

April 11, 2018

Dr. Robert Harrington, Director  
Inyo County Water Department  
P.O. Box 337  
Independence, CA 93526

Dear Dr. Harrington:

Subject: Feasibility Study for Reclaimed Water Project in Big Pine

Thank you for providing the Los Angeles Department of Water and Power (LADWP) a copy of the "Feasibility Study for the Use of Reclaimed Water to Support Restoration and Community Projects in Big Pine" (Study) for review. In this Study, Inyo County's consultant evaluated 18 potential reclaimed water projects in the vicinity of Big Pine, California. LADWP has reviewed the Study and has concerns with regard to the preferred alternative proposed at Big Pine 160 on City of Los Angeles (City) property.

The Study's preferred alternative will add additional water demands onto the City over and above its obligations. This would result in a loss of water for the City and result in replacement water having to be purchased at the expense of the LADWP Ratepayers. The Study proposes to provide reclaimed water onto the revegetation parcel Big Pine 160 in exchange for LADWP providing surface water from the Big Pine Canal to irrigate the Bartell Parcel. LADWP has no obligation, nor any responsibility to provide irrigation water onto the Bartell Parcel.

The revegetation parcel Big Pine 160 is already being naturally restored since it was seeded by LADWP two years ago. The plants in this area are comprised of 7 perennial species that have naturally germinated from seed and have grown utilizing natural precipitation without supplemental water. These plants are not only well adapted to the dry and harsh conditions of the site, but are thriving. Ultimately, this approach is the most beneficial to the sustainability of the environment.

In addition, given that we are in the nascent stages of plant establishment, it is premature to destroy the existing native vegetation, which is uniquely adapted to the site, to install a reclaimed water drip line irrigation system to grow the same vegetation that

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currently exists at the site. Further, the vegetation at the site ultimately needs to be self-sustaining, relying upon precipitation.

The reclaimed water Study proposes to use is secondary treated and undisinfected wastewater which poses a public health and safety issue. Title 22 of the California Environmental Health Code allows only a very few uses of this classification of water (Undisinfected Secondary Treated). Some of the uses that are not allowed for this type of water in Title 22 include "any non-edible vegetation with access control to prevent use as a park/playground/schoolyard". The site will likely be visited by the public and LADWP employees. Therefore, there are potential hazards associated with human contact.

This project could result in a high cost for an obligation that the City does not have a fiduciary obligation or responsibility. The report describes that the project will be funded by LADWP as a potential grant funder.

Given the additional water obligations to the City, potential harm to the environment, health risk to the public and LADWP staff that may be onsite, and costs to the City of Los Angeles, LADWP cannot provide support for the preferred alternative as proposed. We encourage you to focus your efforts on the other potential reclaimed water projects in the Big Pine area identified in your study that do not occur on City property.

Sincerely,



James Yannotta  
Manager of Aqueduct

GL:fj

Enclosure

c: Mr. Larry Freilich

Mr. Gregory Loveland

Mr. David Martin