



**The RIVER
PROJECT**

12215 Ventura Blvd, # 111

Studio City, California 91604

tel: 818-980-9660

www.TheRiverProject.org

July, 13 2018

TO: 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 Los Angeles County Board of Supervisors,

The River Project (TRP) is a 501(c)(3) nonprofit with a mission to advance responsible planning and management of our lands, working toward living rivers nourished by healthy watersheds for the social, economic, and environmental benefit of our communities. TRP supports the May 30, 2017 motion by Supervisors Sheila Kuehl and Hilda Solis *Regional Water Resilience Planning, Outreach, and Engagement, and Stormwater Capture Expenditure Plan*. We acknowledge the critical need for a County stormwater funding mechanism. The latest draft *Safe, Clean Water Program* Ordinance and Program Elements reflect areas of progress that could be considered hopeful.

However, there are several specifics in the latest draft Ordinance that we feel present significant impediments to success. Among them are: a definition for Nature-Based Solutions that is in fundamental conflict with the term itself; a governance structure still too top-down and not meaningfully inclusive; the absence of any reference to the critical need for—or clear pathway to develop—a residential retrofit incentive program; a staggeringly underwhelming ~\$1.2M/yr. for *all* Programs; the persistent use of “either/or” with respect to “multiple benefits”; the hurdles for residential property owners to receive waivers and credits making even exemptions for qualifying seniors unlikely; and no apparent mechanism for land conservation without capital improvements. TRP and others have provided input on these issues throughout the process.

While it's encouraging to see that there appears to be room and time to develop and finalize components of the Program Elements, and that a provision for future amendments to the Ordinance exists, the adopted Ordinance is going to set the frame for at least the first decade.

Given that, unless the definition of Nature-Based Solutions is changed, we find the program impossible to support.

The current definition now conflates Nature-Based Solutions with grey-green infrastructure projects, which not only strips us of a means to differentiate between the two, but renders the project prioritization—intended as a mechanism to simultaneously address multiple challenges and advance practice in the region—meaningless. The end result will be investments in projects no better or more cost-effective than those we implemented 20 years ago.

As described in our recent report *Measuring Benefits of Distributed, Nature-Based Solutions* (attached), consideration of typology and scale in project analysis and ranking are key to making sound decisions about financial investments in our water future. A diverse suite of projects at different typologies and scales are appropriate for different situations—including grey and grey-green infrastructure. However, the comprehensive benefits and cost-effectiveness of

projects that rely predominantly on soils and vegetation objectively set them apart for prioritization, which is not meaningfully captured or reflected.

Therefore, we strongly encourage the following, more appropriate definition:

Nature-Based Solutions: Projects that **rely predominantly on soils and vegetation to facilitate natural processes** which slow, detain, infiltrate, and/or filter Stormwater and/or Urban Runoff. **Nature-Based Solutions provide additional benefits such as: sequestering carbon, providing shade, supporting biodiversity, and improving quality of life for surrounding communities. Examples** include: increasing permeability of Impermeable Areas; protecting undeveloped mountains and floodplains; creating and restoring riparian habitat and wetlands; creating rain gardens, bioswales, and parkway basins; **enhancing soil through composting, mulching; and planting trees and vegetation, with preference for native species.**

Nature-Based Solutions do not include nature-mimicking Green Infrastructure projects such as green streets relying predominantly on concrete and pipes, scarified spreading grounds, and planted media relying predominantly on fabricated or constructed water storage capacity.

We appreciate your attention to these comments and those submitted previously.

Sincerely –

Melanie Winter
Founder & Director

Johnathan Perisho
Design & Policy Director

CC: Russ Bryden, Public Works, Los Angeles County
Genevieve Osmena, Public Works, Los Angeles County
Matt Frary, Public Works, Los Angeles County
Leslie Friedman Johnson, Conservation and Natural Resources Group
Rachel Roque, Conservation and Natural Resources Group
Kelly Cook, Conservation and Natural Resources Group
Deb Smith, Los Angeles Regional Water Quality Control Board