

Attachment A

City of Los Angeles IRP Steering Group Workshop No. 10 April 22, 2004

FEEDBACK REPORT

- 1. Now that we're moving into the environmental and regulatory phase of the IRP, you should invite a member of the Regional Water Quality Control Board to attend the workshops - (Mary Benson, Tujunga Watershed Stakeholders).**

The Regional Water Quality Control Board has been participating in the IRP Steering Group from the very beginning of the process starting in Phase I in November 1999. Blythe Ponek-Bacharowski from the Regional Board is at the workshop today (April 22). Also, on April 8, 2004, IRP staff briefed the Regional Board's staff about the four IRP recommendation alternatives.

- 2. Part of the purpose of an environmental impact report is to assess the technical feasibility and impacts of the alternatives, so to remove the option of using recycled water for groundwater recharge at the start of an analytical effort like an EIR seems to be a blunder. The EIR should certainly evaluate the use of recycled water for groundwater recharge - (Arthur Golding, Los Angeles-San Gabriel Rivers Watershed Council).**

The IRP looked at using recycled water for groundwater recharge from a scientific, technical and economic prospective. We have now come to the stage where we are moving the alternatives forward through an EIR process where actual projects will result. The current City policy is to not actively pursue groundwater recharge of recycled water (treated wastewater) as part of these four recommended draft alternatives. However, the City will continue to collaboratively work with sister agencies, professional organizations and community stakeholders to monitor the latest advances in water quality improvement technology, review treatment effectiveness and water quality information, address community concerns, and identify additional opportunities for efficient management of water resources. The option for groundwater recharge using runoff will remain as an option in the alternatives moving forward in the EIR process. Also see item 13 below.

Another point to consider is that including the recycled water for groundwater recharge option in the IRP alternatives may jeopardize the implementation of the entire IRP. The IRP is much more than recycled water, yet the Daily News publishes articles describing the IRP in emotional, inaccurate terms like "Toilet-to-Tap" technology. Opponents to recycled water for groundwater recharge have also circulated emails suggesting that the IRP is just a sham/cover-up to push "Toilet-to-Tap" technology; however, the intent of the IRP is to provide a holistic integrated approach to water resources management.

Although an option to use recycled water for groundwater recharge will not be part of the alternatives evaluated in the EIR, all of the information about the use of recycled water for groundwater recharge that was studied in the IRP will be part of the EIR, including the economic comparison between using recycled water for groundwater recharge vs. constructing an expanded non-potable system to deliver the recycled water for industrial and

irrigation uses. Also, anyone can provide comments during the EIR process, and all comments must be addressed. If you would like to include the recharge option in the IRP, you can make a comment to the EIR recommending that the recharge option be made part of any preferred EIR alternative, and the City would have to investigate and respond to the comment.

- 3. Can you prevent the recycled water used for irrigation from going to the groundwater (like the irrigation water for the new golf course near the Tujunga wash where the soil is sandy and the groundwater table is high)? If it does percolate to the groundwater table, how long would it take to reach the groundwater table that serves the production wells?**

When you irrigate with recycled water, a small portion will eventually percolate to the groundwater table. There is an environmental document currently open for public comment that addresses this issue. In the case of the Angeles National Golf Course, the golf course is a very good location to study how irrigation water affects the groundwater table because there are already monitoring wells set-up to make sure no harmful material like fertilizer is being transported to the groundwater table. It typically takes a long time for water that percolates to the groundwater table to actually reach a production well. For the Hanson Spreading Ground area (which is significantly closer to production wells than the Angeles National Golf Course), it is estimated that it takes five years for the water percolated through the spreading grounds to reach a drinking water production well.

The decision to remove the option of recharging the groundwater table with recycled water from the IRP alternatives does not include the removal to use recycled water for irrigation as an option. The use of recycled water option being removed (groundwater recharge) is the option to augment the drinking water supply with recycled water through spreading ground infiltration. We are not removing the irrigation option, which may contribute an incidental amount of recycled water to the groundwater table.

- 4. We need to explain that all water is recycled, and we need two definitions of reuse of water: one is a natural process, and the other is a direct recharge, which is the “Toilet-to-Tap” method. We need to explain that we are not going to have direct recharge of recycled water, but we are going to indirectly recharge the groundwater through the natural process that has been taking place for thousands of years. You also have to make sure the recycled water carries no heavy metals or poisons. High amounts of nitrates (which is the big issue) is fine for irrigation because the nitrates are fertilizer for the vegetation – (Charles Brink, Northridge Community Council (1)).**

Comment - no response required.

- 5. We need to inform the person who made the decision to remove the groundwater recharge option from the IRP alternatives that if we don’t recharge the recycled water, we will be dumping it into the Los Angeles River and will then have to pay for imported water to replace it. We need to respond to the Daily News when they print misleading information. I propose we send them a letter with the following statement:**

“I see the Daily News has used the term “Toilet-to-Tap” again. I’m disappointed that your paper can be so casual about your investigations that you end up totally misrepresenting the facts. The facts are that:

- (1) The Tillman plant output meets all drinking water standards with exception of nitrogen. The nitrogen compound is removed from the first twelve inches of the spreading ground.**
- (2) The Tillman water is the cleanest water that is used on these spreading grounds**
- (3) Maybe because of your outrageous “Toilet-to-Tap” representation, Tillman process water is dumped into the L.A. River. It costs over \$3 million a year to replace the water that is being thrown away.**

If you have a desire to learn the facts, call Bill Van Wagoner.”

We have to stop ignoring this nonsense that these people print. Councilmember Cindy Miscikowski set a good example of “don’t just ignore outrageous nonsense” – (Charles Church, Resident of Canoga Park).

For the betterment of our community, we encourage all stakeholders to speak out and let their opinions be heard especially if they disagree with something presented in the workshops or reported in the media.

- 6. I support Charles Church and Arthur Golding’s comments. Taking the use of recycled water for groundwater recharge option off the table just because our City Council members don’t understand it doesn’t make sense to me. There ought to be some way that the option can be explored in an alternative. We also need to continue to get the key agencies participating in the IRP - (Ed Hunt, Melrose Hill Neighborhood Association).**

Key agencies are participating as part of the Management Advisory Committee meetings (MAC), and a separate agency (interdepartmental) coordination meeting has been organized, and will continue to help get the City “Family” to support the IRP implementation and to reduce and/or eliminate the interdepartmental differences on many of these issues.

- 7. There is no point in us debating “Toilet-to-Tap” here. The Los Angeles drinking water consumers will ultimately decide whether or not they want to drink it. I see some wisdom in including the recharge option in the EIR because there are multiple options in the EIR to choose from so you don’t have to do everything that is in the EIR. But there will be a long, difficult public relations process to get the consumers to accept the recharge of recycled water option. We need to move on to the key issues that will determine whether or not the IRP fails - like who is going to pay for the IRP alternatives – (Gerald Silver, Homeowners of Encino).**

Comment - no response required.

- 8. I’m encouraged to hear so many supporters of the option to use recycled water to recharge the groundwater. I know that the recycled water from the Tillman plant is a lot cleaner than what happens when my backyard is watered because I know what’s happening in my backyard. I would like to see a show of hands of how many people who think that the “Toilet-to-Tap” controversy is ridiculous and that we should be recharging the recycled water – (Polly Ward, Studio City Residents Association).**

A question was posed to the audience asking how many believed that the use of recycled water for groundwater recharge option should be part of the environmental process for the IRP. In response to the question, a majority of the audience raised their hand.

- 9. The negative “Toilet-to-Tap” propaganda should not allow the people in charge to ignore the issue. We need to fight the propaganda by giving examples of how**

astronauts, other cities, and other countries use recycled water for drinking water – (Leonard Shapiro, L.A. Watts Times)

Comment - no response required.

10. Who made the decision to remove the groundwater recharge option from the IRP alternatives - (Charles Church, Resident of Canoga Park)?

Current City policy is not to actively pursue groundwater recharge of recycled water as part of the four recommended draft alternatives. Since the environmental process for the IRP would result in recommendation of future projects, the City decided that the IRP alternatives that are being moved forward to the EIR process should not include options that could result in a project to use recycled water for groundwater recharge. Therefore, the alternatives have been modified to remove the recharge option.

11. The failure to adequately look at the environmental aspects and trying to hide the project from the public is what created the “Toilet-to-Tap” controversy. By including the option of using recycled water for groundwater recharge in the EIR, it exposes the option to public scrutiny, so we should include it in the EIR for the IRP - (Charles Brink, Northridge Community Council (1)).

Comment - no response required.

12. Perception is everything in politics. I encourage you to send a letter to your representatives stating your opinion about the project. City Council makes policy for the City, and your opinion is very important to them. Councilmember Ed Reyes is very supportive of a holistic approach to our watershed issues – (Lupe Vela, senior staff for the Ad Hoc Committee on the Los Angeles River).

Comment - no response required.

13. I’m stunned and disappointed that groundwater recharge is not going to be an option in the IRP. This is supposed to be an integrated plan, but how can it be integrated if you’re not looking at groundwater recharge. Our future sustainability and watershed management is dependent upon our getting back to recharging our groundwater aquifer. If the City has a policy against it right now, then that policy clearly needs to change if we’re going to be self-sustaining given the upcoming challenges we face. The IRP process is where it should be put on the table as a primary consideration, not taken off the table and hidden in the document - (Melanie Winter, The River Project).

There are two options of groundwater recharge studied in the IRP. One option is to use recycled water (treated wastewater) for groundwater recharge, and the other option is to use captured runoff to recharge the groundwater. The option removed from consideration in the four IRP recommended alternatives is the option using recycled water. The option for groundwater recharge using runoff is not against current City policy and is currently a major source of the groundwater recharge supply and will remain as an option in the alternatives moving forward in the EIR process. Also see response for Question 2.

14. Orange County is currently pursuing their massive groundwater recharge project using recycled water with reverse osmosis advanced treatment. This is the type of groundwater recharge option that we have been considering in the IRP (advanced treatment prior to recharge), and this technology is a totally different project than the “Toilet-to-Tap” project. So the recharge considered in the IRP may not necessarily be against City policy. We may want to set-up a meeting with the DWP management and

the Steering Group to discuss the possibility that the option is not against City policy. We also need to publicize that Orange County is going forward with a recharge project that will make them more self-sustaining – (Judy Wilson, Judy Wilson and Associates).
Comment - no response required.

15. **This is valuable feedback that we are getting from the Steering Group. It should be clear to everyone that the City is not manipulating the IRP process to pull something over on the community. The City took previous strong input against groundwater recharge of recycled water and responded with City policy prohibiting it which they are sticking to. They are hearing from the Steering Group that they should consider recharge now and not back away from it because we have high confidence. To honor the policy that was set before, and to honor the value of the entire IRP process, they didn't want to threaten the entire IRP by letting it get tagged as a "Toilet-to-Tap" scheme, so they separated the recharge debate from the IRP. What the Steering Group is saying is that to move recharge forward, it will end up in public debate. The last time that "Toilet-to-Tap" wound-up in public debate there was not a strong environmental community response saying we need this. DWP was hung out to dry. If DWP follows our recommendation to consider the recharge option, we have to step forward to support our recommendation. (Andy Lipkis, TreePeople).**

Comment - no response required.

16. **The goal of the IRP is to get the cleanest water we can for the future, so we should add an option to the EIR alternatives to purchase land to protect our pristine watersheds. The Tujunga watershed is pristine, but development is about to encroach, so we need to buy that land and keep it open to wildlife and water reclamation – (Jerry Piro, Sun Valley Area Neighborhood Council)**

Comment - no response required.

17. **Are the leadership projects included in the four recommended alternatives different for each alternative, and have you prioritized them based on the rankings the Steering Group submitted? – (Frank Butterworth, Institute for River Research International)**

We are in the process of prioritizing the leadership projects based on the feedback (ranking form) provided by the Steering Group, as well as feasibility, funding and siting of potential projects, and we will be sharing this information with you as soon as it is completed. The leadership projects will be the same for all alternatives. The leadership projects are the projects we can implement right now either as demonstration projects or as full-scale projects (such as changing City policy to allow metering of individual apartments, or implementing smart irrigation for public facilities). It is a serious commitment by the City to go forward with these leadership projects. The goal is to implement the demonstration projects as fully as possible once we see that they will work, assuming we have adequate funding.

18. **We need to recognize that the use of recycled water for non-potable uses does not require secondary treatment because what we are removing is the fertilizer component that is needed for non-potable uses. And I'm objecting to ratepayers paying huge costs for membrane-processed water that is then dumped back into the Los Angeles River. We need to evaluate non-membrane treatment for reuse for non-potable uses - (Charles Brink, Northridge Community Council (1)).**

Title 22 treatment, which are the regulations governing recycled water, are produced by the California Dept. of Health Services. These requirements are what the current treatment level

at the Tillman and LAG plants were built to, which are the standard treatment level required for non-potable (irrigation and industrial) recycled water uses. Title 22 treatment or tertiary treatment is a higher level of treatment than secondary treatment. Advanced treatment (membrane technology), which is a higher level of treatment than Title 22 treatment, is the treatment level needed to meet the California Toxics Rule, which the City may have to meet in the future to discharge to the Los Angeles River. However, the State Dept. of Health Services is in the process of revising their Title 22 rules, so the City does not know at this time what the changes might be. They may require an increase in the treatment quality for Tillman and LAG.

The recycled water being discharged to the Los Angeles River has created a benefit with the establishment of ecosystems in the river (*Note: there is ecosystem in both lined and unlined portions of the river*), and the reclamation plants must discharge enough recycled water to the river to maintain a baseline flow for those benefits per State and Federal regulations. We also must provide recycled water to Lake Balboa, the Japanese Garden Pond, and the Wildlife Lake in the Sepulveda Basin. Since these waterbodies drain into the river, we have to raise the treatment level to meet these requirements, as well as providing sufficient flow in the Los Angeles River to maintain the ecosystems. Furthermore, during wet weather, recycled water demand is greatly reduced, necessitating the ability to treat the entire plant flow to a quality sufficient for discharge to the river.

19. Ignoring the unit cost differential, if we simply look at Alternative 4 with and without groundwater recharge (GWR) of recycled water; without GWR, there is 10,000 acre-feet per year of water that has to come from some other source at a cost of \$595 per acre-feet. This means that almost \$6 million per year has to be spent to buy that water. Is this correct - (Arthur Golding, Los Angeles-San Gabriel Rivers Watershed Council)?
Yes.

20. Looking at the \$595/acre-feet cost to replace the water that the recycled water would have contributed if groundwater recharge was an option, we are assuming that the water will be available. It may not be available for that estimated cost – (Denny Schneider, LAX-Community Noise Roundtable).
Comment - no response required.

21. For Alternative 1 (Hyperion Expansion, Moderate Water Resources), does this mean that the Hyperion plant will be expanded to treat the additional 2020 flow? If so, what will be done at Tillman - (Gerald Silver, Homeowners of Encino)?
Yes, Alternative 1 will expand the capacity at Hyperion to meet the increased wastewater flow projected in 2020. For Alternative 1, if the California Toxics Rule is imposed on the City, Tillman will be upgraded to advanced treatment and Los Angeles/Glendale (LAG) plant will become a Title 22 plant that would only treat enough wastewater to meet the local recycled water demands. The excess flow to the LAG plant would be diverted back to the collection system down to Hyperion. The Tillman plant must continue to operate to provide enough baseline flow to the Los Angeles River to maintain the existing ecosystem in the river.

22. Looking at only the capital, operation and maintenance costs, is Alternative 1 the least expensive alternative - (Gerald Silver, Homeowners of Encino)?

Simply considering the capital, operation and maintenance costs perspective, Alternative 1 is the cheapest. However, looking at the multi-benefits (like the reduction of imported water benefit), Alternative 1 may not be the least expensive.

- 23. We need to take out inflation cost because it is a fudge factor. We also have to include all of the cost benefits in the cost estimates. We can't say there are other benefits that are not included in the estimates. We also have to address the major question which is: are ratepayers going to pay for all of the costs for expansion, or should the developers bear these costs? This issue will make the "Toilet-to-Tap" issue look like a walk in the park - (Charles Brink, Northridge Community Council (1)).**

Comment - no response required.

- 24. In the total scheme of things, with Iraq costing us \$200 billion a year and improvements to the airport projected to cost \$9 billion, the difference between the IRP alternatives is just chicken feed - (Ed Hunt, Melrose Hill Neighborhood Association).**

Comment - no response required.

- 25. How would the proportional cost of the IRP be passed on to the over 500,000 apartments that are rent controlled? – (Victor Viereck, North Hollywood Residents Assoc.)**

The rent control issue has not been looked at closely but is something that would have to be considered before the rates are implemented.

- 26. Are the potential rate impacts of the IRP alternatives based on an equal distribution over the entire residential consumer base and the entire consumer industrial base - (Gerald Silver, Homeowners of Encino)?**

The potential rate impacts are based on the current distribution between commercial and residential and on the respective loads they contribute. The current distribution between commercial and residential ratepayers was assumed to be the same proportion in 2020.

- 27. You need to add a financial funding option where the additional or marginal costs are paid by the new ratepayers – (Gerald Silver, Homeowners of Encino).**

The City has a Sewer Facilities Charge (SFC) which is a one-time fee to connect to the City's sewer system, and all new developments have to pay this connection fee. This fee requires them to buy-in to the equity of the system. Currently the Sewer Facilities Charge brings in about \$5 million per year. If the Sewer Facilities Charge is doubled, it will bring in \$10 million per year which resulted to about a \$0.50 reduction per month to the ratepayers. Any increase in the SFC rates will require that a link be established between the costs of wastewater capacity and the new customers' use of the capacity.

Adopting any incremental or marginal cost method of calculating internal-City SFC rates would pose another problem for the City. The wastewater contract agencies are charged SFCs based on buying into the system equity. Changing the agencies' SFC would require unanimous consent of the agencies in amending their agreements, which seems unlikely. Moreover, the agreements cannot be amended for another five years. Changing the basis for the internal-customers' SFCs without a corresponding change in the agencies' SFCs would result in two classes of customers paying on different bases. This would be inequitable.

28. In addition to the one time connection fee, there should be an option where the monthly rates are higher for new ratepayers. I'd like to see a show of hands of who would like new ratepayers to pay more – (Gerald Silver, Homeowners of Encino).

In response to the show of hands of who would like to have new ratepayers pay a higher monthly rate, a few hands were raised but not a clear majority. The Clean Water Act and State Water Resources Control Board require that the sewer service charge be based on the user's contribution to the wastewater loadings (flow and strength). Increasing the rates for new customers would not be in compliance with these requirements.

29. I would like to see a chart of the population growth of the City to see how the new cost will be distributed - (William Savage, Westwood Hills Property Owners Assoc.).

The potential rate impacts of the four IRP recommended alternatives presented in the workshop took into consideration the increase in population in 2020 (approximately 700,000 more residence by 2020), and the costs were distributed equally among all ratepayers projected in year 2020.

30. The idea of a higher monthly rate for new ratepayers will not work. A similar option that will work is an option like the Acton Water District uses where a facilities charge of 100% reimbursement for all of the infrastructure facilities that a new home is going to use is charged to connect to the system. The ratepayers pay a yearly stand-by fee which is reimbursed by the facilities charge - (Charles Brink, Northridge Community Council (1)).

Comment - no response required.

31. The idea of separate rates for new ratepayers is just another way to divide us. Using this reasoning, you could charge higher rates for people who live farther from the treatment plants and so on. It's not like the people buying new houses haven't contributed anything before. If someone lives in their house for 25 years and then moves to a new house within the City, they still have been contributing to the system. A lot of new houses are so expensive because we tack them for everything (development fees) that only the people who already live here and sell their home can afford to buy a new home. We need to stop trying to stick it to someone else and focus on getting the most cost effective alternative - (Charles Church, Resident of Canoga Park).

Comment - no response required.

32. New developers need to take into consideration that we have spent a lot of money on our sewer, water, and stormdrain systems, and if you want to build here you will pay your proportionate share of what we have paid in the past - (Leonard Shapiro, L.A. Watts Times).

Comment - no response required.

33. There is no end to sticking it to the people who just moved in and it is complicated. Do you prorate rates where someone who lived here 150 years pays nothing and someone who just moved in pays everything? What about 20 years vs. 5 years. Where does it end? While you determine the best ways to improve your community, please also consider the greater good for the entire City - (Daniel Hackney, Bureau of Sanitation Neighborhood Council Liaison).

Comment - no response required.

- 34. We went though this when the State passed a bill to charge developers for school tax, but what happened is that when people remodeled their home, they were hit with the school tax. If you charge new residents higher rates, what happens when someone has a child? Are you going to charge them higher rates for the required additional capacity needed at the treatment plants? In reality separate rates just do not work - (Richard Blumenberg, Pacific Palisades Civic League).**

Comment - no response required.

- 35. Workshop No. 10 slide 24 (Year 2020 Monthly Stormwater Bill for Single-Family Customer) showed incorrect information.**

The slide with the corrected information is attached

- 36. Why are we pushing the majority of the costs for the runoff portion towards the end (2020) - (Melanie Winter, The River Project)?**

We are incorporating the runoff options to address the regulations imposed by the Los Angeles Regional Water Quality Control Board following the allowable timing conditions. The large beneficial use options are being implemented with leadership projects in the early years and full scale in the later years.

The runoff assumptions under the 4 recommended alternatives moving forward into the EIR phase of the IRP does not provide compliance with future Total Maximum Daily Loads (TMDLs) regulations because the majority of the regulations do not exist, and will not be completed until 2012. The baseline assumption for meeting existing TMDLs, i.e. Santa Monica Bay Wastewater and Stormwater bacteria TMDLs, are included. The actual construction of facilities will take place after design is completed, which is in the 2015 to 2020 time frame.

- 37. Shouldn't we move the implementation of the runoff options sooner rather than later to avoid funding problems and to show leadership commitment - (Melanie Winter, The River Project)?**

There is a certain amount of time required between the planning, design, and construction phases of some of the runoff options. Also, until the TMDL's are completed, the City does not know what level of treatment needs to be done, or how much runoff needs treatment. Without this information the City can't finalize the design of all of the elements. Since the last TMDL won't be completed until 2012, this means that for some of the projects the work will be done between 2015 and 2020. Also, using an integrated approach makes for a more complicated project. For example, determining how much of the runoff to capture and treat, on-site, treat off-site, reuse onsite, deal with other cities and agencies in the same watershed that the TMDL is covering will take a lot of time. The Regional Board is allowing up to an 18-year compliance schedule per TMDL to acknowledge the better end result for using an integrated approach, versus only 10 years for a non-integrated approach. Leadership projects will address feasibility of implementation in the short term.

- 38. On the cost benefits analysis, we need to consider the recreational benefits of creating places to capture stormwater when it rains and use these places for recreation when it is not raining - (Mary Benson, Tujunga Watershed Stakeholders)?**

Comment - no response required.

- 39. For any land acquisition required for any of the options, we need to start purchasing it now because the price of land is increasing much faster than inflation so we'll be paying a premium for land if we defer the acquisition to later years - (Arthur Golding, Los Angeles-San Gabriel Rivers Watershed Council).**

The City will look into the feasibility of this option. As the City moves into the EIR portion of the IRP, site-specific locations, if identified, could be purchased.

- 40. I agree we should have a land-banking element with the IRP. Once the EIR is complete, we will know more or less where the facilities need to be located. We should start laying out money before we are ready to construct - (Judy Wilson, Judy Wilson and Associate).**

Comment - no response required.

- 41. I agree that the longer we put off purchasing land the more expensive it will be. We'll save money and avoid sticker shock if we do it now – (Charles Church, Resident of Canoga Park)?**

Comment - no response required.

- 42. I would like to see the per capita costs of the alternatives - (William Savage, Westwood Hills Property Owners Assoc.).**

The potential rate impacts of the four IRP recommended alternatives presented in the workshop took into consideration the increase in population in 2020 (approximately 700,000 more residents by 2020) and distributed the cost equally among all ratepayers projected in year 2020.

- 43. The potential rate impacts for the runoff options were put off to 2020 as a political scheme to move the costs so far out where no one will notice it (Leonard Shapiro, L.A. Watts Times).**

The potential rate impacts for the runoff were not based on politics. See response to questions 36 and 37.

- 44. Do the potential rate impacts for the runoff options consider that some of our industrial base is moving out due to environmental regulations and more service based businesses are moving in - (Denny Schneider, LAX-Community Noise Roundtable)?**

There is no treatment for the current stormwater system so the current stormwater fee is based on the amount of impervious land (or volume of runoff contributed), and there is no consideration to set up a special industry surcharge. Our large industries currently have special stormwater permits from the Regional Board. They analyze runoff quality samples and submit the results to the Regional Board in regular reports. There are other cities and agencies, such as Irvine Ranch, where the runoff fee is tied to the amount of water used on the outside of buildings for irrigation and washdown, for example, that becomes runoff. A four-tier structure has been set up to pay for this runoff that is tied to the customer's outdoor water use. This is based on the more you generate, the more you pay theory.

- 45. Has the effect of increased population density been taken into consideration in the potential rate impacts for the runoff options - (Gerald Silver, Homeowners of Encino)?**

The current runoff rate structure already takes this into account. As runoff is governed by the amount of impervious area (i.e. buildings and pavement) from property, and any change in the property to accommodate the extra population by adding dwellings will most likely lead

to an increase in the impervious area, which will in turn increase the runoff fee for this piece of property.

- 46. We need to integrate the Recreation and Parks benefits into the rate impacts for people to see that they are not only getting runoff benefits but also open space and recreation benefits for the costs - (Melanie Winter, The River Project).**

In the presentation, we show how funding partners lower the cost of the runoff options. See slide 30.

- 47. The impervious portion of the City is growing. We need to recognize the value of maintaining the pervious area in single-family residences as well as parks. We need to charge a fee when a pervious area is paved - (Charles Brink, Northridge Community Council (1))**

Comment - no response required.

- 48. How are you considering the population increase into the potential rate impacts - (William Savage, Westwood Hills Property Owners Assoc.)?**

The revenue requirements for funding the alternatives were divided by the projected population in 2020, not the current population.

- 49. Is there a way to renegotiate the contract with Universal City to make sure they pay their fare share of runoff and wastewater contributed to the L.A.'s system as they grow- (Gerald Silver, Homeowners of Encino)?**

Universal City pays the proportional amount of the actual quantity of wastewater they contribute to the City's wastewater system. They also pay service charges for dry-season urban runoff that they also discharge into the wastewater system. The City's new service agreement with Universal Studios already requires them to pay their fair share of the costs of conveying and treating their wastewater and runoff. Universal City doesn't contribute to Los Angeles's stormdrain system, but there are opportunities for the IRP to work with Universal City and other contract agencies to encourage them to partner with us in some of the runoff management solutions like reducing paving.

- 50. Proposition 50 funding is not available to the City because City policy will not allow us to do the things that it would fund. We were not ready to take advantage of Proposition 50. Unless we are prepared to take advantage of the funding when it becomes available, we will miss more funding opportunities - (Melanie Winter, The River Project).**

The City proposes to pursue all applicable funding opportunities as part of the IRP, including Proposition 50.

- 51. In the EIR, will the seismic concerns be addressed (Domingo F. Leon, Society of Hispanic Prof. Engr., Inc.)?**

The seismic considerations will be discussed in the EIR and will also be considered during the design phase of each specific project implemented in the IRP.

- 52. In the EIR for the IRP, how do you address the environmental justice concerns associated with locating stormwater treatment facilities in industrial areas which are usually close to low income areas – (Judy Wilson, Judy Wilson and Associates)?**

Stormwater treatment facilities would be addressed in the EIR at a programmatic level, which means that site-specific location information is not likely to be available. To the

extent that environmental impacts for such facilities could be anticipated and discussed, the environmental justice impacts can be identified. In addition, to address potential IRP impacts that could disproportionately affect low income or minority populations that may be located close to industrial areas, mitigation measures would be identified. Such mitigation measures could be to incorporate multi-benefit uses such as parks or recreational areas/open space.

53. Is the EIR for the IRP going to be a program EIR - (Arthur Golding, Los Angeles-San Gabriel Rivers Watershed Council)?

The EIR for the IRP is part program EIR and part project EIR. A program EIR deals with a series of actions that are related and serves as an umbrella document that future environmental documents can tier from. A project EIR deals with a site-specific project and no other environmental documents are generally required. In general, program EIRs are less detailed than site-specific EIRs.

The IRP would be comprised of a series of related actions or sub-projects, some of which are detailed and others that are more conceptual in nature. It is envisioned that the site-specific IRP components will be examined in the EIR in detail with no need for further environmental documentation, whereas the more conceptual components may require additional environmental documentation in the future..

54. The statement of overriding considerations needs to be put on the EIR process flow chart - (Gerald Silver, Homeowners of Encino).

The statement of overriding considerations was not specifically listed, but was to be verbally addressed under the City Council EIR Certification item. The statement of overriding consideration states that “although the project will have significant impacts on the environment, there are other considerations which override the environmental impacts.”

55. The time limit for each step in the EIR is so short that it is almost impossible for protesters to get the kind of publicity they want. As the lead agency, DWP had the power to certify its own draft, which makes it very difficult. With term limits, the City Council has a propensity to pass whatever DWP wants. Where does the public fit in this process - (Grace Masuda, Resident of Studio City)?

The Notice of Preparation has to be circulated for 30 days. The Notice of Preparation is only a thin document. The Draft EIR is circulated for public review and comment for a minimum of 45 days, but for the IRP it will probably be circulated for 60 days. If more time is needed, it will be extended longer.

56. In other projects, the DWP has granted an extension on the comment period to allow as much public comment as people feel is required. I think that DWP is trying to be sensitive to public input - (Mary Benson, Tujunga Watershed Stakeholders).

Comment - no response required.

57. We have to increase the groundwater recharge in the City - (Leonard Shapiro, L.A. Watts Times).

Comment - no response required.

58. In about 30 months you will have completed the environmental process for the IRP. Does this mean that for the next 18 years there will never be another environmental hearing, like what was done for Tillman – (Gerald Silver, Homeowners of Encino)?

For the program elements in the EIR for the IRP, if a specific project has to be implemented, a supplemental EIR will have to be produced. If a project is cleared specifically in the EIR, then a supplemental EIR is not required. But the City has a new commitment to public input. The IRP is going to be a very flexible process so if we need to review the EIR in the future, the EIR will be amended or supplemented accordingly.

Year 2020 Monthly Stormwater Bill for Single-Family Customer

