1. INTRODUCTION

This section of the Draft EIR discusses sanitary sewers service for the Herald Examiner project sites and the surrounding area. This section analyzes the proposed project's impact on the ability of the City of Los Angeles Department of Public Works (LADPW), Bureau of Sanitation, to meet the project's wastewater demands.

2. EXISTING CONDITIONS

a. Treatment Facilities

The LADPW, Bureau of Sanitation, provides sewage collection service to the project sites. The sewage generated by the uses on the project sites ultimately flows to and is treated at the Hyperion Wastewater Treatment Plant (HTP) located in Playa del Rey at 12000 Vista Del Mar. The HTP treats wastewater from almost all of the City of Los Angeles as well as seven contract cities (Santa Monica, Beverly Hills, Burbank, Culver City, El Segundo, Glendale, San Fernando), unincorporated portions of Los Angeles County and 29 contract agencies. Opened in 1950, the HTP was upgraded in 1998 by adding additional capacity of 90 million gallons per day (mgd) such that it could accommodate a total average flow of 450 million gallons per day (mgd). Currently, the HTP treats an average dry weather flow of 340 mgd.[1]

The HTP service area also includes two inland reclamation plants: the Los Angeles/Glendale Water Reclamation Plant (LAGWRP) and the Tilman Water Reclamation Plant (TWRP). These plants partially treat upstream flows generated by urban uses in the San Fernando Valley and route the partially treated flows to the HTP. The LAGWRP opened in 1976 and is capable of processing approximately 30 mgd of wastewater. The TWRP became operational in 1985 and was designed to process 40 mgd of wastewater. An expansion of TWRP was completed in October 1991, which increased its operating capacity to 80 mgd. In total, the HTP, inclusive of LAGWRP and TWRP, has the capacity to treat 590 mgd of domestic wastewater under normal operating conditions. Presently, the HTP system is treating 350 mgd, 240 mgd below its rated maximum capacity. This spare capacity is due in part to water conservation measures now required as part of the City of Los Angeles Uniform Building Code, as sewer flows are directly proportionate to water usage.

1 www.lacity.org/SAN/wpd/WPD/general/hypern1.htm.

b. Collection Facilities

Broadway and Hill Street Sites

The sewer infrastructure in the vicinity of the Broadway and Hill Street sites include existing VCP 8-inch lines under Broadway and 11th Street and a 24-inch line under Hill Street. The 8-inch line under Broadway feeds into a 39-inch line under 12th Street and the 8-inch line under 11th Street feeds into a 16-inch line under Main Street and the 24-inch line under Hill Street feeds into a 27-inch line in the same street. The current capacity of these lines cannot be determined as gauging data for these lines is not available at this time. The design capacity at d/D (depth to diameter/capacity) of 50 percent for the 8-inch, 16-inch, 24-inch, 27-inch and 39-inch lines is 0.23, 1.5, 4.8, 6.5 and 11.5 mgd respectively.[2]

12th Street Site

The sewer infrastructure in the vicinity of the 12th Street site includes existing VCP (vitrified clay pipe) 8-inch lines under 12th Street and Broadway, a 39-inch line under 12th Street, a 16-inch line under Main Street. The 8-inch lines feed into 16-inch lines under Main Street and Pico Boulevard. The current capacities of these lines cannot be determined as gauging data for these lines is not available at this time. The design capacity at d/D of 50 percent for the 8-inch, 16-inch and the 39-inch lines is 0.269, 1.6 and 11.5 mgd, respectively.

The LADPW requires that the wastewater of the new development connect to the City's existing sewer system. Any developer constructing a new sewer line is required to coordinate the construction and dedication of any such sewer with the LADPW for future operation and maintenance. It would then be the responsibility of the LADPW to upgrade the wastewater collection and treatment systems by providing relief for existing trunk lines nearing capacity and expanding treatment facilities.

3. REGULATORY FRAMEWORK

a. City of Los Angeles Department of Public Works

The LADPW Bureau of Sanitation has the responsibility of providing sanitation wastewater services for the public, including channel and debris basin cleaning, cleaning catch basins, overflow of catch basins, repair of catch basins, roach/rodent abatement, sewer odors, sewer repairs, sewer service charge adjustments, sewer spills, sewer stoppages, standing water and storm drain maintenance.

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2 Written correspondence from Adel Hagekhalil, Division Manager, Wastewater Engineerign Services Division, Bureau of Sanitation, City of Los Angeles Departement of Public Works, November, 29 2005.

b. Wastewater General Plan Framework Element

The City of Los Angeles General Plan Framework Element is a plan for long-term growth that establishes a Citywide context to guide the update of the community plan and Citywide elements. The Framework Element discusses that the reuse of gray water offers an opportunity for demand side management. Gray water, as well as reclaimed water, can be used to supplant potable water for irrigation purposes in the urban forest. The Wastewater Framework Element states that recent legislation allowing residential use of gray water should be supported through streamlining of the permitting process. Gray water systems can reduce the wastewater stream, although the extent of this potential is unknown. The Wastewater Framework Element states that every effort must be made to ensure that gray water does not enter the stormwater system through any means.

4. ENVIRONMENTAL IMPACT ANALYSIS

a. Significance Criteria

The *L.A. CEQA Thresholds Guide* indicates that a project would normally have a significant wastewater impact if:

- The project would cause 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; 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.

b. Project Impacts

Construction

Impacts related to wastewater would be significant if the proposed project would:

- *Cause 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; or*
- *Result in additional wastewater flows that 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.*

During project construction, construction contractors for the project would provide portable, on-site sanitation facilities that would be serviced at approved disposal facilities and/or treatment plants. The amount of construction-related wastewater that would be generated would not have a significant impact on wastewater disposal and treatment facilities due to the temporary nature of construction and expected

low volumes of wastes. As a result, construction impacts to wastewater services would be less than significant.

It has been determined by LADPW Bureau of Sanitation that detailed gauging and evaluation will be needed for final determination of local sewer line capacities as part of the permit process as gauging data for the existing lines serving the project sites is not available at this time. If insufficient capacities exist, the developer is required to build a secondary line to connect the flow to the nearest lines with sufficient capacity. At the time of development of the secondary line, a final approval for sewer capacity and connection permit will be made.[3]

Operation

Construction and operation of the proposed project would introduce approximately 575 new residential units, as well as new office, commercial and retail uses, on three sites within the South Park area of Downtown Los Angeles. Currently, uses on these site do not generate any regular wastewater, as the Broadway and Hill Street sites are largely unoccupied and the 12th Street site is developed with a surface parking lot. As shown in **Table IV.J.2-1**, below, using the City of Los Angeles' Sewage Generation Factors,[4] operation of the proposed project is expected to generate approximately 115,961 gallons per day (gpd) of wastewater.

Table IV.J.2-1
Projected Wastewater Discharges for the Herald Examiner Project

Type Description	Units	Generation Factor (gal/day/per unit)	Daily Generation (gal/day)	Annual Generation (acre-feet/year)
Proposed				
Multi-family Residence-2 BR	575 d.u.	160 gpd	92,000	104.10
Retail/Commercial	39,610 sq.ft.	80 gpd/1,000 sq.ft.	3,169	3.59
Office	39,725 sq.ft.	150 gpd/1,000 sq.ft.	5,959	6.74
Service Space	30,978	80 gpd/1,000 sq.ft.	2,478	2.8
Storage Space	30,978	20 gpd/1,000 sq.ft.	620	0.7
Indoor Amenities	6,330	80 gpd/1,000 sq.ft.	506	0.57
Outdoor Amenities	140,330	80 gpd/1,000 sq.ft.	11,226	12.7
Project Total			115,961	131.2

Source of factors is City of Los Angeles, L.A. CEQA Thresholds Guide, *May 1998, wastewater generation factors.*

3 Written correspondence from Adel Hagekhalil, Division Manager, Wastewater Engineerign Services Division, Bureau of Sanitation, City of Los Angeles Departement of Public Works, November, 29 2005.

4 *L.A. CEQA Thresholds Guide*, City of Los Angeles, Environmental Affairs Department, May 14, 1998, exhibit K.2-11.

The project's wastewater collection system would connect to the existing sewer mains under South Broadway, Hill Street and 11th Street. In 2004, the DWP completed the East Central Interceptor Sewer, which runs under Exposition Boulevard and connects the project area with HTP to increase conveyance capacity to accommodate growth in the area.

As part of project implementation, the project applicant would be required by the City of Los Angeles to pay sewage connection fees based on the number of plumbing fixtures associated with the proposed project. In addition, the applicant would be required by the City to pay sewage facility charges that allow the project to pay its share of the cost of treatment facilities. The sewage facility charge is collected by the City of Los Angeles from owners/developers of new land uses within the City. Fees may be offset by credits, should credits be available through prior uses. However, in the instance of the proposed Herald Examiner project, minimal wastewater is currently being generated by the existing on-site uses and/or unoccupied buildings.

All projects served by the HTP are subject to the Sewer Allocation program, which limits additional discharge according to a pre-established percentage rate. Before the Los Angeles Department of Building and Safety formally accepts a set of plans and specifications, the DWP must first determine if there is allotted sewer capacity available for the project. If the allotment for a particular time period (usually a month) has already been allocated, the project is placed on a waiting list until adequate treatment capacity has been determined. Under the allocation program, HTP has capacity to serve a particular growth rate.

The estimated wastewater generation for the project is projected to be 115,961 gal/day or 115,961 mgd. The HTP currently treats 340 mgd. This would represent an increase of approximately 0.03 percent over the daily volume of wastewater treated at the HTP. As such, it is expected that the HTP has sufficient capacity to accommodate the project's wastewater and impacts on wastewater treatment capacity would be less than significant.

Impacts related to wastewater would be significant if the proposed project would:

- *Cause 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.*

As stated by the LADWP, Bureau of Sanitation, the current capacity of the existing lines serving the project sites cannot be determined as gauging data for the lines is not available at this time. As such, mitigation measures for detailed gauging and evaluation for determination of local sewer line capacities are required in order to mitigate potentially significant impacts to a less than significant level.

Impacts related wastewater are considered significant if:

- *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.*

The estimated wastewater generation for the project is projected to be 115,961 gal/day or 115,961 mgd. The HTP currently treats 340 mgd. This would represent an increase of approximately 0.03 percent over the daily volume of wastewater treated at the HTP. As such, it is expected that the HTP has sufficient capacity to accommodate the project's wastewater and impacts on wastewater treatment capacity would be less than significant. In addition, LADWP, Bureau of Sanitation has determined that the Hyperion Treatment Plan has sufficient capacity for the project.[5]

Therefore, it has been determined that with implementation of mitigation measures, the project would not have the potential to significantly affect wastewater services.

c. Cumulative Impacts

Development of the proposed project, redevelopment of land uses in the South Park neighborhood due to the Central Business District Redevelopment Project, along with other related approved and pending projects within the project area, would increase development intensity and wastewater generation. Several improvements to the HTP system have recently been completed, that have allowed the system to treat increased wastewater flows. In addition, each new development within the City of Los Angeles is required to comply with the City's water conservation ordinances and other regulations pertaining to sewer collection and disposal. Therefore, there is no potential for cumulative impacts on wastewater.

d. Mitigation Measures

MM-WW-1. Detailed gauging and evaluation for determination of local sewer line capacities shall be done as part of the permit process.

MM-WW-2. If insufficient local sewer line capacities exist, the project applicant shall build a secondary line to connect the flow to the nearest lines with sufficient capacity.

MM-WW-3. A final approval for sewer capacity and connection permit shall be made at time of development of the secondary line.

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5 Written correspondence from Adel Hagekhalil, Division Manager, Wastewater Engineerign Services Division, Bureau of Sanitation, City of Los Angeles Departement of Public Works, November, 29 2005.

e. Adverse Impacts

With the implementation of the mitigation measures listed above, construction and operation of the proposed project would not result in significant impacts to wastewater or result in a cumulatively considerable impact to the City of Los Angeles Sewer infrastructure. Therefore, no adverse impacts would result from the proposed project.