



Scoring Committee Memo

To: Safe, Clean Water Program Scoring Committee From: Safe, Clean Water Program Regional Coordination Team
Date: January 4, 2023

Reference: Scoring Committee Comments and Recommendations – Round 5 Projects

Purpose and Background

At the December 7, 2023 Scoring Committee (Committee) meeting, Committee Members requested that the Regional Coordination team summarize the observations and recommendations made by the Committee about the Safe, Clean Water Program (SCWP) scoring criteria during the evaluation of Round 5 projects (Fiscal Year 2024-2025 Call for Projects).

Because of ongoing work from the Metrics & Monitoring Study (MMS) and the work of the Regional Oversight Committee (ROC) Biennial Report, this year the memo also expresses linkages between Committee observations and recommendations being made by other adaptive management efforts.

Scoring Committee Recommendation #1: Implement separate applications for Infrastructure Program Projects that are in different stages of development

In Round 5 and prior rounds of scoring, the Committee expressed difficulty in evaluating the three types of Infrastructure Program Project submittals: design, construction, and operations & maintenance (O&M). The Committee believes projects at different stages of development requesting funding for different phases warrant different application requirements and different scoring approaches. For example, the Committee is requiring site-specific geotechnical reports for construction funding requests but may accept simpler analyses for design-only applications.

The Committee recommends that the SCWP encourage projects that apply for design, construction, and/or O&M funding to submit separate applications, acknowledging there are multiple phases of the project. The Committee has previously suggested modifying Feasibility Study Guidelines and the Project Module to outline specific requirements for each project submittal type:

- a. Design-Only Projects:
 - i. A more flexible application process
 - ii. Require conceptual plan/feasibility study (already required)
 - iii. No required letter from Watermaster or Sanitation agency verifying Water Supply Benefit potential
 - iv. Preference for on-site geotechnical analysis, but would be satisfactory to use existing or nearby geotechnical information
- b. Construction Projects:
 - i. Require a minimum of 60% design plans (elevation and profile plans, strong cost estimates)
 - ii. Require site-specific geotechnical analysis
 1. "Site-specific" information should refer to data obtained at the project location or another maximum distance decided upon by the Committee.
 - iii. Require a letter from Watermaster or Sanitation agency verifying capacity to provide Water Supply Benefit
- c. Operations & Maintenance Only Projects:
 - i. Require monitoring data rather than modeling data

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In the past, the Committee also requested guidance on how to evaluate design-only projects that propose a variety of alternatives. Existing policy says that a project seeking funding for the first phase scope of a multi-phase project cannot claim benefits beyond what the first phase will achieve. In situations where an applicant is seeking funding for a design phase where multiple potential implementation scenarios exist, the Committee would like clearer guidelines about how to evaluate projects that propose a variety of alternatives.

Finally, the Committee previously requested guidance affirming that the cost/benefit calculations for project benefits are based on the entire cost and merits of a project rather than just components of the project funded by the SCWP. Some applicants have elected to include only partial project costs in the cost/benefit calculations.

Alignment with existing recommendations:

Adjusting the application process for various stages of project development is supported by the ROC. To expedite watershed planning efforts, the ROC has recommended that the SCWP “develop guidelines/criteria to streamline applications for various sized projects and various stages of development” as part of Biennial Report recommendations.

In the November 27, 2023 letter from the Director of Public Works to the Board of Supervisors, three items were called out as being responsive to the July Board motion for “accelerating implementation of the” SCWP. Item 2 is entitled “Plans to improve, streamline, and simplify the regional application process.” Shared there is a planned effort to create “alternative application pathways based on project phase[s].”

Scoring will be impacted by the establishment of separate guidance or application processes based on project stage.

Scoring Committee Recommendation #2: Consistent inputs for Water Quality Benefits

The Committee continues to express a challenge with making consistent comparisons of Water Quality Benefits across projects. The Committee has recommended the following changes be made to standardize calculations and information inputted by applicants:

1. Changes to Projects Module:
 - a. Allow applicants to select multiple BMP types in series or parallel to be evaluated.
 - b. Revise the Projects Module to accurately predict Water Quality Benefits based on 24-hour BMP capacity determined using reservoir routing for the design storm, typically the 85th percentile storm.
 - c. Allow dry weather pollutant loading calculations to be superseded by monitoring data, if available.
 - d. Investigate standardizing the process for the flow calculation inputted by the applicant.
2. Changes to Feasibility Study Guidelines:
 - a. Require site-specific geotechnical reports for projects applying for construction funding. “Site-specific” information should refer to data obtained at the project location or another maximum distance decided upon by the Committee.
3. Changes to Scoring Criteria:
 - a. Allow applicants to categorize the project using a load-based criteria (i.e., pounds of pollutants removed), in addition to dry weather or wet weather scoring criteria.
 - b. Create sliding scale for projects that capture quantities between dry weather and wet weather capacities.

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- c. Revise the cost-effectiveness (per acre-foot) criteria under A.1.1 Wet +Dry Weather Water Quality Benefit section to provide additional point scale flexibility so that project scores can be tallied at one-point increments (as compared to the current stepwise criteria).
- d. Consider creating a cost-effectiveness category for the A.2 Dry Weather Water Supply Benefit section (possibly employing a flow rate per dollar metric such as GPM/\$1M).

Alignment with existing recommendations:

These suggested changes are underscored by the MMS, which recommends benchmarking performance to adapt Water Quality guidance and scoring. If, for example, continuing projects are successfully reducing pollutants with multiple BMP types, an adaptive response would be to allow applicants to select multiple BMP types in the Projects Module.

In addition, the ROC has recommended that the SCWP “establish Water Quality quantitative goals and develop a plan with timelines to accomplish these goals. Ensuring that these goals and planning efforts are developed to build upon established regional water quality programs and projects (e.g., Municipal Separation Storm Sewer System (MS4) permit) and include characterization of upstream and downstream program interactions.” It is unclear how a SCWP goal of supporting MS4 compliance quantitative targets would enrich the identification of eligible projects. Currently, SCWP projects must be included in a plan for MS4 compliance or an Integrated Regional Water Management Plan, suggesting that SCWP is prioritizing support for projects that have been deemed important to other regional efforts. This step, where projects must contribute to other regional goals, is evaluated by staff during completeness checks, and doesn’t come before the Committee.

Scoring Committee Recommendation #3: Clarify eligible claims to Water Supply Benefits

In Round 5, the Committee only awarded Water Supply Benefit points to projects that could demonstrate proof of generating new water through infiltration to currently pumped groundwater aquifers, diversion to reclamation facilities, or onsite reuse. The Committee requested that all claims be verified with a letter from the appropriate Watermaster or agency overseeing the reclamation of diverted stormwater (e.g., Los Angeles County Sanitation Districts). The Committee previously recommended modifying the Feasibility Study Guidelines to require that projects which claim Water Supply Benefits via offsetting potable water demand provide an analysis of supply and demand impacts of the project. In addition, the Committee noted that the appropriateness of claiming water supply gained through sanitary sewer diversions has been a long-standing issue as the timing of stormwater capture projects and reclamation facility improvements may be misaligned, and the future ability for diverted stormwater to be fully used for reclamation remains speculative.

Of the 20 projects scored in Round 5, only 9 projects received Water Supply Benefit points. The average Water Supply score across all evaluated projects was 6 out of a maximum of 25 points. The Committee has previously acknowledged that the current Water Supply scoring criteria prevents them from awarding Water Supply Benefit points to projects that lack robust proof of creating new water supplies.

To address difficulty in claiming Water Supply Benefit points, the Committee has previously recommended either changing the SCWP ordinance definition of Water Supply Benefit to include activities that infiltrate water with the *intent* to replenish groundwater or adjusting the scoring criteria to include specific thresholds for each Watershed Area, creating a “base plus bonus” system of scoring, and/or assigning weights to different scoring sections.

Alignment with existing recommendations:

Improving how the SCWP’s achieves the goal to increase water supply from stormwater is a focus area of the ROC’s Biennial Report recommendations. To expedite watershed planning efforts, the ROC recommends

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setting “a region wide water supply target of 300,000 acre-ft of additional stormwater capture by 2045.” In addition, the ROC would like to “clarify that claiming Water Supply Benefits requires an applicant to demonstrate that the stormwater capture is “new” water and will be available for regional water supply.”

The MMS provides additional recommendations on how to better account for SCWP attainment of capturing more stormwater and provide insight on potential endpoints of captured water and progress towards goals. The Project Module currently equates water supply to a project’s annual capture volume. The MMS notes that “a more nuanced approach is needed to parse capture volume into specific fates, like infiltration to confined aquifer, infiltration to deep aquifer, diversion to reclamation facilities, or onsite reuse.” MMS recommends collecting additional metrics to represent the fate of managed stormwater, including the annual volume of stormwater managed (acre-ft/year), parsed by fate. However, which fates constitute a “locally available” water supply must be agreed upon by the District and stakeholders. It is likely that the Committee will play a role in verifying whether projects are creating “new” water based on the applicants’ ability to provide adequate proof of potential endpoints of the captured stormwater.

Scoring Committee Recommendation #4: Evaluate Water Supply scoring methodology and Alternate Water Supply Scoring Pilot

In Round 5, applicants had the opportunity to select the Alternate Water Supply Scoring Pilot developed through the MMS. The alternate scoring rubric calibrated Water Supply Benefits scoring to historical projects, to allow for project proponents to potentially increase their Water Supply Benefit score and address stakeholder concerns about inflation. Of the 20 projects scored in Round 5, 8 projects opted to use the Alternate Water Supply Scoring Pilot. Projects that used the Alternate Water Supply Scoring Pilot scored an average of 11 Water Supply Benefit points, compared to projects scored using the current Water Supply scoring rubric which scored an average of 3 Water Supply Benefit points.

The Committee noted that the use of a cost-effectiveness metric is misleading, because when calculating the Water Supply Benefit against the entire project cost, very high dollar-to-benefit comparisons are made. Because projects are mostly spending on benefits other than water supply, it leaves the sense that these projects are producing very expensive water supplies. Committee Members have pointed out that the multi-benefit nature of projects makes it difficult to determine the exact amount of money that produces Water Supply Benefits. The Committee recognizes that this scoring metric is one that offers comparisons between the proposed projects, but still finds the dollars-per-volume values to be troubling.

The Committee also expressed concern that the Alternate Water Supply Scoring Pilot, which made Water Supply Benefit points more easily earned, has unintentionally deemphasized the importance of CIBs, community engagement, Nature-Based Solutions, and leverage funding. Because eligibility can be achieved more easily with just Water Quality and Water Supply Benefits, other aspects of the program may suffer.

Alignment with existing recommendations:

The Committee has previously recommended adjusting scoring criteria with recommendations from the MMS investigation on how to lower or recalibrate the B.1 cost effectiveness section for Water Supply Benefit points. As a result, the MMS produced the Alternate Water Supply Scoring Pilot and recommended that SCWP evaluate the results to further refine Water Supply guidance and scoring.

The ROC has recommended that SCWP “develop guidelines/criteria to incentivize large infrastructure projects and investments.” Utilizing cost-effectiveness as a scoring metric will likely play a role in determining which projects (e.g., large or small, extent of multi-benefit features) move forward for consideration.

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Scoring Committee Recommendation #5: Clarify eligible claims of Community Investment Benefits

In Round 5, the Committee continued to reflect on how flood protection can be considered under the CIB section. In previous rounds of scoring, the Committee decided that only projects that capture the 85th percentile storm can receive flood management benefits. However, the Committee has also discussed how this restriction may prevent CIB points from being awarded to projects that seek to address localized flooding concerns that occur in storms less than the 85th percentile. The Committee determined that it would not restrict dry weather projects that do present clear solutions to localized flooding (i.e., addressing recurring flooding at the intersection across from a school) from receiving CIB points for flood management.

Alignment with existing recommendations:

The ROC recommends establishing “[CIB] quantitative goals, including the development of a plan with timelines to meet these goals.”

The MMS is recommending more specific metrics to be captured related to CIBs, which may support the Committee’s evaluation of projects in the future. The current Projects Module collects qualitative descriptions of how projects create CIBs across 7 primary CIB categories; however, very little quantitative data is being collected about the type or magnitude of these benefits. The MMS developed approaches to quantifying CIBs, such that comparisons could be made between all projects. For example, if a project claims to reduce urban heat, a collected metric might be the number and net area of manmade shade structures. In addition, the Equity in Stormwater Investments White Paper pointed to a need for projects to be responsive to specific community or tribe-identified needs (which may or may not correlate to the 7 CIBs). As a result, the MMS has recommended adapting CIB scoring criteria to accept community-preferred benefits alongside existing CIB categories.

Scoring Committee Recommendation #6: Reinforce scoring criteria for Nature-Based Solutions

In previous rounds of scoring, the Committee determined that artificial turf will not be considered a Nature-Based Solution. The Committee also shared that they would like to be able to assign points for projects that connect habitats and community hubs and to pay more attention to the net or additive benefits of multiple projects. Committee Members also concluded that the best way to improve the impervious surface removal calculation is to require that applicants submit a description of impermeable surface removed relative to the total project area. Specific Committee recommendations to address these goals include:

1. Modify Projects Module to require that applicants submit additional information documenting the impermeable surface removed in relation to the total project area.
2. Consider adjusting the scoring criteria for impermeable area removed from a percentage to the total impermeable area removed.
3. Consider adjusting the scoring criteria to assign points for projects that connect habitats or community hubs, or otherwise provide net benefits via nature-based solutions.

Alignment with existing recommendations:

The MMS notes that the current Projects Module only gathers qualitative descriptions of how projects incorporate Nature-Based Solutions. The MMS instead recommends collecting additional metrics to quantify the extent that projects are meeting goals across the 6 categories of Nature-Based Solutions by ranking methodology as either Good, Better, or Best as defined in the 2022 Interim Guidance.

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Scoring Committee Recommendation #7: Strengthen requirements to demonstrate local support

In prior rounds of scoring, the Committee clarified that letters of support for a project should be recent (e.g., less than 1-2 years) and addressed to the SCWP rather than reusing letters of support addressed to other organizations. In addition, the Committee would benefit from a clearer definition of “strong support” and the minimum requirements for demonstrating that support. The Committee suggested that, at a minimum, demonstration of “strong support” should include concrete evidence of meaningful support rather than just a plan for future outreach.

The Committee has shared a preference for projects that not only provide a community engagement plan, but also a budget for community engagement. The Committee hopes that more information can be requested of the applicants, such as number of community members contacted, community demographics, demonstration of represented population engaged from the neighborhood, and demonstration by applicants of strong local support.

Alignment with existing recommendations:

The MMS found that community engagement emerged as a core consideration with stakeholder groups, who emphasized the need to track and account for community engagement. The MMS recommends collecting metrics around a project’s “Level of Achievement” for community engagement using the Good, Better, Best framework identified in the 2022 Interim Guidance. This additional metric about level of engagement will evaluate how well project proponents are informing, consulting, involving, educating, learning from, collaborating with, incorporating and partnering with communities and Tribes.

Scoring Committee Recommendation #8: Adjust weighting or Threshold Score for sections of the scoring criteria.

In prior rounds of scoring, the Committee suggested adjusting the scoring system to establish certain mandatory categories. For example, E.2 Leveraging Funds and Community Support section is only worth 5 points, so project applicants can neglect community engagement and still achieve an eligible score. The Committee felt that this should not be the case, as intentional community outreach and engagement should be required for projects seeking SCWP funds.

Alignment with existing recommendations:

The ROC Biennial Report acknowledges that scoring criteria could be re-evaluated to align with experience to date in the SCWP and new metrics/methods. The scoring criteria establishes eligibility by assessing how the project will contribute to the SCWP goals. The ROC notes that “refinements are needed to... establish scoring criteria that better align with all the SCWP goals – especially related to Community Investment Benefits, Disadvantaged Community Benefits, Equity, Community Engagement, and Nature-Based Solutions.”

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Other Items

The following comments reflect other issues raised by Committee Members:

Cost Estimates Vary

The Committee has shared that inconsistent estimates of O&M costs across applications make it difficult to assess projects evenly. Estimates used for cost escalation have also increased, from rates of 3-5% used in the first round to the 12-15% used today. It may be helpful to encourage applicants to use industry standards for cost escalation and O&M budgeting.

Alignment with existing recommendations:

The ROC Biennial Report found that inflation and COVID-19 have largely impacted supply chains, thus modifying Regional Program projects' costs and schedules. Understanding the assumptions used by applicants to estimate future costs, and providing guidance on how to standardize those estimates, may mitigate challenges with future cost escalations.

Adding Points

While the Committee often declines to award points claimed by an applicant during the evaluation process, in Round 5, there were two instances when the Committee awarded points that were not originally claimed by an applicant (E.2 Leveraged Funds and Community Support section for both the Sorensen Park Multi-Benefit Stormwater Capture Project and the Dominguez Channel Parkway BMPs Prioritization Project).

This practice is without precedent and isn't supported or prevented by guidelines in the SCWP. It is not aligned with any existing recommendations but was notable during Round 5.

Additional Scoring Sections

The Committee recommendations from previous rounds of scoring also included considering how job creation might contribute to application scores and developing guidance on how to weigh a project's climate-related impacts. For example, some projects require a significant amount of pumping which uses energy, potentially producing greenhouse gas emissions.

Recommendations to implement these goals have included:

1. Consider awarding points for job creation in the scoring criteria, perhaps within Community Investment Benefits.
 - a. Doing so would require a standard metric for job creation, perhaps referencing [Water Use Efficiency and Jobs](#), a 2011 publication of the Economic Roundtable.
2. Consider including positive impact on climate response in the scoring criteria.

Alignment with existing recommendations:

The ROC has recommended making "strategic investments in workforce development programs for skills related to SCW programs and projects in the short and long term and ensure workforce-related elements are reflected in procedures, guidelines, and reports as appropriate." By awarding points related to job creation in the scoring criteria, the Committee may play a role in encouraging greater workforce development throughout the SCWP.