Appendix IS-8

Wastewater Report



THE BLOC RESIDENTIAL TOWER & SIGNAGE SUD PROJECT

UTILITY TECHNICAL REPORT: WASTEWATER DECEMBER 2022

PREPARED BY:

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1. INTRODUCTION

1.1. PROJECT DESCRIPTION

The proposed BLOC Residential Tower and signage (Project) would be located on the southern portion of a larger mixed-use development known as The BLOC located in the Financial District of Downtown Los Angeles (Development Area). The Applicant proposes to construct 466 residential units within a high-rise tower and signs included in The BLOC Supplemental Use District (case number CPC-2018-6388-SN) (Project). The development area is located within a 186,674-square-foot site (4.285-acre) known as The BLOC located at 700 South Flower Street, 700 West 7th Street, and 711 and 775 South Hope Street (Project Site) in the City of Los Angeles (City). The residential tower address will be 775 South Hope Street. The Project Site comprises of an entire City block that is currently developed with hotel, office and commercial/retail uses and associated parking and contains a portal to the 7th Street/Metro Center rail station.

The BLOC Residential Tower would be located in the southern half of the Project Site (Development Area) and would consist of a high-rise tower with up to 466 residential units. The residential tower address will be 775 South Hope Street. The proposed signage would be provided pursuant to a new Supplemental Use District (case number CPC-2018-6388-SN).

The existing hotel, office, and commercial/retail uses would be retained, with the exception of approximately 24,342 square feet of existing commercial (theater and retail) uses that would be removed and replaced with residential uses (including the new residential lobby).

The BLOC Residential Tower would be constructed within and above an existing commercial/parking podium building. The rooftop parking level of the existing nine-story podium building would be enclosed, and two additional levels of parking would be added, increasing the podium to 12 stories. A new 41-story residential tower would extend above the 12-story podium. The two existing basement levels below the podium would be retained.

The 41-story residential tower will consist of the following: 2 stories of mechanical space, 1 story of rooftop amenities, 37 stories of residential dwelling units, and 1 story with amenities at podium roof level. The 12-story podium with parking consists of the following: 2 stories of new parking, 1 story of existing roof level parking now enclosed, 5 stories of enclosed existing parking and 4 stories of existing commercial area. The 2 below grade levels consist of 1 existing parking level and 1 loading level.

1.2. SCOPE OF WORK

As a part of the environmental assessment for the Project pursuant to the California Environmental Quality Act (CEQA), the purpose of this report is to analyze the potential impact of the Project to the existing water, wastewater, and energy infrastructure.

2. REGULATORY FRAMEWORK

The City of Los Angeles has one of the largest sewer systems in the world including more than 6,700 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. 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)¹. The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system to meet the WDRs for the system. In addition, the SSMP identifies protocols to help reduce and prevent sanitary sewer overflows, and to mitigate any sanitary sewer overflows that do occur. The City's 2019 SSMP confirms that the City is in full compliance with the applicable WDRs.

Sewer permit allocation for projects that discharge into the Hyperion Water Reclamation 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 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

 $\underline{https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/\simedisp/cnt035427.pdf}$

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¹ City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25, 2019.

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. WWSIs serve a similar function as SCARs 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 as a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength as well as volume. The determination of wastewater strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters (biological oxygen demand and suspended solids) for each type of land use. Fees paid to the Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including but not limited to industrial waste control and water reclamation purposes.

In addition, the City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City Standards (Bureau of Engineering Special Order No. SO06-0691). Per Special Order, lateral 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 Program was developed to meet future wastewater needs of more than 4.3 million residents expected to live within the City by 2020. In order to meet future demands posed by increased wastewater generation, the City has chosen to expand its current overall treatment capacity, while maximizing the potential to reuse recycled water through irrigation, and other approved uses. To that end, the City has developed the final draft of the One Water LA 2040 Plan, which builds on the premise of the Integrated Resources Plan to maximize water resources and to develop a framework for managing the City's watersheds, water resources, and water

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² City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Planning CEQA Analysis in Los Angeles, M-Public Utilities, 2006. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

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

https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010373.pdf

facilities.⁴ As with the IRP, such efforts would be organized in phases. Phase I of the One Water LA 2040 Plan includes developing initial planning baselines and guiding principles for water management and citywide facilities planning in coordination with City departments, other agencies, and stakeholders.⁵ Phase II includes development of technical studies and an updated facilities plan for stormwater and wastewater. The final draft of One Water LA has been completed, and work on its Programmatic Environmental Impact Report (PEIR) will begin soon.⁶

3. EXISTING CONDITIONS

The 4.285-acres Project Site is currently occupied by The BLOC, a mixed-use destination that includes an office tower, a high-rise hotel, commercial/retail uses and an expansive plaza that includes the portal to the 7th Street/Metro Center rail station, all located within the northern portion of the Project Site, outside of the Development Area (The BLOC Residential Tower). The southern portion of the Project Site that is comprised of the Development Area is currently developed with a an existing 9-story podium building, which includes five (6) stories of enclosed parking, four (2) stories of existing commercial/retail floor area, and one (1) rooftop parking. Vehicular access to the Project Site is provided via ingress/egress access points along Flower Street, 8th Street, and Hope Street. The Project Site generally slopes from north to south between Flower Street and Hope Street with a grade difference of approximately 7.75 feet. The topography of the parking structure varies across the property and does not exceed a 50:1 slope. The existing Project Site, inclusive of the Development Area is approximately 100-percent impervious.

3.1. WASTEWATER

Sanitary sewer service to the site is provided by the City's BOS. According to the City's sewer wye maps, there are existing sewer facilities along the adjacent streets surrounding the site. There is an existing 8-inch vitrified clay pipe (VCP) within Hope Street, which flows southwesterly at a slope of 1.25%, an existing 8-inch vitrified clay pipe (VCP) within Flower Street, which flows northeasterly at a slope of 2.51% and joins an existing 8-inch vitrified clay pipe (VCP) also within Flower Street, which flows southwesterly at a slope of 2.50%. The City's sewer wye maps indicate that there are twenty-two (22) sewer wyes⁷ on Hope Street from 7th to 8th street and five (4) sewer wyes on Flower Street from

⁴ City of Los Angeles, One Water LA Plan, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-es-owla-r?_adf.ctrl-state=14epm9vu42_298&_afrLoop=2995637137833887#! accessed October 27, 2021.

⁵ City of Los Angeles, One Water LA Plan, Plan Development, www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es-owla-au/s-lsh-es-owla-au-aowla-pd?_adf.ctrl-state=f0cxqccpz_68&_afrLoop="accessed October 27">www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es/s-lsh-es-owla-au-aowla-pd?_adf.ctrl-state=f0cxqccpz_68&_afrLoop="accessed October 27">www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es-owla-au-aowla-pd?_adf.ctrl-state=f0cxqccpz_68&_afrLoop="accessed October 27">www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-lsh-es/s-

⁶ One Water LA, Plan Documents, https://www.lacitysan.org/san/faces/wcnav externalId/s-lsh-es-owla-r? adf.ctrl-state=rnwk2mfka_5&_afrLoop=3595575820503671#!, accessed October 27, 2021.

⁷ A wye is a short "y" shaped pipe intended to connect a sewer lateral branch to a sewer main line at an acute angle.

7th to 8th street. Sewage waste is conveyed for treatment at the City's Hyperion Treatment Plant.

Existing wastewater generation estimates from existing uses to be removed have been prepared based on the BOS sewerage generation factors for commercial categories and are summarized in Table 1 below.

Table 1 - Estimated Existing Wastewater Generation from Existing Uses to be Removed			
Land Use	Quantity	Average Daily Flow ^(a)	Total Avg. Gallons Per Day (GPD)
Retail Area (less than 100,000 SF)	23,888	25 KGSF/GPD	597
Total Existing Wastewater Generation (gpd)			597

- (a) The average daily flow based on 100% of City of Los Angeles sewerage generation factors.
- (b) Wastewater generated by the theater space is not included since the removal of this space will not affect the existing wastewater generation.

4. SIGNIFICANCE THRESHOLDS

The City of Los Angeles considers the questions listed in Appendix G of the CEQA Guidelines as significance thresholds regarding impacts on wastewater infrastructure and treatment capacity. These questions are as follows:

Would the Project:

- Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which would cause significant environmental effects?
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

In the context of the above questions from the Appendix G of the CEQA Guidelines, the City of Los Angeles considers the following criteria from the CEQA Thresholds Guide (2006 *L.A. CEQA Thresholds Guide*) with regard to wastewater impacts:

• The project would cause a measurable increase in wastewater flows at a

- point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.⁸

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

5. METHODOLOGY

The methodology for determining the significance of a project'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 as required. The following has been considered as part of the determination for this Project:

Environmental Setting

- Location of the Project and appropriate points of connection to the wastewater collection system on the pertinent 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

⁸ LADWP, 2017 Power Integrated Resource Plan, December 2017. https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB655007&Revisi-onSelectionMethod=LatestReleased

 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.

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. BOS' 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 3 for results of this BOS preliminary analysis, which is also known as the Wastewater Service Information Letter (WWSI).

6. PROJECT IMPACTS

6.1. CONSTRUCTION

During construction, existing sewer laterals would allow sewage generated at the BLOC's existing facilities to continue to enter the public sewer system. However, temporary facilities (such as portable toilet and hand wash areas) would be provided by the contractor at the Project Site. Sewage from these facilities would be collected and hauled offsite and not discharged into the public sewer system. Wastewater generated from other construction activities such as drilling and piling, concrete batching, or dust suppression would be required to be treated before being discharged from the site and may be transported off-site. Therefore, since the anticipated additional wastewater generated during construction is not anticipated to connect directly to existing sewer facilities, the increase in wastewater flow during construction is expected to be zero. If wastewater from construction activities is discharged from the project site, the amount is expected to be a modest amount and well within the capacity of the existing public sewer system. Thus, impacts to the sewer infrastructure due to construction activity are considered less than significant.

As part of the Project, new sewer lines would be required within the Project Site. This expansion of the existing on site sewer system would collect sewage from the Project and flow would be routed towards the public sewer laterals at the property line or at the existing sewer wye connections in the public right of way. At the time when the new onsite sewer lines would be constructed, the primary associated construction impacts would be the placement of pipe, and connection into city sewer main along the existing hardscape. Any offsite work that may affect services to the existing sewer line would be coordinated with the City of Los Angeles Bureau of Engineering (BOE). BOE would be

able to provide for connection requirements, pipe depths, and connection location(s). In addition, as part of the Project, a Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access. Therefore, Project impacts on wastewater infrastructure associated with construction activities would be less than significant.

6.2. OPERATION

6.2.1.1. SEWER GENERATION

In accordance with the L.A. CEQA Thresholds Guide, the base estimated sewer flows were based on the BOS sewerage generation factors for commercial, office and residential categories. A Request for Wastewater Service Information (WWSI) that conservatively overestimated the Project's anticipated sewage generation was submitted to see whether the existing public infrastructure can accommodate the Project. In preparing the WWSI, LASAN analyzed the Project's wastewater demands in conjunction with existing conditions and forecasted growth and has approved the Project to discharge up to 55,530 gpd of additional wastewater to the existing adjacent sewer lines on Hope Street (e.g., the net increase in wastewater generation associated with the Project). The estimated sewer flows have been summarized in Table 2 below.

Table 2 - Estimated Proposed Wastewater Generation ^(a)				
Connection To:	Land Use	Quantity	Average Daily Flow ^(a)	Average Wasterwater Generation (GPD)
Hope Street	Lounge	56,236 SF	50 KGSF/GPD	2,812
	Residential: APT- Bachelor	83 DU	75 DU/GPD	6,225
	Residential: APT-1 Bedroom	203 DU	110 DU/GPD	22,330
	Residential: APT-1 Bedroom +	68 DU	110 DU/GPD	7,480
	Residential: APT-2 Bedroom	100 DU	150 DU/GPD	15,000
	Residential: APT-3 Bedroom	12 DU	190 DU/GPD	2,280
	56,127			
Existing Wastewater Generation for Project				597
Net Increase in Wastewater Generation for Project				55,530

(a) Based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table.

The existing design capacity of the Hyperion Water Reclamation Service Area, which would treat the Project's wastewater, is approximately 450 mgd (million gallons per day). Currently, up to approximately 300 mgd is treated at the Hyperion Water Reclamation Plant, resulting in a residual treatment capacity of approximately 150 mgd. The Project's proposed wastewater generation would be approximately 0.055530 mgd, which is roughly equal to 0.03702 percent of the Hyperion Water Reclamation Plant's available capacity. Consequently, impacts on wastewater treatment capacity are less than significant. Therefore, adequate wastewater treatment capacity would be less than significant.

7. CUMULATIVE IMPACTS

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

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant. As previously stated, based on information from the BOS, the existing design capacity of the Hyperion Treatment Service Area is approximately 450 million gpd, and the existing average daily flow for the Hyperion Water Reclamation Plant is approximately 300 million gpd. The Project's estimated wastewater generation increase of 55,530 gpd summarized in Table 2 comprises roughly 0.03702 percent of the available capacity for the Hyperion Water Reclamation Plant.

The BLOC Residential Tower Environmental Impact Report December 2022

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 October 27, 2021.

City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2019. https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf

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

8. LEVEL OF SIGNIFICANCE

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

EXHIBIT 1 - CITY OF LOS ANGELES "REQUEST FOR WASTEWATER SERVICES INFORMATION" (WWSI) LETTER

CITY OF LOS ANGELES

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March 7, 2022

Mr. Sergio Mendoza, Project Manager **KPFF** Consulting Engineers 700 S Flower Street, #2100 Los Angeles, CA 90017

Dear Mr. Mendoza,

THE BLOC (UPDATE) - REQUEST FOR WASTEWATER SERVICE INFORMATION

This is in response to your February 8, 2022 letter requesting a review of your proposed mixed-use project located at 775 S. Hope Street, Los Angeles, CA 90017. The project will consist of residential units and lounge. 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)
Proposed			
Residential Apt: Bachelor	75 GPD/1 DU	83 DU	6,225
Residential Apt:1-BDRM	110 GPD/1 DU	271 DU	29,810

Residential Apt:2-BDRM	150 GPD/1 DU	100 DU	15,000
Residential Apt:3-BDRM	190 GPD/1 DU	12 DU	2,280
Lounge Space	50 GPD/1000 SQ.FT	56,236 SQ.FT	2,812
Total			56,127

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Hope St. The sewage from the existing 8-inch line feeds into a 10-inch line on Hope St then into a 39-inch line on 12TH St before discharging into a 57-inch sewer line on Santee 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 and the 10-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	Hope St.	*	405,389 GPD
10	Hope St.	*	483,104 GPD
39	12 th St.	9	7.83 MGD
57	Santee St.	19	28.10 MGD

^{*} No gauging available

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

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

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

STORMWATER REQUIREMENTS

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

POST-CONSTRUCTION MITIGATION REQUIREMENTS

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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: www.eng2.lacity.org/techdocs/stdplans/

CONSTRUCTION REQUIREMENTS

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

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

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within File Location: CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\The Bloc - Request for WWSLdocx

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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.

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SOLID RESOURCE REQUIREMENTS

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

Sincerely,

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

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Attachment: Figure 1 - Sewer Map

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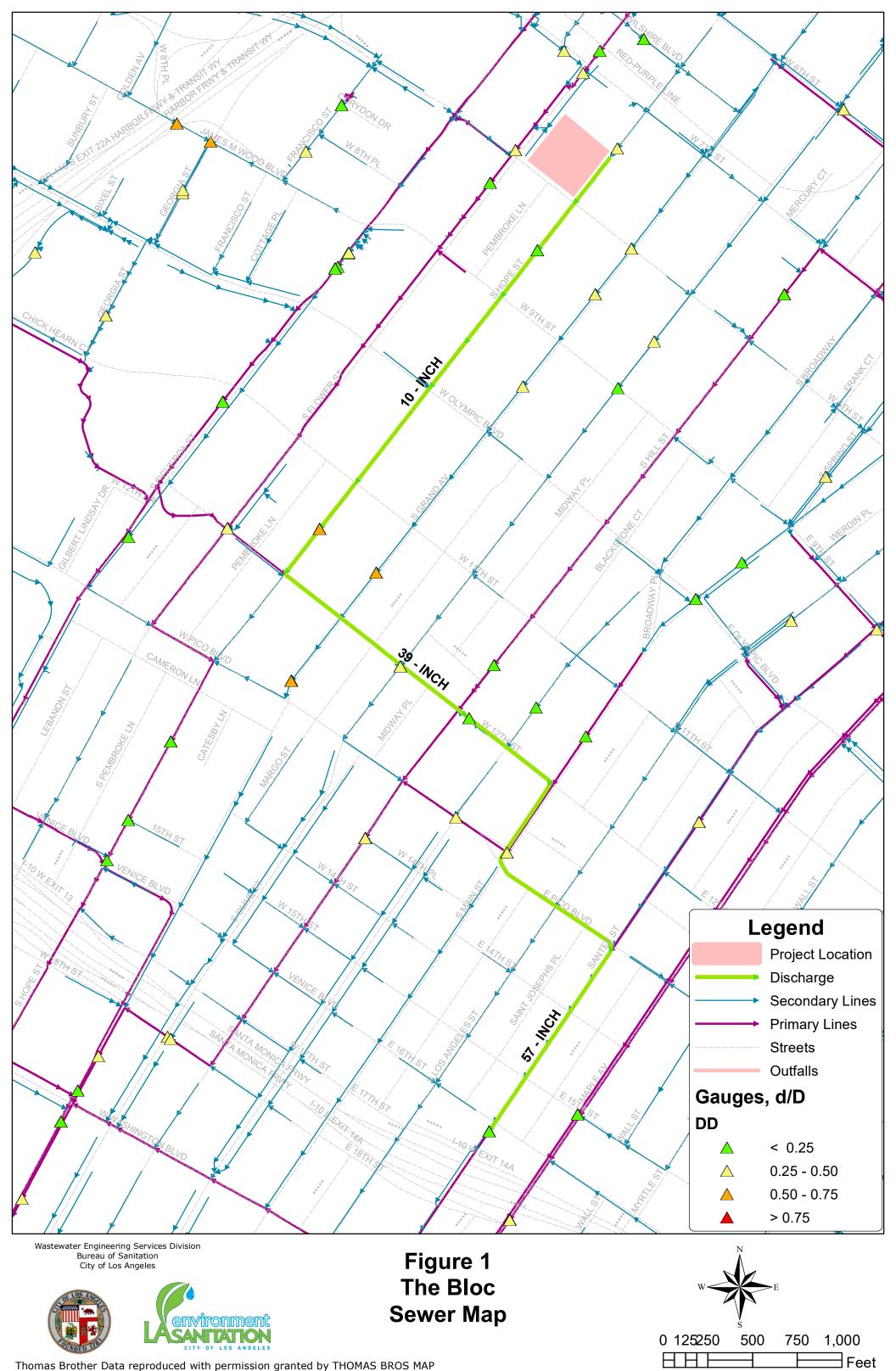


EXHIBIT 2 - EXISTING INFRASTRUCTURE

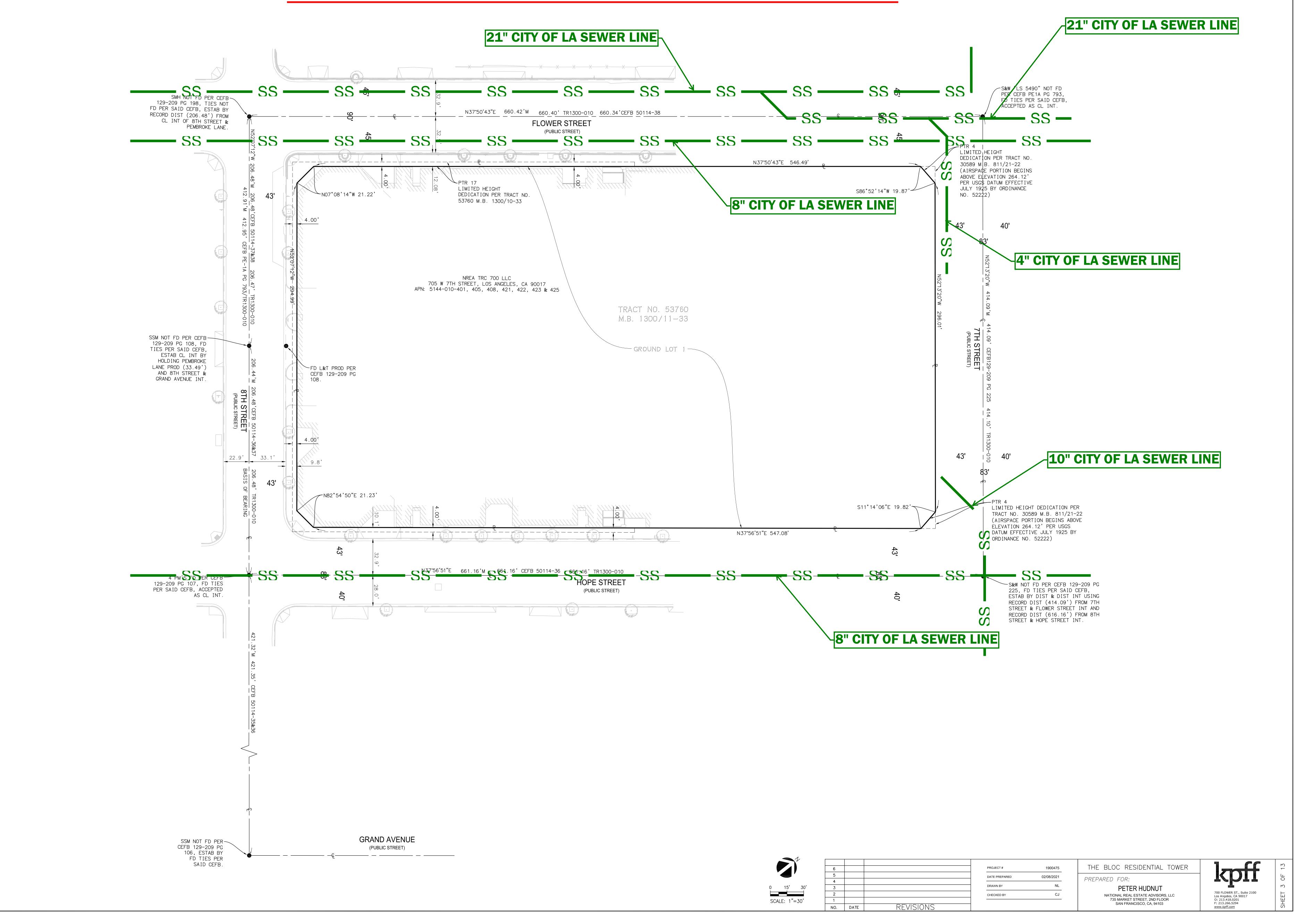


EXHIBIT 3 - PROPOSED INFRASTRUCTURE

