

Douglas E. Feay-Retired Engineering Geologist California
Regional Water Quality Control Board

10330 Eldora Ave. Sunland CA 91040

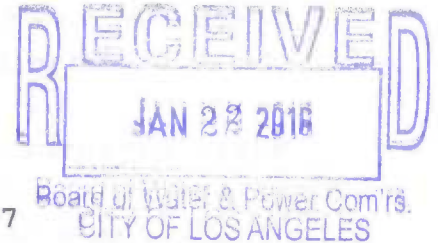


15-1543

PROTEST

January 5, 2016

Los Angeles Department of Water and Power
111 N. Hope Street, Los Angeles, CA 90012-2607



Protest-LADWP Proposed Water Rate Restructure and Increases

In the letter date December 2015 LADWP stated that rate increases would provide needed funding for investing in needed infrastructure for providing reliable water supply and encouraging conservation and expanding local water supply projects and meeting regulatory mandates.

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It is my opinion, based on my experience regulating LADWP operations in the Owens Valley (see Owens Valley Operations below) that an increase in funding from tax payers will not produce the desired effects LADWP is looking for if there is no change in the way LADWP is currently operated. Below I have listed several recommendations that need to be implemented before any more tax payer money is given to LADWP.

LADWP Owens Valley Operations

During the month of July of 2004 I wrote an Administrative Civil Liability (ACL) for a maximum liability of 1,105,330.00 dollars. The ACL was issued to LADWP due to a sewage spill of 843,000 gallons of sewage from the Independence Waste



Treatment Facility which LADWP owns and operates. A day of maintenance and adequate field supervision would have prevented the sewage spill. I have attached the first page of the ACL for your reference.

While performing a joint inspection with California Fish and Game during 2006 we discovered equipment operators with LADWP digging up McGee creek. They had dug a hole 50 feet long and over 6 feet deep in the creek. Their job was to clean debris from the weir station. They were unsupervised and had no maintenance plan or training. The ACL for this violation was given to our Tahoe office to be filed jointly with Fish and Game. Maximum liability for this violation could be as high as 500,000.00 dollars.

While inspecting the Grant Lake Canal I observed an LADWP worker throw a portable generator into the canal. His supervisor was 4 miles to the east and this left the worker unsupervised. At my request the supervisor removed the generator from the canal and cleaned up the oil and gas slick. After many more incidents like this I requested LADWP e-mail me the weekly maintenance schedule for Owens Valley. I informed LADWP I would be making unannounced inspections of maintenance in the Owens Valley.

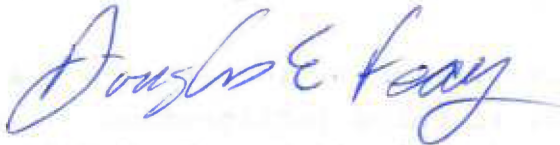
Recommendations

1. LADWP needs to greatly improve maintenance procedures and training procedures in both Owens Valley and Los Angeles operations. This improvement would free up millions of dollars that could be used for infrastructure improvements.

6. In reviewing the proposed rate changes I found no provision for people on fixed retirement incomes. Social Security has not given a COLA in five years while food, medicine, and now water are going up 5 to 10 percent. People on fixed retirement incomes should not be subject to the same rate increases as people who get annual pay increases.

7. At the end of every fiscal LADWP transfers about 15 to 20 million dollars back to the city of LA. The reasons for this transfer of funds is so LADWP does not show a profit. This money is also used to garner favors from LA City for LADWP projects. This practice must stop and the money used for infrastructure improvements.

Thank You for your considerations on this matter.



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2. There is a practice within the LADWP of paying 15 to 17 percent higher pay rates to employees than Los Angeles city employees get for the same job. For example, a locksmith for the City of Los Angeles gets a maximum pay rate of 62,974 dollars per year. The same locksmith at LADWP would get a maximum pay rate of 79,176 dollars per year. A civil engineer with Los Angeles City gets a maximum pay rate of 103,376 dollars per year. The same civil engineer with LADWP would get a maximum pay rate of 122,000 dollars per year. The practice of paying higher wages to LADWP employees for similar jobs performed by LA City employee's needs to stop. Millions of dollars can be saved and put towards infrastructure.
3. LADWP Board of Commissioners needs to be disbanded and the responsibility of LADWP given back to the City Counsel. This would allow several million dollars to be used for infrastructure improvements.
4. Billions of gallons of rain water are lost to the sea via the LA River. LADWP needs to build infiltration galleries which would capture 15 to 20 percent of the lost rain water and put into the groundwater basin of Los Angeles. Making more groundwater available for use could reduce the need of water from the Owen Valley reducing the costs of the Owens Valley operations.
5. LADWP needs to make better use of recycled water. When replacing infrastructure recycled water pipes should be installed. Golf courses and most businesses in Los Angeles are currently not using recycled water and they should be.

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION**

**ADMINISTRATIVE CIVIL LIABILITY ORDER NO. R6V-2004-0030
WDID NO. 6B140103001**

**ADMINISTRATIVE CIVIL LIABILITY
LOS ANGELES DEPARTMENT OF WATER AND POWER
INDEPENDENCE WASTE WATER TREATMENT FACILITY**

**VIOLATION OF WASTE DISCHARGE REQUIREMENTS CONTAINED IN BOARD
ORDER NO. 6-95-64 FOR THE FEBRUARY 10, 2003 DISCHARGE OF SEWAGE TO
THE LOS ANGELES AQUEDUCT**

Inyo County

The California Regional Water Quality Control Board, Lahontan Region (Regional Board), finds:

1. Discharger

The Los Angeles Department of Water and Power (LADWP) discharges treated domestic wastewater from the Independence Waste Treatment Facility (WTF). For the purposes of this Administrative Civil Liability Order (Order), the Los Angeles Department of Water and Power is considered the "Discharger".

2. Facility

Discharge from the Independence WTF is subject to Waste Discharge Requirements (WDRs) specified in Board Order No. 6-95-64, adopted June 8, 1995. Domestic wastewater is treated in lined oxidation ponds and then discharged to unlined percolation ponds. Discharge to the percolation ponds consists of undisinfected secondary treated sewage. The ponds are connected by a concrete pipe. The oxidation and percolation ponds are located less than 0.5 mile from the Los Angeles Aqueduct (LAA).

3. Facts

On or about February 10, 2003, the LADWP violated prohibitions and provisions contained in WDRs prescribed for the Independence WTF and caused a condition of pollution as defined by California Water Code (CWC) Section 13050. LADWP discharged undisinfected secondary-treated effluent to an unauthorized area, in violation of the WDRs for the Independence WTF as described further below and in Administrative Civil Liability Complaint No. R6V-2004-0011 issued May 5, 2004.

- a. On February 7, 2003, at approximately 5:00 PM, the operator for the Independence WTF opened the gate to begin discharge of undisinfected secondary-treated sewage effluent to

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Marcus Shaw
1170 Angelo Ave
Beverly Hills, Ca 90210

LADWP Water Rate
Ordinance

I protest!!!
The rate increase!

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BY _____ DEPUTY

Fred

From: AAGLA RED ALERT <info@aagla.org>
Sent: Wednesday, January 20, 2016 9:11
To: fred@intes.com
Subject: LADWP Rate Increase

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**PROTEST THE LADWP
WATER RATE INCREASE!**

Why we oppose the five-year rate increase:

- According to the LADWP's own benchmarking study and a review by the ratepayer advocate and an independent study, LADWP salaries and benefits are higher than comparable utilities, higher than comparable jobs for L.A. City, and higher than comparable jobs across the nation, yet nothing is being done about it except calls for more studies-while LADWP plans a "cost-of-living" raise in 2016.
- The new water rate ordinance lifts the cap that limits the extra charges for "adjustment factors," which raise your rates in-between the other rate increases. These extra charges will now be unlimited, and they can be increased over and over, without City Council approval.

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BY [signature]

To protest the new water rate ordinance,
just write on a piece of paper

Your name (or the name of the DWP customer)

Your address (the property address, not a P.O. Box or billing address)

The words, "LADWP Water Rate Ordinance"

The words, "I protest" or "We protest"

Mail or hand-deliver it to:

City Clerk

200 N. Spring Street, Room 395

15-1543

15-1543

ORDINANCE

WATER RATE

PROTEST

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ADMIN CUSTOMER:

PRESRAG MIKANOMIC

5262 AUCKLAND AVE #4

NORRIS HOLLYWOOD, CA 91601

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01/20/2016

Presrag Mikano