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MAJOR PROJECTS
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Alejandro A. Huerta, Environmental Review Coordinator
City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Huerta:

Subject: Comment Letter Regarding Notice of Completion of a Draft Environmental Impact Report for the Crossroads Hollywood Project (ENV-2015-2026-EIR)

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. In reviewing your proposed project description, the LADWP has determined that the project may have impacts to water resources. The following comments reflect our review for matters related to water resources for the project; you may receive additional comments from other divisions at LADWP separately referring to other respective areas in the DEIR.

COMMENTS ON GROUNDWATER

1. IV. Environmental Impact Analysis; E. Geology & Soils; Sections:

- **2.b(3)(b) Groundwater (Page IV. E-13)**
- **3.d Analysis of Project Impacts (Page IV. E-19)**
- **3.d(2) Groundwater (Page IV. E-22)**

Comment:

The historical groundwater level is stated as 70-80 feet bgs (IV.E-13). The geotechnical investigation states that no groundwater was encountered at 70.5 feet bgs (IV.E-19). There is a chance of a changed condition and that construction of the subterranean parking lots may encounter groundwater. If groundwater is encountered and dewatering is required temporarily during construction and/or permanently after construction (IV.E-22), LADWP recommends beneficial reuse of dewatering discharge on or off-site as a conservation measure instead of discharging to the storm drain or sewer. In addition to

water conservation, beneficial reuse may reduce or eliminate costs 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).

The referenced sections are noted below:

“Based on the California Geological Survey, the historic high groundwater level beneath the Project Site is at a depth of approximately 70 to 80 feet below the existing ground surface. As part of the Geotechnical Investigation, no groundwater was encountered at the maximum explored depth of 70.5 feet.” (Page IV.E-13)

“Construction activities would consist of the demolition of the existing surface parking lots and building structures, except for those located in Crossroads of the World, followed by grading and excavation for the subterranean parking garages... The parking garage for Development Parcel A would provide six levels of subterranean parking. Development Parcels B and C would provide five connected/shared levels of subterranean parking underneath the two development parcels and the realigned Las Palmas Avenue, while the parking garage for Development Parcel D would provide three levels of subterranean parking. The maximum depth of excavation would range from 36 to 78 feet below grade surface.” (Page IV.E-19)

“In the event groundwater is encountered during construction of the Project, temporary dewatering or other withdrawals of groundwater could be required within the Project Site. However, as discussed in Section IV.G, Hydrology and Water Quality, of this Draft EIR, if dewatering is required, adherence to applicable National Pollutant Discharge Elimination System (NPDES) Permit and industrial user sewer discharge permit requirements would ensure operation of the temporary dewatering system would have a minimal effect on local groundwater recharge in the vicinity of the Project Site. In addition, a permanent dewatering system during Project operation would result in only minor impacts to the top of the groundwater table and would not affect any supply wells.” (Page IV.E-22)

COMMENTS ON WATER SUPPLY

2. IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. a(3)(b) Sustainable City pLAN (Page IV.M.1-10)

Comment:

Fourth sentence under (b) Sustainable City pLAN: “The pLAN also includes a reduction in imported water purchases from MWD by 50 percent of the total supply by 2035.”

Revise the sentence to:

“The pLAN also includes a reduction in imported water purchases from MWD by 50 percent of the total supply by 2025.”

Also, please include another pLAN goal, to expand all local sources of water to 50 percent of the total water supply by 2035.

3. IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(1)(a) Los Angeles Aqueducts (Page IV.M.1-12)

Comment:

Second paragraph, fourth sentence: “Average deliveries from the LAA system from 2010-2011 through 2014-2015 were approximately 160,461 acre-feet of water annually.”

Table IV.M.1-1 water supply data are in Calendar Year. Also, check the average deliveries from the LAA system from 2011 to 2015. Revise the sentence to the following:

“Average deliveries from the LAA system from Calendar Years 2011 through 2015 were approximately 135,643 acre-feet of water annually.”

4. IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(1)(a) Los Angeles Aqueducts (Page IV.M.1-13)

Comment:

In Table IV.M.1-1, revise “Fiscal Year” to “Calendar Year”.

5. IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(1)(a) Groundwater (Page IV.M.1-14)

Comment:

Third full paragraph, first sentence: “As shown in Table IV.M.1-2 on page IV.M.1-15, during the 2014-2015 water year (October through September),...”

Table IV.M.1-2 is in Fiscal Year. Revise the sentence to:

“As shown in Table IV.M.1-2 on page IV.M.1-15, during the 2014-2015 fiscal year (July through June),...”

6. IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(1)(b) Groundwater (Page IV.M.1-14, 15)

Comment:

Last paragraph on Page IV.M.1-14: “Furthermore, basin management is achieved by collective efforts of a court-appointed Watermaster and the Upper Los Angeles River Area (ULARA) Administrative Basins.”

As shown on page 6-3 of 2015 LADWP UWMP, revise the sentence to:

“Furthermore, basin management is achieved by collective efforts of a court-appointed Watermaster and the Upper Los Angeles River Area (ULARA) Administrative Committee.”

7. IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(1)(c) Metropolitan Water District of Southern California (MWD) (Page IV.M.1-15, 16)

Comment:

Second paragraph, second sentence: “The Sustainable City pLAN calls for a reduction in purchased imported water by 50 percent by 2025 from the Fiscal Year 2014-2015,…”

Revise the sentence to:

“The Sustainable City pLAN calls for a reduction in purchased imported water by 50 percent by 2025 from the Fiscal Year 2013-2014,…”

8. IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(1)(c)(i) State Water Project (Page IV.M.1-17)

Comment:

First paragraph and footnote 22: We recommend updating the current allocation to 85 percent per Notice to State Water Project Contractors, Number 17-05, released on April 14, 2017.

9. IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(1)(c)(iii) Additional MWD Actions to Address Supply (Page IV.M.1-21)

Comment:

Second full paragraph: “MWD also has more than 5 million acre-feet of storage capacity of available reservoirs and banking/transfer programs, with approximately 1.21 million acre-feet, inclusive of Intentionally Created Surplus, in that storage, and 626,000 acre-feet in emergency storage as of January 2015. MWD has plans to increase storage capacity in 2016, and the end-of-year 2016 storage balances are estimated to be 1.1 to 1.5 million acre-feet depending on State Water Project and Colorado River Aqueduct supply conditions…”

We recommend updating the above information to the following:

“MWD also has more than 5 million acre-feet of storage capacity of available reservoirs and banking/transfer programs, with approximately 1.25 million acre-feet, inclusive of Intentionally Created Surplus, in that storage, and 626,000 acre-feet in emergency storage as of January 2017. MWD has plans to increase storage capacity in 2017, and the end-of-year 2017 storage balances are estimated to be 2.0 to 2.2 million acre-feet depending on State Water Project and Colorado River Aqueduct supply conditions.”

10.IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(1)(d) Precipitation Conditions (Page IV.M.1-21)

Comment:

Second sentence under (d) Precipitation Conditions: “The impact of four years of drought conditions cannot be mitigated with average rainfall in one year.”

We recommend revising the sentence to the following:

“The impact of five years of drought conditions cannot be mitigated with average rainfall in one year.”

Also, we recommend updating the information in section (d) Precipitation Conditions to include improved precipitation conditions and termination of the January 17, 2014 Drought State Emergency per Executive Order B-40-17.

11.IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(1)(f) Water Conservation and Recycling (Page IV.M.1-23)

Comment:

Footnote 36: Check to see if the referenced source should be revised from California DWR *Water Conditions Update, June 2016* to *2015 LADWP UWMP*.

12.IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 2. b(2)(a) LADWP Water Demand (Page IV.M.1-23)

Comment:

Third full paragraph, first sentence: “As discussed in more detail in the Project’s WSA, at the end of May 2016, the City’s per capita potable water consumption has been reduced to 104 gallons per capita,…”

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Revise the sentence to:

“As discussed in more detail in the Project’s WSA, at the end of May 2016, the City’s per capita potable water consumption has been reduced to 104 gallons per capita per day,…”

13.IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 3. c Project Design Feature M.1-1 (Page IV.M.1-28)

Comment:

Note that some of the voluntary water conservation measures listed on page IVM.1-28 have been superseded by more stringent codes, such Ordinance 184248.

14.IV. Environmental Impact Analysis; M.1. Utilities and Service Systems – Water Supply and Infrastructure; 3. d(1)(b) Operation (Page IV.M.1-31)

Comment:

Table IV.M.1-4: Revise the Cooling Tower quantity from 5,760 sf to 5,760 tons.

For any questions regarding the above comments, please contact Ms. Nadia Parker of my staff at (213) 367-1745 or at nadia.parker@ladwp.com.

Sincerely,



Charles C. Holloway
Manager of Environmental Planning and Assessment

BG:rc
c: Nadia Parker