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November 19, 2015

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CITY OF LOS ANGELES

JAN 21 2016

ENVIRONMENTAL  
UNIT

Mr. Alejandro Huerta, Environmental Analysis Section  
City of Los Angeles, Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Mr. Huerta:

Subject: Initial Study for Crossroads Hollywood Project

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the Crossroads Hollywood Project. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles (City). In reviewing your proposed project description, LADWP has determined that the project may have impacts to water resources as well as water rights and groundwater management. These comments provide references and guidance for the water resources analyses to be conducted in the DEIR for the proposed project:

Water Resources Comments:

1. For estimating a project's indoor water demand, we use applicable sewer generation factors (sgf). Refer to the current factors at link: <http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf>
2. For outdoor (landscape) water demand, we use California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance. Refer to link: <http://www.water.ca.gov/wateruseefficiency/landscapeordinance/>
3. If the proposed project scope includes cooling tower(s), then water demand should also be estimated.
4. The City's water supply and demand projections should be discussed, including the multiple dry years scenario. The most current Urban Water Management Plan

(UWMP), currently 2010 UWMP, can be used for this discussion. Link to 2010 UWMP: <http://www.ladwp.com/docs/QOELLADWP005416>.

5. The latest water conservation codes and ordinances can be obtained from [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-ordinanceandcodes?\\_adf.ctrl-state=3tyeqnxor\\_4&\\_afLoop=490627735098901](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-ordinanceandcodes?_adf.ctrl-state=3tyeqnxor_4&_afLoop=490627735098901), or by visiting [www.ladwp.com](http://www.ladwp.com) and selecting “About Us,” “Water,” “Water Conservation,” and “Ordinance and Codes.”
6. Additionally, applicants are encouraged to implement voluntary water conservation measures beyond those required by codes and ordinances to further reduce water use. The Initial Study should list the project’s voluntary water conservation measures. A few examples of voluntary water conservation measures are waterless urinals, high efficiency clothes washers, cooling tower conductivity controllers or cooling tower pH conductivity controllers, a high percentage of drought tolerant plants of the total landscape area, etc.
7. Discuss the basis for concluding that the City has sufficient water supplies to serve the project. The LADWP works closely with the City’s Department of City Planning to develop and update our UWMP every five years. The UWMP is the planning document for future water demands for the City. The UWMP identifies short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years over a 20-year horizon. The City’s water demand projection in the UWMP was developed based on the Regional Transportation Plan (RTP) demographic projection by the Southern California Association of Governments (SCAG).
  - a. In general, projects that conform to the demographic projection from the RTP by SCAG, and are currently located in the City’s service area, are considered to have been included in LADWP’s water supply planning efforts in the UWMP; therefore, projected water supplies would meet projected demands. For more information, see Section 11.4, *Water Supply Assessments*, of the 2010 UWMP.

#### Water Rights & Groundwater Management

1. IX. Hydrology and Water Quality, paragraph b on pages B-19 to B-20:

Beneficial reuse of dewatering discharge (as an alternative to discharging to the storm drain or sewer), either on or off-site is encouraged as a conservation measure. In addition to water conservation, beneficial reuse may reduce or eliminate costs

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associated with storm drain and sewer permitting and monitoring. Common applications of Beneficial Reuse include, Landscape irrigation, Cooling tower make-up, and Construction (dust control, concrete mixing, soil compaction, etc.)

The property owner will need to be in compliance with certain California groundwater regulations and/or water rights as decreed by California Superior Court. The subject property is located within the Hollywood Basin where the water rights have not been determined by adjudication and Court judgment. California recently enacted the Sustainable Groundwater Management Act (SGMA) in January 2015. A regional groundwater management agency may be formed pursuant to SGMA to manage groundwater in this basin. This management agency may require property owners who discharge groundwater to periodically report their discharge volumes. Fees may also be assessed to groundwater pumpers and dischargers in order to allocate the cost of SGMA compliance, related basin management infrastructure, and groundwater replenishment.

If you have any questions regarding the above comments, please contact Ms. Stephanie Eatinger, of my staff, at (213) 367-0968. Also, please add Ms. Eatinger to your direct mailing list for any future notices regarding this project and others.

Sincerely,

  
Charles C. Holloway  
Manager of Environmental Planning and Assessment

SE:dms

c: Ms. Stephanie Eatinger