

The Water System Organization needs to align plans with reality. The report states:

*The existing strategic documents lay out strategies, principles, initiatives, and goals and objectives that currently drive the WSO. Taken together, these documents could provide a robust foundation for the WSO's Strategic Business Plan. **However, most of the plans focus on water supply and water conservation, with limited attention paid to infrastructure. Given the current challenges related to infrastructure maintenance, renewal and enhancement, additional efforts should be devoted to developing a strategy that addresses infrastructure.***

Costs need to be estimated and disclosed. The City prefers Capital Expenditures and discourages Operations and Maintenance. Both aspects of the system should be integrated into a complete plan. Please keep in mind that LADWP is a water supplier with regulatory compliance issues. Budgeting should occur for Operations and Maintenance.

This report addresses collaborative issues with several initiatives including One Water LA 2040, The Sustainable City pLAN and County of Los Angeles Enhanced Watershed Management Program but fails to identify the regulatory compliance issues in each initiative. One Water LA 2040 and County of Los Angeles Enhanced Watershed Management Program (sic) Plans should be identified as compliance plans for the LA Regional Water Board's MS4 Municipal Separate Storm Sewer NPDES permit under the Clean Water Act. The MS4 permit has no regulatory compliance for LADWP/

County of Los Angeles Enhanced Watershed Management Program (sic) Plans are voluntary elections of the MS4 compliance and is driven by each individual entity on the permit. County of LA and the LA Flood Control District, are two partners in some of the Watershed Management Areas identified in the permit. There are 84 incorporated cities in the permit.

Costs related should have no impact on LADWP and its ratepayers especially in lieu of Capistrano Tax Payers Association v. San Juan Capistrano, California (Court of Appeal 4th Appellate District, Division 3 Case No. G048969).

The report states:

#### **6.4 Future Approach for Los Angeles**

*The Los Angeles water agencies were recently brought together by local nonprofit TreePeople as part of the Greater LA Water Collaborative to build the case for a collaborative, systemic approach to address the region's short-term drought emergency and long-term water crisis.<sup>21</sup> By aligning the diverse water and related*

*infrastructure agencies' goals, investments, and programs, the three organizations would ideally be able to achieve benefits including greener and more resilient neighborhoods, a more responsive government, and decreased costs to the public...*

*The benefits of a collaborative approach could be further amplified by creating a single entity with the sole purpose of managing all aspects of the City's water, wastewater, stormwater, and flood protection services. However, this is a more dramatic step than suggested by previous work. It would require a large organizational and cultural change with significant impacts on the Water Organization. It would also require several City Charter changes, the full support of City leaders and Department management, and a larger process at the County level to include LACDPW. The ultimate design of an integrated water group demands a dedicated analysis of its own. Navigant recommends the City of Los Angeles initiate a study to provide this analysis.*

Because permitting and regulatory issues prevail, costs could not be passed through LADWP at this point in time. Any study would be money wasted without major legislative changes and voter approvals as with Proposition 218.

Unified Water is not a reality as stormwater is not defined as "water" in the drinking water supply sense.

Pipeline system should be analyzed, aged and scheduled for replacement. Most water supply savings could occur from fewer water main breaks.

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