



April 11, 2023

Regional Oversight Committee
Sent via email

RE: Input on SCWP SIP Review

Chair Ahkiam, Vice-Chair Guerrero & Committee Members,

On behalf of the OurWaterLA (OWLA) coalition, the undersigned recommend that the Regional Oversight Committee (ROC) approve the Stormwater Investment Plans (SIPs) for 7 of the 9 Watershed Area Steering Committees (WASCs), but send two SIPs back to WASCs for reconsideration:

- **The Imperial Highway Green Infrastructure Project should be sent back to the Central Santa Monica Bay (CSMB) WASC to reconsider its classification of that project as “Disadvantaged Community (DAC) Benefiting”; and**
- **The Upper LA River (ULAR) WASC SIP should be sent back so that the Bowtie Demonstration Project can be reconsidered for full *or partial* funding.**

Imperial Highway Project and DAC-benefiting Criteria

The Imperial Highway Green Infrastructure Project is one of the seven priority projectsⁱ that OWLA recommended be funded. However, we were disappointed that **the CSMB WASC determined that the project was DAC benefiting, despite being 2.5 miles away from the nearest disadvantaged community and being located in an area that scores in the 36th percentile on CalEnviroScreen** per the Watershed Coordinator presentation. According to their application, the project has also not conducted outreach to disadvantaged communities to understand whether or not those communities consider it a project that enhances their communities. The rationale that was used to justify its classification was that the amenities provided (safe access routes for pedestrians, cyclists, and motorists to Dockweiler State Beach and LAX) will benefit some members of disadvantaged communities.

Forgetting even that these amenities will also benefit many more people outside DAC communities, we fear the precedent of this decision - that any project (no matter how far outside a heavily burdened community) can be classified as DAC-benefiting if some members of frontline communities might take advantage of the proposed project. OWLA was, during Measure W negotiations, a major advocate for setting aside funds for projects in communities that have long faced racist land-use practices and serious underinvestment as a way to start offsetting these historic practices. We were concerned when a specific definition of what types of projects would qualify was not included in the measure (in favor of the much more vague ‘DAC benefiting’ criteria), precisely because we feared an expansion of what types of projects would qualify that would render this requirement practically meaningless.

This, we fear, has come to pass. The Metrics and Monitoring Study (MMS)-commissioned report undertaken by UCLA Luskin Center for Innovation and Stantec, [Equity in Stormwater Investments](#), found that:

*Analysis of these [SCWP Round 1 & 2] projects **suggests** that the SCWP is greatly exceeding its equity goal of 46% of funding benefiting disadvantaged communities, with 79% of funding **claiming** to benefit disadvantaged communities...However, **only 36% of the investments are actually located within disadvantaged communities**. The other 43% of investments are in projects that claim to provide benefits directly to a disadvantaged community population while being located outside those communities. [emphasis added]*

While being located within a DAC may not be the *only* criteria to classify a project as DAC benefiting, it is troubling that such a high percentage of qualifying projects are not located within our most burdened communities. That same assessment also found that 79% of projects in Rounds 1 and 2 of the SCWP would have been within 1 mile of a DAC.

If projects that are 2.5 miles away from a disadvantaged community can be considered DAC benefiting without a much stronger demonstration of that nexus and without those communities articulating their support for such projects en masse, then virtually any project could qualify as DAC benefiting without actually providing direct benefit to the frontline communities. Not only will such a result not achieve the intended goal of offsetting historic inequities in investment in these communities, it could actually exacerbate these inequities. That cannot be what the Board of Supervisors intended when including this provision in the SCWP. Moreover, it is our understanding that this project would not even need to be classified as DAC-benefiting to receive funding this round. But by classifying it as such, it lessens the pressure to identify and support projects that more directly benefit DAC communities in future funding rounds (in order to achieve the required percentage of DAC-benefiting projects).

In addition to sending this project back to the CSMB WASC for reconsideration of its DAC-benefiting designation, this provides another example of why the ROC must initiate its biennial review as soon as possible to consider a clearer definition of DAC benefiting and audit funded projects to ensure they are helping to achieve this critical SCWP goal.

Bowtie Project and a Rushed Process

OWLA also asks that the **ULAR SIP be sent back to that WASC so that the Bowtie Demonstration Project (a priority project identified by OWLA) can be reconsidered for full or partial funding**. Bowtie is a project that has immense community support, is *actually* located within a DAC, and will create new habitat through vegetated nature-based solutions along the LA River. In fact, it has long been one of the lynchpin projects in efforts to revitalize and restore the LA River.

Yet, it was not funded - and partial funding was not seriously considered by the ULAR WASC - largely, we fear, due to a rushed process. The ULAR WASC had more projects to consider than any other WASC this round (12 infrastructure projects + 2 scientific studies); yet, they still finished deliberations *in one meeting*. Last year for comparison, they took 3 meetings to deliberate about the same number of applications (8 infrastructure projects + 5 scientific studies + 2 TRPs).

One thing that stuck out to us was the discussion around partial funding. In previous years, due to longer discussions, if a project was on the cusp of funding or realized their original ask would not be viable, they could submit a partial funding request. When Bowtie Demonstration Project proponents indicated interest in the partial funding mechanism based on concerns presented by the WASC, it seemed the WASC decided to not consider providing a number they would be willing to offer or allowing the Bowtie

Demonstration Project to submit one because it would involve returning for an in-person meeting the following month.

We recognize that the ULAR WASC (not only the largest watershed area, but also one with ideal soils for stormwater projects) is the most competitive and oversubscribed WASC. Even so, we believe Bowtie is a true exemplar that warrants funding. That said, while it is one thing if the WASC decided that the project was not competitive, it is another to ignore the possibility of providing partial funding because it would require an additional meeting to approve a partial funding request.

While SIP deliberation has always felt rushed - a point OWLA has made before - this year faced an additional challenge as WASC meetings occurring after February 28th would need to occur in person rather than virtually. This resulted in WASC meetings with rushed discussions and abbreviated project deliberations as committee members sought to avoid having to meet in person.

In addition to our request that the Bowtie project be sent back to the ULAR WASC to consider partial (or even full) funding, we believe the process of reviewing projects is something that should be taken up as part of the biennial review to ensure adequate time for robust project deliberations. Given the breadth of issues that should be part of the biennial review (including things like defining DAC-benefiting and revisiting review process as highlighted her) as well as the volume of materials that should be considered (including several assessments already completed), we encourage the ROC to begin the biennial review as soon as possible and to start the review with briefings on existing assessments.

Conclusion

OWLA would like to thank the ROC for your service in reviewing the SIPs, as well as all the committees that have worked so hard to score projects and develop these SIPs. We are in agreement with the vast majority of the SIPs and the projects moving forward for funding (including 10 of our 11 'priority recommendations' and 'honorable mentions'). We even support virtually all of what is included in the CSMB and ULAR SIPs. That said, we owe it to the residents and businesses of LA County whose taxes are funding this program to get these SIPs right and ensure the goals of the SCWP are being fully met. We believe sending these two SIPs back to their respective WASCs to reconsider the two projects highlighted is critical to achieve these goals.

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

Sincerely,
OurWaterLA

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

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.

CC: Lauren Ahkiam, Matt Frary, Kirk Allen

ⁱ OWLA's priority projects:

1. Bowtie Demonstration Project (ULAR)
2. El Monte Norwood Elementary School Stormwater Capture Project (RH)
3. Emerald Necklace John Muir High School Campus Natural Infrastructure Improvement Project (ULAR)
4. Imperial Highway Green Infrastructure Project (CSMB)
5. Long Beach Municipal Urban Stormwater Treatment (LB MUST) Phase 2 (LLAR)
6. Wilmington-Anaheim Green Infrastructure Corridor Project (SSMB)
7. Via Princessa Park and Regional BMP Project (SCR)

OWLA's honorable mentions (fund if budget allows):

1. Eagle Rock Boulevard: A Multi-Modal Stormwater Capture Project (ULAR)
2. Earvin "Magic" Johnson Park Operation and Maintenance Project (ULAR)
3. Hollenbeck Park Lake Rehabilitation Project (ULAR)
4. Sylmar Channel Project (ULAR)



Public Comment Form

Name:* _____ Organization*: _____

Email*: _____ Phone*: _____

Meeting: _____ Date: _____

- LA County Public Works may contact me for clarification about my comments
- *Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to SafeCleanWaterLA@dpw.lacounty.gov. All public comments will become part of the official record.

Please complete this form and email to SafeCleanWaterLA@dpw.lacounty.gov by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]" (ex. "Public Comment: USGR 4/8/20").

Comments



April 11, 2023

SCWP Regional Oversight Committee
Sent via email

RE: SCWP Biennial Review

Chair Ahkiam, Vice-Chair Guerrero & Committee Members,

On behalf of the OurWaterLA (OWLA) coalition, the undersigned strongly urge the Regional Oversight Committee (ROC) to launch the inaugural biennial review as expeditiously as possible, hosting initial briefings no later than May.

Over the course of the first four rounds of the Safe Clean Water Program (SCWP), the biennial review has been cited as the point at which any course corrections will be established for the program to ensure it is fully achieving the program's laudable and ambitious goals. The communities that OWLA represents have been waiting for this biennial review as the first opportunity to take a deeper dive into the program's successes and limitations, and make adjustments to the program to meet the expectations of LA County voters. As such, we are anxious to ensure the review is as thorough as possible.

The SCWP is a massive and complex program that aims to achieve a myriad of diverse goals for the LA Region, ranging from improved water quality and enhanced local water supplies to improving health outcomes by greening local communities and workforce development. Through the first 3 rounds of funding, more than \$700M in taxpayer funding has already been earmarked through the regional program alone (and that total is much higher including municipal funding). It is imperative that the ROC take sufficient time to undertake this review, which we believe will take many months. As such, it is concerning that this process has not yet started.

The good news is that a number of SCWP assessments have already been completed, including those led by the ARLA Working Group, SCOPE, LA Waterkeeper, and Stantec with UCLA Luskin Center for Innovation (as part of the Metrics and Monitoring Study). **OWLA recommends that the ROC initiate the biennial review with briefings on these assessments beginning no later than May 2023**, either through a half day workshop or over several meetings scheduled over a short period of time. As OWLA members were involved in these reviews, we can attest to the massive undertaking it is to understand the various aspects of the SCWP in depth. While this intensive work provides an excellent foundation for the biennial review, the ROC will need sufficient time to assess these reports, identify data gaps, undertake its own research, and develop a detailed assessment and list of recommendations.

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

Sincerely,
OurWaterLA

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

CC: Lauren Ahkiam, Matt Frary, Kirk Allen

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.



Public Comment Form

Name:* _____

Organization*: _____

Email*: _____

Phone*: _____

Meeting: _____

Date: _____

LA County Public Works may contact me for clarification about my comments

*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to SafeCleanWaterLA@dpw.lacounty.gov. All public comments will become part of the official record.

Please complete this form and email to SafeCleanWaterLA@dpw.lacounty.gov by at least 5:00pm the day prior to the meeting with the following subject line: “Public Comment: [Watershed Area] [Meeting Date]” (ex. “Public Comment: USGR 4/8/20”).

Comments



Public Comment Form

Name*: _____ Organization*: _____
Email*: _____ Phone*: _____
Meeting: _____ Date: _____

LA County Public Works may contact me for clarification about my comments
*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to SafeCleanWaterLA@dpw.lacounty.gov. All public comments will become part of the official record.
Please complete this form and email to SafeCleanWaterLA@dpw.lacounty.gov by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]"
(ex. "Public Comment: USGR 4/8/20").

Comments



Public Comment Form

Name:* Fernando Garcia de Alba Organization*: Cal Poly Pomona (CPP)
Email*: falba@cpp.edu Phone*: (951) 367-5421
Meeting: Regional Oversight Committee Date: 4/20/2023

LA County Public Works may contact me for clarification about my comments

*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to SafeCleanWaterLA@dpw.lacounty.gov. All public comments will become part of the official record.

Please complete this form and email to SafeCleanWaterLA@dpw.lacounty.gov by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]" (ex. "Public Comment: USGR 4/8/20").

Comments

Good Afternoon,
My name is Fernando Garcia,

As a student in Cal Poly Pomona, I wanted to express my gratitude to the last year committee for funding CPP's previous study. During the past year that I worked on that project, I found a much deeper understanding of water management infrastructure systems in this region, specifically, drywell systems, their constructions, their recharging mechanisms among others. This was indeed a unique work opportunity for me as a first-generation college student, and made me to decide to continue working in water infrastructure here in southern California. Funding this new proposal this year, will help students like me who have a passion in water infrastructure to get hands-on experience and apply school concepts to real life projects.



Public Comment Form

Name*: Mehrad Kamalzare, Ph.D., P.E. (CA, NY, CT) Organization*: California State Polytechnic University, Pomona
Email*: mkamalzare@cpp.edu Phone*: 909-869-4908
Meeting: Regional Oversight Committee Date: April 19, 2023

LA County Public Works may contact me for clarification about my comments

*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to SafeCleanWaterLA@dpw.lacounty.gov. All public comments will become part of the official record.

Please complete this form and email to SafeCleanWaterLA@dpw.lacounty.gov by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]" (ex. "Public Comment: USGR 4/8/20").

Comments

Good afternoon,

My name is Mehrad Kamalzare, Associate Professor, Cal Poly Pomona (CPP). I am submitting this card in support of CPP proposed scientific study.

Our proposed scientific study for this year has received the highest rank from the external reviewers (see page-5 of the ULAR SIP document). It received no negative comment during any of the steering committee meetings. However, it was removed from the suggested funding list due to one comment at the very end of the last ULAR WASC meeting. The comment stated that our study is already being conducted by the LA County Public Works. However, the County Public Works reached out to us recently, and informed us that the comment was a "misunderstanding", and it does NOT apply to the CPP proposed study.

Being glad that it has now been clarified by the County that "CPP's proposal is not currently covered in County's existing or proposed study", we would like to ask this committee to kindly reconsider funding our proposal based on its merit, top-score, and its potential to develop a unique technology for LA County.

Thank you.

