



WASTEWATER INFRASTRUCTURE ASSESSMENT REPORT

1400 VINE STREET

1400 Vine Street
City of Los Angeles, California

Prepared For

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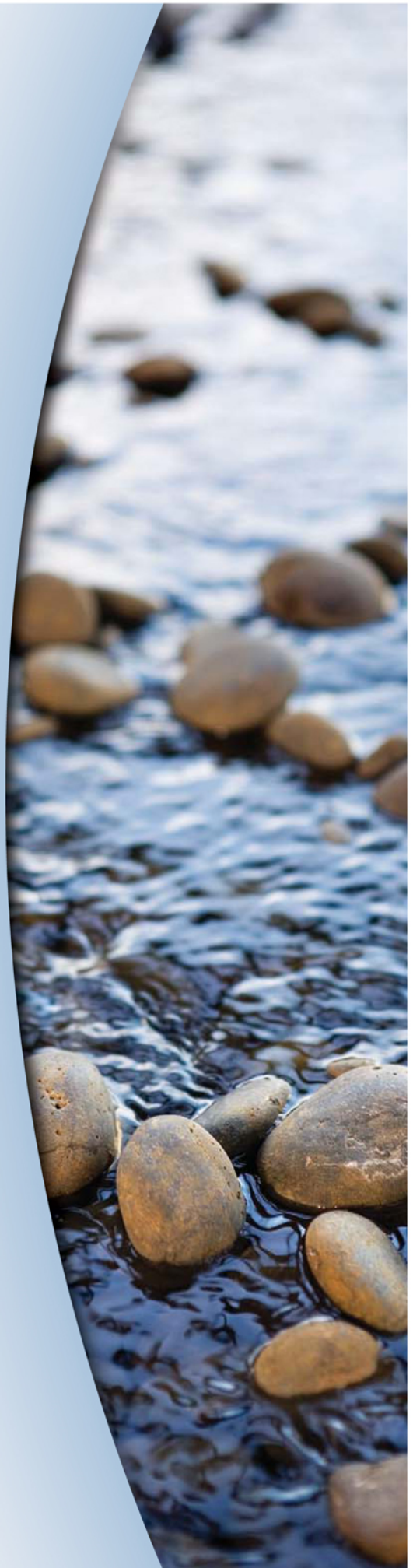


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1. INTRODUCTION

1.1 PROJECT DESCRIPTION

Tooley Interests, LLC (Applicant) is proposing to develop a new mixed-use development (Project) on an approximately 1.13-acre site (1.09 acres post-dedication), located at 1400 Vine Street (Project Site) in the City of Los Angeles. The Project proposes a 8-Story structure above three levels of subterranean parking. The Project will include 198 apartment units (studio, 1-bedroom, and 2-bedroom units) above approximately 16,000 square feet of retail and restaurants on the ground level, and 278 parking stalls in three subterranean levels. Two existing commercial buildings, a FedEx Office to the North and a wine merchant to the South, and a shared surface parking lot shall be removed to accommodate the Project.



1.2 SCOPE OF WORK

This report describes the current location of existing wastewater infrastructure and analyzes potential Project impacts to the City's infrastructure.

2. REGULATORY FRAMEWORK

The Project site is located in the City of Los Angeles, and therefore falls under the jurisdiction of the Bureau of Sanitation (BOS) of the City of Los Angeles Department of Public Works. The BOS serves over four million customers, and its sewer system is split into three subsystems – the Hyperion Sanitary Sewer System, the Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System. The Project site lies within the Hyperion Sanitary Sewer System service area (“Hyperion”),

Projects that discharge into the Hyperion system must follow the regulations under Ordinance No. 166,060 adopted by the City in 1990. This ordinance established an additional annual allotment of 5 million gallons per day (MGD), of which it allocates 1.7 MGD for priority projects, 0.4 MGD for public benefit projects, and 2.9 MGD for non-priority projects.

Under the City of Los Angeles Municipal Code (“Municipal Code”), all new projects connecting to the sewer collection system or proposing additional discharge must have a Sewer Capacity Availability Request (SCAR) performed by the City (Section 64.15, Municipal Code). The SCAR analyzes existing sewer system to determine whether or not the proposed increases in wastewater flows will generate any capacity issues. New connections to the sewer system must also pay associated fees (Sewerage Facilities Charge) based upon flow strength and volume (Section 64.11.2, Municipal Code). Pursuant to the City’s design criteria, any new sewer laterals less than 18” must be designed for a 100-year planning period, and depth of peak dry weather flows shall not exceed one half the diameter of the pipe ($d/D=0.5$).

3. EXISTING CONDITION

As noted above, the existing Project Site consists of a 5,997 square-foot 1-story FedEx office building, an 8,976 square-foot 1-story wine merchant, and surface parking.

The Bureau of Sanitation of the City of Los Angeles Department of Public Works provides sanitary sewer service to the Project Site through a main system in the surrounding streets. There is an existing sewer main along Leland Way, which flows westerly, beginning with an 8-inch VCP main adjacent to the northern portion of the Project. The 8-inch main transitions into a 10-inch VCP main as it intersects the sewer main on Vine Street. The 10-inch main continues in the southwesterly direction along Vine Street beyond the limits of the Project. There is also an existing 8-inch VCP main along De Longpre Avenue flowing in the easterly direction. Each of these sewer mains that are adjacent to the Project Site connect to a network of sewer lines that ultimately convey wastewater to the City’s Hyperion Treatment Plant.

Based on available record data from the City, there are currently 14 existing sewer laterals connecting from the City’s public sewer system to the Project Site. Four of these laterals connect from the 8-inch main off Leland Way, ten connect from the 10-inch main off Vine Street, and four of them connect from the 8-inch main off De Longpre Avenue. Per Navigate LA, the calculated capacity of the 3 aforementioned sewer mains are: 0.71 cfs, 2.4 cfs, and 0.71 cfs respectively.

Table 1 shows the estimated existing wastewater generation for the Project Site, based on Bureau of Sanitation sewer generation factors.

Table 1– Estimated Existing Wastewater Generation

Land Use	Units	Average Generation Factor (gpd/unit)	Total Average Daily Generation (gpd)
Retail Building 1	5,997 sf	25/1000 sf	150
Retail Building 2	8,976 sf	25/1000 sf	225
Total Existing Sewer Demand			375

4. SIGNIFICANCE THRESHOLDS

Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to wastewater. These questions are as follows:

Would the project:

- Require or result in the relocation or construction of new wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?
- 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?

In the context of these questions from the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant wastewater impact if:

- 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.

These thresholds are applicable to the Project and are used to determine if the Project would have significant wastewater impacts.

5. METHODOLOGY

The methodology for determining the significance of a project as it relates to a project’s impact on wastewater collection and treatment infrastructure is based on the *City of Los Angeles CEQA Thresholds Guide*. This methodology involves a review of the project’s environmental setting, project impacts, cumulative impacts, and mitigation measures as required. The following has been considered as part of the determination for this Project:

Environmental Setting

- Location of the Project and appropriate points of connection to the wastewater collection system on the pertinent Sewer Wye Map;
- Description of the existing wastewater system which would serve the Project, including its

capacity and current flows.

Project Impacts

- Evaluate the Project wastewater needs (anticipated daily average wastewater flow), taking into account design or operational features that would reduce or offset service impacts;
- Compare the Project's wastewater needs to the appropriate sewer's capacity and/or the wastewater flows anticipated in the Wastewater Facilities Plan or General Plan.

This report analyzes the potential impacts of the Project on the existing public sewer infrastructure by comparing the estimated Project demand with the calculated available capacity of the existing facilities.

The BOS, Wastewater Engineering Division made a preliminary analysis of the local and regional sewer conditions to determine if available wastewater conveyance and treatment capacity exists for future development. The BOS's response to the Request for Wastewater Services Information (WWSI) for the proposed Project dated March 17, 2020 included in Exhibit 2 estimates the project wastewater generation and states that the sewer system might be able to accommodate the total flow for the proposed project. Additional permitting (e.g. SCAR) will be required by LABOS to confirm adequate capacity of the sewer infrastructure.

6. PROJECT IMPACTS

6.1 CONSTRUCTION

Construction activities for the Project could result in a temporary increase in wastewater generation on-site. However, such use would be temporary and nominal when compared with the wastewater generated by the Project. In addition, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to direct wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities is not anticipated to cause any measurable increase in wastewater flows. Therefore, the Project's construction impacts to the wastewater system would be less than significant.

The Project will require abandonment of existing sewer lines to the site and construction of new on-site wastewater infrastructure to serve the new building. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution and minor off-site work associated with connections to the public main. No upgrades to the public main are anticipated. Any work that may affect services to the existing sewer lines will be coordinated with the City of Los Angeles. Furthermore, a Construction Management Plan, which would ensure safe pedestrian access as well as emergency vehicle access and safe vehicle travel in general, will be implemented to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. Moreover, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, Project impacts on wastewater associated with construction activities would be less than significant.

6.2 OPERATION

In accordance with the *LA CEQA Thresholds Guide*, the Project’s estimated sewer flows were based on the BOS’s sewage generation factors for residential and commercial categories. Based on the proposed uses and generation factors, the Project’s projected wastewater generation is approximately 56,420 gpd, representing a net increase in wastewater generation at the Project Site of approximately 56,045 gpd. A breakdown of these wastewater generation calculations is provided in Table 2.

Table 2– Estimated Proposed Wastewater Generation

Land Use	Units	Avg. Generation Factor (gpd/unit)	Total Wastewater Generation (gpd)
Residential: Studio(Bachelor)	54 units	75/unit	4,050
Residential: Apt – 1 Bedroom	111 units	110/unit	12,210
Residential: Apt – 2 Bedroom	33 units	150/unit	4,950
Retail:	3,100 sf	50/1,000 sf	155
Restaurant (12,900 sf):	430 seats	30/seat	12,900
Outdoor Common Area:	10,900 sf	50/1,000 sf	545
Indoor Common Area:	7,400 sf	50/1,000 sf	370
Gym:	1,600 sf	650/1,000 sf	1,040
Pool:	1 pool	20,200/pool	20,200
Total Proposed Wastewater Flow			56,420
Total Existing Wastewater Flow			375
Project Net Wastewater Flow (Proposed – Existing)			+56,045

A Wastewater Service Information (WWSI) request was submitted to the BOS to determine whether the existing wastewater infrastructure can accommodate the Project. BOS has analyzed the Project demands in conjunction with existing conditions and forecasted growth, and has preliminarily approved the Project to discharge up to 56,420 gpd into the City’s system by connecting to the existing sewer lines on Leland Way, Vine Street, and De Longpre Avenue. The original WWSI was approved for a total 55,893 gpd, but was later amended by email to account for an additional 527 gpd, yielding the net 56,420 gpd generation. This email can also be found with the WWSI in Exhibit 2.

The BOS’s most current Integrated Resources Plan (IRP) notes that the existing design capacity of the Hyperion Service Area is approximately 550 mgd (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles-Glendale Water Reclamation Plant). The project’s proposed wastewater generation increase is approximately 56,045 gpd. Currently, an average of 275 mgd is treated at the Hyperion Treatment Plant, resulting in a treatment capacity of 175 mgd, which means the project would account for approximately

0.00032 percent of the available capacity in the system. Therefore, based on the WWSI for the Project and the available wastewater treatment capacity, impacts on wastewater infrastructure would be less than significant.

Capacities of the sewer lines at 50% full were analyzed using FlowMaster software. The existing capacity of the 8-inch sewer line at 50% full in Leland Way is approximately 0.38 cubic feet per second (cfs). The existing capacity of the 10-inch sewer line in Vine Street at 50% full is approximately 1.31 cfs. The existing capacity of the 8-inch sewer line in De Longpre Avenue at 50% full is approximately 0.38 cfs. The project's net increase in sewage generation is approximately 56,045 gpd (0.09 cfs).

It was assumed that the sewer generation from the project would be split evenly (33.3%) to the sewer lines along Leland Way, Vine Street, and De Longpre Avenue. This results in approximately 7.6% of the pipe's half-full capacity in Leland Way, 2.2% of the half-full capacity in Vine Street, and 7.6% of the half-full capacity in De Longpre Avenue. Due to this fact, and the will-serve letter generated by the Bureau of Sanitation, impacts on wastewater infrastructure would be less than significant.

6.3 CUMULATIVE IMPACTS

The Project will result in the additional generation of sewer flow. However, as discussed above, the BOS has conducted an analysis of existing and planned capacity and determined that adequate capacity exists to serve the Project. Related projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a sewer capacity availability request to the BOS as part of the related project's development review. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and the Bureau of Sanitation to construct the necessary improvements. Impact determination will be provided following the completion of the SCAR analysis.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant system. As previously stated, based on information from the LA City Sanitation website, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (mgd) and the existing average daily flow for the system is approximately 275 mgd. The Project's estimated wastewater generation increase of 56,045 gpd summarized in Table 2 comprises less than 0.00032 percent of the available capacity in the system and less than 1.2 percent of the 5 mgd annual allotment of wastewater flow increase for the Hyperion Treatment Plant per Ordinance No. 166060. It is expected that related projects would also be required to adhere to the Bureau of Sanitation's annual wastewater flow increase allotment.

Based on these forecasts, the Project's increase in wastewater generation would be adequately accommodated by the Hyperion Service Area. In addition, the BOS's analysis confirms that the Hyperion Treatment Plant has sufficient capacity and regulatory allotment for the proposed Project. Thus, operation of the Project would have a less than significant impact on wastewater treatment facilities. Related projects must go through the same analysis to determine if any facilities will need to be upgraded to accommodate for the increase in capacity.

7. LEVEL OF SIGNIFICANCE

Based on the analysis contained in this report, less than significant water or wastewater impacts have been identified for this Project.

EXHIBIT 1

CITY OF LOS ANGELES (LA BOS – WILL SERVE LETTER)

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11/19/2019

ANTHONY NAVARRETE
600 WILSHIRE BLVD, STE 1470
LA, CA, 90017

Dear ANTHONY NAVARRETE,

SEWER AVAILABILITY: 1400 VINE ST

The Bureau of Sanitation has reviewed your request of 11/18/2019 for sewer availability at **1400 VINE ST**. Based on their analysis, it has been determined on 11/19/2019 that there is capacity available to handle the anticipated discharge from your proposed project(s) as indicated in the attached copy of the Sewer Capacity Availability Request (SCAR) .

This determination is valid for 180 days from the date shown on the Sewer Capacity Availability request (SCAR) approved by the Bureau of Sanitation.

While there is hydraulic capacity available in the local sewer system at this time, availability of sewer treatment capacity will be determined at the Bureau of Engineering Public Counter upon presentation of this letter. A Sewer Connection Permit may also be obtained at the same counter provided treatment capacity is available at the time of application.

A Sewerage Facilities Charge is due on all new buildings constructed within the City. The amount of this charge will be determined when application is made for your building permit and the Bureau of Engineering has the opportunity to review the building plans. To facilitate this determination a preliminary set of plans should be submitted to Bureau of Engineering District Office, Public Counter.

Provision for a clean out structure and/or a sewer trap satisfactory to the Department of Building and Safety may be required as part of the sewer connection permit.

Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480.

City of Los Angeles
Bureau of Engineering

SEWER CAPACITY AVAILABILITY REVIEW FEE (SCARF) - Frequently Asked Questions

SCAR stands for Sewer Capacity Availability Review that is performed by the Department of Public Works, Bureau of Sanitation. This review evaluates the existing sewer system to determine if there is adequate capacity to safely convey sewage from proposed development projects, proposed construction projects, proposed groundwater dewatering projects and proposed increases of sewage from existing facilities. The SCAR Fee (SCARF) recovers the cost, incurred by the City, in performing the review for any SCAR request that is expected to generate 10,000 gallons per day (gpd) of sewage.

The SCARF is based on the effort required to perform data collection and engineering analysis in completing a SCAR. A brief summary of that effort includes, but is not limited to, the following:

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 cumulated 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 from Item 6 above. This includes tracing the cumulative impacts of all known SCARs, along with the subject SCAR, downstream to insure sufficient capacity exist throughout the system.
7. Correspond with the applicant for additional information and project and clarification as necessary.
8. Work with the applicant to find alternative sewer connection points and solutions if sufficient capacity does not exist at the desired point of connection.

Questions and Answers:

1. When is the SCARF applied, or charged?

It applies to all applicants seeking a Sewer Capacity Availability Review (SCAR). SCARs are generally required for Sewer Facility Certificate applications exceeding 10,000 gpd, or request from a property owner seeking to increase their discharge thru their existing connection by 10,000 gpd or more, or any groundwater related project that discharges 10,000 gpd or more, or any proposed or future development for a project that could result in a discharge of 10,000 gpd.

2. Why is the SCARF being charged now when it has not been in the past?

The City has seen a dramatic increase in the number of SCARs over 10,000 gpd in the last few years and has needed to increase its resources, i.e., staff and gauging efforts, to respond to them. The funds collected thru SCARF will help the City pay for these additional resources and will be paid by developers and property owners that receive the benefit from the SCAR effort.

3. Where does the SCARF get paid?

The Department of Public Works, Bureau of Engineering (BOE) collects the fee at its public counters. Once the fee is paid then BOE prepares a SCAR request and forwards it to the BOS where it is reviewed and then returned to BOE. BOE then informs the applicant of the result. In some cases, BOS works directly with the applicant during the review of the SCAR to seek additional information and work out alternative solutions

EXHIBIT 2

CITY OF LOS ANGELES (LA BOS – WWSI)

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

March 17, 2020

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Mr. Anthony Navarrete, Applicant
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600 Wilshire Boulevard, Suite 1470
Los Angeles, CA, 90017

Dear Mr. Navarrete,

1400 VINE STREET - REQUEST FOR WASTEWATER SERVICES INFORMATION

This is in response to your March 5, 2020 letter requesting a review of your proposed mixed-use project located at 1400 Vine Street, Los Angeles, CA 90028. The project will consist of residential, retail, and commercial space. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<i>Proposed</i>			
Residential: Studio	75 GPD/DU	54	4,050
Residential: 1-BDRMS	110 GPD/DU	111	12,210
Residential: 2-BDRMS	150 GPD/DU	33	4,950
Retail Space	50 GPD/1000 SQ.FT	1,600 SQ.FT	80
Restaurant	30 GPD/SEAT	415 SEATS	12,448
Outdoor Common Area	50 GPD/1000 SQ.FT	10,900 SQ.FT	545
Indoor Common Area	50 GPD/1000 SQ.FT	7,400 SQ.FT	370
Gym	650 GPD/ 1000 SQ.FT	1,600 SQ.FT	1,040
Pool	20,200 GAL/UNIT	1 UNIT	20,200
Total			55,893

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SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Leland Wy. The sewage from the existing 8-inch line feeds into an 18-inch and 16-inch line on Vine St before discharging into a 20-inch sewer line on Bronson Av. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	LELAND WY	*	251,210 GPD
18	VINE ST	26	1,260,754 GPD
16	VINE ST	*	2,522,053 GPD
20	BRONSON AV.	28	2,045,013 GPD

In addition, this proposed project also includes a discharge into an existing 8-inch line on De Longpre Av. The sewage from the existing 8-inch line feeds into 12-inch line on Gower St as well as an 18-inch and 16-inch line on Vine St before discharging into a 20-inch sewer line on Bronson Av. Figure 2 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line cannot be determined at this time without additional gauging.

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	DE LONGPRE AV	*	229,323 GPD
12	GOWER ST	*	585,537 GPD
18	VINE ST	26	1,260,754 GPD
16	VINE ST	*	2,522,053 GPD
20	BRONSON AV.	28	2,045,013 GPD

* No gauging available

Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

All sanitary wastewater ejectors and fire tank overflow ejectors shall be designed, operated, and maintained as separate systems. All sanitary wastewater ejectors with ejection rates greater than 30 GPM shall be reviewed and must be approved by LASAN WESD staff prior to other City plan check approvals. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org.

STORMWATER REQUIREMENTS

LA Sanitation, Stormwater Program is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI, Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (also known as Low Impact Development [LID] Ordinance). Prior to issuance of grading or building permits, the applicant shall submit a LID Plan to the City of Los Angeles, Public Works, LA Sanitation, Stormwater Program for review and approval. The LID Plan shall be prepared consistent with the requirements of the Planning and Land Development Handbook for Low Impact Development.

Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lacitysan.org. It is advised that input regarding LID requirements be received in the preliminary design phases of the project from plan-checking staff. Additional information regarding LID requirements can be found at: www.lacitysan.org or by visiting the stormwater public counter at 201 N. Figueroa, 2nd Fl, Suite 280.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. Green Street standard plans can be found at: www.eng2.lacity.org/techdocs/stdplans/

CONSTRUCTION REQUIREMENTS

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

If there are questions regarding the stormwater requirements, please call WPP's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 2nd Fl, Suite 280.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

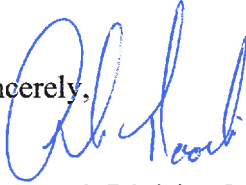
Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of \$1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

SOLID RESOURCE REQUIREMENTS

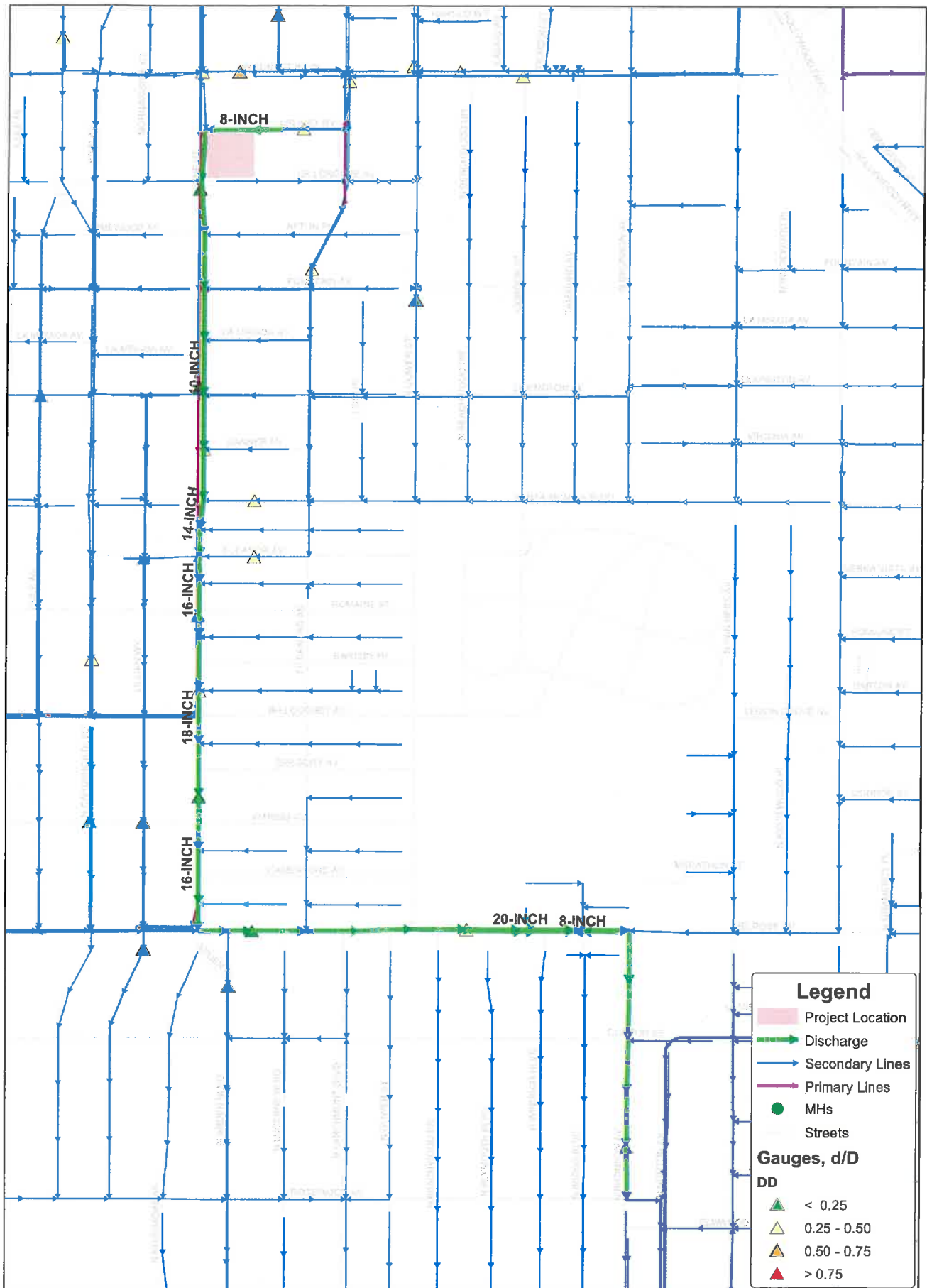
The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

Sincerely,

Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

AP/CD: ga

Attachment: Figure 1 - Sewer Map
Figure 2 - Sewer Map

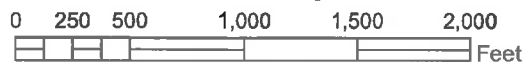
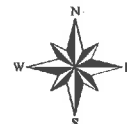
c: Kosta Kaporis, LASAN
Cyrus Gilani, LASAN
Christopher DeMonbrun, LASAN

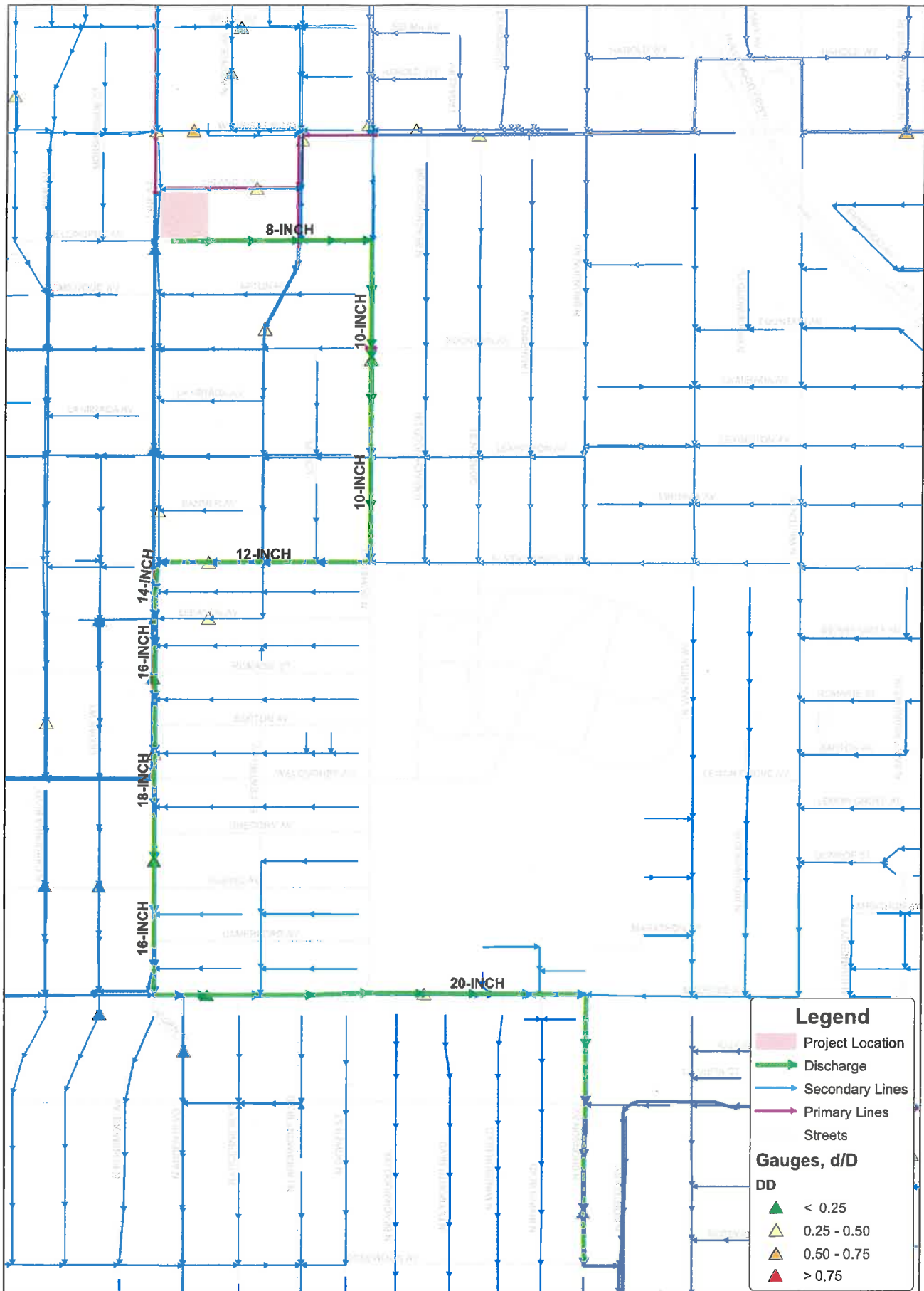


Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles



Figure 1
1400 Vine Street
Sewer Map





Legend

- Project Location
- Discharge
- Secondary Lines
- Primary Lines
- Streets

Gauges, d/D

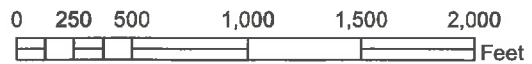
DD

- < 0.25
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75

Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles



Figure 2
1400 Vine Street
Sewer Map



Anthony Navarrete

From: Christophe DeMonbrun <chris.demonbrun@lacity.org>
Sent: Monday, March 23, 2020 5:09 PM
To: Anthony Navarrete
Cc: Samson Kawjaree
Subject: Re: 1400 Vine Street - WWSI Response Letter

Hello Anthony,

The addition of 527 GPD of wastewater will not cause the system to be increased above design requirements. As such the previous analysis and response remains valid. As with the previous response the following statement still holds:

Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

All sanitary wastewater ejectors and fire tank overflow ejectors shall be designed, operated, and maintained as separate systems. All sanitary wastewater ejectors with ejection rates greater than 30 GPM shall be reviewed and must be approved by LASAN WESD staff prior to other City plan check approvals. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480.

Please let me know if you need any additional assistance.

Regards,

Chris

On Mon, Mar 23, 2020 at 3:06 PM Anthony Navarrete <ANavarrete@fuscoe.com> wrote:

Hi Chris,

Hope you had good weekend. Just following up on my email and our conversation from this past Friday. Per our conversation, I am just looking for an email confirming that an increase of 527 gpd from the approved 55,893 gpd to 56,420 gpd won't need an updated WWSI.

Thanks,