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CALIFORNIA



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December 20, 2023

ELECTRONIC MAIL

Los Angeles County Flood Control District
Safe, Clean Water Regional Program
11th Floor, PO Box 1460
Alhambra, CA 91802-1460

SUBJECT: LETTER OF NON-OBJECTION FROM THE CITY OF LOS ANGELES FOR THE ELEPHANT HILL OPEN SPACE AND STORMWATER INFRASTRUCTURE FEASIBILITY STUDY, PROPOSED BY SAVE ELEPHANT HILL, FOR ROUND 5 SAFE CLEAN WATER REGIONAL PROGRAM FUNDING

Dear Safe, Clean Water Program Upper Los Angeles River Watershed Area Steering Committee Chair and Members,

The City of Los Angeles (City) is pleased to issue a letter of non-objection to Save Elephant Hill's submission of the Elephant Hill Open Space and Stormwater Infrastructure Feasibility Study (Project) to the fifth round of the Safe, Clean Water (SCW) Regional Program for the Technical Resources Program (TRP). The request to the SCW Regional Program is approximately \$300,000 which will be allocated towards the development of a feasibility study and technical assistance efforts.

The Safe, Clean Water Regional Infrastructure Program's application process for the Technical Resources Program asks community-proposed project applicants, such as Save Elephant Hill, to include a letter of non-objection from the municipality in which the project is proposed. Save Elephant Hill submitted an application via the Round 5 Regional Technical Resources Program to the Upper Los Angeles River Watershed Area Steering Committee for the Project, which was due on July 31st, 2023. This letter of non-objection does not bind the City to completing any specific permitting, design, construction, operation, funding, or maintenance actions.

The Elephant Hill area is an approximately 110-acre property owned by a mixture of the City, the Mountains Recreation & Conservation Authority (MRCA), and privately owned land surrounded by a residential community. The Project proposes to treat stormwater runoff and beautify the local open space through the development of nature-based stormwater infrastructure. This project additionally aims to provide community benefits such as restoring park space and habitat on the MRCA owned parcels on Elephant Hill. The project applicant currently estimates that the Project has a total construction cost of \$988,568, with

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Letter of Non-Objection for Round 5 SCWP Application of the Elephant Hill Project
December 20, 2023

planning and design costs estimated at \$290,112, and annual maintenance and monitoring costs at \$362,076 and \$43,219, respectively. The project scope, feasibility, cost, and schedule will all be verified and may change during the TRP process.

Los Angeles Sanitation and Environment (LASAN) leads City efforts to review requests for letters of non-objection for the Regional SCW Program. As part of the review process, LASAN coordinated and received feedback from stakeholders including third party project proponents, other City departments, and the City's SCW Program Working Group and the City's SCW Program Administrative Oversight Committee (AOC). The Los Angeles City Council approved the SCW Program AOC's recommendation to issue a letter of non-objection in City Council File 18-0384-S9 based on the findings below:

- The Project proposes to provide potential water quality, water supply, and community enhancement benefits, consistent with City and SCW Program goals through the implementation of various BMPs that will beautify the area, and, additionally, capture and treat stormwater;
- The Project has community support from various stakeholders;
- The Project will need to establish clear plans for operation and maintenance, permitting and right of way ownerships, detailed cost estimates, and other technical details during the feasibility study development process, if approved for TRP funding.

LASAN will continue to coordinate and collaborate with the project proponent to ensure that the Project scope aligns with the goals of the City and the SCW Program, throughout the TRP process. If you have any questions regarding the City's letter or wish to discuss further, please contact Michael Scaduto at (213) 485-3981 or via email at Michael.Scaduto@lacity.org.

Sincerely,



Barbara Romero
Director and General Manager
LA Sanitation and Environment

cc: Ryan Jackson, Mayor's Office
Matthew W Szabo, CAO
Sharon M. Tso, CLA
Michelle Barton, Mayor's Office
Jacqueline Wagner, CAO
Janice Chang Yu, CAO
Jessica Quach, CAO
Rafael Prieto, CLA
Blayne Sutton-Wills, CLA
Sarai Bhaga, LASAN
Traci Minamide, LASAN
Julie Allen, LASAN
Michael Scaduto, LASAN



Public Comment Form

Name:* Maggie Gardner Organization*: OurWaterLA Coalition

Email*: maggie@lawaterkeeper.org Phone*: (310) 651-3360

Meeting: ULAR WASC Date: 3/21/2024

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

Please see attached letter



Date: March 20, 2024

To: Upper Los Angeles River WASC Committee Members
cc: SCWP Staff, Watershed Coordinator

From: OWLA Core Team (Heal the Bay, LAANE, LA Waterkeeper, Nature for All, 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 2024-2025 SIP. **OWLA strongly recommends** that you 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 directly to and, as applicable, are located in a disadvantaged community, and
- promote green jobs.

We recognize that the ULAR WASC has an especially difficult task this year with the high volume of project modification requests with increased funding asks alongside their already full Round 5 application cohort. As you consider projects, OWLA has identified the following projects as exemplars and have elaborated on what elements have made them stand out to us. We would like to see as many of these funded as possible given your budgetary constraints.

1. **Bowtie Demonstration Project**

- a. **Extensive community engagement** that included working with partners on the ground for community outreach in English and Spanish, hosting events and workshops, regularly attending four monthly Neighborhood Council meetings, and compensated listening sessions with a tribe,
- b. **Creation and restoration of riparian habitat and wetlands** with more than 50% of the site being established with native species,
- c. Within a **DAC census block group** and efforts to identify how the project can support monolingual Spanish-speaking and unhoused community members with community-based partners, and
- d. **Quality labor standards** under Proposition 68 including prevailing wage.

2. **Sun Valley Green Neighborhood Infrastructure Project**

- a. Demonstration of **listening to community priorities** and incorporating those priorities into the project,
- b. **Located in a DAC** that faces **historic flooding issues**,
- c. **Water supply capture** of 189.9 ac-ft per year, and
- d. Anticipated to be covered under a **City of LA Project Labor Agreement**.

3. Green Street Demonstration Project on Main Street

- a. Provides **water supply benefits + ecosystem water supply benefits**,
- b. **Creation of nearly 1 acre of new habitat** (58,000 square feet of native plants),
- c. Located within a **DAC**, and
- d. Inclusion of **ADA accessible ramps and crosswalks**.

4. Osborne Street Stormwater Capture Green Street Project

- a. **Extensive community engagement** including 20+ outreach events and **DAC specific outreach**,
- b. Crosses through a **DAC and SDAC**,
- c. **Decrease of 3 acres of impervious surface** and more than 4500 native plants and 250 trees planted, and
- d. **Water supply capture** of 96 ac-ft per year.

For the Scientific Studies, **we recommend that the following study NOT be funded.**

1. *The Application of Innovative Technology for Microbiological Testing in the Los Cerritos Channel Watershed - Study Developer Not Yet Decided*

This proposal targets a specific source of a specific pollutant rather than providing multiple benefits, and it does not even address all anthropogenic sources of bacteria given that human activity can also affect levels of animal bacteria found with surface waters. This proposed study therefore will not support many of the SCW program goals. The \$1.2M in funding requested for this study should instead be spent to invest in our communities with multi-benefit stormwater capture projects.

When OWLA reviews projects, it considers 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 some of 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 and the upcoming visioning process occurring at the ROC.

OWLA wants to see better representations of meaningful community engagement to ensure projects are responsive to community needs and priorities, especially for projects located in and claiming to serve disadvantaged communities. Projects should seek to involve—if not collaborate with and empower—community members that are and will be impacted by the proposed project through an iterative process of actively soliciting and incorporating input.

- The strongest examples were projects in which there were partnerships with community-based and/or nonprofit organizations, such as the Bowtie Demonstration Project and Finkbiner Park Stormwater Capture Project. These CBO/NGO partnerships

realized strategies such as supporting youth councils, conducting surveys with wide reach and synthesized analyses, engaging tribal members, multiple community events, and metrics-based outreach plans.

- While project applicants listed various activities like presentations, community meetings, or tabling events, we would like to see more details about who was engaged, how many people, and how they were engaged (ex. receiving information, filling out passive feedback forms, engaging in active discussion, voting on project elements).
- Another key detail must be whether and how community input was synthesized and incorporated into the project. For example, the Osborne Street Stormwater Capture Green Street Project incorporated safer transportation and green space benefits based on feedback from engagement activities.
- Another concern was a few projects that had only one touchpoint with community members and other stakeholders when outreach/engagement should be an iterative process.
- We also want to flag projects that claim to provide DAC benefits yet explicitly state having not done any DAC outreach/engagement. This reiterates a concern we had with the CSMB WASC's Imperial Highway Green Infrastructure Project in the last round.

OWLA has always held vegetated nature-based solutions as a cornerstone of our priorities for the SCWP because of their potential to provide a number of community benefits while also contributing to water quality and water supply. We are concerned with the number of projects we are seeing that are replacing impervious surfaces with permeable pavers, rather than with natural materials. This type of project further cements our commitment to seeing more nuanced nature-based solutions scoring metrics. We will always prefer to see some impervious surface removal, even if it is replaced with permeable pavers, to none at all. However, permeable pavers do not provide the same multiple benefits to people, wildlife, and ecosystems that native plants, amended soil, or mulch can provide such as habitat and reduced heat island effect. Similarly, we are very much concerned with the conversion to artificial turf. These surfaces may be slightly more permeable than concrete, but they can increase heat island effect and can have troubling environmental impacts such as contributing to microplastic pollution.

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.



Public Comment Form

Name*: NAIDA CANTABRANA Organization*: LA CITY COUNCIL DISTRICT 6
Email*: _____ Phone*: (213) 473-7006
Meeting: UPPER LOS ANGELES RIVER WASC MEETING Date: 03/21/2024 2-4:30 PM

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

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Comments

REQUEST TO MAKE A PUBLIC COMMENT. THANK YOU.



Public Comment Form

Name*: Office of Supervisor Hilda Solis Organization*: Board of Supervisor of LA County
Email*: bfeldman@bos.lacounty.gov Phone*: 323.447.2258
Meeting: Upper Los Angeles River (ULAR) WASC Date: 3/21/2024

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

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Comments

Dear Committee Members,

As the Supervisor of Los Angeles County's First District, I support California Polytechnic University Pomona's funding request under the Safe Clean Water Program. This project would evaluate the long-term effectiveness of stormwater infiltration via drywells, crucial for sustainable water management across Los Angeles County. This study will optimize drywell performance, enhance water quality, and significantly contribute to the County's water sustainability goals.

I am proud to support Cal Poly Pomona for advancing efforts to provide LA County residents with sustainably-sourced, clean drinking water. For these reasons, I strongly support this funding request.