







Date: May 20, 2021

To: Lower Los Angeles River WASC Committee Members  
cc: SCWP Staff, Watershed Coordinator

From: OWLA Core Team (Heal the Bay, LAANE, LA Waterkeeper, Nature for All, NRDC, Pacoima Beautiful, SCOPE, The Nature Conservancy and TreePeople)

RE: Input on Project Prioritization for SCWP SIP

OurWaterLA is a diverse coalition of community leaders and organizations from across Los Angeles County united to create a strong water future for Los Angeles. Our goal is to secure clean, safe, affordable and reliable water for drinking, recreation and commerce now and for the future. We have a deep commitment to ensuring that the trust of the voters in passing this measure is upheld and that projects which achieve the three Safe Clean Water Program objectives of water quality, water supply and community investments are prioritized. Your active participation on this body is appreciated and we are excited about the prospects of working together to achieve a better water future for our region.

As we have identified in previous letters to this body, this program is dynamic, and based on the first round of project reviews, interested stakeholders such as OWLA, committee members and staff recognize the need for improvements to program metrics. With contributions from various stakeholders we are optimistic that future rounds of program funding will yield projects that not only improve water quality and water supply, but also provide community investments that are developed with community participation from concept to implementation and operations. The priorities for OWLA have always been clear, community led project designs using nature based solutions. These types of designs will not only address MS4 permit issues, but will also result in projects that can meet the multiple priorities for our region including addressing climate change, providing healthy recreational opportunities and developing engagement tools so that water issues are more broadly understood and supported by our communities.

As has been reported by staff to the committee, there is currently an assessment being conducted to determine how DAC investments and "benefits" are attributed to DAC communities. The position of OWLA on this issue is very clear; projects must be located in DACs in order to be counted. We are expecting that the reports in development by the SCWP staff working with subject matter experts for Round 4 projects will provide us all with the metrics necessary to plan for and achieve our DAC investment goals. Until that time, we are urging all

WASCs to use only the benchmark of projects located in a DAC to count toward the 110% threshold.

The task before you is to consider the prioritization of projects for funding in this round for the 2021-22 SIP. After careful review of the project submissions, **OWLA strongly recommends** that you approve only those projects that:

- clearly demonstrate they have a strong community engagement plan,
- include a significant community investment element and
- as, applicable, are located in a DAC.

For this WASC the following infrastructure projects are recommended for approval:

- The City of South Gate's Urban Orchard Project
- LAUSD's Huntington Park High School Storm Water Management System
- LA County's Compton Blvd. Project

With respect to the special studies presented to this WASC, our recommendation is as follows:

OWLA recommends approval of:

- Gateway Water Management Authority's Gateway Area Pathfinding Analysis (GAP Analysis)

*Regional Pathogen Reduction Study – Gateway Water Management Authority:*

We recommend that no funding be allocated for the Regional Pathogen Reduction Study. We have serious concerns about the legitimacy of this proposed study as no scientific professionals were involved in the development of the study, which is required under the SCWP Scientific Studies Program when feasible. We do appreciate the external review conducted by the Southern California Coastal Water Research Project, but these external experts seem conflicted about how well this study will achieve its proposed goals. OWLA agrees, as we do not understand what new information will be achieved with this study. Additionally, this proposal targets a specific source of a specific pollutant rather than providing multiple benefits, and will potentially weaken water quality objectives rather than improving our water quality. This proposed study therefore will not support many of the program goals. There are already other potential opportunities to conduct a study like this, including through the Stormwater Monitoring Coalition, which already has a similar study in its 5-year plan. Therefore, funding should instead be spent to invest in our communities with multi-benefit stormwater capture projects.

Thank you for your consideration of these recommendations. We look forward to continuing our engagement with this committee and the new watershed coordinators to ensure a better water future for the region.

Thank you,

OurWaterLA