Appendix N

Utility Infrastructure Technical Report:
Wastewater

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SUNSET + WILCOX
UTILITY INFRASTRUCTURE TECHNICAL REPORT: WASTEWATER
MARCH 2022

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Appendix

1. INTRODUCTION

1.1. PROJECT DESCRIPTION

Seward Partners LLC (the Project Applicant) proposes to construct a new commercial project (Project) on an approximately 1.70-acre (73,903 square feet) site (Project Site) in the Hollywood Community Plan Area of the City of Los Angeles (City). The Project is bound by Sunset Boulevard on the north, Wilcox Avenue on the west, Cole Place on the east, and De Longpre Avenue on the south. The Project Site includes 10 individual parcels, and is currently occupied by a Staple retail store, office, and surface parking lots.

The Project would demolish the existing surface parking lots and office and retail uses to allow the construction of a 15-story, approximately 275 foot tall commercial building that would include approximately 431,032 square feet of office use and approximately 12,386 square feet of restaurant or retail use;[1] and, a 18-foot tall building to house Department of Water and Power (LADWP) equipment and an underground generator with a landscaped surface parking lot. The Project's proposed floor area ratio (FAR) would be 6:1. The Project would include ground floor restaurant and retail uses, offices use on the above floors, and mechanical equipment located on the rooftop.

Construction of the Project would be completed over an approximately four-year period, beginning as early as 2022. Construction timing may vary and the EIR will analyze the most conservative construction schedule. Project construction would require grading and excavation activities down to a maximum depth of 52 feet below existing grade for building foundations and three levels of subterranean parking. The Project would export approximately 93,000 cubic yards of soil and generate approximately 2,896 tons of demolition debris (asphalt, interior and exterior building demolition, and general demolition debris). No import of soil is proposed.

1.2. SCOPE OF WORK

As a part of the EIR for the Project, the purpose of this report is to analyze the potential impact of the Project to the City's wastewater infrastructure systems.

2. REGULATORY FRAMEWORK

The City has one of the largest sewer systems in the world including more than 6,600 miles of sewers serving a population of more than four million. The Los Angeles sewer

[1] The Project requests a Zoning Administrator's Interpretation pursuant to LAMC Section 12.21-A.2, to clarify that covered outdoor spaces provided within the building cut-outs on the ground floor and terrace on Level 12 of the Project do not count towards the total allowable floor area as defined in LAMC Section 12.03. The total covered outdoor spaces not counted towards the floor area, as defined in LAMC Section 12.03, would be approximately 2,200 square feet on the ground level (of which 1,800 square feet is attributable to the restaurant/retail space and 400 square feet to the office space) and 2,530 square feet on the Level 12 terrace attributable to the office space. As such, to provide a conservative analysis of the Project's environmental impacts, this report, as applicable, assumes the excluded areas would count towards the Project's total floor area when analyzing environmental impacts, to consist of 433,962 square feet of office space and 14,186 square feet of restaurant/retail space for a total of 448,148 square feet.

system is comprised of three systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System. To comply with Waste Discharge Requirements (WDRs), a Sewer System Management Plan (SSMP) was prepared for each of these systems.

The Project Site lies within the Hyperion Service Area served by the Hyperion Sanitary Sewer System. In January 2019, a SSMP was prepared for the Hyperion Sanitary Sewer System pursuant to the State Water Control Board's (SWRCB) May 2, 2006 Statewide General WDRs[2]. The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system to meet the WDRs for the system. In addition, the SSMP identifies protocols to help reduce and prevent sanitary sewer overflows, and to mitigate any sanitary sewer overflows that do occur. The City's 2019 SSMP confirms that the City is in full compliance with the applicable WDRs.[3]

Sewer permit allocation for projects that discharge into the Hyperion Treatment Plant is regulated by Ordinance No. 166,060 adopted by the City in 1990. The Ordinance established an additional annual allotment of 5.0 million gallons per day, of which 34.5 percent (1.725 million gallons per day) is allocated for priority projects, 8 percent (0.4 million gallons per day) for public benefit projects, and 57.5 percent (2.875 million gallons per day) for non-priority projects (of which 65 percent is for residential project and 35 percent for non-residential projects).

The City's Municipal Code (LAMC) includes regulations that allow 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 Request (SCAR) when any person seeks a sewer permit to connect a property to the City's sewer collection 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 is an analysis of the existing sewer collection system to determine if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

The City has begun requiring projects in the entitlement phase to apply for a Wastewater Service Inquiry (WWSI) to allow Bureau of Sanitation (BOS) to review the project as described above without confusing construction projects from projects in the planning stages. They serve similar function for the purposes of CEQA analysis.

LAMC Section 64.11.2 requires the payment of fees for new connections to the sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer

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[2] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2019.

[3] Ibid.

system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength, as well as volume. The determination of wastewater strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters (biological oxygen demand and suspended solids) for each type of land use. Fees paid to the 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. SO06-0691). Per the Special Order, laterals sewers, which are sewers 18 inches or less in diameter, must be designated for a planning period of 100 years. The Special Order also requires that sewers be designated so that the peak dry weather flow depth during their planning period shall not exceed one-half the pipe diameter.[4]

In 2006 the City approved the Integrated Resources Plan (IRP), which incorporates a Wastewater Facilities Plan.[5] The IRP was developed to meet future wastewater needs of more than 4.3 million residents expected to live within the City by 2020. In order to meet future demands posed by increased wastewater generation, the City has chosen to expand its current overall treatment capacity, while maximizing the potential to reuse recycled water through irrigation, and other approved uses. To that end, the City is now developing the One Water LA 2040 Plan, which builds on the premise of the IRP to maximize water resources and to develop a framework for managing the City's watersheds, water resources, and water facilities.[6] As with the IRP, such efforts would be organized in phases. Phase I of the One Water LA 2040 Plan includes developing initial planning baselines and guiding principles for water management and citywide facilities planning in coordination with City departments, other agencies, and stakeholders.[7] Phase II includes development of technical studies and an updated facilities plan for stormwater and wastewater. The final draft of One Water LA has been completed, and work on its Programmatic Environmental Impact Report (PEIR) will begin soon.[8]

3. EXISTING CONDITION

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4 City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Planning CEQA Analysis in Los Angeles, M-Public Utilities, 2006. http://www.environmentla.org/programs/thresholds/M-Public%20Utilities.pdf

5 City of Los Angeles, Department of Public Works, LA Sewers Website, Integrated Resources Plan Facilities Plan, Summary Report, December 2006.

6 City of Los Angeles, One Water LA Plan, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-owla-au?_adf.ctrl-state=3s41u47kd_4&_afrLoop=19192846888885768#!, accessed June 1, 2020.

7 City of Los Angeles, One Water LA Plan, Plan Development, www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla/s-lsh-es-owla-au/s-lsh-es-owla-au-aowla-pd?_adf.ctrl-state=f0cxqccpz_68&_afrLoop=28963541793939404#!, accessed June 1, 2020.

8 One Water LA, Plan Documents, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-owla-r?_adf.ctrl-state=rnwk2mfka_5&_afrLoop=3595575820503671#!, accessed June 1, 2020.

3.1.1. REGIONAL

The BOS operates and maintains the wastewater treatment, reclamation and collection facilities serving most of the City's incorporated areas as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. The collection infrastructure consists of over 6,700 miles of local, trunk, mainline and major interceptor sewers, five major outfall sewers, and 46 pumping plants. The Project Site is located within the Hyperion Sewer System Service Area, which is operated and maintained by BOS. The existing design capacity of the Hyperion Sewer System Service Area is approximately 550 million gallons per day (mgd), consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant.[9] However, the LA Sanitation's Customer Care Center Facts & Figures for Wastewater Collection and Treatment, dated January 14, 2017, indicates the existing average daily flow for the Hyperion Sewer System Service Area system is approximately 362 mgd. As such, the more conservative value of 362 mgd has been used in the analysis.

3.1.2. LOCAL

The following sewer mains are located within the vicinity of the Project Site (see Exhibit 1):

- **Sunset Boulevard:** There are two sewer lines in Sunset Boulevard between Wilcox Avenue and Cole Place.
    - The southerly line is a 10-inch concrete line between Wilcox Avenue and Cole Place that flows westward.
    - The northerly line is an 8-inch VCP line between Wilcox Avenue and Cole Place that flows westward.
- **Wilcox Avenue:** There a 12-inch VCP sewer line between approximately 140 feet south of the center line of Sunset Boulevard and De Longpre Avenue that flows southward.
- **Cole Place:** There is a 6-inch VCP sewer line between approximately 140 feet south of the center line of Sunset Boulevard to De Longpre Avenue that flows southward.
- **De Longpre Avenue:** There is an 8-inch VCP sewer line between Wilcox Avenue and Cole Place that flows westward.

[9] City of Los Angeles Department of Public Works, Bureau of 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=oep8lwkld_4&_afrLoop=28344654751341747#, accessed May 11, 2020.

Per capacity information provided on the City of Los Angeles's NavigateLA website:

- **Sunset Boulevard:**

  The capacity of the easterly 8-inch VCP sewer line in Sunset Boulevard is:

  - 0.709 cfs or 458,885 gpd entering the system between manhole ID number 49613154 and 46913152.

  The capacity of the westerly 10-inch VCP sewer line in Sunset Boulevard is:

  - 1.286 cfs or 831,163 gpd entering the system between manhole ID number 46913156 and 46913151.

- **Wilcox Avenue:**

  The capacity of the easterly 12-inch VCP sewer line in Wilcox Avenue is:

  - 5.334 cfs or 3,447,454 gpd entering the system between manhole ID number 49613181 and 46913210.

  - 5.535 cfs or 3,577,363 gpd entering the system between manhole ID number 49613210 and 46913209.

- **Cole Place:**

  The capacity of the easterly 6-inch VCP sewer line in Cole Place is:

  - 0.840 cfs or 519,638 gpd entering the system between manhole ID number 49613182 and 46913211.

  - 0.859 cfs or 555,186 gpd entering the system between manhole ID number 49613211 and 46913212.

- **De Longpre Avenue:**

  The capacity of the easterly 12-inch VCP sewer line in Wilcox Avenue is:

  - 0.709 cfs or 458,238 gpd entering the system between manhole ID number 49613212 and 46913208.

4. SIGNIFICANCE THRESHOLD

The City considers the questions listed in Appendix G of the CEQA Guidelines as significant thresholds for CEQA compliance regarding impact on wastewater. These questions are as follows:

Would the Project:

- Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which would 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 the above questions from the Appendix G of the CEQA Guidelines, the City considers the following criteria from the CEQA Thresholds Guide (2006 *L.A. CEQA Thresholds Guide*) with regard to impacts on wastewater:

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.[10]

Based on these factors, the Project would have a significant impact if the City's wastewater infrastructure would not adequately serve the Project and would result in an increase in wastewater such that it exceeds available infrastructure capacity requiring construction of new facilities.

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 *L.A. CEQA Thresholds Guide*. This methodology involves a review of the project's environmental setting, project impacts, cumulative impacts, and mitigation measures (if 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 Wye Map;

- Description of the existing wastewater system which would serve the Project, including its capacity and current flows.

[10] LADWP, 2017 Power Integrated Resource Plan, December 2017.

- Summary of adopted wastewater-related plans and policies that are relevant to the Project area.

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 wastewater generation with the calculated available capacity of the existing facilities.

Pursuant to LAMC Section 64.15, 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 of the Project Site. BOS's approach consisted of the study of a worst-case scenario which envisions peak demands from the relevant facilities occurring simultaneously on the wastewater 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 sewer discharge. The data used in this report are based on the findings of the BOS preliminary analysis. Refer to Exhibit 2 for the WWSI, which were prepared for the Project and contain the results of the BOS preliminary analysis. Based on the cumulative impacts evaluation, it was determined that the infrastructure in the vicinity currently has capacity to accommodate the total flow of the Project. Furthermore, the Hyperion Water Reclamation Plan has sufficient capacity to accommodate the Project.

6. PROJECT IMPACTS

6.1. CONSTRUCTION

Construction activities for the Project would not result in wastewater generation as temporary facilities (such as portable toilet and hand wash areas) would be provided by the contractor at the Project Site. Sewage from these facilities would be collected and hauled offsite and not discharged directly into the public sewer system within the immediate Project vicinity. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, Project impacts associated with construction-period wastewater generation would be less than significant.

The Project will require construction of new on-site infrastructure to serve the new buildings. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for 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.

A Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, Project impacts on wastewater associated with construction activities would be less than significant.

Wastewater generation would occur incrementally throughout construction of the Project as a result of construction workers on-site. However, such use would be temporary and nominal when compared with the wastewater generated by the Project, which as discussed below, can be accommodated by the existing public wastewater system. In addition, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows.

6.2. OPERATION

To determine whether the existing municipal infrastructure can accommodate the Project, the City requires a WWSI which was submitted to the City and is included herein as Exhibit 2. In preparing the WWSI, BOS has analyzed the Project's wastewater demands in conjunction with existing conditions and forecasted growth and has provided current sewer gauging information for the relevant sewer lines downstream of the Project.

In accordance with the *L.A. CEQA Thresholds Guide*, the future wastewater generation was estimated based on the proposed project size and types of land uses and BOS sewerage generation factors. Therefore, as outlined in Table 2 below, the Project will generate approximately a net of 85,943 gallons per day (gpd) of wastewater. The proposed transformer building located on the Southern Site of the Project will not generate any wastewater. The WWSI dated May 18, 2020 reports a lower sewage generation rate of 68,264 gpd as compared to the WSA. Per correspondence with BOS, the calculated flow in the WWSI is in accordance with the standard practice of BOS as they use the generations rates of the Sewer Generation Factor Table (SGFT) created by the Bureau of Engineering (BOE) in 2012. This does not include some of the additional factors that the WSA analyzes such as, cooling tower size, base demand adjustments, covered parking, and required ordinance savings. BOS stated that the WWSI dated May 18, 2020 reflects the values of the BOE SGFT table and is sufficient as is for the assessment of the project wastewater generation (see Exhibit 2). Table 1 below outlines the existing wastewater generation based on existing use and the BOS Sewer Generation Factor Table (SGFT).

Table 1 – Estimated Existing Wastewater Generation[(a)]			
Land Use	**Size**	**Generation Rate**[(a)]	**Total (gpd)**
Commercial	16,932 sf	50 gpd/1,000 sf	847
Office	9,331 sf	120 gpd/1,000 sf	1,120
Total Estimated Existing			1,966
[(a)] The existing indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available.			

Table 2 – Estimated Proposed Wastewater Generation					
Land Use	**Units**	**Generation Rate (gpd/unit)**	**Total Wastewater Generation (gpd)**	**Required Ordinances Water Savings[(b)]**	**Proposed Wastewater Demand (gpd)**
Proposed					
Restaurant: Full Service [(a)]	530 seats	30/seat	15,900		
Office Building[(c)(a)]	431,032 sf	0.12	51,724		
Base Demand Adjustments[(d)]			1,057		
Subtotal Proposed			**68,681**	5,849	62,832
Landscaping[(e)]	8,693 sf				
Covered Parking[(f)]	379,602 sf	0.02	250		250
Cooling Tower Total[(g)]	1,500 ton	21.06	31,590	6,318	25,272
Proposed Subtotal			**100,521**	**12,167**	**88,354**
Less Existing to be Removed Total[(i)]					-1,966
Less Additional Conservation[(h)]					-445
Net Additional Wastewater Demand					**85,943**

(a) The indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available. http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.
(b) The proposed development land uses will conform to the City of Los Angeles Ordinance No. 186488, 184248, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.
(c) Office area includes 5,336 SF of Lobby space that serves the office area.
(d) Base Demand Adjustments is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.
(e) Landscaping water excluded for Sewer Generation.
(f) Auto parking water uses are based on the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.
(g) Assumed to operate 12 hours/day, 7 days/week and 55% of chiller capacity.
(h) Water conservation due to additional conservations commitments agreed by the Applicant. See table 2 in the project WSA.
(i) This existing water generation quantity is obtained from Table 1 under Total Estimated Existing (gpd) using the 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table.

The existing sewer gauging information from BOS has been summarized in Table 3 below. Additionally, sewer capacity analysis has been performed to determine the impact of adding the Project's anticipated sewage generation as shown in the table above. For a conservative approach, a sewer generation rate of 85,943 gpd as provided in Table 2 above and based on the WSA, was used for analysis as opposed to the smaller generation factor provided in the WWSI.

The WWSI outlines the flow path of the sewage flow generated by our project and describes the pipes of particular interest which includes a 12-inch line in Wilcox Avenue, a 21-inch line in Cole Avenue, and a 20-inch pipe in Melrose Avenue. See Table 3 below for an outline of the analysis.

Table 3 – Sewer Gauging Plus Project Analysis

Pipe Location	Pipe Diameter (in)	Pipe ID[(a)]	Existing Gauging d/D (%)	Existing MGD[(b)]	50% Design Capacity MGD	Existing MGD+ Project
Wilcox Ave.	12	4691318146913210A	X[(c)]	0.30377	1.72	0.38971
Cole Ave.	21	4930123949301172A	X[(c)]	0.30377	5.46	0.38971
Melrose Ave.	20	4930603849306039A	21	0.30377	1.56	0.38971

(a) Pipe IDs are taken from Navigate LA, and cross-referenced with the WWSI.
(b) Existing MGD was calculated using Bentley Flowmaster and based on the 50% Design Capacity Pipe characteristics.
(c) Gauging for this pipe was not provided in WWSI. A conservative assumption was taken that the upstream pipes would have the same existing flow as furthest downstream pipe in Melrose Ave.

Based on the analysis presented above and the WWSI, the pipes noted in Table 3 appear to have adequate capacity and are not considered constrained according to current City of LA standard practice. 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. As such, impacts on wastewater infrastructure would be less than significant.

As further discussed below, 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, Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant).[11] The Project's estimated wastewater generation is approximately 0.086 mgd. This is equal to less than one percent of the Hyperion Treatment Plant's capacity where the Project's wastewater would be treated.

6.3. CUMULATIVE IMPACTS

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

At this time, BOS has found that it appears to have the capacity to serve the Project and related projects anticipated in growth forecast with the existing infrastructure (see Exhibit 2). Based on these forecasts and the Project-specific information reviewed by BOS, the Project's increase in wastewater generation is not cumulatively considerable and would be adequately accommodated by the Hyperion Treatment Plant. In addition, the BOS analysis confirms that the Hyperion Treatment Plant has sufficient capacity and regulatory allotment for the Project and anticipated growth of cumulative projects.

[11] City of Los Angeles Department of Public Works, Bureau of 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=oep8lwkld_4&_afrLoop=28344654751341747#, accessed May 11, 2020.

Therefore, operation of the Project would have a less than significant cumulative impact on wastewater treatment facilities.

7. CONCLUSION

Based on the calculations provided above, the Project would generate net increased wastewater flows of 85,943 gpd. Based on the WWSI in Exhibit 2, the City has indicated that there is enough available sewer capacity to serve the Project.

EXHIBIT 1

ALTA/NSPS LAND TITLE SURVEY

EXHIBIT 1

LINETYPES

- BUILDING LINE/HATCH
- BUILDING OVERHANG
- BRICK LINE/HATCH
- CONC LINE/HATCH
- CHAINLINK FENCE
- CURB FACE WITH BACK OF CURB (0.5' O/S)
- FLOWLINE
- GRADEBREAK
- WALL
- WIRE FENCE
- WROUGHT IRON FENCE
- PROPERTY LINE
- LOT LINE
- RIGHT OF WAY LINE
- POTENTIAL RIGHT OF WAY LINE
- CENTERLINE
- EASEMENT LINE
- OHU — OVERHEAD UTILITY LINES
- FO — FIBER OPTIC LINE
- E — ELECTRICAL LINE
- TS — TRAFFIC SIGNAL LINE
- T — TELECOMMUNICATIONS LINE
- SD — STORM DRAIN LINE
- SS — SANITARY SEWER LINE
- W — WATER LINE
- G — GAS LINE
- CATV — CATV LINE

ABBREVIATIONS

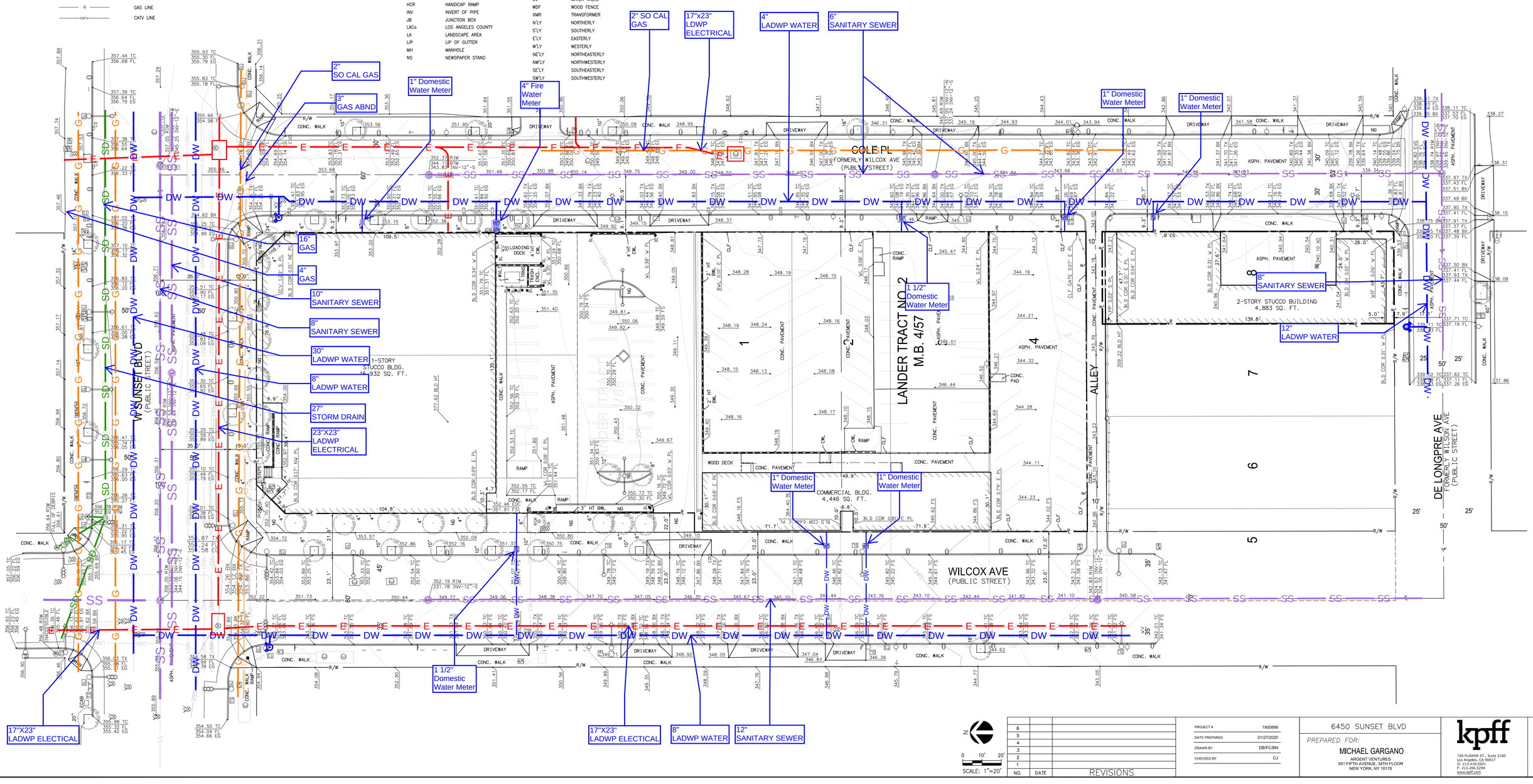
AC	ASPHALT CONCRETE
APR	APRON
ARV	AIR VENT
ASPH	ASPHALT
AD	AREA DRAIN
BFP	BACK FLOW PREVENTER
BL	BOLLARD
BW	BACK OF WALK
℄	CENTERLINE
CATV	CABLE TV
CD	CURB DRAIN
CB	CATCH BASIN
CBW	CONCRETE BLOCK WALL
CLF	CHAIN LINK FENCE
CMP	CORRUGATED METAL PIPE
COL.	COLUMN
COM.	COMMUNICATIONS
CONC.	CONCRETE
D/W	DRIVEWAY APRON
DI	DROP INLET
EG	EDGE OF GUTTER
ELEV	ELEVATION
ELEC.	ELECTRICAL
ELP	ELECTRICAL PANEL
ELV	ELECTRICAL VAULT
ESC	METRO ESCAPE ACCESS PORTAL
FDC	FIRE DEPARTMENT CONNECTION
FF	FINISHED FLOOR
FL	FLOW LINE
FS	FINISHED SURFACE
GB	GRADE BREAK
GI MH	GREASE INTERCEPTOR MANHOLE
GV	GAS VALVE
HCR	HANDICAP RAMP
INV	INVERT OF PIPE
JB	JUNCTION BOX
LACo	LOS ANGELES COUNTY
LA	LANDSCAPE AREA
LIP	LIP OF GUTTER
MH	MANHOLE
NS	NEWSPAPER STAND
NTS	NOT TO SCALE
℄	PROPERTY LINE
PCL	PARCEL
PWFB	PUBLIC WORKS FIELD BOOK (LA COUNTY)
R/W	RIGHT-OF-WAY
RCP	REINFORCED CONC. PIPE
RET WALL	RETAINING WALL (CONCRETE)
SCO	SEWER CLEANOUT
SD	STORM DRAIN
SDMH	STORM DRAIN MANHOLE
SLPB	STREET LIGHT PULLBOX
SS	SANITARY SEWER
SSMH	SANITARY SEWER MANHOLE
SSM	STANDARD SURVEY MONUMENT WELL
SWK	SIDEWALK
TC	TOP OF CURB
TOP	TOP OF SLOPE
TOE	TOE OF SLOPE
TE	TRASH ENCLOSURE
TR	TRASH RECEPTACLE
TG	TOP OF GRATE
TRW	TREE WELL
TS	TRAFFIC SIGNAL
TSCB	TRAFFIC SIGNAL CABINET
TPB	TRAFFIC PULLBOX
TYP.	TYPICAL
UNK	UNKNOWN
VCP	VITRIFIED CLAY PIPE
VLT	VAULT
WIF	WROUGHT IRON FENCE
WL	WALL
WVLT	WATER VAULT
WV	WATER VALVE
WDF	WOOD FENCE
XMR	TRANSFORMER
N'LY	NORTHERLY
S'LY	SOUTHERLY
E'LY	EASTERLY
W'LY	WESTERLY
NE'LY	NORTHEASTERLY
NW'LY	NORTHWESTERLY
SE'LY	SOUTHEASTERLY
SW'LY	SOUTHWESTERLY

LEGEND

- AERIAL TARGET
- AR — AIR RELEASE VALVE
- AREA DRAIN (SQUARE)
- AREA DRAIN (CIRCLE)
- BACKFLOW PREVENTER
- BL — BOLLARD
- BM — BENCHMARK
- BO — BLOW-OFF VALVE
- CD — CURB DRAIN
- CONTROL POINT
- CA — CABLE TV PULLBOX
- C — COMMUNICATIONS PULLBOX
- ETS — ELECTRONIC TEST STATION
- FIRE DEPARTMENT CONNECTION
- FIRE HYDRANT
- FP — FLAG POLE
- FO — FIBER OPTIC PULLBOX
- GL — GROUND LIGHT
- E — ELECTRIC CABINET
- E — ELECTRIC MANHOLE
- EM — ELECTRIC METER
- UTILITY POLE
- E — ELECTRIC PULLBOX
- RD — ROOF DRAIN
- SCO — SEWER CLEAN OUT
- S — SEWER MANHOLE
- HANDICAP PARKING
- SIGN
- SPO — SPRINKLER
- D — STORM DRAIN MANHOLE
- STREET LIGHT
- SL — STREET LIGHT PULLBOX
- T — TELEPHONE BOX
- T — TELEPHONE CABINET
- T — TELEPHONE MANHOLE
- TS — TRAFFIC PULLBOX
- TS — TRAFFIC SIGNAL CABINET
- G — GAS MANHOLE
- GV — GAS VALVE
- GM — GAS METER
- GUY WIRE
- GREASE INTERCEPTOR
- HB — HOSE BIB
- IR — IRRIGATION CONTROL BOX
- IR — IRRIGATION CONTROL VALVE
- AREA LIGHT
- MB — MAILBOX
- MW — MONITORING WELL
- PALM
- PARKING METER
- PI — POST INDICATOR VALVE
- TRAFFIC SIGNAL
- TREE
- U — UNIDENTIFIED PULLBOX
- U — UNIDENTIFIED CABINET
- UC — UNIDENTIFIED CLEAN OUT
- M — UNIDENTIFIED MANHOLE
- UV — UNIDENTIFIED CONTROL VALVE
- VENT
- W — WATER MANHOLE
- WM — WATER METER
- WV — WATER VALVE
- RSR — RISER
- DCV — DETECTOR CHECK VALVE
- DF — DRINKING FOUNTAIN

LEGEND

- SS — EX SEWER
- SD — EX STORM DRAIN
- DW — EX DOMESTIC WATER
- E — EX ELECTRICAL
- G — EX GAS



SCALE: 1"=20'

NO.	DATE	REVISIONS
6		
5		
4		
3		
2		
1		

PROJECT #	1900898
DATE PREPARED	01/27/2020
DRAWN BY	DB/FC/BN
CHECKED BY	CJ

6450 SUNSET BLVD

PREPARED FOR:
MICHAEL GARGANO
ARGENT VENTURES
551 FIFTH AVENUE, 34TH FLOOR
NEW YORK, NY 10176

kpff
700 FLOWER ST., Suite 2100
Los Angeles, CA 90017
P: 213.418.0201
F: 213.266.3294
www.kpff.com

F:\2019\1900898 6450 Sunset Blvd Survey\Survey\DWG\ALTA\1900898-x-ALTA-02.dwg 1/21/2020

EXHIBIT 2

EXHIBIT 2

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

WASTEWATER ENGINEERING
SERVICES DIVISION
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
FAX: (323) 342-6210
WWW.LACITYSAN.ORG

May 18, 2020

Mr. Connor Kennedy, Project Engineer
KPFF Consulting Engineers
700 S Flower Street, #2100
Los Angeles, CA 90071

Dear Mr. Kennedy,

SUNSET AND WILCOX - REQUEST FOR WASTEWATER SERVICES INFORMATION

This is in response to your May 7, 2020 update for your April 21, 2020 letter requesting a review of your proposed commercial development project located at 1420, 1424, 1426, 1428, 1432, 14320, 1434, 1436, 1438, 1450, 1452, and 1454 North Wilcox Avenue; 6450, 6460, and 6462 West Sunset Boulevard; 1413, 1417, 1419, 1425, 1427, 1433, 1435, 1439, 1441, 1443, 1445, and 1447 North Cole Place; and, 6503 De Longpre Avenue, Los Angeles, CA 90028. The project will consist of office and restaurant 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)
Existing			
Office Space	170 GPD/1000 SQ.FT	14,212 SQ.FT	(2,417)

EXHIBIT 2

Retail	50 GPD/1000 SQ.FT	16,932 SQ.FT	(847)
Proposed			
Restaurant	30 GPD/SEAT	530 SEATS	15,900
Office Space	170 GPD/1000 SQ.FT	436,368 SQ.FT	52,364
Total			**68,264**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 12-inch line on Wilcox Ave. The sewage from the existing 12-inch line feeds into a 21-inch line on Cole Ave before discharging into a 20-inch sewer line on Melrose Ave. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 12-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
12	Wilcox Ave.	*	1.72 MGD
21	Cole Ave	*	5.46 MGD
20	Melrose Ave	21	1.56 MGD

* 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-away 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.

EXHIBIT 2

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.

EXHIBIT 2

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,

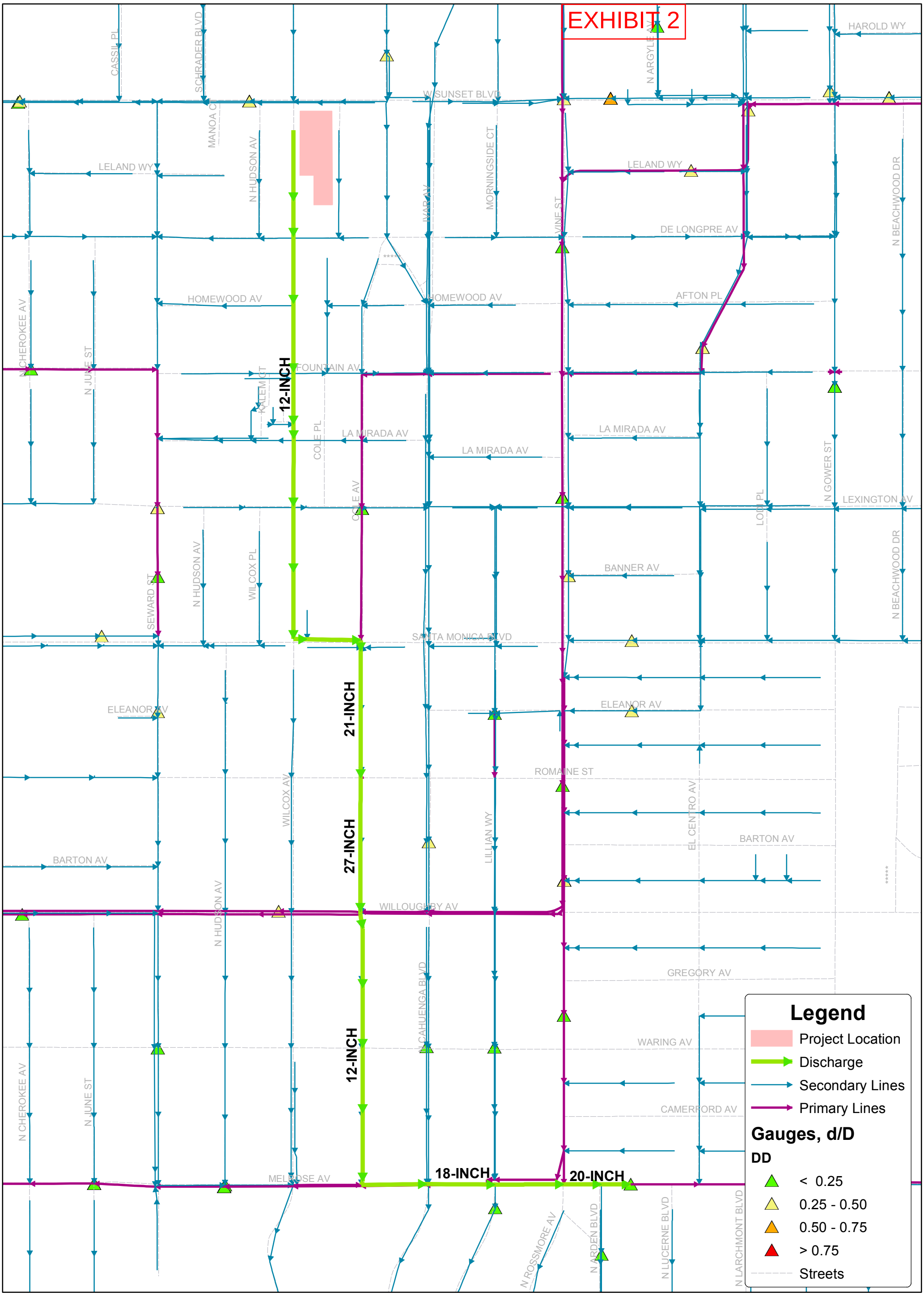
Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

AP/CD: ga

Attachment: Figure 1 - Sewer Map

c: Michael Scaduto, LASAN
Alfredo Magallanes, LASAN
Wing Tam, LASAN
Ryan Thiha, LASAN
Christopher DeMonbrun, LASAN

EXHIBIT 2



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Figure 1
Sunset and Wilcox Project
Sewer Map

N
W E
S

0 250 500 1,000 1,500
Feet

EXHIBIT 2

Connor Kennedy

From: Albert Lew <albert.lew@lacity.org>
Sent: Thursday, September 9, 2021 9:48 AM
To: Connor Kennedy
Cc: Miriam Huston; Christopher DeMonbrun; Stephanie Lopez
Subject: Re: Sunset and Wilcox | Wastewater Services Information (WWSI) Request

Connor,

The wastewater services information response letter uses the Sewer Generation Factor Table (SGFT) created by the Bureau of Engineering (BOE) in 2012. LASAN is obligated to use those values as they are the values used in the Sewer Capacity Availability Requests (SCARs) and for determining Sewer Facility Charges with BOE. The restaurant and office space in your WWSI did reflect the values from the SGFT and should be sufficient

Regards,

Albert C. Lew, P.E.
Wastewater Engineering Services Division (WESD)
Bureau of Sanitation
Department of Public Works
City of Los Angeles
Phone: 323.342.6207
Fax: 323.342.6210

On Thu, Sep 9, 2021 at 9:37 AM Connor Kennedy <connor.kennedy@kpff.com> wrote:

> Hi Albert,
>
> For this project we recently received a WSA from LADWP and it appears they have identified updated water generation values that take into account the demand from the water cooling tower and the covered parking (see page 16 in the attached WSA). It appears the water demand is now greater than the sewer generation demand displayed in the WWSI dated May 18, 2020 (see attached WWSI). Do we need to update the attached WWSI to account for these new water generation demands or is the existing WWSI still sufficient to use for our EIR analysis.

EXHIBIT 2

Thanks,

Connor Kennedy, EIT
Project Engineer

O 213.418.0201 D 213.212.6095
700 South Flower Street, Suite 2100
Los Angeles, CA 90017

connor.kennedy@kpff.com

From: Albert Lew <albert.lew@lacity.org>
Sent: Thursday, May 28, 2020 9:37 AM
To: Connor Kennedy <connor.kennedy@kpff.com>
Cc: Miriam Huston <miriam.huston@kpff.com>; Christopher DeMonbrun <Chris.DeMonbrun@lacity.org>; Stephanie Lopez <stephanie.lopez@lacity.org>
Subject: Re: Sunset and Wilcox | Wastewater Services Information (WWSI) Request

Mr. Kennedy,

Thanks for your patience. Please find attached the official response. A hard copy will be sent to your office when normal operations resume.

Regards,

Albert C. Lew, P.E.
Wastewater Engineering Services Division (WESD)
Bureau of Sanitation
Department of Public Works
City of Los Angeles
Phone: 323.342.6207
Fax: 323.342.6210