



February 23, 2023

Safe Clean Water Program, SMBC,

We would like to start by saying the goals of the SCWP are vital to the resiliency of disadvantaged communities and well-being, especially within Los Angeles (and beyond); and we want to thank you for taking on this herculean task of managing it.

To this point, we would like to take some time to explain the challenges we face as a nonprofit organization— one that is directly linked to our stakeholders (and therefore answerable). The issue of timing and when funding is available to perform the work is one of main concern. We are happy to redirect our efforts and resources towards the TRP route. However, the deleterious issue is if funding is available solely in 2024, this will have real world consequences to the communities we represent. Additionally, the opportunities to collaborate with others that have contiguous projects will be harmed. We have been actively seeking out partnerships, and are having discussions with other parties that the WASC has recommended we reach out to along the Ballona Creek. Our Blackwelder Community Greenbelt along the West Adams Channel has the potential to *exponentially* benefit these overall projects: such as mini parks, an extended bike path, water quality and water quantity infrastructures, *any and all green improvements* \downstream projects, etc. Our site also has the added bonus of *linking* these other projects to directly benefit DACs (since our site is actually in a DAC area). Delays in starting the CGW Blackwelder Community Greenbelt project will further the continuation of disadvantages that the communities face (like lack of green spaces and more critically, will also delay the direct benefits to DACs).

If we are to move in-step with these projects, we ask that the WASC SMBC committee look into solutions that can most efficiently and beneficially help all of us reach our goals of supporting the main goals of Measure W and the SCWP.

Please reach out if you have any questions, comments or concerns. We will also be available at the WASC SMBC meeting at the end of the month.



Date: February 28, 2023

To: Central Santa Monica Bay Watershed WASC Committee Members
cc: SCWP Staff, Watershed Coordinators

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

The task before you is to consider the prioritization of projects for funding for the 2023-2024 Stormwater Investment Plan (SIP). OurWaterLA (OWLA) urges the Central Santa Monica Bay Watershed Area Steering Committee (WASC) to approve projects that include strong remarks for water quality and water supply and that:

- utilize vegetated nature-based solutions,
- clearly demonstrate a strong community engagement plan and process took place,
- include a significant community investment element,
- provide benefits directly to and, as applicable, are located in a disadvantaged community, and
- promote green jobs.

Recommendations on Infrastructure Projects (IP)

OWLA recommends the Imperial Highway Green Infrastructure Project for funding approval. We believe it represents a good project and particularly want to highlight the following project elements:

- Removal of impervious surface and integration of nature-based solutions including trees, bioswales, and native landscaping.
- While not claiming any water supply benefits, the project's shallow groundwater infiltration will support soil health and vegetation.
- Community enhancements including improving active transportation routes and access to recreational activities and LAX facilities.
- Well documented survey efforts, meeting presentations, and communications and input gathered from engagement.
- Fourteen letters of support that span City representatives and resident committees, residents, and environmental and active transportation nonprofits.
- Assumed Project Labor Agreement in place which will ensure good, green, local jobs.
- Considerable amount of leverage funding from the Cities of El Segundo and Los Angeles and Los Angeles World Airports.

While the project is claiming disadvantaged community benefits, we want to push back on this claim at this time given the application explicitly mentions a lack of outreach and engagement to

date to neighboring disadvantaged communities and that there will be forthcoming efforts in the design phase.

Recommendations on Scientific Studies (SS)

OWLA recommends 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. In addition, we do not understand what new information will be achieved with this study. Furthermore, this proposal targets a specific source of a specific pollutant rather than providing multiple benefits, and will potentially weaken rather than improve water quality objectives. This proposed study therefore will not support many of the program goals. Funding should instead be spent to invest in multi-benefit stormwater capture projects in our communities.

Recommendations on Technical Resources Projects (TRP)

OWLA recommends the Blackwelder Tract Community Greenbelt BMPs and Landscape Improvement for funding approval. We appreciate that the project is guided by early and ongoing community engagement efforts. Project proponents have also demonstrated attention to maximizing community benefits, improving connectivity between community assets, and integrating nature-based solutions. We believe TRP funding can support development of a strong feasibility study for consideration in future rounds.

Initial Findings from Round 4 Project Review

When OWLA reviews projects, it considers several different categories:

- Location within or outside of a disadvantaged community census block group
- Whether addressing an actual community need or priority, especially if claiming disadvantaged community benefits
- Anti-displacement measures
- Community support and engagement
- Water quality and water supply
- Public health and community investments
- Nature-based solutions
- Green jobs
- Cost and leveraged funding

We have summarized our initial findings to highlight the considerations we make and the concerns we have to help WASC members as they review projects. We hope these observations can also inform project developers, the ongoing Metrics and Monitoring Study (MMS), and the upcoming biennial review.

OWLA maintains that community engagement should seek to involve—if not collaborate with and empower—community members that are and will be impacted by the proposed project starting from project identification/prioritization through implementation. This looks like working closely with community members to actively solicit and incorporate input through an iterative process. Therefore, projects would adequately represent and address community needs and priorities. Using this lens, we found that:

- Most applicants did not provide enough details to allow a clear assessment. For example, some applicants listed presentations, community meetings, or tabling events

but lacked information on who participated, how many people attended, and how they were engaged (e.g., receiving information, filling out passive feedback forms, engaging in active discussion, voting on project elements).

- For applicants that did solicit input, there lacked details on how community visioning and feedback specifically contributed to project changes and if not why.
- A few applicants cited outdated activities or letters of support without clearly outlining whether there have been changes to the project since then and how they have contributed to the iterative community engagement process.
- At least five projects were led by community organizations and/or stemmed from a community visioning process.
- Some Round 4 community engagement highlights included engaging residents on interactive mapping exercises, supporting a youth council, recruiting a project advisory group with broad stakeholder representation, conducting extensive community and youth-oriented surveys, providing compensated site visits to tribal partners, prioritizing targeted outreach to neighboring mobile home communities, and regularly meeting with organizations serving unhoused community members.

We recognize that there is ongoing evaluation of how to determine disadvantaged community benefits through the MMS. However, until this is further refined, OWLA maintains that projects must be located in a disadvantaged community and provide needed benefits directly to members of that disadvantaged community. Based on this stance, we found that:

- Out of twenty-two projects claiming disadvantaged community benefits, eight or over a third of the projects were not located in a disadvantaged community but were within a mile of one.
- Most cited interactions with community groups and nonprofit organizations rather than direct engagement with community members. They further did not clarify whether these organizations represent or aim to represent the benefiting disadvantaged communities.
- At least two applicants had yet to engage residents in neighboring disadvantaged communities despite claiming these benefits.
- Lack of adequate community engagement obscured assessments of whose needs are being addressed, who is benefitting, and whether there is local support.

Vegetated nature-based solutions (NBS) are integral to OWLA's vision for LA County. We were excited to see projects proposing to create new riparian habitat and wetlands, remove impervious surface, and plant new native trees and vegetation as part of their overall NBS strategy. Because of how NBS is scored, we have found that projects with the highest scores in NBS do not necessarily correspond to the projects that emerge as exemplar within that category. As designed, scoring criteria does not capture nuances well. Every project that passed the Scoring Committee received at least 10 points, the full points for using a natural material and a natural process. The remaining points, based on percentage of impervious surface removed, can make a project stand out artificially. For example, a project that removed 12 acres of impervious surface scored the same in the NBS category in Round 4 as a project that removed 0.14 acres of impervious surface (11/15 points) while a project that removed 0.30 acres of impervious surface scored higher than both (14/15 points). Great NBS projects score at least 10 points but can fall anywhere in the range of 10-15 points in the current criteria. This highlights how important it is to review the scope of work of projects at the WASC level during deliberations. OWLA has previously submitted recommendations on how NBS scoring could be adjusted and we encourage the SCWP to consider changes during the MMS and biennial review.

OWLA would like to see more project applicants who note they are planting native plants complement this claim with a plant palette that illustrates which plants will be included in the project. To that end, the SCWP should consider the creation of regional plant lists and regional appropriate plant characteristics that correspond to best management practices to help applicants ensure the long-term success of plantings used in SCWP projects. While we understand that turf is often a component of park rehabilitation projects, we do not like to see it and want to emphasize our opposition specifically to artificial turf. We encourage applicants that are considering turf to consider native grasses as an alternative to turf or to avoid turf altogether within the scope of their SCWP projects. We also recommend that the SCWP require applicants to disclose how many existing mature trees are being removed by the project to ensure that there is adequate replacement and mitigation by the project.

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.

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

Sincerely,

OurWaterLA

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 uphold the trust that voters had in us when passing this measure and that projects which achieve Safe Clean Water Program objectives of water quality, water supply, nature-based solutions and community investments are prioritized.

