

Appendices

Appendix FEIR-1

Draft EIR Comment Letters



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

February 5, 2019

Adam Villani
City of Los Angeles
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012

Subject: 713 East 5th Street Project
SCH#: 2018061005

Dear Adam Villani:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 4, 2019, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2018061005
Project Title 713 East 5th Street Project
Lead Agency Los Angeles, City of

Type EIR Draft EIR

Description Project proposes to develop a new residential building on a 5,506-sq. ft. or approx. 0.13 acre site comprised of two parcels located within the Central City Community Plan Area of the city of Los Angeles. The project includes 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units, and one manager's unit, residential supportive service uses, and one surface parking space. The proposed uses would be located within an eight-story building comprised of 33,007 sq. ft. including 433 sq. ft. of residential supportive service uses. To accommodate the new uses, the existing 14,475 sq. ft. residential building, which contains 45 new Very Low Income single room occupancy (SRO) units and one manager's unit, would be demolished.

Lead Agency Contact

Name Adam Villani
Agency City of Los Angeles
Phone 213-847-3688
email
Address 221 N. Figueroa St., Suite 1350
City Los Angeles
Fax
State CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 34° 02' 34.27" N / 118° 14' 29.14" W
Cross Streets 5th St., and Stanford Ave.
Parcel No. 5147010002
Township 1S **Range** 13W **Section** 9 **Base**

Proximity to:

Highways US-101, I-5, 10, CA-60, 110
Airports
Railways Metro, Metrolink, UP
Waterways LA River
Schools 9th St ES, Korpus School of Art&Gallery;Metropolitan HS, Inner C
Land Use Residential/M2-2D/Light Manufacturing

Project Issues Air Quality; Archaeologic-Historic; Noise; Landuse; Tribal Cultural Resources; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; State Water Resources Control Board, Division of Drinking Water; Air Resources Board, Major Industrial Projects; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Santa Monica Mountains Conservancy; Department of Housing and Community Development; Department of Toxic Substances Control

Date Received 12/20/2018 **Start of Review** 12/20/2018 **End of Review** 02/04/2019

0011 2018061005



Department of Toxic Substances Control



Matthew Rodriguez
Secretary for
Environmental Protection

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

December 21, 2018

Mr
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E

Governor's Office of Planning & Research

JAN 07 2019

STATE CLEARINGHOUSE

Adam Villani
Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 713 EAST 5TH STREET PROJECT (PROJECT)

Dear Mr. Villani:

The Department of Toxic Substances Control (DTSC) has received your Draft Environmental Impact Report for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The draft EIR needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The draft EIR needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the draft EIR should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

Mr. Adam Villani
December 21, 2018
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pete Cooke", with a long horizontal flourish extending to the right.

Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

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FEB 12 2019

MAJOR PROJECTS
UNIT

February 4, 2019

Adam Villani
Department of City Planning
City of Los Angeles
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Edward Hotel, LP c/o Skid Row Housing
Trust
SCH #2018061005
GTS # 07-LA-2018-02133

Dear Mr. Villani:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would involve the development of a new residential building on a 5,506-sq. ft. or approx. 0.13-acre site comprised of two parcels located within the Central City Community Plan Area of the City of Los Angeles. The Project includes 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units and one manager's unit, residential supportive service uses, and one parking space. The proposed uses would be located within an eight-story building comprised of 33,007 sq. ft. including 433 sq. ft. of residential supportive service uses. To accommodate the new uses, the existing 14,475 sq. ft. residential building, which contains 46 new Very Low Income single room occupancy (SRO) units and one manager's unit, would be demolished.

After reviewing the Draft Environmental Impact Report (DEIR), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

Additionally, Caltrans seeks to provide equitable mobility options for people who are economically, socially, or physically disadvantaged. Therefore, we ask the Lead Agency to evaluate future development for access problems, Vehicles Miles Traveled (VMT) and service needs that may need to be addressed.

Furthermore, we encourage the Lead Agency to actively promote a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. Such alternatives include: incentives for commuters to use transit, park-and-ride lots, discounts on month-long bus and rail passes, shuttle buses, vanpools, etc. These alternatives can be significant to reducing car trips, to the extent that more of the population shifts to transit for some of their inter-regional trips and thus future cumulative traffic impacts to freeways may be satisfactorily mitigated, thereby reducing VMT.

Mr. Villani
February 4, 2019
Page 2 of 2

For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online:

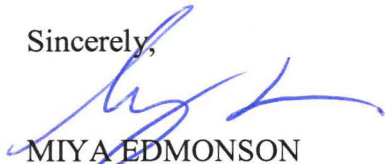
<http://www.ops.fhwa.dot.gov/publications/hfwahop12035/fhwahop12035.pdf>

Any reduction in vehicle speed benefits pedestrian and bicyclist safety since there is a direct link between impact speeds and the likelihood of fatality. Methods to reduce pedestrian and bicyclist exposure to vehicles improve safety by lessening the time that the user is in the likely path of a motor vehicle. These methods include the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact Carlo Ramirez, the project coordinator, at carlo.ramirez@dot.ca.gov, and refer to GTS #07-LA-2018-02133.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



Adam Villani <adam.villani@lacity.org>

SCAQMD Staff Comments on Draft Environmental Impact Report for the Proposed 713 East 5th Street Project (SCH No. 2018061005)

2 messages

Alina Mullins <AMullins@aqmd.gov>
To: "Adam.villani@lacity.org" <Adam.villani@lacity.org>
Cc: Lijin Sun <LSun@aqmd.gov>

Fri, Feb 1, 2019 at 7:36 AM

Dear Mr. Villani,

Attached are SCAQMD staff's comments on the Draft Environmental Impact Report (Draft EIR) for the Proposed 713 East 5th Street Project (SCH No. 2018061005) (SCAQMD Control Number: LAC181221-10). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. SCAQMD staff comments are meant as guidance for the Lead Agency and should be reviewed for incorporation into the Draft EIR. Please contact me if you have any questions regarding these comments.

Kind regards,

Alina Mullins

Assistant Air Quality Specialist, CEQA IGR

Planning, Rule Development & Area Sources

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765

P. (909) 396-2402

E. amullins@aqmd.gov

**Please note that the SCAQMD is closed on Mondays.*

LAC181221-10 DEIR 713 East 5th Street_20190201.pdf
197K

Adam Villani <adam.villani@lacity.org>
To: Alina Mullins <AMullins@aqmd.gov>
Cc: Lijin Sun <LSun@aqmd.gov>

Fri, Feb 1, 2019 at 5:26 PM

Excellent; thank you

[Quoted text hidden]

—



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

February 1, 2019

Adam.villani@lacity.org

Adam Villani, City Planner
City of Los Angeles, Planning Department
Major Projects Section
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Draft Environmental Impact Report (Draft EIR) for the Proposed 713 East 5th Street Project (SCH No.: 2018061005)

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish a 14,475-square-foot building and construct a 33,007-square-foot building with 51 residential units on 0.13 acres. (Proposed Project). The Proposed Project is located on the northwest corner of Stanford Avenue and 5th Street in the community of Central City. Based on a review of the Draft EIR, SCAQMD staff found that the Proposed Project is located within 600 feet a cold storage distribution center¹.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant². Additionally, for the purpose of disclosing the potential health risks as useful information to future residents living within 600 feet of the cold storage distribution center, the Lead Agency prepared a Health Risk Assessment (HRA) for the Proposed Project and found that the residential cancer risk would be 2.1 in one million, which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk³.

Enhanced Filtration Units and Limitations

Notwithstanding the court rulings, SCAQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. A cold storage distribution center is a potential source of air pollution because it is capable of generating or attracting heavy-duty, diesel-fueled trucks during operation that emit diesel particulate matter (DPM). The California Air Resources Board has identified DPM as a toxic air contaminant based on its carcinogenic effects⁴. Because of SCAQMD's concern about the potential public health impacts of siting sensitive populations within close proximity of a cold

¹ Draft EIR. Section IV A. Page IV.A-49.

² *Ibid.* Page IV.A-24 – 52.

³ *Ibid.* Page IV.A-50.

⁴ California Air Resources Board. August 27, 1998. Resolution 98-35. Accessed at:
<http://www.arb.ca.gov/regact/diesltac/diesltac.htm>.

storage distribution center, SCAQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

Many strategies are available to reduce exposure, including, but not limited to, building filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Because of the potential adverse health risks involved with siting sensitive receptors near land uses that generate or attract heavy-duty, diesel-fueled trucks, such as a cold storage distribution center, SCAQMD staff recommends that the Lead Agency require the installation of MERV 13 filters or better at the Proposed Project in the Final EIR.

SCAQMD staff also recommends that the Lead Agency consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters⁵, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

Enforceability of Enhanced Filtration Units

If enhanced filtration units are required for the Proposed Project, and to ensure they are enforceable throughout the lifetime of the Proposed Project and effective in reducing exposures to DPM emissions, SCAQMD staff recommends that the Lead Agency make the installation of enhanced filtration units a project design feature and provide additional details on ongoing, regular maintenance, and monitoring of filters in the Final EIR. To facilitate a good faith effort at full disclosure and provide useful information to future residents at the Proposed Project, at a minimum, the Final EIR should include the following information:

- Disclose the potential health impacts to prospective residents from living in a close proximity to warehouses or distributions centers and the reduced effectiveness of the air filtration system when windows are open and/or when residents are outdoors (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency such as the Lead Agency to ensure that enhanced filtration units are inspected and maintained regularly;
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents;
- Provide information to residents on where the MERV filters can be purchased;
- Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;
- Identify the responsible entity such as residents themselves, Homeowner's Association, or property management for ensuring enhanced filtration units are replaced on time, if appropriate

⁵ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by SCAQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

and feasible (if residents should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);

- Identify, provide, and disclose ongoing cost sharing strategies, if any, for replacing the enhanced filtration units;
- Develop a City-wide or Proposed Project-specific process for evaluating the effectiveness of the enhanced filtration units.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM

LAC181221-10

Control Number



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311



Edmund G. Brown Jr.
Governor

December 21, 2018

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JAN 08 2019

MAJOR PROJECTS
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Adam Villani
Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 713 EAST 5TH STREET PROJECT (PROJECT)

Dear Mr. Villani:

The Department of Toxic Substances Control (DTSC) has received your Draft Environmental Impact Report for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The draft EIR needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The draft EIR needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the draft EIR should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

Mr. Adam Villani
December 21, 2018
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,



Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806



Jared Blumenfeld
Secretary for
Environmental Protection

Department of Toxic Substances Control

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311



Gavin Newsom
Governor

January 15, 2019

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**MAJOR PROJECTS
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Adam Villani
Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE EDWARD HOTEL PROJECT (PROJECT)

Dear Mr. Villani:

The Department of Toxic Substances Control (DTSC) has received your Draft Environmental Impact Report for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The draft EIR needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The draft EIR needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the draft EIR should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

Adam Villani
January 15, 2019
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Pete Cooke', with a stylized flourish at the end.

Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

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INTER-DEPARTMENTAL CORRESPONDENCE

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MAJOR PROJECTS
UNIT

DATE: January 7, 2019

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: Adam Villani, City Planner
Department of City Planning

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



SUBJECT: EDWARD HOTEL, LP C/O SKID ROW HOUSING TRUST – NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT

This is in response to your December 20, 2018 letter requesting a review of your proposed residential building project located at 713-717 ½ East 5th Street, Los Angeles, 90013. The project will consist of 50 residential bachelor units, one two-bedroom unit, 433 square feet of residential supportive service uses and 1,640 square feet of common areas. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

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

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<i>Proposed</i>			
Residential: APT- Bachelor	75 GPD	50 UNITS	3,750
Residential: APT- 2 BDRM	150 GPD	1 UNITS	150
Residential supportive service uses and common area		2,073 SQ.FT	2,000
Total			5,900

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on 5th St. The sewage from the existing 8-inch line feeds into a 24-inch line on Alameda St before discharging into a 40-inch sewer line on Alameda St. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line cannot be determined at this time without additional gauging.

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

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	5 th St	*	245,921 GPD
10	Central Ave	*	445,885 GPD
10	Central Ave	*	441,012 GPD
10	6 th St	*	436,084 GPD
12	6 th St	*	676,120 GPD
24	Alameda St	40	2,879,895 GPD
40	Alameda St	24	13,515,238 GPD
40	8 th St	26	11,245,357 GPD

* No gauging available

Based on the 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 has insufficient 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 that time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

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

STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Program (WPP) 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 (LID Ordinance) and as it may be subsequently amended or modified. Prior to issuance of grading or building permits, the Applicant shall submit a LID Plan to the City of Los Angeles, Bureau of Sanitation, Watershed Protection Division (WPD), for review

and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

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 early phases of the project from WPD's plan-checking staff.

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. Additionally, 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, 3rd Fl, Station 18.

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

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

SOLID RESOURCE REQUIREMENTS

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

CD/AP: aj

Attachment: Figure 1 – Sewer Map

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