



April 13, 2021

Martin Adams  
 General Manager and Chief Engineer  
 Los Angeles Department of Water & Power  
 111 N. Hope Street Room 1520  
 Los Angeles, CA 90012

Submitted via email to: [martin.adams@ladwp.com](mailto:martin.adams@ladwp.com)

**RE: Comments and Recommendations on LADWP’s draft 2020 Urban Water Management Plan**

Dear Mr. Adams,

On behalf of the signatories listed below, we submit the following comments and recommendations on the Los Angeles Department of Water & Power’s (LADWP) draft 2020 Urban Water Management Plan (UWMP).

In 2014, Mayor Garcetti set forth, in Executive Directive 5, and, in 2019, extended through the Green New Deal Sustainability pLAn (Sustainability pLAn), a proven road map for the sustainable transformation of Los Angeles’ water resources. We strongly support Los Angeles’ leadership towards building a climate-resilient water future.

LADWP’s draft 2020 UWMP does much to document LA’s conservation achievements over the past seven years. Thanks to conservation measures implemented to date, Los Angeles is nearly 15 years ahead of schedule in achieving the Sustainability pLAn 2035 goal of reducing Los

Angeles’ potable water use by 25%, a target of 100 gallons per capita daily (GPCD). According to the 2020 UWMP, today LA is using less water (potable and recycled combined) than it did 50 years ago, despite the city’s population growing by more than 1.2 million people since 1970.

These are excellent developments and speak to the leadership of Mayor Garcetti, his team, and LADWP on water and climate. However, the draft UWMP, if implemented as written, could impede the City’s trajectory to sustainability at the time when we need bold action.

We outline certain contradictions between the Sustainability pLAN and the draft UWMP. This is important because the UWMP is the blueprint for how the Sustainability pLAN water supply goals will be achieved over the next 25 years. This misalignment could slow or even obstruct Los Angeles’ efforts to build a climate resilient water future. For example, the Sustainability pLAN states:

- Los Angeles will obtain 70% of LA’s water supplies from local resources by 2035. The 2020 UMWP does not accomplish this goal;
- Los Angeles will use 100% of its recycled water supply by 2035. The 2020 UWMP does not account for water generated from Operation Next and other local supply projects planned to enhance LA’s future water supplies; and,
- Los Angeles will reduce potable per capita water use to 100 gallons by 2035 and will maintain or reduce per capita water use through 2050. The 2020 UWMP appears to effectively cap potable per capita water use at 106 gallons through 2045.

In order to align the UWMP with the Sustainability pLAN, we recommend the following changes to the UWMP:

1. Provide a more realistic future water demand scenario that retains and builds upon Los Angeles’ existing water efficiency achievements and helps to achieve the Sustainability pLAN goal of obtaining 70% of the City’s water supply from local sources.
2. Remove LADWP’s per capita water use efficiency “cap” of 100 gallons, establish a new, bold conservation target to achieve water use efficiency of 75–80 gallons by 2045 and address other water use factors that inappropriately inflate forecasted water demands.
3. Count local water supplies created by Operation Next in the UWMP supply scenario, recognizing these are estimates. These new local recycled water supplies are an essential part of LA’s commitment to obtain 70% of its water supplies from local sources.
4. More fully quantify local water supplies to be created by the Safe Clean Water Program—including all planned and anticipated stormwater capture/reuse projects, regardless of whether such projects are being led by LADWP or other City Departments (e.g. LASAN), outside agencies (e.g. LAUSD) or other third-party groups, including NGOs.

5. Build on and expand LA’s diversity programs to address equity and affordability concerns for lower-income communities. Increase Los Angeles’ community-based organization involvement in the design and implementation of LADWP’s water efficiency, distributed stormwater capture, and conservation projects and programs. Augment outreach, funding, and enforcement for rental housing conservation improvements, and provide more detail on tracked metrics.
6. Commit to the development of a sustainable Integrated Regional Water Management Plan for the Los Angeles Aqueduct in partnership with the Eastern Sierra Tribes, local communities, and conservation organizations. There are opportunities for shared stewardship and efficiency improvements in both watersheds that are more cost-effective and environmentally beneficial than continued litigation, and will achieve a more climate-resilient and sustainable future for both the Eastern Sierra and Los Angeles.

As California confronts another serious drought, we cannot be complacent about the climate-related water challenges facing our communities. Los Angeles’ Sustainability pLAN needs to be fully implemented.

This is the time to be bold. LADWP’s 2020 Urban Water Management Plan needs to reflect the City’s commitment to building a climate-resilient water future.

For questions regarding this matter please contact Bartshé Miller, Mono Lake Committee Eastern Sierra Policy Director, at (760) 647-6595 x121 or [bartshe@monolake.org](mailto:bartshe@monolake.org).

Sincerely,



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