Summary of 2025 Urban Water Management Plan and 2025 Water Shortage Contingency Plan Written Comments with LADWP Responses

Keshav Boddula (3/16/2026)

Comment: Focusing more on the demand/water use rather than water quality in my comment here, consider these 3:

1) Where the actual burden of responsibility for water use lies and should be prioritized accordingly, i.e. industry/ag. industry vs. (over-emphasis on) residential use (I mean SGMA and SWRCB and DWR have been focusing on this relatively recently, but still)

2) Sustainable, ecological use (especially consider the carrying capacity in relation to water use). This can be in coordination with major plans for (reverse) migration from city to rural, like I have outlined here)

3) Local, urban solutions that include water harvesting, graywater use, green/soft/nature-oriented infrastructure as much as feasible / where appropriate (consult LA Greywater Corps, LA ecovillage, permaculture teachers/practitioners)

Response: *Some of these considerations fall outside of the scope of the UWMP and other ongoing planning efforts have been described in Chapter 10, Integrated Long-Term Planning. Chapter 6, Watershed Management and Chapter 3, Water Conservation provide additional details regarding LADWP's efforts to implement local and urban solutions where feasible.*

Lisa Hart, Los Angeles Neighborhood Council Sustainability Alliance (3/16/2026)

Comment Summary: Comment letter supporting the banning of artificial turf

Response*: Chapter 3, Conservation details how conservation in outdoor irrigation and replacement of turf with California Friendly Landscaping are critical to meeting LADWP's conservation goals. LADWP does not currently provide incentives for replacement of turf with artificial turf.*

Casey Maddren (3/16/2026)

Comment: While Exhibits ESG, ES-H, and ES-I purport to show service reliability assessment for average year, single dry year, and multiple dry year conditions, the numbers do not seem realistic. Also, the conclusion that "No water supply shortages are anticipated as projected demands are met by the available supplies under all hydrologic scenarios," does not appear to be credible.

Response: *LADWP recognizes that there are uncertainties in its factors used to develop the demand and supply forecasts. UWMP forecasts relies on the best available data and methodologies at the time of development and demand forecasts are revisited and refined every UWMP cycle to capture evolving conditions, trends, and new information. The UWMP Act requires that reliability assessments consider specific scenarios. LADWP recognizes the importance of continued consideration of additional scenarios beyond the scope of the UWMP as discussed in Chapter 10, Integrated Long-Term Planning. In addition, the 2025 Water Shortage Contingency Plan outlines a process to identify potential supply shortages and how to effectively respond to supply shortage conditions in the event that shortage conditions emerge.*

Comment: First, Exhibits ES-G, ES-H, and ES-I all show huge increases in groundwater supplies. While LADWP has made significant investments in increasing groundwater resources in recent years, it's hard to believe that the agency will go from the current 6,100 AF to 103,800 AF in 2030, and then reliably maintain a level of 109,300 AF thereafter. These projections seem highly optimistic, and likely unrealistic.

Furthermore, the fact that the projected numbers for groundwater stay constant in ES-H, Single Dry Year and ES-I, Multiple Dry Year, is hard to understand, since groundwater supplies are tied to rainfall. If LA experiences multiple years with reduced rainfall, it strains credibility to believe that this would have no impact on groundwater resources. I understand that LADWP's planned groundwater treatment facilities will be coming on-line soon, and that Sylmar and Central Basin production capacity will increase with the completion of wellfield improvement projects. Even so, the projection that groundwater production will be sustained at consistent levels, even during multi-dry year scenarios, does not seem realistic.

Response: *Chapter 9, Water Supply Reliability states that the projected groundwater supplies is based on the assumption that "(1) groundwater basin elevations can support this level of pumping on a safe yield basis; (2) LADWP*

planned groundwater treatment facilities will be operational by FY 2025/26; and (3) Sylmar and Central Basin production capacity will increase based on completion of various wellfield improvement projects." Additional details regarding LADWP groundwater rights and remediation facilities are provided in Chapter 5, Local Groundwater.

Comment: Given the current state of affairs, it's unrealistic for the UWMP to assume that MWD will be able to boost future deliveries to the levels described in Exhibits ES-H and ES-I. The numbers given in the UWMP should be reevaluated to reflect the realities of the current situation.

Response: *As described in Chapter 8, Section 8.1, Colorado River Supply Reliability Challenges, LADWP recognizes the negotiations among Colorado River Basin states regarding post-2026 operational guidelines are ongoing and the effects of the outcome of these negotiations on water supply are highly uncertain at this time. LADWP relies on data from MWD regarding their projections of Colorado River Supplies and MWD has utilized the latest available information and assumes a continuation of the current operating agreements through their planning horizon to project their Colorado River supplies for their 2025 UWMP. More information regarding MWD's reliability analysis and assumptions can be found in MWD's 2025 UWMP which is available at mwdh2o.com/how-we-plan*.

Terry Saucier, Los Angeles Neighborhood Council Sustainability Alliance (3/16/2026)

Comment Summary: Comment letter supporting the banning of artificial turf

Response*: Chapter 3, Conservation details how conservation in outdoor irrigation and replacement of turf with California Friendly Landscaping are critical to meeting LADWP's conservation goals. LADWP does not currently provide incentives for replacement of turf with artificial turf*.

Audrey Siu, Los Angeles Waterkeeper (03/16/2026)

Comment: LADWP must redouble its already-successful conservation efforts through direct install and pre-bates, and these programs should emphasize native species and co-benefits … LADWP must redouble its already-successful conservation efforts through direct install and pre-bates, and these programs should emphasize native species and co-benefits … LADWP must take steps to ensure emerging industries do not increase water demand

Response: *Chapter 2, Water Demand details the many demand drivers LADWP incorporated into its demand forecasting model to forecast future demands in the 2025 UWMP. Population is one of the many factors considered and has shown to continue to be a driver of demand after controlling for other factors, including conservation efforts. Additional details regarding LADWP's projected water conservation savings are detailed in Chapter 3, Water conservation. As detailed in Chapter 3, findings from the 2017 Water Conservation Potential study identified a maximum cost-effective savings potential which is incorporated into the 2025 UWMP demand forecast. LADWP is also considering expanding programs to maintain compliance with the State adopted Urban Water Use Objectives.*

Comment: Improve and simplify how information on remediation is conveyed to clarify how groundwater remediation will enhance local supplies

Response*: Chapter 5, Local Groundwater provides additional detail regarding specific groundwater remediation facility capacities and operational timelines. Additionally, the footnote in Exhibit 5G has been expanded to provide additional clarity for additional supplies expected from the Los Angeles Groundwater Replenishment Project. Please note that projected groundwater supplies are based on the assumption that (1) groundwater basin elevations can support this level of pumping on a safe yield basis; (2) LADWP planned groundwater treatment facilities will be operational by FY 2025/26; and (3) Sylmar and Central Basin production capacity will increase based on completion of various wellfield improvement projects, as stated in Chapter 9, Water Supply Reliability.*

Comment: LADWP should be more explicit in the projects needed to meet ambitious stormwater capture goals

Response*: LADWP plans to continue pursuing a diverse portfolio of centralized and distributed stormwater capture projects. While centralized projects will likely constitute the majority of LADWP's stormwater capture capacity, LADWP recognizes the meaningful impact of multi-benefit distributed projects and will continue to pursue strategic partnerships and initiatives to advance multi-benefit objectives. The Stormwater Capture Parks Program serves as a model for future planning efforts as LADWP seeks to further develop additional multi-benefit projects and seek funding opportunities through programs such as the Safe, Clean Water Program.*

Comment: UWMP should highlight what could be achieved through PWLA
… we are disappointed that projections for the City's Pure Water LA (PWLA) project are not included in the report. … our recollection is that in a presentation staff made to LAW staff, there was a table that included a projection of PWLA (assuming a phased buildout) below the totals line. … We were very happy with that approach, and ask that LADWP include such a 'below the totals' projection, both for the tables in the Executive Summary (Tables ESG-ESJ) as well as in the recycled water section (Table 7G).

Response*: Discussion regarding PWLA is consolidated in Chapter 11, Pure Water Los Angeles which presents potential future supplies from PWLA as Exhibit 11C.*

Comment: LADWP should prioritize reducing imports from Mono Lake and the Eastern Sierras

Response: *As demonstrated in the 2025 UWMP reliability tables in Chapter 9, Water Supply Reliability, LADWP continues to rely on its imported supplies to maintain long-term water supply reliability. Chapter 4, Los Angeles Aqueduct details LADWP's continued commitments in the Mono Basin and Owens Valley for environmental enhancements and other uses.*

Geoffrey McQuilkin, Mono Lake Committee (04/20/2026)

Comment: Use lower, more realistic future water demand projections. Based on models that incorporate climate scenarios, LADWP's 2050 water demand is more likely to be in the range of 380,000 acre-feet per year (AFY), not 476,000 AFY.

Response: *Chapter 2, Water Demand details the many demand drivers LADWP incorporated into its demand forecasting model to forecast future demands in the 2025 UWMP. Demand forecasts for the UWMP are intended to provide a conservative estimate to ensure that adequate supplies are identified to maintain water supply reliability across the hydrologic scenarios required by the UWMP Act.*

Comment: Remove LADWP's 2035 cap on water conservation savings and significantly expand the Department's investment in water efficiency programs to support both low-income customers and the implementation of LA's updated Climate Adaptation and Action Plan.

Response: *As detailed in Chapter 3, findings from the 2017 Water Conservation Potential study identified a maximum cost-effective savings potential which is incorporated into the 2025 UWMP demand forecast. LADWP offers various water conservation programs to promote water use efficiency and is also considering expanding programs to maintain compliance with the State adopted Urban Water Use Objectives.*

Comment: Expand LADWP conservation incentive programs to further reduce demand while better aligning with the City's stated biodiversity goals.

Response: *As detailed in Chapter 3, LADWP offers various water conservation programs to promote water use efficiency and is also considering expanding programs to maintain compliance with the State adopted Urban Water Use Objectives.*

Comment: Prioritize nature-based climate solutions as a core strategy for stormwater management and local supply development

Response: *LADWP plans to continue pursuing a diverse portfolio of centralized and distributed stormwater capture projects. While centralized projects will likely constitute the majority of LADWP's stormwater capture capacity, LADWP recognizes the meaningful impact of multi-benefit distributed projects and will continue to pursue strategic partnerships and initiatives to advance multi-benefit projects. The Stormwater Capture Parks Program serves as a model for on-going planning and implementation efforts as LADWP seeks to further develop multi-benefit projects and seek funding opportunities through programs such as the Safe, Clean Water Program.*

Comment: Provide metrics for how stormwater capture and other infiltration projects will improve LA's groundwater yield.

Response: *Chapter 6, Section 6.1, Managing the City's Watersheds describes that "recharging the SFB with stormwater provides benefits such as increasing stored groundwater, helping maintain the basin's safe yield, and supporting long-term reliability of the City's local water supply." Chapter 5, Local Groundwater, details LADWP's groundwater rights across local groundwater basins.*

Comment: Plan a future in which LADWP reduces imported water supplies from both MWD and the Los Angeles Aqueduct.

Response: *As demonstrated in the 2025 UWMP reliability tables in Chapter 9, Water Supply Reliability, LADWP continues to rely on its imported supplies to maintain long-term water supply reliability. Chapter 4, Los Angeles Aqueduct details LADWP's continued commitments in the Mono Basin and Owens Valley for environmental enhancements and other uses.*

Lauren Ahkiam, Los Angeles Alliance for a New Economy (04/24/2026)

Comment: We urge LADWP to continue its focus on climate- and seismic-resilient water investments like large-scale stormwater capture projects, wastewater recycling, groundwater remediation projects, continued improvements in water efficiency, and other upgrades to modernize our water infrastructure.

Response: *LADWP's 2025 UWMP demonstrates how it will maintain water supply reliability through 2050. As noted in Chapter 1, Introduction, LADWP is committed to meeting all the City's current and future water needs while increasing supply reliability by continuing with its strategy to maintain access to imported supplies, diversifying its water supply portfolio through the development of local supplies, and continuing to improve water use efficiency and achieving significant water conservation.*

Comment: … increased investments in water efficiency upgrades (both for outdoor and indoor water use) can help customers save water and money – especially if programs are structured as direct installation retrofit programs, like LADWP's popular and successful energy programs, Home Energy Improvement Program and Commercial Direct Install. Designing programs to increase accessibility and targeting outreach to customers in need also advances LADWP's equity strategies.

Response: *As detailed in Chapter 3, LADWP offers various water conservation programs to promote water use efficiency and is also considering expanding programs to maintain compliance with the State adopted Urban Water Use Objectives.*