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**APPENDIX B**  
**RESPONSE COMMENTS**

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**COMMENT LETTER 1**

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**METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA**



**MWD**  
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

May 10, 2001

Ms. Kathy Stevens  
21865 E. Copley Drive  
Diamond Bar, California 91765

Dear Ms. Stevens:

Notice of Preparation of a Draft Environmental Impact Report for the  
Proposed Installation of a Combined Cycle Generating Facility at the LADWP Valley Generating  
Station

The Metropolitan Water District of Southern California (Metropolitan) has received a Notice of Preparation (Notice) of a Draft Environmental Impact Report for the proposed installation of a combined cycle generating facility at the LADWP Valley Generating Station in the City of Los Angeles (City). The proposed project would consist of the installation of a new combined cycle generating facility (CCGF) at an existing generating station, which will replace four existing utility boilers. The new CCGF will include two combustion gas turbines (CTs), a new steam turbine generator, two heat recovery steam generators (HRSGs) and associated selective catalytic reduction (SCR) air pollution control equipment, cooling towers, and ancillary equipment. This letter contains our response as a potentially affected public agency.

Our review of the Notice indicates that Metropolitan's East Valley Feeder is in the area of the proposed project. The enclosed map shows this facility in relation to the proposed project. It will be necessary for LADWP to consider this facility in its project planning.

1-1

In order to avoid potential conflicts with Metropolitan's rights-of-way, we request that any preliminary engineering design drawings or improvement plans for any activity in the area of Metropolitan's pipelines and rights-of-way be submitted for our review and written approval. You may obtain detailed prints of drawings of Metropolitan's pipelines and rights-of-way by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist you in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

1-2

**COMMENT LETTER 1: METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA**

**Response 1-1:** At this time, LADWP does not propose constructing any offsite improvements in association with the VGS project. If offsite improvements occur in association with the VGS project in the area of the Metropolitan East Valley Feeder or other Metropolitan pipelines or right-of-ways, LADWP will provide the Metropolitan Water with appropriate documentation in order to evaluate potential conflicts with the District's infrastructure.

**Response 1-2:** As stated above, LADWP does not propose, at this time, to construct any offsite improvements in association with the VGS project. If LADWP's plans change in the future such that offsite improvements are proposed in the area of Metropolitan's pipelines and rights-of-way, LADWP will submit the appropriate preliminary engineering drawings or plans for Metropolitan's review and approval. LADWP appreciates Metropolitan providing their guidelines to assist LADWP in preparing plans that are compatible with Metropolitan's facilities and easements in case this becomes necessary in the future.

**COMMENT LETTER 2**

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**DEPARTMENT OF TRANSPORTATION**

**DEPARTMENT OF TRANSPORTATION**  
OFFICE OF ADVANCE PLANNING  
DISTRICT 7, IGR OFFICE 1-11B  
120 SOUTH SPRING STREET  
LOS ANGELES, CA 90012  
TEL: (213) 897-6536 ATSS: 8-647-6536  
FAX: (213) 897-8906



Mr. Steve Smith, PHD  
South Coast Air Quality Management District  
21865 East Copley Drive  
Diamond Bar, CA. 91765-4182

RE: IGR/CEQA #010549 NY  
Install Combined Cycle Generating Facility  
Vic. LA / 5/35.94

May 18, 2001

Dear Mr. Smith :

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Installation of Combined Cycle Generating Facility at the LADWP Valley Generating Facility.

We would like to remind you that any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods.

2-1  
2-2

If you have any questions regarding this response, you can reach me at (213) 897-4429 and refer to IGR/CEQA No. 010549NY.

Sincerely,

STEPHEN J. BUSWELL  
IGR/CEQA Program Manager  
Transportation Planning Office  
Caltrans, District 7

**COMMENT LETTER 2: DEPARTMENT OF TRANSPORTATION**

**Response 2-1:** LADWP will obtain a Caltrans transportation permit for the transportation of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways.

**Response 2-2:** Section 4.7 of the EIR discusses Transportation/Traffic impacts. The evaluation concluded that the proposed project would not cause significant traffic impacts. The evaluation also indicates that because most truck traffic would be materials deliveries, the truck trips likely would be spread through out the day, with few trips during peak hours.

COMMENT LETTER 3

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SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS



SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

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Inspectional Comptroller: Hank Kujala, Imperial County • David O'Brien, B. Camo

Los Angeles County: Yvonne Bradshaw Bush, Los Angeles County • Zev Wassilovsky, Los Angeles County • Zilma Anzures, Diamond Bar • Bob Barakat, Lancaster • Bruce Barrows, Cudahy • George Bak, Bell • Hal Barson, Los Angeles • Chris Castellanos, Covina • Robert Branch, Rosemead • Emma Clark, Los Angeles • Greg Daniels, Pomona • Denise Dancy, San Costa • John Ferris, Los Angeles • Michael Boez, Los Angeles • Paul Gaudier, Los Angeles • Ray Gonzalez, Long Beach • Don Hamilton, Orange • Mike Hernandez, Los Angeles • Mark Holman, Los Angeles • Luciano Hildey, Inglewood • Tom McCarty, Downey • Cindy Mittlewirth, Los Angeles • Stevie Murphy, Burbank • Jim O'Connor, Santa Monica • Matt Peterson, Los Angeles • Alan Rella, Los Angeles • Beverly Poon, Red Arrow • Mark Ridley-Thomas, Los Angeles • Richard Rodan, Los Angeles • Karen Rosenthal, Claremont • Marlene Sano, Compton • Betty Fontana, Los Angeles • Paul Rubin, Anaheim • Wilsey Tule, N. Pomona • Joe Walsh, Los Angeles • Rita Walker, Los Angeles • Dennis Wallburn, Calhoun • Rob Webb, Long Beach

Orange County: Charles Smith, Orange County • Joe Nunez, Los Alamitos • Kapil Bawa, Fullerton • Brad • Ann Brown, Buena Park • Elizabeth Cowan, Costa Mesa • Calhoun DeYoung, Laguna Hills • Richard Dixon, Lake Forest • Alan Duke, La Habra • Shirley MacCracken, Azusa • Bev Perry, San

Northridge County: Bob Brant, Riverside County • Ron Lovingside, Riverside • Greg Puck, Cathedral City • Andrea Togg, Carlsbad • Ron Bowen, Thousand Oaks • Charles Wina, Miramar Valley

San Bernardino County: Jon Miran, San Bernardino County • Bill Alexander, San Dimas • Jim Bagley, Fontana • David Robinson, Fontana • Joe Alan Garcia, Grand Terrace • Owen Hanson-Perry, Clare Hills • Judith Viles, San Bernardino

Ventura County: Judy DeBelle, Ventura County • Donna De Rose, San Buenaventura • Gina Brown, Santa Valley • Thel Young, Port Puceros

Riverside County: Transportation Commissioner: Robb Lowe, Hemet

Ventura County: Transportation Commissioner: Bill Davis, Santa Valley

May 21, 2001

Ms. Kathy C. Stevens  
CEQA Section  
Planning, Rules and Area Sources  
South Coast Air Quality Management District  
21865 E. Copely Drive  
Diamond Bar, CA 91765-4182

RE: Comments on the Notice of Preparation for a Draft Environmental Impact Report for the LADWP Valley Generating Station - SCAG No. 1 20010238

Dear Ms. Stevens:

Thank you for submitting the Notice of Preparation for a Draft Environmental Impact Report for the LADWP Valley Generating Station to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies in reviewing projects and plans for consistency with regional plans.

In addition, The California Environmental Quality Act requires that EIR's discuss any inconsistencies between the proposed project and the applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

Policies of SCAG's Regional Comprehensive Plan and Guide, which may be applicable to your project, are outlined in the attachment. We expect the Draft EIR to specifically cite the appropriate SCAG policies and address the manner in which the Project is consistent with applicable core policies or supportive of applicable ancillary policies. Please use our policy numbers to refer to them in your Draft EIR. Also, we would encourage you to use a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the policy with the Proposed Project.

Please provide a minimum of 45 days for SCAG to review the Draft EIR when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP  
Senior Planner  
Intergovernmental Review

3-1

COMMENTS ON THE PROPOSAL TO DEVELOP A  
DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE  
LADWP VALLEY GENERATING STATION  
SCAG NO. I 20010238

PROJECT DESCRIPTION

The proposed Project considers the installation of a new combined cycle generating facility (CCGF) at an existing generating facility, which will replace four existing utility boilers. The new CCGF will also include two combustion gas turbines, a new steam turbine generator, two heat recovery steam generators and associated selective catalytic reduction air pollution equipment, cooling towers and ancillary equipment.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR/EIS for the Project:

3-2

*3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

The **Regional Transportation Plan (RTP)** also has policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant policies and actions of the RTP are the following:

3-3

Core Regional Transportation Plan Policies

*4.02 Transportation investments shall mitigate environmental impacts to an acceptable level.*

*4.04 Transportation Control Measures shall be a priority.*

*4.16 Maintaining and operating the existing transportation system will be a priority over expanding capacity.*

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING**

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

3-4

- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*
- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE**

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

3-5

- 3.18 *Encourage planned development in locations least likely to cause adverse environmental impacts.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resource, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

**AIR QUALITY CHAPTER CORE ACTIONS**

The **Air Quality Chapter** core actions related to the proposed project includes:

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*
- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

3-6

**WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS**

The **Water Quality Chapter** core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

3-7

- 11.07 *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

**CONCLUSIONS**

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

3-8

### COMMENT 3: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

**Response 3-1:** The SCAQMD appreciates SCAG's comment on the LADWP VGS. The VGS project involves the refurbishment of an existing power generating facility at an existing site. The VGS project EIR evaluates project impacts associated with regional and local plans and policies.

LADWP is proposing modifications to the VGS, which is located in the South Coast Air Quality Basin, in order to help LADWP comply with its annual RECLAIM Allocations for future years, improve in-Basin power reliability, and participate in the California Independent System Operator. Regulation XX - RECLAIM, is an alternative regulatory program designed and adopted by the SCAQMD's Governing Board on October 15, 1993 to reduce NO<sub>x</sub> and sulfur dioxides (SO<sub>2</sub>) emissions (collectively known as oxides of sulfur or SO<sub>x</sub>) from stationary sources in the Basin while lowering the cost of attaining clean air through the use of market incentives. Facilities such as the VGS are required to comply with these emission reduction requirements. Projects performed in order to comply with SCAQMD rules and regulations are considered consistent with the Air Quality Management Plan (AQMP). Because the project is proposed in order to comply with Regulation XX, it is consistent with the AQMP.

**Response 3-2:** As discussed in EIR Section 4.9.2, the proposed project is not expected to have any significant growth-inducing impacts.

**Response 3-3:** The proposed project will involve installing new, more efficient power generating equipment to replace old generating equipment at an existing electric generating facility. It is expected to lead to an overall decrease in nitrogen oxides emissions. Thus, although the project involves no significant transportation elements, it is consistent with the transportation-related goal of enhancing the environment.

**Response 3-4:** As discussed in EIR Section 2.1, the objectives of the proposed project include improving in-Basin power reliability and supporting LADWP's participation in Cal-ISO by supplying excess electrical power during peak electricity demand periods, thereby decreasing the risk of blackouts in the state. The proposed project also will have minimal impacts on public services and infrastructure. Both of the above characteristics of the proposed project support the goal of improving the regional standard of living.

**Response 3-5:** The proposed project will assist LA DWP in complying with SCAQMD regulations and will reduce overall nitrogen oxides emissions, thus supporting clean air goals. By upgrading an existing power generating facility, it avoids converting new land areas to industrial uses and potential impacts. By utilizing new, more efficient equipment, structures and technology, it will minimize noise, exposure to seismic hazards, etc., compared to the old equipment that will be replaced.

**Response 3-6:** EIR Sections 3.2 and 4.2 address the air quality setting and the proposed project's air quality impacts. The project is undergoing a full CEQA review, as demonstrated by the EIR itself. Thus, the proposed project is consistent with the core elements of the Air Quality chapter of the Regional Comprehensive Plan and Guide (RCPG).

**Response 3-7:** As discussed in EIR Section 4.5, the proposed project is not expected to generate significant impacts on water supply or water quality. Thus, the project is consistent with regional water quality goals.

**Response 3-8:** The EIR identifies feasible measures to mitigate the identified potential adverse impacts of the proposed project.

**COMMENT LETTER 4**

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**CITY OF LOS ANGELES FIRE DEPARTMENT**

CITY OF LOS ANGELES  
INTER-DEPARTMENTAL CORRESPONDENCE

June 8, 2001

TO: South Coast Air Quality Management District  
Attn: Ms. Kathy C. Stevens

FROM: Fire Department

SUBJECT: PROPOSED INSTALLATION OF A  
COMBINED CYCLE GENERATING FACILITY

PROJECT LOCATION

LADWP Valley Generating Station

PROJECT DESCRIPTION

The LADWP is proposing to install a new combined cycle generating facility (CCGF) at an existing generating station, which will replace four existing utility boilers. The new CCGF will include two combustion gas turbines (CTs), a new steam turbine generator, two heat recovery steam generators (HRSGs) and associated selective catalytic reduction (SCR) air pollution control equipment, cooling towers and ancillary equipment. The Initial Study concludes that adverse impacts may occur in the following environmental areas: air quality, geology/soils, hazards/hazardous materials, hydrology/water quality, noise, and transportation/traffic. Potential adverse impacts to these environmental areas will be further evaluated in the Draft EIR.

The following comments are furnished in response to your request for this Department to review the proposed development:

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

4-1

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low Density Residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 6,000 to 9,000 G.P.M. from 4 to 6 fire hydrants flowing simultaneously.



B. Response Distance

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 77  
8943 Glenoaks Boulevard  
Sun Valley, CA 91352  
Paramedic Engine Company  
Staff - 4  
Miles - 2.0

Fire Station No. 98  
13035 Van Nuys Boulevard  
Pacoima, CA 91331  
Task Force and Engine Company  
Paramedic Rescue Ambulance  
Staff - 12  
Miles - 2.6

Fire Station No. 89  
7063 Laurel Cyn. Boulevard  
North Hollywood, CA 91605  
Fire Station No. 89  
7063 Laurel Cyn. Boulevard  
North Hollywood, CA 91605  
Staff - 12  
Miles - 2.9

The above distances were computed to 11801 W. Sheldon Street.

Based on these criteria (response distance from existing fire stations), fire protection would be considered inadequate.

C. Firefighting Access, Apparatus, and Personnel.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department.

Businesses that intend to handle hazardous materials may have to participate in the Unified Hazardous Waste and Hazardous Materials Management Program (Unified Program). Businesses are required to register with the Fire Department and complete

a hazardous materials inventory if they handle hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases; or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR parts 30, 40 or 70. Businesses that operate underground storage tanks must apply for permits to install, modify, abandon or operate those tanks. Businesses that generate, treat, recycle or otherwise handle hazardous waste must register with the Unified Program Agency and receive a permit for these activities.

4-3  
cont.

Businesses that intend to handle regulated substances (previously called extremely hazardous substances) which are listed in Section 2770.5 of the California Code of Regulations (CCR) Title 19, Division 2, Chapter 4.5 may be required to participate in the California Accidental Release-prevention Program (CalARP). These businesses shall notify the Fire Department's Unified Program Agency in writing of their inclusion into the program.

Risk Management Plans involve all administrative and operational procedures of a business which are designed to prevent the accident risk of regulated substances, including, but not limited to programs which include design safety of new and existing equipment, standard operating procedures, preventative maintenance programs, operator training and accident investigation procedures, risk assessment for unit operations or operating alternatives, emergency response planning, and internal or external audit procedures to ensure that these programs are being executed as planned. Refer to CCR Title 19, Division 2, Chapter 4.5 and Federal regulations 40 CFR Part 68: "Chemical Accidental Prevention Provisions" for further information and requirements regarding this program. If a business is required to submit a Risk Management Plan, the plan shall be submitted to the Fire Department prior to the facility beginning operation.

4-4

For additional information regarding the Unified Program, please contact the Technical Section of the Fire Department at (213) 485-8080

4-5

In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems will be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07.

4-6

Submit plot plans indicating access road and turning area for Fire Department approval.

4-7

Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

4-7  
cont.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

A valid Division 5 Fire Department permit is required prior to installation for Atmosphering tanks exceeding 60 gallons containing Hazardous materials and private fire hydrant systems.

4-8

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708).

4-9

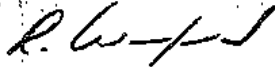
CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

4-10

For additional information, please contact Inspector Joseph Jackson of the Construction Services Unit at (213) 485-5964.

WILLIAM R. BAMATTRE  
Fire Chief



Richard A. Warford, Assistant Fire Marshal  
Bureau of Fire Prevention and Public Safety

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#### **COMMENT 4: CITY OF LOS ANGELES FIRE DEPARTMENT**

**Response 4-1:** The proposed project involves upgrades to an existing facility and will comply with the applicable fire flow requirements.

**Response 4-2:** The proposed project would involve replacing old power generating equipment with new, more efficient power generating equipment. The project was addressed in an Initial Study released in May 2001. At that time, fire protection, was not identified as a potential significant adverse impact because the project would occur within an existing power generating facility. It would not represent a modification of demand for fire services or a modification in current response times to the VGS. However, SCAQMD appreciates the Fire Department's concern regarding inadequate response distance, and will take appropriate measures to mitigate this concern (see Response 4-5 below)..

**Response 4-3:** The proposed project will comply with Fire Department requirements with respect to fire hydrants, private streets and entry gates that may be required for the project. As discussed in EIR Section 4.4, the proposed project will comply with applicable requirements for inventorying hazardous materials and other aspects of risk management and compliance with Fire Department and Cal-ARP requirements.

**Response 4-4:** As discussed in Section 4.4, LA DWP will update the VGS Risk Management Plan and conduct other safety reviews, analyses, training, etc. to ensure the safe handling of hazardous materials associated with the proposed project.

**Response 4-5:** The proposed project will include sprinkler systems throughout any structure to be built, in order to address the Fire department's concern concerning the inadequacy in fire protection because of response distance.

**Response 4-6:** As required, LADWP will submit for Fire department approval plot plans for the proposed project showing access road and turning area.

**Response 4-7:** In implementing the proposed project, LADWP will comply with Fire Department requirements concerning fire lanes, dead end streets, turning areas, and access into structures for Fire Department personnel and equipment.

**Response 4-8:** In implementing the proposed project, LADWP will comply with Fire Department permit requirements for installing tanks that contain hazardous materials and private fire hydrant systems.

**Response 4-9 and Response 4-10 (same comment):** The proposed project will comply with all applicable State and local codes and ordinances and with the applicable fire protection, prevention and safety guidelines contained in elements of the General Plan of the City of Los Angeles.

**Response 4-9 and Response 4-10 (continued):** The SCAQMD appreciates the City of Los Angeles Fire Department's comment and recognizes the fire department's conclusion. The proposed project will comply with all applicable State and local codes and ordinances and the guidelines found in the Fire Protection and Fire Prevention Plan and Safety Plan.