INITIAL STUDY

APPENDIX L.2: UTILITY INFRASTRUCTURE TECHNICAL REPORT: WASTEWATER REPORT

ECHELON STUDIOS
UTILITY INFRASTRUCTURE TECHNICAL REPORT: WASTEWATER
APRIL 2023

PREPARED BY:

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Appendix

1. INTRODUCTION

1.1. PROJECT DESCRIPTION

The Echelon Studios Project (the "Project") proposes the construction of a new approximately 510,621-square-foot production studio and creative office campus located at 5601 - 5673 West Santa Monica Boulevard, 5612 - 5672 West Virginia Avenue, and 1110 - 1118 North Wilton Place, within the Hollywood Community Plan area (the "Project Site") in the City of Los Angeles (the "City"). The Project has been designed to incorporate a variety of interconnected uses geared toward the entertainment industry in single building, standing up to six stories and 93 feet in height, that would include approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space on a walkable campus. The Project would also include approximately 981 vehicular parking spaces on-site in a two-level subterranean parking garage and approximately 162 bicycle spaces in the first subterranean parking garage level and on the ground floor. The Project would be built on a 225,456-square-foot lot (including 11,373-square-foot alleyway), resulting in a site-wide Floor Area Ratio (FAR) of up to 2.26 to 1. The Project would require a Vesting Tentative Tract Map for the merger of an existing 11,373-square-foot public alley that runs through the Project Site, subdivision resulting in a ground lot and eight air space lots, and a waiver for all dedication and street widening requirements along Wilton Place, Santa Monica Boulevard, and along the public alley. The anticipated outbound haul route from the Project Site would be along Santa Monica Boulevard to the 101 freeway. Approximately 251,000 cubic yards of soil would be excavated and exported from the Project Site.

1.2. SCOPE OF WORK

The purpose of this report is to analyze the potential impacts of the Project to the existing wastewater infrastructure system.

2. REGULATORY FRAMEWORK

The City of Los Angeles has one of the largest sewer systems in the world including approximately 6,439 miles of sewers serving a population of more than four million. The Los Angeles sewer system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System.[1]

[1] City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 25, 2019. https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, Accessed October 31, 2022

The Project Site lies within the Hyperion Service Area served by the Hyperion Sanitary Sewer System and the Hyperion Treatment Plant. In January 2019, a Sewer System Management Plan (SSMP) was prepared for the Hyperion Sanitary Sewer System pursuant to the State Water Control Board's (SWRCB) May 2, 2006 Statewide General Waste Discharge Requirements (WDRs).[2]

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. This 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 projects and 35 percent for non-residential projects).

The City of Los Angeles Municipal Code (LAMC) includes regulations that allow the City to assure available sewer capacity for new projects and require fees for improvements to the infrastructure system. LAMC Section 64.15(i) requires that the City perform a Sewer Capacity Availability Request (SCAR) analysis 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 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.

[2] Ibid.

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 this Special Order, laterals sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period shall not exceed one-half the pipe diameter.[3]

In 2006 the City approved the Integrated Resources Plan, which incorporates a Wastewater Facilities Plan.[4] The Integrated Resources Plan was developed to meet future wastewater needs of more than 4.3 million residents expected to live within the City by 2020. In 2018, the City approved the *One Water LA 2040 Plan* which builds on the success of the Water IRP and extends the planning horizon to year 2040.[5] 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.

3. EXISTING CONDITIONS

The Project Site consists of an existing asphalt parking lot, concrete alley, and concrete building with a total area of approximately 225,456 square feet (5.18 acres). Sanitary sewer service to the Project Site from the surrounding streets is provided by BOS.

The Project Site is located within the Hyperion Sewer System Service Area, which is operated and maintained by the City's BOS. The existing design capacity of the Hyperion Sewer System Service Area is approximately 550 million gallons per day (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).[6]

Based on available record data provided by the City, there is an 8-inch vitrified clay pipe (VCP) sewer line in Virginia Ave that flows west to North Wilton Place. There is an 8-inch VCP sewer line and a 6-inch VCP sewer line in North Wilton Place, both of which flow south to Santa Monica Boulevard. There is a 12-inch VCP sewer line in Santa Monica Boulevard that flows west to North Wilton Place. There is an 8-inch VCP sewer line in North Saint Andrews Place that flows north to Virginia Avenue. Based on the City

[3] 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.
[4] City of Los Angeles, Department of Public Works, LA Sewers Website, Integrated Resources Plan Facilities Plan, Summary Report, December 2006. https://www.lacitysan.org/san/sandocview?docname=CNT025148
[5] City of Los Angeles, Department of Public Works, LA Sanitation, One Water LA 2040 Plan, Executive Summary, April 2018.
[6] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed August 22, 2022.

of Los Angeles Bureau of Engineering's online Navigate LA database, the 8-inch VCP in Virginia has a varying calculated capacity of 0.76 to 0.87 cubic feet per second (cfs) (0.4912 to 0.5623 million gallons per day [mgd]). The 6-inch and 8-inch sewer lines in North Wilton Place have calculated capacities of 1.55 cfs and 0.85 cfs respectively (1.0017 & 0.5493 mgd). The 12-inch VCP sewer line in Santa Monica Boulevard has a calculated capacity of 1.98499 cfs (1.2829 mgd). The 8-inch VCP sewer line in North Saint Andrews Place has a calculated capacity of 0.63 cfs (0.4071 mgd).[7] Available records indicate that the 8-inch main in Virginia Ave has thirteen (13) sewer wyes and one (1) lateral, the 6-inch main in North Wilton Place has zero (0) laterals and nine (9) sewer wyes, the 8-inch main in North Wilton Place has zero (0) sewer wyes and zero (0) laterals, and the 8-inch main in North Saint Andrews Place has six (6) wyes and two (2) laterals, the 12-inch main in Santa Monica Blvd has twelve (12) wyes and zero (0) laterals.

As described above, the Project Site is currently composed of an asphalt parking lot, concrete alley, and concrete building. Current sewer demands are zero as the property is vacant.

4. SIGNIFICANCE THRESHOLDS

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

- Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects; or

- Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

In assessing impacts related to wastewater infrastructure in this section, the City has determined to use Appendix G as the thresholds of significance. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The L.A. CEQA Thresholds Guide identifies the following factors to evaluate wastewater capacity and infrastructure:

- The total estimated wastewater demand for the project;

- Whether sufficient capacity exists in the wastewater infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;

[7] https://navigatela.lacity.org/navigatela/

- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and

- The degree to which scheduled wastewater infrastructure improvements or project design features would reduce or offset service impacts.

This guidance is applicable to the Project and as such are used to determine if the Project would have significant wastewater impacts.

5. METHODOLOGY

The methodology for determining the significance of a project under the Appendix G thresholds as it relates to a project's potential 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 significance 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.

- 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 a worst-case scenario envisioning 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 analysis. Refer to Exhibit 1 for the approved SCAR Application and Exhibit 3 for the WWSI for the Project, which contains the results of the BOS analysis.

6. PROJECT IMPACTS

6.1. CONSTRUCTION

Wastewater generation would occur incrementally throughout construction of the Project as a result of construction workers on-site. However, construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not be anticipated to cause any increase in wastewater flows. Therefore, Project impacts associated with construction-period wastewater generation would be less than significant.

The Project would require construction of new on-site infrastructure to serve the new building, and potential upgrade and/or relocation of existing infrastructure. 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 would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work would be required in order to connect to the public main. Therefore, as part of the Project, a Construction Staging and Traffic Management Plan (CSTMP) would be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The CSTMP would reduce any temporary pedestrian and traffic impacts during construction, ensuring safe vehicle travel and safe pedestrian and emergency vehicle access. Overall, construction of any required wastewater infrastructure would be done in connection with construction of the Project, would be of a relatively short-term duration (i.e., months) and would cease to occur once the construction is complete. Therefore, Project impacts associated with construction of wastewater facilities and infrastructure would be less than significant.

6.2. OPERATION

To determine whether the existing municipal infrastructure would be able to accommodate the Project, the City requires a SCAR request. This was submitted to the City and is included herein as Exhibit 1. A WWSI was also submitted to the City and is included herein as Exhibit 3.

In accordance with the *L.A. CEQA Thresholds Guide*, the estimated sewer flows were based on the City of LA BOS sewer generation factors for the Project's uses. Based on the type of use and generation factors, the Project would generate approximately 357,649 gallons per day (gpd) of wastewater, as summarized in Table 1 below.

Table 1 – Estimated Proposed Wastewater Generation

Facility	Average Daily Flow (gpd)[(a)]	Unit	Quantity	Average Daily Wastewater Generation (gpd) [(b)]
Restaurant	30	Seats	825	24,750
Office	120	KGSF	332,304	39,876
Studio (Audience Viewing Room)	3	Seats	1,495	4,485
Studio (Ind. Use Film Process/Machine Shop)	50	KGSF	10,744	537
SE-1 & 2©	72,000	GPD	-	72,000
SE-3 & 4[(c)]	72,000	GPD	-	72,000
SE-5 & 6[(c)]	72,000	GPD	-	72,000
SE-7 & 8[(c)]	72,000	GPD	-	72,000
Total Proposed Wastewater Generation for Project Site			357,649	

[(a)] The average daily flow based on BOS sewerage generation factors.

[(b)] Average daily water demand = Average daily flow x Quantity

[(c)] Sewage Ejector per Project MEP

A Sewer Capacity Availability Request (SCAR) and Wastewater Services Information Request (WWSI) letter were submitted to assess whether the existing infrastructure could accommodate the Project. BOS has analyzed the Project's wastewater generation in conjunction with existing conditions and forecasted growth, and has approved the Project to discharge up to 357,649 gpd of wastewater to the existing sewer mains in Virginia Avenue and Santa Monica Boulevard. Therefore, the Project's potential impacts on

wastewater would be less than significant. See Exhibit 1 for the approved SCAR dated April 12th, 2023 and Exhibit 3 for the WWSI Response Letter dated April 17, 2023 with existing sewer gauging information.

As further discussed above, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (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).[8] The Project's estimated wastewater generation is approximately 0.358 mgd. Currently up to 300 mgd is treated at the Hyperion Treatment Plant resulting in a treatment capacity of 150 mgd, which means the Project would account for approximately 0.24 percent of the Hyperion Treatment Plant's available capacity. Consequently, impacts on wastewater treatment capacity are less than significant.

6.3. CUMULATIVE IMPACTS

The Project would create additional sewer flow. However, as discussed above, BOS has conducted an analysis of existing and planned capacity as related to the Project. Similar to the Project, future projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a SCAR to BOS during the design phase of the project.[9] The analysis by BOS takes into consideration previously approved SCARs as part of their 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 BOS to construct the necessary improvements.

In addition to the City's SCAR analysis, a related projects list has been generated. There are 7 related projects, which consist of, but are not limited to, residential, office, and retail/commercial uses. The total increase in wastewater generation for the related projects is approximately 2.80 million gallons per day (mgd). Combined with the Project, the increase in wastewater generation is approximately 3.16 mgd. Refer to Exhibit 4 for a breakdown of the related projects and associated wastewater generation.

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 BOS, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (mgd)[10] and the existing average daily flow for the system is approximately 300 mgd, resulting in a treatment

[8] 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.

[9] City of Los Angeles Bureau of Engineering, Sewer Permits https://engpermits.lacity.org/spermits/index1.cfm, accessed November 29. 2022

[10] City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal, accessed November 8, 2022.

capacity of 250 mgd.[11] The estimated wastewater generation increase of the Project would be 0.358 mgd, which represents approximately 0.143 percent of the available capacity in the system. The estimated wastewater generation increase of the Project and related projects combined would be 3.16 mgd, which represents approximately 1.26 percent of the available capacity in the Hyperion Service Area system. The related projects would also be required to adhere to the BOS's annual wastewater flow increase allotment.

Therefore, cumulative impacts on wastewater treatment capacity are less than significant.

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

7. LEVEL OF SIGNIFICANCE

Based on the analysis contained in this report no significant impacts have been identified to wastewater infrastructure for this Project.

EXHIBIT 1

City of Los Angeles
Bureau of Engineering

Sewer Capacity Availability Request (SCAR)

To: Bureau of Sanitation
The following request is submitted to you on behalf of the applicant requesting to connect to the public sewer system. Please verify that the capacity exists at the requested location for the proposed developments shown below. The results are good for 180 days from the date the sewer capacity approval from the Bureau of Sanitation. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480. **If not listed in the Proposed Facility Description section of the SCAR, sewer ejector use is prohibited.**

Job Address:	**5601 W Santa Monica Blvd**	Sanitation Scar ID:	**70-6362-1122**
Date Submitted	11/16/2022	Request Will Serve Letter?	Yes
BOE District:	Central District		
Applicant:	Matthew Gooden, KPFF Consulting		
Address:	700 S Flower Street, Suite 2100	City :	Los Angeles
State:	CA	Zip:	90017
Phone:	213.266.5206	Fax:	
Email:	matthew.gooden@kpff.com	BPA No.	
S-Map:	493	Wye Map:	4580-2

SIMM Map - Maintenance Hole Locations

No.	Street Name	U/S MH	D/S MH	Diam. (in)	Approved Flow %	Notes
1	VIRGINIA AVE	49303048	49303046	8	23.00	82,261 GPD
2	VIRGINA AVE	49303046	49303045	8	22.00	78,684 GPD
3	VIRGINA AVE	49303045	49302086	8	22.00	78,684 GPD
4	SANTA MONICA BLVD	49303067	49303065	12	27.00	96,567 GPD
5	SANTA MONICA BLVD	49303064	49302102	12	6.00	21,459 GPD

Proposed Facility Description

No.	Proposed Use Description	Sewage Generation (GPD)	Unit	Qty	GPD
1	RESTAURANT: FULL SERVICE INDOOR SEAT	30	SEAT	825	24,750
2	OFFICE BUILDING	120	KGSF	332,304	39,876
3	STUDIO: FILM/TV - AUDIENCE VIEWING ROOM *13	3	SEAT	1,495	4,485
4	STUDIO: FILM/TV - INDUSTRIAL USE *13 FILM PROCESS/MACHINE SHOP *7	50	KGSF	10,744	537
5	SEWER EJECTOR		GPD	72,000	72,000
6	SEWER EJECTOR		GPD	72,000	72,000
7	SEWER EJECTOR		GPD	72,000	72,000
8	SEWER EJECTOR		GPD	72,000	72,000
				Proposed Total Flow (gpd):	**357,649**

Remarks: 1): Approved for the maximum allowable capacity of 357,649 GPD (248.37 gpm). 2): Discharge as indicated in flow %s. 3): IWMD Permit required.

Scar Request Number: 4960

Note: Results are good for 180 days from the date of approval by the Bureau of Sanitation

Date Processed:	04/12/2023	Expires On:	10/09/2023

Processed by:	Albert Lew Bureau of Sanitation Phone: 323-342-6207 Sanitation Status: Approved Reviewed by: Sunbula Azieh on 04/12/2023	Submitted by:	Wallie Jong Bureau of Engineering Central District Phone:

Fees Collected	Yes	SCAR FEE (W:37 / QC:708)	$2,860.00
Date Collected	11/17/2022	SCAR Status:	**Completed**

Scar Request Number: 4960

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

Scar Request Number: 4960

EXHIBIT 2

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF PUBLIC WORKS

BUREAU OF ENGINEERING

TED ALLEN, PE
CITY ENGINEER

1149 S BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

http://eng.lacity.org

04/12/2023

MATTHEW GOODEN, KPFF CONSULTING
700 S FLOWER STREET, SUITE 2100
LOS ANGELES, CA, 90017

Dear Matthew Gooden, KPFF Consulting,

SEWER AVAILABILITY: 5601 W Santa Monica Blvd

The Bureau of Sanitation has reviewed your request of 11/16/2022 for sewer availability at **5601 W SANTA MONICA BLVD**. Based on their analysis, it has been determined on 04/12/2023 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. **If not listed in the Proposed Facility Description section of the SCAR, sewer ejector use is prohibited.**

Sincerely,

Wallie Jong

Central District, Bureau of Engineering

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 3

CITY OF LOS ANGELES
CALIFORNIA

KAREN BASS
MAYOR

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

April 17, 2023

Ms. Miriam Huston, Project Manager
KPFF Consulting Engineers
700 S Flower Street, #2100
Los Angeles, CA 90017

Dear Ms. Huston,

ECHELON STUDIOS (APRIL 2023) - REQUEST FOR WASTEWATER SERVICE INFORMATION

This is in response to your April 11, 2023 letter requesting a review of your proposed project located at 5601-5673 W. Santa Monica Boulevard, 5612-5666 W. Virginia Avenue, and 1110-1118 N. Wilton Place, Los Angeles, CA 90038. The project will consist of production studios and related support 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 capacity 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)
Proposed			
Restaurant	30 GPD/1 Seat	825 Seats	24,750

Office Space	120 GPD/1000 SQ.FT	332,304 SQ.FT	39,877
Studio: Film/TV Audience	3 GPD/1 Seat	1,495 Seats	4,485
Studio: Ind. Use Film Process	50 GPD/10000	10,744 SQ.FT	537
Sewer Ejector 1 & 2	72,000	N/A	72,000
Sewer Ejector 3 & 4	72,000	N/A	72,000
Sewer Ejector 5 & 6	72,000	N/A	72,000
Sewer Ejector 7 & 8	72,000	N/A	72,000
Total			**357,649 GPD**

SEWER AVAILABILITY

The developer is proposing to split the flow into five points of discharge, as follows:

- Virginia Ave: 23% 82,259 GPD
- Virginia Ave: 22% 78,683 GPD
- Virginia Ave: 22% 78,683 GPD
- Santa Monica Blvd: 27% 96,565 GPD
- Santa Monica Blvd: 6% 21,459 GPD

For the discharges on Virginia Ave, the sewer infrastructure in the vicinity of the proposed project includes three existing 8-inch lines on St Andrews Pl. The sewage from the three existing 8-inch lines join to feed into a 10-inch line on Wilton Pl. The sewage from the 10-inch line feeds into an 18-inch line on Norton Ave before discharging into a 42-inch sewer line on Norton Ave. 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 lines 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	St Andrews Pl.	32	245,921 GPD
8	Virginia Ave.	*	229,323 GPD
8	Virginia Ave.	*	280,862 GPD
12	Wilton Pl.	25	641,424 GPD
10	Wilton Pl.	43	743,787 GPD
12	Melrose Ave.	52	855,231 GPD
20	Bronson Ave.	39	2.05 MGD
18	Norton Ave.	37	3.15 MGD
45	Norton Ave.	17	34.42 MGD
42	Norton Ave.	17	27.34 MGD

* No gauging available

For the discharges on Santa Monica Boulevard, the sewer infrastructure in the vicinity of the proposed project includes 2 existing 12-inch lines on Santa Monica Blvd. The sewage from the two existing 12-inch lines join to feed into a 10-inch line on Wilton Pl. The sewage from the 10-inch line feeds into an 18-inch line on Norton Ave before discharging into a 42-inch sewer line on Norton Ave. Figure 2 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 12-inch lines 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	Santa Monica Blvd.	*	641,424 GPD
12	Wilton Pl.	25	641,424 GPD
10	Wilton Pl.	43	743,787 GPD
12	Melrose Ave.	52	855,231 GPD
20	Bronson Ave.	39	2.05 MGD
18	Norton Ave.	37	3.15 MGD
45	Norton Ave.	17	34.42 MGD
42	Norton Ave.	17	27.34 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.

This response letter is not intended to address any potential utility conflicts associated with the wastewater or stormwater conveyance systems. Construction of any type near any wastewater or stormwater conveyance infrastructure in the public right of way, or in/near any conveyance easement must be evaluated separately.

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 groundwater 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: https://eng2.lacity.org/techdocs/stdplans/index.htm

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 a 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 the 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.

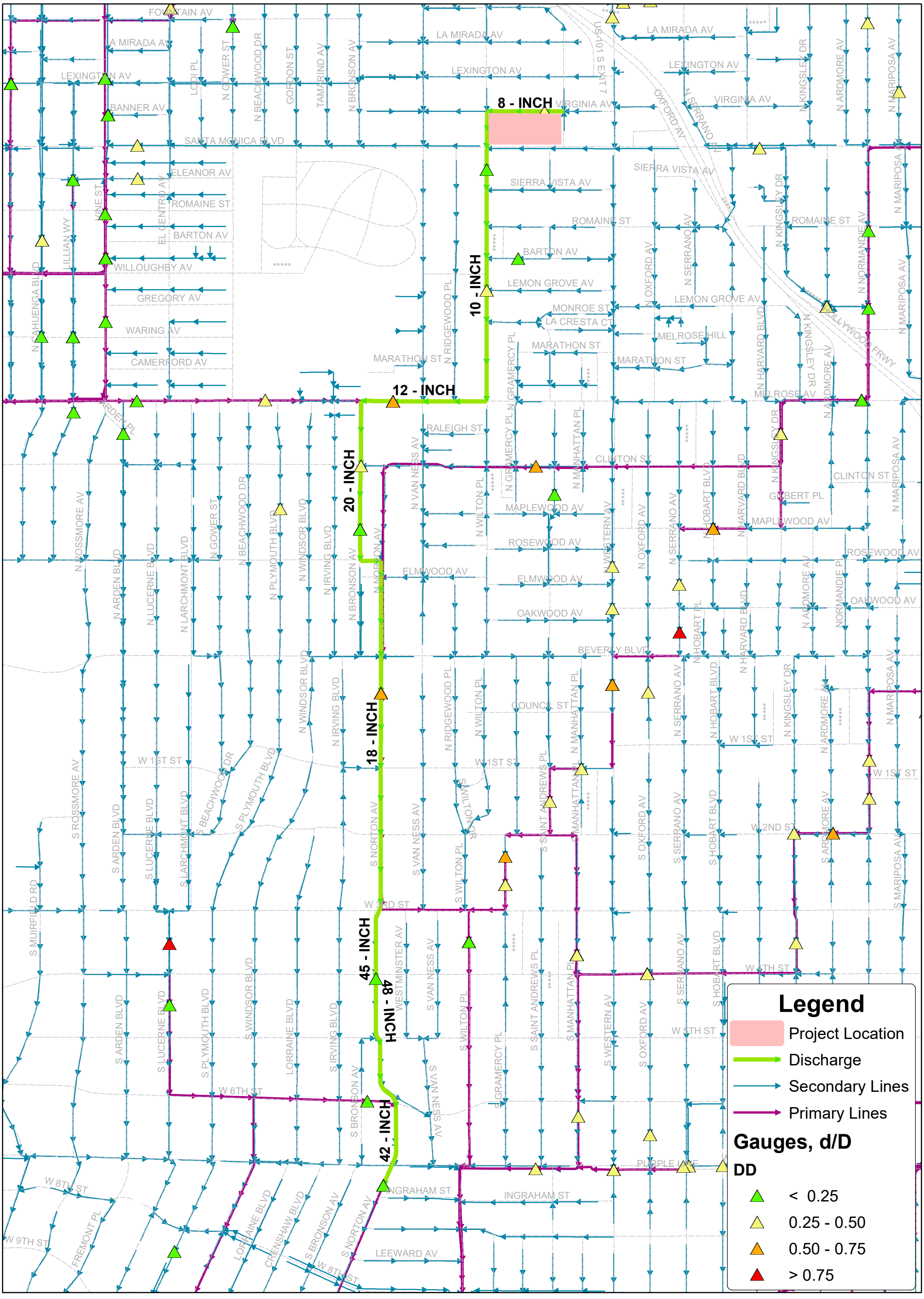
Sincerely,

Rowena Lau, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

RL/CD: sa

Attachment: Figure 1 - Sewer Map

c: Julie Allen, LASAN
Michael Scaduto, LASAN
Ryan Thiha, LASAN
Christopher DeMonbrun, LASAN



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Figure 1
5601 W Santa Monica Blvd
Sewer Map

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W E
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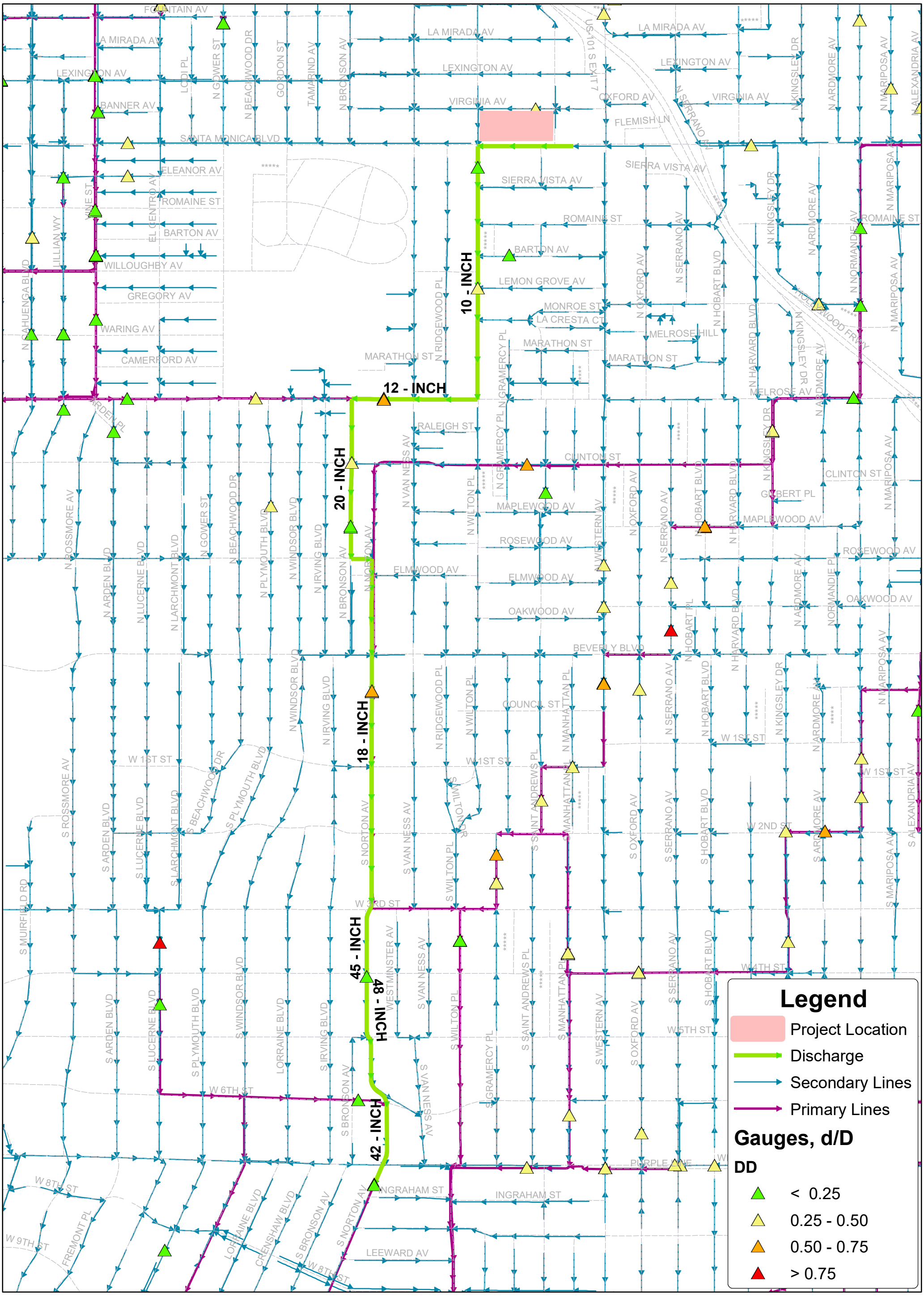
0 312.5625 1,250 1,875 2,500
Feet

Thomas Brother Data reproduced with permission granted by THOMAS BROS MAP



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Figure 2
5601 W Santa Monica Blvd
Sewer Map

EXHIBIT 4

Related Projects - Estimated Wastewater Generation Table			
Land Use	Units	Consumption Rate[2] (gpd/unit)	Total Consumption (gpd)
Retail	51,674	50/1000 SF	2,583,700
Office	180,073	120/1000 SF	21,609
Apartment	1,307	150/DU[1]	196,050
		TOTAL	2,801,359

SF= SQUARE FEET, GPD = GALLONS PER DAY, DU= DWELLING UNIT

[1] For calculation purposes all units assumed as 2-Bedroom

[2] Consumption rates based on 100% of BOS Sewer Generation Factors for Residential and Commercial Categories. https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart