



TIM McOSKER
Councilmember, 15th District

February 3, 2023

Los Angeles County Safe Clean Water Program
South Santa Monica Bay Watershed Area Steering Committee
Regional Oversight Committee
Scoring Committee

Subject: Support for Machado Lake Operation and Maintenance Project for Safe Clean Water Program
Fiscal Year 2023-24 Stormwater Investment Plan

Dear Committee Members,

I am writing to express my support for Los Angeles Sanitation and Environment's proposed Machado Lake Operation and Maintenance Project ("Project") funding application for the Safe Clean Water Program's Regional Infrastructure Program for the Fiscal Year 2023-24 Stormwater Investment Plan.

As you may be aware, Proposition O funded the \$100 million Machado Lake Rehabilitation Project, which was completed in 2017. Unfortunately, Proposition O did not provide for the funding of the operations and maintenance of projects. Due to budget constraints, the City of Los Angeles has been forced to defer many critical operations and maintenance tasks, which continues to endanger the lake's complex and complicated structural, mechanical and natural systems. The funding of operation and maintenance tasks is imperative to the long-term success of the original Proposition O-funded lake rehabilitation project.

The funding for the Project will also assist the City of Los Angeles in achieving three important goals. First, it will ensure that Machado Lake will provide beneficial and recreational uses for Angelenos as well as enhanced habitat for Southern California wildlife. Second, the proper maintenance of Machado Lake will help protect our downstream communities and beaches from contaminants that can make people sick and threaten marine life. Lastly, it will allow Los Angeles to comply with Machado Lake's federal, state and local regulatory mandates.

The Machado Lake Operations and Maintenance Project is an ideal example of a multi-benefit project that meets the criteria, vision and mission of LA County's Safe Clean Water Program. I fully support this Project. Thank you for your consideration.

Sincerely,


TIM McOSKER

Councilmember, 15th District



Date: 2/15/2023

To: South Santa Monica Bay WASC Committee Members
cc: SCWP Staff, Watershed Coordinator - Nancy Shrodes

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 in this round for the 2023-2024 Stormwater Investment Plan (SIP). OurWaterLA (OWLA) urges the South 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 to and, as applicable, are located in a disadvantaged community, and
- promote green jobs.

There were a number of good projects proposed for the 2023-2024 SIP in the South Santa Monica Bay. OWLA would like to highlight the **Wilmington-Anaheim Green Infrastructure Corridor Project** as an exemplary project and recommend it for funding approval.

This project addresses all of the main objectives for the Safe, Clean Water Program (SCWP) by providing good water quality benefits, some water supply benefit (which is a challenge in the South Santa Monica Bay), multiple community investments to support public health, and good incorporation of nature-based solutions that include the use of healthy soils and vegetation. In addition, this project is located directly within a Disadvantaged Community (DAC), and will therefore directly benefit that community. Community engagement for this project has been strong, involving DAC members and expanding as needed to improve cultural relevance, both of which help to ensure that local needs are met. There is also indication that a Project Labor Agreement will be in place for this project, ensuring good, green, local jobs. OWLA hopes to see more projects like this being proposed and funded through the SCWP in the future.

When OWLA reviews projects, we consider several different categories:

- Location (within/outside a DAC)
- Does the project address an actual need of an underserved community?
- Anti-displacement measures
- Community support and engagement
- Water quality and water supply
- Public health, community investments, and multiple benefits
- Nature-based solutions
- Green jobs
- Cost and leveraged funding

We have summarized our observations across these categories 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 design 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 (ex. 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 Metrics and Monitoring Study. 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 don't 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- 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.

