd and the forecasted 2025 wastewater flow of 335.5 mgd for the Hyperion Sanitary Sewer System would result in a total cumulative wastewater flow of approximately 337.65 mgd. Based on the Hyperion Sanitary Sewer System's estimated future capacity of approximately 550 mgd, the Hyperion Sanitary Sewer System is expected to have adequate capacity to accommodate the wastewater flow of approximately 337.65 mgd aggregated from the Project, related projects, and forecasted growth by 2025. The 2.15 mgd of cumulative plus Project wastewater would represent approximately 0.39 percent<sup>31</sup> of the Hyperion Sanitary Sewer System's estimated project.

Furthermore, as previously stated, the One Water LA Plan provides an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management based on water demand projections through 2040. The Wastewater Facilities Plan, which is included in Volume 2 of the One Water LA Plan, describes the City's existing wastewater collection and water reclamation plants, as well as the recommended improvements to meet future flow conditions. As stated therein, based on the design capacities and the projected future flows through the year 2040, it is anticipated that the existing Hyperion Sanitary Sewer System would have sufficient capacity to manage wastewater flows.

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

(2) Mitigation Measures

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

<sup>&</sup>lt;sup>31</sup> (2.15 mgd / 550 mgd) x 100 = 0.39%

### (3) Level of Significance After Mitigation

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