

## 4.11.2 Wastewater

### 4.11.2.1 Introduction

This section addresses potential impacts on existing wastewater infrastructure and treatment facilities and analyzes whether sufficient capacity is available to serve Project demand. Consistency with relevant plans and regulations is also discussed. Information regarding existing sewer capacity and local infrastructure as well as proposed Project improvements was provided in the Utility Technical Report: Water, Wastewater, and Energy (Utility Technical Report), prepared for the Project by KPFF Consulting Engineers, provided in Appendix L of this Draft Environmental Impact Report (EIR).<sup>1</sup>

The Project entitlements include a Sign District on the Project Site and surrounding parcels. Installation of signage would not affect wastewater infrastructure or treatment facilities. Thus, this issue is not addressed further in this Wastewater section.

### 4.11.2.2 Environmental Setting

#### *Existing Conditions*

##### **Wastewater Collection**

Wastewater in the City of Los Angeles (City) is collected and conveyed by three separate sanitary sewer systems owned and operated by the Los Angeles Department of Public Works (LADPW). The largest of these, the Hyperion Water Reclamation Plant Sanitary Sewer System (Hyperion Sanitary Sewer System), encompasses the majority of the City including the Project Site, as well as accepting sewage from 29 other jurisdictions. The Hyperion Sanitary Sewer System is a network of approximately 6,117 miles of gravity-fed sewer laterals and mains, pressurized mains, pump stations, treatment plants, and outfalls in the Pacific Ocean.<sup>2</sup> This system would also provide wastewater services for the Project.

Multiple sewer lines are located in the streets surrounding the Project Site. As stated in the Utility Technical Report, based on records provided by the City, there is a 66-inch reinforced concrete pipe (RCP) sewer line and a 10-inch vitrified clay pipe (VCP) sewer line in S. Figueroa Street, both flowing southwest; a 10-inch VCP sewer line in W. Pico Boulevard, flowing southeast; and a 20-inch VCP sewer line in S. Flower Street, flowing southwest. The existing on-site 27,800-square foot commercial building is served by two sewer laterals and “wyes” (connection points between private laterals and public sewer lines) that discharge to the 10-inch sewer line in S. Figueroa Street. The existing uses in the building are estimated to generate approximately 55,600 gallons per day (gpd) of wastewater.<sup>3</sup> Two additional sewer laterals and wyes, one to W. Pico Boulevard and one

<sup>1</sup> KPFF Consulting Engineers, Fig + Pico Conference Center Hotels: Utility Technical Report: Water, Wastewater, and Energy, May 15, 2017.

<sup>2</sup> City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2017, <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdey/~edisp/ent012544.pdf>. Accessed February 9, 2017.

<sup>3</sup> KPFF Consulting Engineers, Utility Technical Report, Table 2 - Estimated Existing Wastewater Generation, page 4, which is based on the approved Sewer Capacity Availability Report provided by LA Sanitation, April 28, 2017, provided as Exhibit 4 of the report.

to S. Flower Street, connect the Project Site to the sewer lines in those rights-of-way but do not serve the existing building.

### **Wastewater Treatment**

Wastewater generated within the Hyperion Sanitary Sewer System service area is conveyed to and treated at one of three wastewater treatment plants owned and operated by LADPW. The primary and largest plant is the Hyperion Water Reclamation Plant (HWRP), also known as the Hyperion Treatment Plant or HTP in Playa del Rey. The HWRP has a service area encompassing 600 square miles, including the Project Site, and provides preliminary, primary, and secondary treatment of wastewater. Upstream of this plant, the Donald Tillman Water Reclamation Plant (DTWRP) serves the area between Chatsworth and Van Nuys and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP) serves the eastern San Fernando Valley. Both accept and provide tertiary treatment of wastewater flows and supply recycled water to their service areas; they do not serve the Project Site. The HWRP also treats flows bypassed by the DTWRP and LAGWRP.<sup>4</sup>

The current treatment capacity of the Hyperion Sanitary Sewer System is approximately 550 million gallons per day (mgd), including 450 mgd at the HWRP, 80 mgd at DTWRP, and 20 mgd at LAGWRP. The system currently has an average dry weather flow of approximately 449 mgd, resulting in a residual treatment capacity of 101 mgd in the system. More specifically, the HWRP has an average dry weather flow 275 mgd, resulting in a residual treatment capacity at that facility of 175 mgd. The HWRP was designed to accommodate both dry and wet weather days with a maximum daily capacity of 450 mgd and 800 mgd respectively during dry and wet conditions.<sup>5</sup>

Following the secondary treatment of wastewater, the majority of effluent from the HWRP is discharged into Santa Monica Bay, while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. The HWRP has two 12-foot-diameter outfalls that presently discharge into Santa Monica Bay (a 1-mile outfall pipeline and 5-mile outfall pipeline). The 1-mile outfall pipeline is 50 feet below the surface of the ocean and is only used on an emergency basis. The 5-mile outfall pipeline is 187 feet below the surface of the ocean and is used to discharge secondary treated effluent on a daily basis.

HWRP effluent is required to meet Regional Water Quality Control Board (RWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit. Accordingly, HWRP effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds

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<sup>4</sup> City of Los Angeles Department of Public Works, LA Sanitation, Water Reclamation Plants, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?\\_adf.ctrl-state=tqzq08n7g\\_4&\\_afLoop=15368243043312095#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=tqzq08n7g_4&_afLoop=15368243043312095#!). Accessed February 9, 2017.

<sup>5</sup> City of Los Angeles Department of Public Works, LA Sanitation, Hyperion Water Reclamation Plant, [https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=8kqxsrvo2\\_13&\\_afLoop=6324281261161833#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=8kqxsrvo2_13&_afLoop=6324281261161833#!). Accessed June 6, 2017.

the applicable wastewater treatment standards of the RWQCB. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.

**Integrated Resources Plan Improvements**

In November 2006, the Integrated Resources Plan (IRP), developed by the LADPW, was adopted by the Los Angeles City Council.<sup>6</sup> The IRP was developed to incorporate greater efficiency for future, water, wastewater, and runoff management in the City and surrounding service areas. It is a multi-phase program that will result in the establishment of citywide, regional, departmental and public and private partnerships. The IRP accounts for projected needs and sets forth improvements and upgrades to wastewater systems, recycled water systems, and runoff management programs in the City through the year 2020. The IRP includes wastewater flow projections based on population projections from the Southern California Association of Governments (SCAG).

As shown in **Table 4.11.2-1, Population and Average Dry Weather Flow Projections for HWRP Sanitary Sewer System Service Area**, the forecasted population for the Hyperion Sanitary Sewer System service area in 2010 was approximately 4,485,054 residents, approximately 4,641,928 residents in 2015, and approximately 4,854,483 residents in 2020. The wastewater flow projections account for planned levels of water conservation and assumed levels of collection system maintenance and rehabilitation. The average dry weather flow projected by the IRP in 2010 was estimated to be approximately 477.3 mgd, in 2015 approximately 492.3 mgd, and in 2020 approximately 511.5 mgd, with each amount falling within the system-wide treatment capacity of 550 mgd. As previously discussed, the Hyperion Sanitary Sewer System received an actual dry weather flow of 449 mgd in 2015, which is lower than the IRP projected and thus indicates that the system likely has more remaining capacity than anticipated in 2006.

**TABLE 4.11.2-1  
 POPULATION AND AVERAGE DRY WEATHER FLOW PROJECTIONS  
 FOR HWRP SANITARY SEWER SYSTEM SERVICE AREA**

	2000	2005	2010	2015	2020
<b>SCAG Population</b>	4,138,567	4,331,109	4,485,054	4,641,928	4,854,483
<b>Average Dry Weather Flow (in mgd)</b>	443.1	461.8	477.3	492.3	511.5

SOURCE: City of Los Angeles Department of Public Works, LA Sanitation. "City of Los Angeles Integrated Resources Plan," December 2006.

Despite the current and projected availability of system-wide treatment capacity, the IRP includes several proposals for improvements, additions, and expansions within the Hyperion Sanitary Sewer System to maintain adequate service over time. As HWRP is part of the larger City sanitary sewer system, including other treatment plants (DTWRP, LAGWRP, TTP, and the City’s Regional Sanitary Sewer System), connecting outfalls, and numerous sewer connections and major

<sup>6</sup> City of Los Angeles Department of Public Works, LA Sanitation, Integrated Resources Plan, City of Los Angeles, December 2006, [http://lacity-irp.org/documents/December\\_2006-Final\\_010207.pdf](http://lacity-irp.org/documents/December_2006-Final_010207.pdf). Accessed February 9, 2017.

interceptors, current and future implementation of the IRP and its corresponding expansion projects will support continued availability of capacity at the HWRP.

Certification of the Final EIR for the IRP included adoption of the "Approved Alternative" (Alternative 4). Alternative 4 is intended to increase wastewater collection and treatment capacity, water reclamation storage and beneficial use, water conservation, and runoff management opportunities. As part of the adopted IRP, proposed improvements include the following:<sup>7</sup>

- Expansion of HWRP biosolids handling capacity (e.g., new digesters and truck loading facility);
- Addition of secondary clarifiers at the HWRP to meet existing treatment requirements;
- Expansion and upgrade of DTWRP capacity to 100 mgd with advanced treatment;
- Addition of 60-million-gallon wastewater storage at DTWRP;
- Construction of a 5-million-gallon diurnal storage for wastewater and a 5 million gallon recycled water storage at LAGWRP, and maintain the option to upgrade LAGWRP to advance treatment;
- Construction of new Glendale Burbank Interceptor Sewer (GBIS);<sup>8</sup>
- Construction of new North East Interceptor Sewer (NEIS) Phase 2; and
- Construction Valley Spring Lane Interceptor Sewer (VSLIS).

Implementation of the IRP would increase treatment capacity in the Hyperion Sanitary Sewer System by 20 mgd, for a total of 570 mgd. Adoption of the IRP also includes the Adaptive Capital Improvement Program (CIP) which includes the anticipated capital, operation and maintenance, project timing, and implementation strategy for tracking and monitoring triggers. As discussed in the IRP and CIP and based on LADPW information, projects have been completed within all the treatment plants and sewer lines and additional ongoing improvements have been proposed to continually provide services and meet the wastewater needs of the City. Furthermore, projections show that adequate wastewater treatment services are expected to be available through 2025.<sup>9</sup>

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<sup>7</sup> City of Los Angeles Department of Public Works, LA Sanitation and Department of Water and Power, City of Los Angeles Integrated Resources Plan, Facilities Plan, Volume 5: Adaptive Capital Improvement Program, December 2006, <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010381.pdf>. Accessed February 9, 2017.

<sup>8</sup> The GBIS development process had been delayed due to decertification of its EIR. The Los Angeles City Council certified a new EIR and reapproved the project on November 9, 2010. Council File # 10-2389.

<sup>9</sup> City of Los Angeles Department of Public Works, LA Sanitation and Department of Water and Power, City of Los Angeles Integrated Resources Plan, Planning for Wastewater, Recycled Water and Stormwater Management, A Visionary Strategy for the Right Facilities, in the Right Places, at the Right Time - Executive Summary, December 2006, <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010372.pdf>. Accessed February 7, 2017.

## **Regulatory Framework**

### **City of Los Angeles**

#### **General Plan Framework**

Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework 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>10</sup>

#### **Municipal Code**

The Los Angeles Municipal Code (LAMC) includes regulations that require the City to assure available sewer capacity for new projects and fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides an analysis of the existing sewer system to determine if there is adequate capacity existing to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

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

In addition, 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>11</sup>

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<sup>10</sup> City of Los Angeles Department of City Planning, The Citywide General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Wastewater; Originally adopted by City Council on December 11, 1996, Re-adopted on August 8, 2001, <http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm>. Accessed February 7, 2017.

<sup>11</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. <http://eng2.lacity.org/docs/sporders/1991/so00691.pdf>. Accessed February 9, 2017.

## Sewer System Management Plan

The City's Sewer System Management Plan (SSMP) is intended to provide a plan and schedule for the proper management, operation, and maintenance of all parts of the municipal sanitary sewer system.<sup>12</sup> It is intended to help reduce and prevent sanitary sewer overflows as well as mitigate any overflows that do occur. The SSMP establishes design and performance standards for the City's sewer system. It also provides procedures for evaluating the system and providing capacity assurance. It establishes a standard of d/D of 0.75 or greater as the definition of sewers in need of replacement or relief.

## Green Building Code and Water Efficiency Requirements Ordinance

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 require the use of water conservation features in new developments. By using less water for the performance of population activities, residual after-use wastewater is reduced, thus reducing the demand for sewage conveyance and treatment. The Green Building Code, Ordinance No. 181480, is implemented during site plan review and provides standards and a mechanism for evaluating projects for their water conservation features. The Water Efficiency Requirements Ordinance, City Ordinance No. 180822, effective December 1, 2009, requires the use of efficient water fixtures, appliances and cooling towers.

### 4.11.2.3 Environmental Impacts

#### *Methodology*

Project wastewater generation was estimated by Los Angeles Sanitation (LA Sanitation) as part of its preparation of the Project SCAR report.<sup>13</sup> The peak dry weather flow represents the maximum simultaneous demand on the City's sewer system and is related to pipe sizing, as required by the Bureau of Engineering Special Order No. SO06-0691. Peak dry weather flow is determined by the average dry weather flow multiplied by 2.64, which is the basis for selecting pipe size when conveyance capacity is needed.<sup>14</sup> As stated in the IRP, average dry weather flow is used to evaluate treatment plant process capacities.<sup>15</sup> It is then compared to wastewater flows generated on the Project Site under existing conditions. The BOS analysis studied a worst-case scenario envisioning peak demands from the relevant facilities occurring simultaneously on the sewer system. A combination of flow gauging data and computed results from the City's hydrodynamic model were used to project current and future impacts due to additional wastewater discharge. The SCAR report

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<sup>12</sup> City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2017, <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt012544.pdf>. Accessed February 9, 2017.

<sup>13</sup> Refer to Exhibit 4, Sewer Capacity Availability Request and Sewer Will-Serve Letter, in the Utility Technical Report, provided in Appendix L of this Draft EIR.

<sup>14</sup> Peak flows are calculated based on the Bureau of Engineering Manual – Part F, Section 235, Use of the ADWF – PDWF Chart, <http://eng2.lacity.org/techdocs/sewer-ma/f200.pdf>, Page 14. Accessed June 6, 2017.

<sup>15</sup> City of Los Angeles Department of Public Works, LA Sanitation and Department of Water and Power, City of Los Angeles Integrated Resources Plan, Facilities Plan Volume 1: Wastewater Management, November 2005, <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010374.pdf>. Accessed June 6, 2017.

evaluates the capacity of the existing local and regional sewer system conditions and involves, but is not limited to, the following steps:

1. Research and trace sewer flow levels upstream and downstream of the point of connection;
2. Conduct field surveys to observe and record flow levels. Coordinate with maintenance staff to inspect sewer maintenance holes and conduct smoke and dye testing if necessary;
3. Review recent gauging data and in some cases closed circuit TV inspection (CCTV) videos;
4. Perform gauging and CCTV inspection if recent data is not available;
5. Research the project location area for other recently approved SCARs to evaluate the cumulative impact of all known SCARs on the sewer system;
6. Calculate the impact of the proposed additional sewage discharge on the existing sewer system as it will be impacted from the approved SCARs. This includes tracing the cumulative impacts of all known SCARs, along with the subject SCAR, downstream to ensure sufficient capacity exist throughout the system.

In order to evaluate available wastewater treatment capacity, the Project's estimated gross wastewater generation, including projected dry-weather flow from landscape irrigation, is compared with the available treatment capacity within the Hyperion Sanitary Sewer System for 2015 and 2020. Cumulative wastewater generation is also compared with the available capacity of the Hyperion Sanitary Sewer System using the average dry weather flow.

In addition, in response to the SCAR application, the Applicant received a letter from the Bureau of Engineering, dated April 28, 2017, confirming that sufficient hydraulic capacity exists in the system to accommodate the Project's net increased wastewater generation. The SCAR took into consideration design and operational features that would reduce or offset wastewater generation and service impacts.

### ***Thresholds of Significance***

#### **Appendix G of the State CEQA Guidelines**

In accordance with Appendix G of the State CEQA Guidelines, the applicable thresholds of significance with regard to wastewater are below. The Project would have a significant impact if it would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- 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.
- Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

### **LA CEQA Thresholds Guide**

The City's CEQA Thresholds Guide (LA CEQA Thresholds Guide) states that a determination of significance with regard to wastewater shall be made on a case-by-case basis, considering the following:

- 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.

### ***Project Characteristics and Project Design Features***

The Project would require new on-site infrastructure to serve the new buildings and minor upgrades and/or relocation of existing infrastructure that serve the existing uses on the Project Site. Private laterals and wyes would connect the Hotel A/B and Hotel C Towers to the 10-inch sewer main in S. Figueroa Street and 10-inch sewer main in W. Pico Boulevard. Construction associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution and minor off-site work associated with connections to the public sewer main.

No Project Design Features are proposed with regard to wastewater.

### ***Project Impacts***

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**Threshold WW-1:** Would the Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

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### **Construction and Operation**

Construction activities would produce nominal amounts of wastewater from construction workers on the Project Site. Portable restrooms would be provided and maintained on the Project Site for construction workers and would be serviced by a private company, as is typical on most construction sites. The resultant waste would be disposed of off-site by licensed waste haulers and would not be directed to the City's sewer system. Therefore, construction activities would not create wastewater that would exceed the treatment requirements of the applicable RWQCB.

Operationally, the Project would increase the amount of wastewater generated at the Project Site. Similar to existing conditions, the effluent from the Project would be conveyed to HWRP and ultimately discharged after treatment to the Santa Monica Bay. As discussed above, the HWRP continually monitors all effluent to ensure it meets applicable water quality standards of the RWQCB. These standards are more stringent than those required under the operable NPDES permit. Therefore, the Project would comply with the wastewater treatment requirements of the RWQCB. Impacts would be less than significant.

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**Threshold WW-2:** Would the Project 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?

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### **Construction**

During construction of the Project, a nominal volume of wastewater would be temporarily generated by on-site construction workers, totaling less than is generated by the on-site uses under existing conditions. The wastewater would not be directed into the City's sewer system and would not increase in wastewater flows from the Project Site compared to existing conditions.

Construction of the Project would include all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction would occur on the Project Site and be primarily confined to trenching for miscellaneous utility lines and connections to public infrastructure. The designs of these connections would be developed by a registered engineer and approved by the City's Bureau of Engineering.

Project excavation would extend to a depth of approximately 27 feet below ground surface (bgs). As stated in Sections 4.3, Geology, and 4.6, Hydrology and Water Quality, of this Draft EIR, the historic high groundwater level in the Project vicinity is approximately 100 feet bgs. Excavation would not intercept the historic high groundwater and no construction dewatering is anticipated.

Therefore, existing wastewater treatment capacity, and future wastewater treatment capacity, show that sufficient wastewater treatment capacity would be available for Project construction. The Project would not require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

### **Operations**

The Project Site would continue to be served by existing City water and utility lines, including the 10-inch sewer main in S. Figueroa Street and the 10-inch sewer main in W. Pico Boulevard. As indicated in **Table 4.11.2-2, *Wastewater Generated During Project Operation***, the Project would result in an estimated average daily wastewater generation of approximately 310,898 gpd. However, after subtracting the existing wastewater generation of 55,600 gpd, the Project would result in a net increase of 255,298 gpd of wastewater generation over existing conditions. The proposed increase of 255,298 gpd from the Project is approximately 0.2553 million gallons per day (mgd), which equals 0.146 percent of HWRP's available capacity.

**TABLE 4.11.2-2  
 WASTEWATER GENERATED DURING PROJECT OPERATION**

Types of Uses	Size	Wastewater Generation Rate (GPD/unit) <sup>a</sup>	Wastewater Generated (GPD)
Hotel Rooms (A, B, & C)	1,162 rooms	120 GPD/room	139,440
Sky Lobby (A) <sup>b</sup>	7,440 sf	50 GPD/1,000 sf	372
Ground Level Lobby (B) <sup>b</sup>	4,000 sf	50 GPD/1,000 sf	200
Sky Lobby (A) Bar/Food and Beverage Component <sup>b</sup>	2,900 sf	30 GPD/seat	5,800
Ground Level Lobby (B) Bar/Food and Beverage Component <sup>b</sup>	1,500 sf	30 GPD/seat	3,000
Meeting Space (A&B) <sup>c</sup>	11,826 sf	120 GPD/1,000 sf	1,419
Pool Deck (Level 41 – A&B Roof) – Outdoor <sup>d</sup>	5,204 sf	50 GPD/1,000 sf	260
Pool Deck Bar Support (Level 41 – A&B Roof) <sup>e</sup>	1,000 sf	720 GPD/1,000 sf	720
Fitness Center (Level 8 – A&B) – Indoor <sup>d</sup>	1,750 sf	200 GPD/1,000 sf	350
Fitness Deck (Level 8– A&B) Outdoor <sup>d</sup>	3,281 sf	200 GPD/1,000 sf	656
Pool Deck (Level 8– A&B) Outdoor <sup>d</sup>	7,000 sf	50 GPD/1,000 sf	350
Food & Beverage (Level 8 – A&B) Indoor <sup>b</sup>	3,694 sf	30 GPD/seat	7,388
Food & Beverage (Level 8 – A&B) Outdoor <sup>b</sup>	5,218 sf	30 GPD/seat	10,436
Amenities (Level 36 – A/B) Outdoor <sup>f</sup>	3,355 sf	50 GPD/1,000 sf	168
Retail/Restaurant (A&B) <sup>b</sup>	733 seats	30 GPD/seat	22,000
Swimming Pool (Level 8 –A&B) <sup>g</sup>	1 unit		27,768
Swimming Pool (Level 41 & Roof –A&B) <sup>g</sup>	1 unit		44,883
Roof Pool Deck (Level 24 - C) Outdoor <sup>d</sup>	5,000 sf	50 GPD/1,000 sf	250
Roof Pool Deck Bar Support (Level 24 – C) <sup>e</sup>	1,000 sf	720 GPD/1,000 sf	720
Amenities (Level 2 – C) Indoor <sup>h</sup>	9,000 sf	30 GPD/seat	18,000
Retail/Restaurant (C) <sup>c</sup>	2,145 sf	30 GPD/seat	4,290
Swimming Pool (Level 24 & Roof) <sup>g</sup>	1 unit		22,442
<b>Total Wastewater Generation for Proposed Uses</b>			<b>310,898</b>
<b>Existing Uses</b>			
Restaurant	27,800 sf	30 GPD/seat	55,600
<b>Net Increase in Wastewater Generation for Proposed Uses</b>			<b>255,298</b>

<sup>a</sup> Wastewater generation rates are based on the City Department of Public Works' Sewer Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, 2012.

<sup>b</sup> Lobby uses the "Lobby of Retail Area" factor. All Food and Beverage and Retail/Restaurant uses the "Full Service Indoor Seat" factor to provide the most conservative estimated water demand. It is assumed that each seat will occupy 15 square feet.

<sup>c</sup> Meeting Space uses the "Conference Room of Office Building" factor.

<sup>d</sup> Pool Decks use the "Lounge" factor. Fitness Center/Decks use the "Gymnasium: Basketball, Volleyball" factor.

<sup>e</sup> The Bars use the "Bar: Cocktail, Public Table Area" factor.

<sup>f</sup> The Hotel A/B Level 36 amenity area uses the "Lounge" factor.

<sup>g</sup> The estimated average daily wastewater generation rates for swimming pools are based on the sizes of the swimming pools.

<sup>h</sup> The Hotel C Level 2 amenity area will include a Bar and Food & Beverage component. The entire 9,000 square feet is calculated as restaurant use to provide the most conservative estimated water demand.

SOURCE: KPFF Consulting Engineer 2017.

The capacity of sewer lines to serve the Project, specifically 10-inch sewer main in S. Figueroa Street and 10-inch sewer main in W. Pico Boulevard, was validated through the City Bureau of Engineering's letter responses to a SCAR application in April 2017. The letters indicate that sufficient hydraulic capacity exists in the system to accommodate wastewater generated during operation of the Project.<sup>16</sup>

Moreover, the existing design capacity of the HWRP is approximately 450 mgd. Currently, approximately 275 mgd is treated at the HWRP, resulting in residual treatment capacity of approximately 175 mgd. As shown in Table 4.11.2-2, the proposed increase of 255,298 gpd (equivalent to 0.2553 mgd) generated during Project operation would represent 0.146 percent of the HWRP's existing residual capacity.

For future conditions, as discussed below in cumulative impacts, the average dry weather flow for HWRP, as projected by IRP, would be 435 mgd in 2020.<sup>17</sup> The net increase in wastewater that would result from Project operation could be accommodated within the projected available capacity of the HWRP for 2020 and would not substantially increase the projected average dry weather wastewater flows to the HWRP.

In addition, the wastewater generation calculation prepared for this analysis is a conservative estimate as it uses standard generation rates and does not account for reductions in wastewater that would be required for compliance with the City's recommended water conservation measures, as presented in Section 4.11.1, Water Supply, of this Draft EIR.

Therefore, given the amount of wastewater generated during Project operation, existing wastewater treatment capacity, and future wastewater treatment capacity, sufficient wastewater treatment capacity would be available to serve the proposed Project. The Project would not require the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

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**Threshold WW-3:** Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

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As stated above, wastewater in the City is collected and conveyed by three separate sanitary sewer systems owned and operated by LADPW. Sanitary sewer service to the Project Site from the surrounding streets is provided by BOS. As stated in the SCAR, provided in Exhibit 4 of the Utility Technical Report, the BOE requested verification from BOS for sewer capacity for the Project.

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<sup>16</sup> Refer to Exhibit 4, Sewer Capacity Availability Request and Sewer Will Serve Letter, of the Utility Technical Report, included in Appendix L of this Draft EIR.

<sup>17</sup> City of Los Angeles Department of Public Works, LA Sanitation and Department of Water and Power, City of Los Angeles Integrated Resources Plan, Facilities Plan Volume 1: Wastewater Management, November 2005, <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010374.pdf>. Accessed February 23, 2017.

BOS processed the SCAR on April 28, 2017, which led to a determination that there is capacity available to handle the anticipated discharge from the Project. Project construction would generate a nominal amount of wastewater which would be collected and disposed of off-site by a private company providing portable restrooms. Accordingly, construction-related wastewater would not constrain the City's sanitary sewer system, or substantially incrementally exceed the capacity of the HWRP.

The wastewater treatment provider (i.e., BOS), in coordination with BOE, concluded in the SCAR that sufficient capacity exists within the City's sanitary sewer system serving the Project Site to accommodate wastewater generated as part of Project operation without constraining sewer capacity. Ample future capacity also exists at the HWRP, which would treat wastewater discharged from the Project Site, to handle Project wastewater flows.

Therefore, the wastewater treatment provider that serves the Project (i.e., BOS) has determined there is adequate capacity to serve for the Project's demand in addition to the provider's existing commitments. The Project would not require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects, and impacts would be less than significant.

### ***Cumulative Impacts***

#### **Wastewater Generation**

As stated in Chapter 3, General Description of Environmental Setting, of this Draft EIR the cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual environmental impact issue may vary. Here, the HWRP has a service area encompassing 600 square miles, which provides a geographic scope for cumulative analysis. This Draft EIR has identified 191 related projects that are located within an approximately 2-mile radius of the Project Site. The service area of the HWRP, however, is substantially larger than the geographic scope established with the related projects list. Thus, for purposes of potential cumulative impacts associated with wastewater treatment capacity, this analysis considers whether the projected capacity of the HWRP is sufficient to accommodate anticipated growth within its service area boundaries inclusive of the Project and cumulative growth. With respect to wastewater infrastructure, this analysis considers the related projects and SCAR determinations from the City that infrastructure can accommodate cumulative growth.

#### **Wastewater Conveyance Infrastructure**

As with the Project, the related projects would be subject to the provisions of the LAMC requiring provision of on-site infrastructure, improvements to connect project wastewater into the local conveyance infrastructure, and payment of fees for future sewerage replacement and/or relief improvements. In particular, the Project and the related projects would be subject to LAMC Section 64.15 requiring a determination by LADPW that there is allotted sewer capacity available to adequately service each project. The City performs this code-required review for new development projects to ensure that sewer capacity is available prior to the commencement of construction. Moreover, as noted in the Methodology subsection above, the City accounts for other recently

approved SCARs and evaluates the potential for cumulative impacts on the sanitary sewer system caused by related projects and growth.

The City's hydrodynamic modeling for SCAR reports anticipates current and future impacts due to cumulative wastewater discharge. The SCAR reports evaluate the capacity of the existing local and regional sewer system and cumulative impact of all known SCARs on the sewer system. The SCAR for the Project is also considered within the context of this cumulative hydrodynamic modeling. Thus, the approved SCAR for the Project incorporates potential cumulative effects on wastewater infrastructure and determined there would be sufficient capacity.

Therefore, the Project, when considered together with the related projects, would not have a cumulatively considerable significant impact on wastewater infrastructure. The City's sanitary sewer system infrastructure would accommodate current and foreseeable new development and would have sufficient capacity for the contributions of the Project and the related projects.

### **Wastewater Treatment**

For future conditions, as discussed below in cumulative impacts, the average dry weather flow for HWRP, as projected by IRP, would be 435 mgd in 2020. The net increase in wastewater that would result from Project operation could be accommodated within the projected available capacity of the HWRP for 2020 and would not substantially or incrementally impact increase the projected average dry weather wastewater flows to the HWRP.

As previously stated, the HWRP has a treatment capacity of 450 mgd and a projected average dry weather flow of 435 mgd in 2020, which equates to approximately 15 mgd of additional capacity in the future condition. The IRP projected that cumulative growth through 2020 within the service area, which includes the Project Site and vicinity, could be accommodated by the design capacity of the HWRP. As demonstrated above, the Project would generate 255,298 mgd of wastewater in the future operational condition and that equates to 0.017 percent of the available treatment capacity. Forecasted wastewater flow from cumulative growth (i.e., 435 mgd) for the entire service area of the HWRP includes the Project Site and surrounding areas. Thus, the incremental increase of wastewater flow from the Project is captured within the cumulative increase in wastewater flow from growth within the service area. Furthermore, even if the 0.017 percent increase in wastewater flow was added onto the cumulative increase of wastewater from all growth (255,299 gpd + 435 mgd = 435,255,299 gpd) the total wastewater flow would still be well below the 450 mgd average dry weather flow design capacity. Thus, the Project would not have a cumulatively considerable impact on the wastewater treatment capacity of the HWRP.

In addition, the HWRP currently meets applicable water quality standards as set forth by the NPDES. As such, the wastewater effluent discharged by growth within the services area boundary would have a less than significant impact on water quality. Implementation of the IRP, upgrades in the advanced treatment processes at the HWRP, and continual monitoring by the EMD would ensure that effluent discharged is within applicable limits. Thus, cumulative impacts on water quality would be less than significant.

Therefore, the Project considered with cumulative growth and projects within the sanitary sewer service area would not exceed wastewater treatment requirements of the RWQCB, 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, or result in a determination by the wastewater treatment provider, which serves the project, that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

#### **4.11.2.4 Mitigation Measures**

The Project would not result in significant impacts related to wastewater infrastructure or treatment facilities and no mitigation measures are required.

#### **4.11.2.5 Level of Significance After Mitigation**

Impacts associated with wastewater infrastructure and treatment facilities would be less than significant.