

**LETTER NO. 4**

Dated: 2/28/01

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Department of Water and Power  
Box 51111  
Los Angeles, CA 90051-0100

**COMMENT 4.1**

The Los Angeles Department of Water and Power's (LADWP) Corporate Environmental Services has reviewed the Draft Environmental Impact Report (DEIR) for the subject project. The proposed project consists of a multi-use development. The conceptual plan includes: a major convention hotel with a capacity for 1,200 rooms; a second 600-room hotel; up to 1,115,000 gross square feet (GSF) of retail/entertainment/restaurant uses, including a 7,000-seat live theatre; up to 870,00 GSF residential uses (800 dwelling units); up to 300,000 GSF of office space, including medical offices and a sports medicine center; a health/sports club of up to 125,900 GSF; an open-air plaza to feature year-round venues; and combined support parking of up to 5,305 spaces located throughout the project site.

**RESPONSE 4.1**

The project description provided in the comment is consistent with the Section II, Project Description, of the Draft EIR.

**COMMENT 4.2**

LADWP offers the following comments:

Electric Service

Electrical service for the proposed development would be provided in accordance with LADWP rules and regulations. The extent and cost of distribution improvements cannot be determined at this time.

**RESPONSE 4.2**

As stated, electrical service for the proposed development would be provided in accordance with LADWP rules and regulations. **COMMENT 4.3**

The cumulative effect of this and other electric load increases may result in the need for additional distribution capacity to be installed in the area. As the project proceeds further in the design phase,

we recommend the project applicant or designated Project Management Engineer to confer with a single point-of-contact at LADWP (Mr. Marvin Moon, [213] 367-1732) for dealing with power services and infrastructure needs.

**RESPONSE 4.3**

The project applicant will confer with LADWP through the recommended single point-of-contact during the design phase of the proposed project for the provision of electrical service. As a result of an energy analysis performed for the Project, the Project would not result in any significant impacts to electrical generation facilities or service.

**COMMENT 4.4**

Water Service

Water service for the proposed development would be provided in accordance with LADWP rules and regulations. The extent and cost of distribution improvements cannot be determined at this time.

It should be noted that a need for an increased water main capacity or diameter for project demand is possible. The project applicant would bear the cost for this potential improvement. As the project proceeds further in the design phase, the project applicant or designated Project Management Engineer should contact Ms. Julie Spacht at (213) 367-1176 to make arrangements for water supply.

**RESPONSE 4.4**

As was stated in Section IV.J.I. Water in the Draft EIR on Page 402 in Mitigation Measure 3, the DWP shall conduct a flow test prior to the issuance of certificates of occupancy to determine whether the existing water system meets fire flow requirements imposed by the Fire Department for the Project. The Applicant shall undertake and complete those required improvements identified by the DWP as a result of findings of the flow test. With adherence to applicable regulations and this mitigation measure, project-related impacts to fire flows and water supply infrastructure are considered less than significant. The project applicant will confer with LADWP through the recommended single point-of-contact during the design phase of the proposed project for the provision of water service.

**COMMENT 4.5**

LADWP Programs to Assist Customer Water and Power Needs

LADWP has a number of programs that are intended to serve existing and prospective customer water and power needs. Since the proposed project is in the design phase, it may be a good idea to review these programs to consider the feasibility of incorporating measures in the design, project

development, and operations of the proposed facilities. The benefit of these programs is cost savings to the customer while at the same time being environmentally friendly.

Existing and prospective customers of LADWP are encouraged to join us in this effort by taking part in our “Green Power for a Green LA” program. Call 800 GREEN LA (800-473-3652), or visit [www.GreenLA.com](http://www.GreenLA.com) to learn more about the various programs available.

**Green Power for a Green LA Program.** LADWP is committed to replacing electricity generated from fossil fuel-burning power plants with energy generated from renewable resources such as the sun, wind, water, biomass, and geothermal. Mr. John Giese is the Green Power Program Manager and can be reached at (213) 367-0434.

**Efficiency Solutions.** LADWP has a number of energy efficiency programs and cash incentives such as HVAC, lighting, and chillers to reduce electrical demand and energy costs. These programs would apply to new construction as well as any renovation of existing facilities. Mr. Donald Cunningham is the Director of Energy Efficiency Solutions and can be reached at (213) 367-1057.

**Solar Energy.** In an effort to decrease dependency on traditional, polluting energy sources, LADWP is promoting solar power and other incentive programs to make this energy alternative more affordable. Mr. Robert McKinney is the Solar Energy Program Manager and can be reached at (213) 367-0440.

**Electric Transportation.** LADWP is promoting this program by providing our customers with information and assistance that greatly simplifies the process of buying electric vehicles and installing a charger(s). Mr. Scott Briasco is the Electric Transportation Program Manager and can be reached at (213) 367-0239.

**Water Conservation.** LADWP is always looking for ways to facilitate its customers to use water resources more efficiently and welcomes the opportunity to work with new developments to identify water conservation opportunities. Mr. Thomas Gackstetter is the Water Conservation Program Manager and can be reached at (213) 367-0936.

#### Water and Energy Conservation

Based on the proposed project, some of the enclosed energy and water conservation measures may apply and should be considered for inclusion in the proposed project. If there are any questions concerning the recommended conservation measures, please contact our Customer Outreach, or for more details on various water conservation methods available, contact the Water Conservation Group at (213) 367-0936.

Consideration of these conservation measures, including possible use of recycled materials and recycling area requirements for new developments (see Ordinance No. 171687), early on in the design of the various land uses would facilitate incorporation into project implementation based on economic, technical, environmental and marketing objectives.

Thank you for the opportunity to comment on the DEIR. If there are any additional questions, please contact Mr. Val Amezcua of my staff at (213) 367-0429.

**RESPONSE 4.5**

An energy plan for the Project development in conjunction with LADWP and the Southern California Gas Company will set forth a program for the inclusion of energy conservation measures on a building by building basis and will exceed Title 24 requirements by 5 percent.

**COMMENT 4.6**

**IMPACT ON THE WATER SYSTEM**

If the estimated water requirements for the proposed project can be served by existing water mains in the adjacent street(s), water service will be provided routinely in accordance with the Department's Rules and Regulations. If the estimated water requirements are greater than the available capacity of the existing distribution facilities, special arrangements must be made with the Department to enlarge the supply line(s). Supply main enlargement will cause short-term impacts on the environment due to construction activities.

**RESPONSE 4.6**

As stated in Section IV.J.1 Water of the Draft EIR on page 400, the project is anticipated to require upsizing of approximately 900 feet of the 8-inch water line in Olympic Boulevard, between Georgia Street and Figueroa Street, to a 12-inch water line. The Project would also require the construction of an 8-inch water line in Cherry Street, between 11th Street and Olympic Boulevard. The existing 24-inch water line located in 12th Street will be abandoned and re-aligned with a new 24-inch water line.

Impacts to air quality, transportation/circulation and noise from the proposed project, including water line construction, were analyzed in the Draft EIR in Sections IV.E., Air Quality; IV.F., Transportation/Circulation; and IV.H., Noise.

Based on the results of the flow study and LAFD requirements, further expansion to the existing system and site-specific fire suppression improvements may be required. Section IV.J.1.c., Mitigation Measure 3 on page 402 states that the DWP shall conduct a flow test to determine whether the existing water system meets fire flow requirements imposed by the Fire Department for

the Project. The measure further states that the Project Applicant shall undertake and complete those required improvements identified by DWP as a result of findings of the flow test. This mitigation measure has been revised to state that the flow test shall be conducted prior to the issuance of a building permit. Refer to Item IV.J.1.a in Section II, Corrections and Additions to the Draft EIR, of this Final EIR. With adherence to applicable regulations and this mitigation measure, project-related impacts to fire flows and water supply infrastructure are considered less than significant.

**COMMENT 4.7**

In terms of the City's overall water supply condition, the water requirement for any project which is consistent with the City's General Plan has been taken into account in the planned growth of the Water System. Together with local groundwater sources, the City operates the Los Angeles-Owens River Aqueduct and is a member of the Metropolitan Water District of Southern California (MWD). These three sources will supply the City's water needs for many years to come.

Statewide drought conditions in the mid-1970s and late 1980s dramatically illustrated the need for water conservation in periods of water shortage. However, water should be conserved in Southern California even in years of normal climate because electrical energy is required to deliver supplemental MWD water supplies to the City and the rest of Southern California. Conserving water will minimize purchases from MWD and contribute to the national need for energy conservation.

**RESPONSE 4.7**

Water conservation measures are provided in Section IV.J.1, Mitigation Measures 1 and 2 on page 402. The project applicant will confer with LADWP and incorporate water conservation features during the design phase of the proposed project.

**COMMENT 4.8**

**WATER CONSERVATION**

The Water System will assist residential, commercial, and industrial customers in their efforts to conserve water. Recommendations listed below are examples of steps which would conserve water in both new and old construction:

1. Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.
2. Reclaimed water should be investigated as a source to irrigate large landscaped areas.

3. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1976, "Good Looking -- Unthirsty," pp. 78-851, or consult a landscape architect.
4. Recirculating hot water systems can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet.
5. Lower-volume water closets and water-saving shower heads must be installed in new construction and when remodeling.
6. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

In addition, the provisions contained in the Water Conservation Ordinance of April 1988 must be adhered to.

More detailed information regarding these and other water conservation measures can be obtained from the Department's Water Conservation Office by calling (213) 367-0944.

#### **RESPONSE 4.8**

Water conservation measures are provided in Section IV.J.1, Mitigation Measures 1 and 2 on page 402. The project applicant will confer with LADWP and incorporate water conservation features during the design phase of the proposed project. The use of reclaimed water is not part of the Project.

#### **COMMENT 4.9**

During the design process, the applicant should consult with the Los Angeles Department of Water and Power, Energy Services Subsection, regarding possible energy conservation measures. The applicant shall incorporate measures which will exceed minimum efficiency standards for Title XXIV of the California Code of Regulations.

- Built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations.
- Install high-efficiency air conditioning controlled by a computerized energy-management system in the office and retail spaces which provides the following.
  - A variable air-volume system which results in minimum energy consumption and avoids hot water energy consumption for terminal reheat;

- A 100-percent outdoor air-economizer cycle to obtain free cooling in appropriate climate zones during dry climatic periods;
- Sequentially staged operation of air-conditioning equipment in accordance with building demands; and
- The isolation of air conditioning to any selected floor or floors.
- Consider the applicability of the use of thermal energy storage to handle cooling loads.
- Cascade ventilation air from high-priority areas before being exhausted, thereby, decreasing the volume of ventilation air required. For example, air could be cascaded from occupied space to corridors and then to mechanical spaces before being exhausted.
- Recycle lighting-system heat for space heating during cool weather. Exhaust lighting-system heat from the buildings, via ceiling plenums, to reduce cooling loads in warm weather.
- Install low and medium static-pressure terminal units and ductwork to reduce energy consumption by air-distribution systems.
- Ensure that buildings are well-sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads. Where applicable, design building entrances with vestibules to restrict infiltration of unconditioned air and exhausting of conditioned air.
- A performance check of the installed space-conditioning system should be completed by the developer/installer prior to issuance of the certificate of occupancy to ensure that energy-efficiency measures incorporated into the project operate as designed.
- Finish exterior walls with light-colored materials and high-emissivity characteristics to reduce cooling loads. Finish interior walls with light-colored materials to reflect more light and, thus, increase lighting efficiency.
- Install thermal insulation in walls and *ceilings* which exceeds requirements established by the California Code of Regulations.
- Design window systems to reduce thermal gain and loss, thus, reducing cooling loads during warm weather and heating loads during cool weather.

- Install heat-reflective draperies on appropriate exposures.
- Install fluorescent and high-intensity-discharge (HID) lamps, which give the highest light output per watt of electricity consumed, wherever possible including all street and parking lot lighting to reduce electricity consumption.
- Install occupant-controlled light switches and thermostats [sic] to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.
- Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
- Control mechanical systems (HVAC and lighting) in the building with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
- Incorporate windowless walls or passive solar inset of windows into the project for appropriate exposures.
- Design project to focus pedestrian activity within sheltered outdoor areas.

For additional information concerning these conservation measures, please contact Mr. Adan Reinoso, Outreach Customer Manager, Business Planning, at (213) 361-1742.

#### **RESPONSE 4.9**

In designing buildings, the developer should consider the following menu of energy conservation measures, as recommended by LADWP for exceeding minimum efficiency standards for Title XXIV of the California Code of Regulations by 5 percent. The selected measures shall become Conditions of Approval.

The applicant shall incorporate measures which will exceed minimum efficiency standards for Title XXIV of the California Code of Regulations by 5 percent.

1. Built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations.
2. Install high-efficiency air conditioning controlled by a computerized energy-management system in the office and retail spaces which provides the following.
  - A variable air-volume system which results in minimum energy consumption and avoids hot water energy consumption for terminal reheat;



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