

February 20, 2018

The Honorable Kathryn Barger, Fifth District
County of Los Angeles Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisor Barger:

WATER AGENCY COMMENTS ON LOS ANGELES COUNTY SAFE, CLEAN WATER PLAN

Thank you for the opportunity to provide input on the County's Safe, Clean Water Plan and for including water agency representatives on the Stakeholder Advisory Committee.

We recognize the potential role of stormwater capture as part of a more comprehensive strategy to improve water quality, water supply reliability and drought preparedness for Los Angeles County residents. In addition, we applaud the County's efforts to develop a framework for multi-benefit projects that will improve water quality, increase water supply and enhance communities. We believe a carefully planned, well-balanced, multi-benefit approach could achieve your stated objectives and would like to offer our collective experience and knowledge as public water supply managers to assist in your planning.

To support success of the program, we offer the following comments:

- 1. Ensure the characterization of the program's anticipated water supply benefits is realistic and achievable.**

To maintain credibility and the trust of County residents, businesses, and taxpayers, it is essential to accurately characterize the anticipated water supply benefits of the program. In our experience, the public has been most supportive of new water quality and water supply investments when they have a clear understanding of the costs and benefits. The program materials note that over 107 billion gallons of water was lost during last year's rainstorms and that Los Angeles County Flood Control District (LACFCD) could potentially double or triple the amount of rainfall it currently captures. Given that LACFCD achieves approximately 80% of its annual average recharge capacity through 10 major facilities, it is unlikely that the program's comparatively smaller, distributed stormwater capture projects could double, much less triple, the capacity. Furthermore, there are many areas throughout the County where water supply augmentation through stormwater capture and infiltration into groundwater basins is not feasible due to local geology, existing contamination, or project location upstream of existing percolation facilities.

We recommend revisiting the program's potential water supply benefit figures and providing more realistic and achievable estimates. The comparative costs and benefits of alternative investment opportunities would also be useful to help guide an investment strategy that can yield the highest benefits for the least cost. This does not mean that only the least expensive options should be chosen for investment. Multi-benefit options

that can be sustained under potentially variable climate conditions could merit higher priority.

2. Provide sufficient flexibility for the watershed-based regional program to fund projects that result in meaningful water supply benefits.

The watershed-based regional program, which would constitute 50% of the total funding, should provide additional flexibility to fund a broader range of projects that would maximize the potential increases to water supply. As written, the definitions included in the draft program framework could unnecessarily limit the types of projects that would meet the threshold eligibility criteria. Enclosed is a document with our suggested refinements to the definitions. These proposed changes would allow funding for projects such as those involving the diversion of urban runoff or stormwater to the sanitary sewer system for subsequent water recycling.

Another investment opportunity could be increased water conservation. We have seen great progress in reducing water supply demand as a result of our public education and incentive programs. For the purposes of your planning, it would be important to recognize that these positive results include reduced flow into the existing sanitary system creating more capacity in that system to accept and treat dry weather flows from streets and yards, as well as some wet weather flows. This means more opportunity to cost effectively manage significant flows regulated by the Regional Water Quality Control Board's MS4 Order. The result could be less cost for cities struggling to find ways to pay for their MS4 compliance.

It is also well known that a major contributor to dry weather flows is over watering of landscape at homes, businesses, public parks, schools, and street medians. Coordinated investments in converting these properties to more efficient watering systems and/or drought tolerant landscapes can continue to directly reduce unwanted stormwater flow and contamination. All of these types of investments with measurable cost, water quality, and water supply benefits should be included as part of your Safe, Clean Water Plan. We stand ready to help provide information, and to assist County staff to integrate the available data into your planning process.

3. Develop metrics to prioritize projects that result in the greatest combination of water supply and water quality benefits.

Metrics should be developed to support an objective process to prioritize projects that result in the greatest combination of water supply and water quality benefits. To the extent possible, the metrics should be quantitative and recognize the cost of providing the desired benefits. For water supply benefit, the quantity of additional water supply and cost per acre-foot would be valuable metrics.

4. Establish a governance structure similar to that utilized for administering the Greater Los Angeles County Integrated Regional Water Management Plan.

For governance of the proposed regional program, we recommend a watershed-based model similar to that utilized to administer the Greater Los Angeles County Integrated Regional Water Management Plan (IRWMP). The Greater Los Angeles County IRWMP

governance system consists of a Leadership Committee that is chaired by LACFCD with sub-regional representation from each watershed and representatives for five water management focus areas: groundwater, open space, sanitation, stormwater and surface water (see enclosed organizational structure).

We appreciate your consideration of our comments and look forward to continuing to provide input through the Stakeholder Advisory Committee.

Sincerely,



Kevin P. Hunt
General Manager
Central Basin MWD



David Pedersen
General Manager
Las Virgenes MWD



Fernando Paludi, P.E.
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General Manager
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Enclosures

Cc: Chris Perry, LA County, Fifth District
Mark Pestrella, LA County Department of Public Works
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SAFE, CLEAN WATER PLAN

WATER AGENCY PROPOSED REVISIONS TO DEFINITIONS

(proposed revisions shown in red text)

WATER QUALITY: Improvement in the chemical, physical, and biological characteristics of stormwater and urban runoff and/or protection of these characteristics in surface waters, rivers, lakes, streams and the marine environment. Activities resulting in this benefit include:

- (1) infiltration or treatment of stormwater runoff
- (2) nonpoint source pollution control
- (3) reduction of urban runoff through water use efficiency improvements
- (4) diversion of urban runoff or stormwater to sanitary sewer system

WATER SUPPLY: Increase in the amount of locally available water. Activities resulting in this benefit include the following provided there is a nexus to stormwater capture or urban runoff for:

- (1) Reuse
- (2) Water Recycling
- (3) Increased groundwater replenishment, storage ~~or~~ available yield
- (4) Water use efficiency improvements

Mark Pestrella
Chair
Los Angeles County Flood Control District
(Alternate: Gary Hildebrand)

SUB-REGIONAL REPRESENTATION

LOWER SAN GABRIEL AND LOS ANGELES

Chris Cash
Chair
Gateway Water Management
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(Alternate: Grace Kast)

Robb Whitaker
Vice-Chair
Water Replenishment District
(Alternate: Esther Rojas)

NORTH SANTA MONICA BAY

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(Alternate: Neal Shapiro)

UPPER LOS ANGELES RIVER

Martin Adams
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City of Los Angeles
Department of Water and Power
(Alternate: David Pettijohn)

Wendy Ramallo
Vice-Chair
Council for Watershed Health
(Alternate: None)

UPPER SAN GABRIEL RIVER AND RIO HONDO

Kelly Gardner
Chair
Main San Gabriel Basin
Watermaster
(Alternate: None)

Ken Manning
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