

## Communication from Public

**Name:** Jonathan Lonner  
**Date Submitted:** 05/12/2025 05:10 PM  
**Council File No:** 25-0159-S1  
**Comments for Public Posting:** Errata to Communication dated 5-08-25- Eyestone Environmental Memorandum



CONSULTING ENGINEERS/SURVEYORS/PLANNERS

---

November 13, 2024

Mr. W. Paul Hogge  
Hines  
12101 Olympic Boulevard – Suite 200  
Los Angeles, California 90064

To Whom It May Concern:

KHR Associates was pleased to prepare the Water Utility Technical Report for Violet Street Tower in Los Angeles, California dated May 27, 2022 and revised October 27, 2022 (Water Utility Technical Report), under my supervision. The Water Utility Technical Report and its appendices were included as Appendix K to the Violet Street Creative Office Campus Project EIR.

We have reviewed correspondence from Mr. Robert E. Burt, P.E. dated November 12, 2024 in which he indicates, in summary, that there is no evidence provided (1) “indicating that the Project’s existing infrastructure can provide 12,000 GPM of fire flow”, nor (2) “confirming that 400 feet of infrastructure improvement to achieve 12,000 GPM of fire flow (an additional 550 GPM for the Project [above existing fire flow supply]).”

Mr. Burt’s first statement (i.e., indicating that the existing infrastructure is not adequate to provide the required fire flow, and implicitly indicating that certain water system upgrades will be required to provide the 12,000 GPM of fire flow required by the City of Los Angeles) is correct. This analysis and conclusion was clearly disclosed and analyzed in the Water Utility Technical Report. For example, the Executive Summary provides that:

*“Based on the IFFAR and SAR results, LADWP indicated that a water main upgrade would be required on 7<sup>th</sup> Place. According to additional simulations performed by LADWP and a cost estimate prepared by LADWP, 400 feet of water main in 7<sup>th</sup> Place would be required to be upgraded to a 12-inch water main. While upgrading the water main in 7<sup>th</sup> Place would result in short-term construction-related impacts to surrounding uses, the improvements would ultimately provide a long-term post-construction benefit by improving the flow, pressure, and capacity of the municipal water system in the vicinity of the project.”*

This was further detailed in the Water Utility Technical Report, including on pages 4-5, and 7-8, as well as in Appendices A, B, C and E to the Water Utility Technical Report.

Mr. Burt's second statement (i.e., indicating that there is no evidence provided to confirm that 400 feet of infrastructure improvement would achieve 12,000 GPM of fire flow) is not correct.

In preparing the Water Utility Technical Report, KHR Associates followed our ordinary professional practice, which we have applied to dozens of similar projects in the City of Los Angeles. In accordance with that well-established practice, KHR Associates took the following steps:

- In April of 2022, we submitted Information of Fire Flow Availability Requests (IFFAR) and Service Advisory Requests (SAR) to the Los Angeles Department of Water and Power (LADWP). In accordance with LADWP's information requirements, the IFFAR indicated that "12,000 GPM available to any block from 8 fire hydrants flowing simultaneously" was required by the Los Angeles Fire Department. These documents were included as Appendix A and Appendix B to the Water Utility Technical Report.
- LADWP provided Information of Fire Flow Availability results dated April 26, 2022 and Service Advisory Requests dated May 11, 2022. Together, these indicated that a water main upgrade would be required on 7<sup>th</sup> Place, which in our professional judgment was likely due to the fact that the existing fire hydrant at that location is nearly at the end of the existing 8" main, which is not looped, and would need to be increased.
- In August 2022 Jennifer Pierce at KHR Associates spoke with David Thi at LADWP, and sent a follow-up email (dated August 19, 2022) to Amy Kurakusu at LADWP asking for LADWP to work with the LADWP New Business Division to determine the required water main upgrades.
- On August 22, 2022 the LADWP New Business Division sent a resulting email confirming that this request has been submitted, including an acknowledgement that LADWP would provide a cost estimate and that "Amy and David currently working on request" to "have additional simulations performed to determine water main upgrade requirements."
- The LADWP cost letter identifying specific water main upgrades and associated costs were provided to KHR Associates approximately 30 days later, on September 21, 2022. These documents were included as Appendix E to the Water Utility Technical Report.

In our professional judgment and decades' long experience working with the City of Los Angeles and the LADWP in their process to determine what water system upgrades are necessary to provide the LA Fire Department's required fire flow to new development projects, this practice and the resulting correspondence provides reliable evidence to

confirm that the water main infrastructure improvements identified in the Water Utility Technical Report will be sufficient to achieve the required LA Fire Department fire flow requirements for this project.

The statements in Mr. Burt's letter that additional infrastructure would be required are speculative and are not supported by KHR Associates' correspondence with the LADWP.

Sincerely,

**KHR Associates**

A handwritten signature in black ink, reading "James H. Kawamura". The signature is fluid and cursive, with a large initial "J" and "K".

James H. Kawamura, P.E.  
President/CEO