



May 15, 2018

Hon. Sheila Kuehl, Chair, Los Angeles County Board of Supervisors
Hon. Janice Hahn, Chair Pro Tem, Los Angeles County Board of Supervisors
Hon. Hilda L. Solis, Supervisor, First District, Los Angeles County
Hon. Mark Ridley-Thomas, Supervisor, Second District, Los Angeles County
Hon. Kathryn Barger, Supervisor, Fifth District, Los Angeles County
Mark Pestrella, Director of Public Works, Los Angeles County

RE: Safe, Clean Water Program

Dear Honorable Board of Supervisors and Director Pestrella,

The Los Angeles Alliance for a New Economy (LAANE) is pleased to submit comments on the County's Safe, Clean Water Program draft program elements (SCWP or Program). We support the OurWaterLA Coalition's principles (we are a proud member), and write to emphasize job quality and equity pieces imperative for a successful Program. Since 1992, LAANE has worked alongside our allies for **good jobs, thriving communities, and a healthy environment**, such as winning policies reducing 90% of Port trucking emissions, and setting standards for good, accessible jobs on \$12 billion in infrastructure investments. The SCWP could create over **9,500 new jobs** and **\$14 billion** in economic activity over a 30-year investment, according to our [research](#). These public investments can lead to economic and climate resilience, if the Program ensures high standard construction and maintenance, equitable investments, and deep engagement of stakeholders, particularly of low income communities of color.

How Projects Are Built and Maintained

Built: Construction can be a ladder to the middle class when built using the framework of a Construction Careers Policy incorporating targeted hire for local workers and those facing barriers to employment.

- To ensure Projects are on-time and on-budget and to ensure worker safety, a **Community Workforce Agreement (CWA)** must apply to Projects with a project budget over \$2.5 million.
- The proposed Agreements for Transfer of SCW Program Funds (p. 8) are imperative to realizing the County's goals and standards, particularly contracting requirements like **Local and Targeted Worker Hire**. These agreements must apply to all funds.
- Municipal program expenditures should be spent constructing and maintaining multi-benefit projects, with a **10% limit on single-purpose water quality measures** like streetsweeping.ⁱ We support the County's proposal allowing 30% of Municipal funds to maintain existing projects.

Maintained: Improperly maintained Projects fail to function and can exacerbate vector control and pollutant issues, negating the original investment. Projects require frequent and consistent maintenance and specialized training on equipment, native plants, habitats. Projects will be distributed throughout the County and developed by different entities, making monitoring difficult if responsibility is disbursed.

- To ensure **consistent and comprehensive operations and maintenance (O&M)**, the County should assume O&M of new capital projects where O&M is funded via this measure, assembling

a **specially trained public-sector team** reflecting the expertise required, such as landscape and grounds maintenance crews, skilled craftspeople, scientists, and engineers.

- Cities that prefer to use their own public-sector maintenance team or a **qualifying workforce development program** could apply to do so. Eligible workforce development programs should create a pre-civil service pipeline into public sector jobs, inform necessary trainings through labor-management partnerships, and pay a **living wage to trainees** conducting maintenance.ⁱⁱ
- Each project should include a **formal and specific O&M plan**, developed in conjunction with initial project design, reviewed periodically, and including a tracking system.
- Maintenance of commercial or industrial projects, when funded by an ongoing credit or through a reduced tax rate, must be maintained through a **“green infrastructure”-certified workforce**.

Workforce Development: We are glad to see the County’s support for workforce development, necessary to train the next generation of experts able to build and maintain innovative projects.

- The measure should provide at least **\$30 million every 5 years** to develop a curriculum, fund training programs (including apprenticeship readiness programs using Building Trades Multi-Craft Core Curriculum and labor-management apprenticeships), help meet hiring goals, train existing staff, fund jobs coordinator positions to assist with placement, and other needs.
- These programs must be **approved by the County** to ensure high standards. Programs should be geographically distributed, and incorporate **partnerships** with educational institutions, community organizations/faith-based groups, and unions/employers.
- Workers that have successfully completed these programs should get **priority hiring**.
- Participants doing on-the-job training work should receive a **living wage**.ⁱⁱⁱ
- The County should establish a **green infrastructure construction/O&M certification** such as partnering with the National Green Infrastructure Certification program.^{iv}

Who decides the projects is key, given the Board’s commitment to “ongoing stakeholder involvement in program implementation to help ensure that benefits are realized throughout the region”:

- We support the County’s inclusion of **community stakeholders** on the Regional Oversight Committee and Watershed Area Steering Committees (WASC), and the provision of technical training if needed. These leaders have unique expertise in issues affecting their communities.
- It is especially crucial that low-income communities of color/environmental justice communities have at least **one designated representative on each WASC**, similar to the County’s earlier “DAC Stakeholder” proposal. This seat should not be represented by an elected official.

The **type of projects** and the **process** matter to achieving the County’s goals:

- Equitable funding: given 41% of the County’s population is considered “disadvantaged”, we support the County’s dedicated funding via the “110%” proposal, and support points in the Regional program for projects invested in DACs. At least **41% of funds must be made directly in and benefitting disadvantaged communities**, such as in the [California Climate Investments](#). Any rebate/incentive program should be accessible to and targeted at low-income parcels.
- Tax structure: There must be a **limit on the tax burden for low-income residents**, given the constraints AB 195 imposes on a progressive tax structure, such as a cap for medium- to small

residential parcels or a discount program. For example, SCOPE proposes a split-roll to limit the burden on smaller parcels. The amount of the tax should increase with inflation.

- **Regional program project criteria:** All projects must provide **water supply and community benefits, and ensure minimum water quality thresholds** are met. Projects must incorporate **nature-based/nature-mimicking** techniques to provide community benefits and limit negative environmental impacts. Project criteria must evaluate and prioritize projects that can meet goals with **minimal greenhouse gas emissions**. Projects should reflect community engagement in the design, which can help mitigate the threat of displacement from new investments.
- Evaluations of cost-effectiveness must explore how to **incorporate the value of co-benefits**, like quality jobs, and the **cost of secondary environmental impacts**, like greenhouse gas emissions. Jobs created should be tracked, as recommended by SCOPE.

We applaud the Board, led by Supervisors Kuehl and Solis' motion, for its commitment to a strong water future and triunal emphasis on water quality, water supply, and community benefits, and the motion's focus on local job training and employment opportunities. We commend the hard work of the Department of Public Works and many elements of the draft SCWP. With these provisions included, we look forward to working with the County for a successfully developed, adopted, and implemented Safe, Clean Water Program.

Sincerely,



Lauren Ahkiam
Director, Water Project

CC: Angela George, Department of Public Works, Los Angeles County
Russ Bryden, LA County Department of Public Works
Leslie Friedman-Johnson, CNRG
Rachel Roque, CNRG

ⁱ [Research](#) shows that “there is little probability that street sweeping, regardless of street-sweeper type, had any measurable affect on the quality of runoff.” Additional [research](#) has shown that streetsweeping is “primarily a neighborhood livability issue” and that “studies show that street sweeping has little benefit for water quality.”

ⁱⁱ Models include the City of LA Department of Water and Power's Utility Pre-Craft Trainee Program, LA Trade Technical College's train-in-place partnership with the City of LA's Bureau of Street Services, and WERC's partnership with the County of LA leading to placement in entry-level County positions.

ⁱⁱⁱ For example, the highly successful Utility Pre-Craft Trainee program at LADWP, installing energy efficiency retrofits, pays trainees \$17/hour ([source](#)).

^{iv} This [certification](#) was developed by the Water Environment Federation and DC Water (District of Columbia Water and Sewer Authority).