

Appendix P

Utility Infrastructure Technical Report:
Wastewater



**2159 BAY STREET
UTILITY INFRASTRUCTURE TECHNICAL REPORT: WASTEWATER**

AUGUST 29, 2022

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1. INTRODUCTION

1.1. PROJECT DESCRIPTION

The Project includes the demolition of all existing on-site structures, and the construction and development of an eight-story commercial high-rise building with two levels of subterranean parking, and two two-story commercial buildings. The Project would include approximately 217,189 square feet of create office space and 5,000 square feet of retail and restaurant space, in combination operating as a “creative campus”. The Project would provide a total of 711 vehicle parking spaces on two levels of subterranean parking levels and one ground floor parking level.

SCOPE OF WORK

As a part of the Environmental Impact Report 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 of Los Angeles 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 system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System.

The Project Site lies within the Hyperion Service Area served by the Hyperion Sanitary Sewer System and the Hyperion Treatment Plant. In February 2015, 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)¹.

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 requires that the City

¹ City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, February 2015.

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.

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.

In addition, the City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City Standards (Bureau of Engineering Special Order No. SO 06-0691). Per 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.²

In 2006 the City approved the Integrated Resources Plan, which incorporates a Wastewater Facilities Plan.³ 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 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 is currently developed with three buildings: an approximately 25,700 square-foot building located in the southern portion of the site, referred to as the Sacramento Building or Building C (2145-2149-2159 Sacramento Street), an approximately 6,600 square-foot building located in the central portion of the site, referred to as Building B (2148 Bay Street), and an approximately 7,100 square-foot

² <http://www.environmentla.org/programs/thresholds/M-Public%20Utilities.pdf>.

³ City of Los Angeles, Department of Public Works, LA Sewers Website, Integrated Resources Plan Facilities Plan, Summary Report, December 2006.

building located in the northeast portion of the site, referred to as Building A (2159 Bay Street). Hyperloop One currently occupies or is in the process of building out all tenant spaces at the site, and operates uses including engineering and test development operations, office operations, and fabrication and machining operations. Exterior areas in the central and eastern portions of the site are used for storage, equipment staging, and exterior operations. Other smaller structures at the site consist of shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, and parking stackers. Designated areas for storage of raw materials and hazardous waste are located on the south side of Building B. Sanitary sewer service to the Project Site from the surrounding streets is provided by the Bureau of Sanitation (BOS).

Based on available record data provided by the City, there is an 8-inch vitrified clay pipe (VCP) sewer line in Bay Street flowing west. Based upon the City of Los Angeles Bureau of Engineering’s online Navigate LA database, the capacity of this line is 0.71 cubic feet per second (cfs) (458,678 gallons per day (gpd)). Available records indicate that Bay Street has three (3) sewer wyes allocated to the Project Site.

Based on available record data provided by the City, there is an 8-inch vitrified clay pipe (VCP) sewer line in Sacramento Street flowing west. Based upon the Navigate LA database, the capacity of the 8-inch line is 0.71 cubic feet per second (cfs) (458,678 gallons per day (gpd)). Available records indicate the 8-inch main in Sacramento Street has three (3) sewer wyes allocated to the Project Site.

Wastewater generation estimates for the existing Project Site have been prepared based on BOS sewerage generation factors, as summarized in Table 1 below.

Table 1 – Estimated Existing Wastewater Generation			
Land Use	Units	Generation Rate (gpd/unit)	Total Sewage Generation (gpd)
Existing			
Office (Bldg. A)	7,106 SF	120/KGSF	853
Light Industrial (Bldg. B & Bldg. C)	16,222 SF	50/KGSF	811
Creative Office (Bldg. C)	16,000 SF	120/KGSF	1,920
Subtotal Existing			3,584

4. SIGNIFICANCE THRESHOLDS

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

Would the project:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?
- Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it 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 CEQA Guidelines, the *L.A. CEQA Thresholds Guide* states that a project would normally have a significant wastewater impact if:

- The project would cause a measureable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

These thresholds are applicable to the Project and 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 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.
- 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 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 preliminary analysis. Refer to Exhibit 1 for the SCAR prepared for the Project, which contains the results of the BOS preliminary analysis.

6. PROJECT IMPACTS

6.1. CONSTRUCTION

Construction activities for the Project would result in a temporary increase in wastewater generation as a result of construction activities at the Project Site. 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 is not anticipated to cause any 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 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 will 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 is required in order to connect to the public main. Therefore, as part of the Project, a construction management plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining two lanes of travel and ensuring safe

pedestrian access and adequate emergency vehicle access. 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.

6.2. OPERATION

In accordance with the *L.A. CEQA Thresholds Guide*, the base estimated sewer flows were based on the sewer generation factors for the Project's uses. Based on the type of use and generation factors, the Project will generate a net of approximately 34,713 gallons per day (gpd) or 0.035 million gallons per day (mgd) of wastewater. Wastewater generation estimates have been prepared based on the City of LA Bureau of Sanitation sewerage generation factors for residential and commercial categories, and are summarized in Table 2 below.

Table 2 – Estimated Project Wastewater Generation			
Land Use	Units	Consumption Rate (gpd/unit)	Total Water Consumption (gpd)
Existing			
Office (Bldg. A)	7,106 SF	120/KGSF	853
Light Industrial (Bldg. B & Bldg. C)	16,222 SF	50/KGSF	811
Creative Office (Bldg. C)	16,000 SF	120/KGSF	1,920
<i>Subtotal Existing</i>			3,584
Proposed			
Office Building	217,189 SF	120/KGSF	26,063
Restaurant: Full Services Indoor Seat	334 Seats ^(a)	30/Seat	10,020
Wet Deck	2,214 Gal	100% daily replacement	2,214
<i>Subtotal Proposed</i>			38,297
<i>Net Increase</i>			34,713
^(a) Assumed 15 SF per person to estimate existing seat count. ⁴			

A SCAR was submitted to see whether the existing public infrastructure can accommodate the Project. It was assumed that approximately half of the proposed sewer discharge would go into the existing 8-inch sewer main in Bay Street. The remainder of the proposed sewer discharge would go to the existing 8-inch sewer main in Sacramento Street. The Bureau of Sanitation has analyzed the Project demands in conjunction with existing conditions and forecasted growth, and has approved the Project to discharge up to 36,083 gpd of wastewater to the existing sewer mains in Bay Street and Sacramento Street which would be greater than the 34,713 net increase in wastewater from the Project. Therefore, the existing sewer lines would have adequate capacity to serve the Project, and Project impacts on wastewater conveyance capacity would be less than significant. See Exhibit 1 for the approved SCAR and will-serve letter dated May 7, 2022.

As stated above, the existing capacity of the 8-inch sewer line in Sacramento Street is approximately 0.71 cubic feet per second (cfs) (458,678 gallons per day (gpd)). The Project's net increase in sewage generation would be approximately 34,713 gpd. This would represent approximately eight percent of the pipe's capacity. Again, due to this

⁴ International Code Council. (2014). 2015 International Building Code, Section 1004.1.2. Country Club Hills. ICC.

fact, and the approved SCAR, impacts on wastewater infrastructure would be less than significant.

BOS operates four water reclamation plants that serve over four million people. They consist of the Hyperion Water Reclamation Plant (HWRP), the Terminal Island Water Reclamation Plant, the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and the Los Angeles–Glendale Water Reclamation Plant. Together, they have a combined capacity of 580 million gallons of recycled water per day.⁵ The proposed Project's net wastewater generation of approximately 0.035 mgd would be treated at the HWRP. On average 275 million gallons of wastewater enters the HWRP on a dry weather day. The plant was designed to accommodate a maximum daily flow of 450 mgd⁶, resulting in an available treatment capacity of 175 mgd. This means the project would require 0.02 percent of the remaining available capacity of the HWRP. Consequently, the HWRP has adequate capacity to serve the Project, and Project impacts on wastewater treatment capacity would be less than significant.

6.3. CUMULATIVE IMPACTS

The proposed 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 adequate capacity exists to serve the Project. Related projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a SCAR to BOS as part of the related project's development review. Impact determination will be provided following the completion of the SCAR analysis for each project. 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.

Wastewater generated by the proposed Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. As previously stated, based on information from BOS, the existing design capacity of the HWRP is approximately 450 million gallons per day (mgd) and the existing average daily flow for the system is approximately 275 mgd.⁶ The estimated Project wastewater generation increase of 34,713 gpd calculated in Table 2 would comprise only 0.02 percent of the available capacity (175 mgd approximately) in the system. It is expected that the related projects would also be required to adhere to the BOS's annual wastewater flow increase allotment.

⁵ 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=14ml1auzba_4&_afLoop=7495087836967533#!

⁶ City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=14ml1auzba_4&_afLoop=7495506219572866#!

Based on these forecasts the Project's increase in wastewater generation would be adequately accommodated within the Hyperion Service Area. In addition, the BOS analysis confirms that the HWRP has sufficient capacity and regulatory allotment for the proposed Project. Thus, operation of the Project would have a less than significant impact on wastewater treatment facilities.

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

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

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05/07/2022

KPFF CHRISTOPHE BORNAND
700 SOUTH FLOWER, SUITE 2100
LOS ANGELES, CA, 90017

Dear KPFF Christophe Bornand,

SEWER AVAILABILITY: 2136 & 2159 Bay St & 2145 Sacramento St

The Bureau of Sanitation has reviewed your request of 03/16/2022 for sewer availability at **2136 & 2159 BAY ST & 2145 SACRAMENTO ST**. Based on their analysis, it has been determined on 05/07/2022 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 tables below, sewer ejector use is prohibited.**

Sincerely,

Jeanie Lam

Central District, Bureau of Engineering

City of Los Angeles
Bureau of Engineering

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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.
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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.
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