



Date: 07/08/2024

To: Regional Oversight Committee
cc: SCWP Staff

From: OWLA Core Team (Heal the Bay, LAANE, LA Waterkeeper, Nature for All, Pacoima Beautiful, SCOPE, The Nature Conservancy and TreePeople)

RE: Input on SCWP SIP Review

Chair Kristine Guerrero, Vice Chair Belinda Faustinos, and Committee Members:

On behalf of the OurWaterLA (OWLA) coalition, the undersigned recommend that the Regional Oversight Committee (ROC) approve the Stormwater Investment Plans (SIPs) for the 9 Watershed Area Steering Committees (WASCs) to expedite funding allocation for selected projects and studies.

OWLA has identified the following projects that were included in SIPs as exemplars in Fiscal Year 2023-2024, and have elaborated on what elements have made them stand out.

Upper LA River WASC:

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. Using a combination of hydrodynamic separators, membrane filtration, and a constructed wetland to **treat dry weather and partial wet weather flows for metals, bacteria, and organics,**
 - d. 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
 - e. **Quality labor standards** under Proposition 68 including prevailing wage.
2. 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**
 - d. Inclusion of **ADA accessible ramps and crosswalks**

Rio Hondo WASC:

1. South El Monte High School Stormwater Improvement Project
 - a. Example of a school district project and **located on school grounds and within a DAC**

- b. **Addressed feedback from community** in their application
- c. Distributed stormwater facilities across the campus that will include **native vegetation and compost amended soil**
- d. While no water supply benefit due to high groundwater, project is providing **surface level ecosystem water supply benefits**

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 SCWP committee 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 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 reinforces 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,

OurWaterLA¹

¹ 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.

From: STEPHEN B <srbz@aol.com>
Sent: Wednesday, July 10, 2024 9:42 AM
To: DPW-SafeCleanWaterLA <SafeCleanWaterLA@dpw.lacounty.gov>
Subject: July 10 Mtg Comments - La Habra Heights Project - Lower San Gabriel - Discrepancies and Scoring - Needs review Before Approving

CAUTION: External Email. Proceed Responsibly.

Chair and Committee Members,

Someone needs to review the figures, calculations and scoring for the La Habra Heights project (Exhibit 7-1 on Page 19 of the Stormwater Investment Plan for Lower San Gabriel River) as **2/3** of the described catchment area is NOT actually part of the project, reducing the benefit similarly.

Also, the benefits are overstated.

This needs to be done before approval.

The below quotes and diagrams come from the Project Application, found here:

<https://portal.safecleanwaterla.org/projects-module-api/api/reportdownload/pdf/13/332>

The parking lots at the Park are not heavily used outside of discrete events such as summer Music in the Park and some community and other events.

Much of the pollutants are described as coming from Hacienda Rd, a 20,000 +/- daily volume road.

Application Page 10

"The catchment for the system includes a section of Hacienda Road that is above the upper parking lot and was recently upgraded along with a section of Encanada Road that adjoins the park."

Application p18

"Hacienda Road has significant traffic loadings that result in a concentration of heavy metals and toxic compounds (e.g hydrocarbons) impacting the catchment. "

Application P27

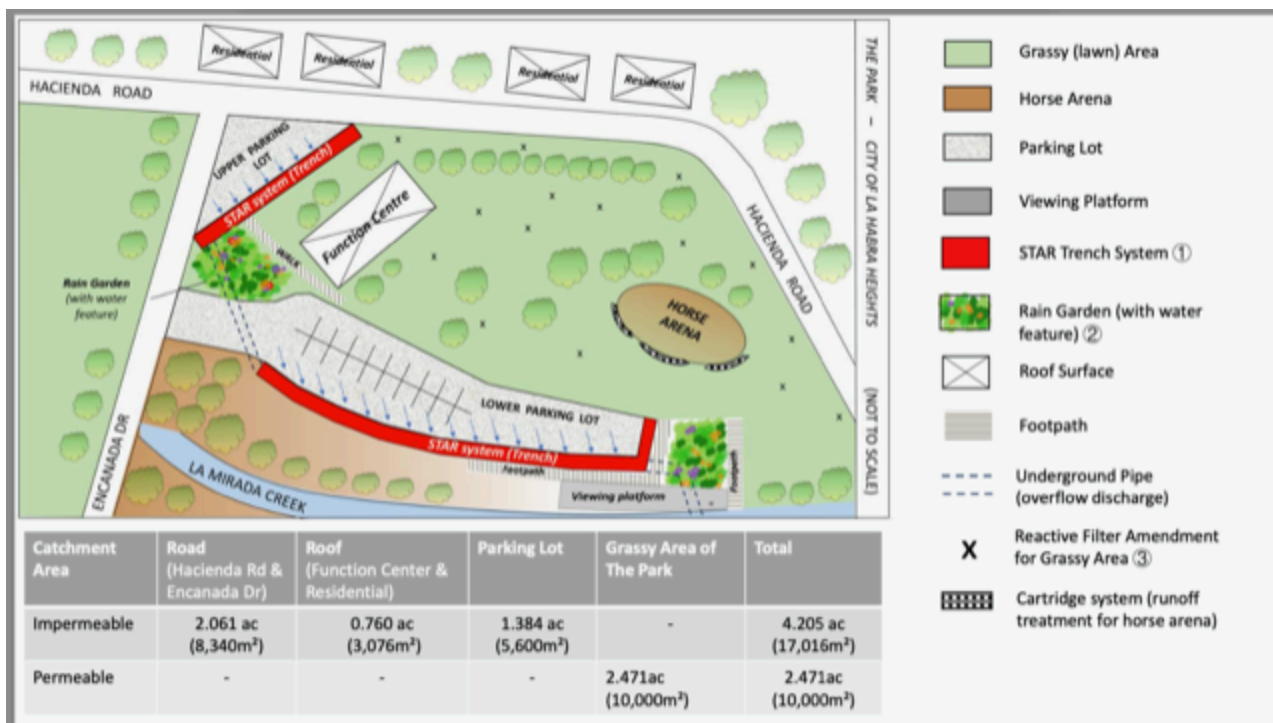
"The system also had a high efficiency rate for removing common pollutants such as nutrients, heavy metals, bacteria, toxic compounds and microplastics that Hacienda Road and surrounding areas impact Hacienda Park with."

Catchment Area Substantially Overstated

The project description and benefits include that it is capturing and treating storm water runoff from Hacienda Rd, Encanada Rd, and 4 houses on Nueva Vista Rd, even though those roads and houses do NOT drain to the Park and are below the elevation of the Park.

These rather obvious flaws reduce the project’s catchment area by over 2/3. Diagram from Application Page 59 below

As hard as it may be to believe such an obvious flaw exists, it is true. Someone may not have visited the site before doing the Application.



Again on page 75 of the Application (below), where 2/3 of the alleged capture area is mistaken. The Residential roof and road surface are not draining to the Park or altered to get there.

Catchment Descriptions

The catchment for the model was divided into various sub-catchments. The catchment areas are summarised below in Table 2.

Table 2 Catchment descriptions

Catchment	Approx. Area	Treatment
Carpark 1	1,300m ²	STAR System Trench advanced biofiltration
Carpark 2	3,500m ²	
Function centre Roof	800m ²	
Residential Roof	3076m ²	
Road surface	8340m ²	
Total	17016m²	

Unusable "Benefit"

One of the important claimed benefits of the project is that the water stored can be used for irrigation of the Park, but the fine print says (Application page 10):

"It should be noted that the project provides treatment and storage of stormwater runoff only, any additional assets, like pumping the water to the irrigation system are not included in this proposal."

Apparently there is a small drip irrigation included in the demonstration.

Further, the Application claims 20% reduction in irrigation needs, but the area is in a Mediterranean climate with rainfall mostly between October and March, and dry the rest of the year. As such, there would likely be only a few opportunities to use the stored water, as there won't be rainfall to refill it between approximately March and October, not a continual drain and refill.

Below from Application Page 77

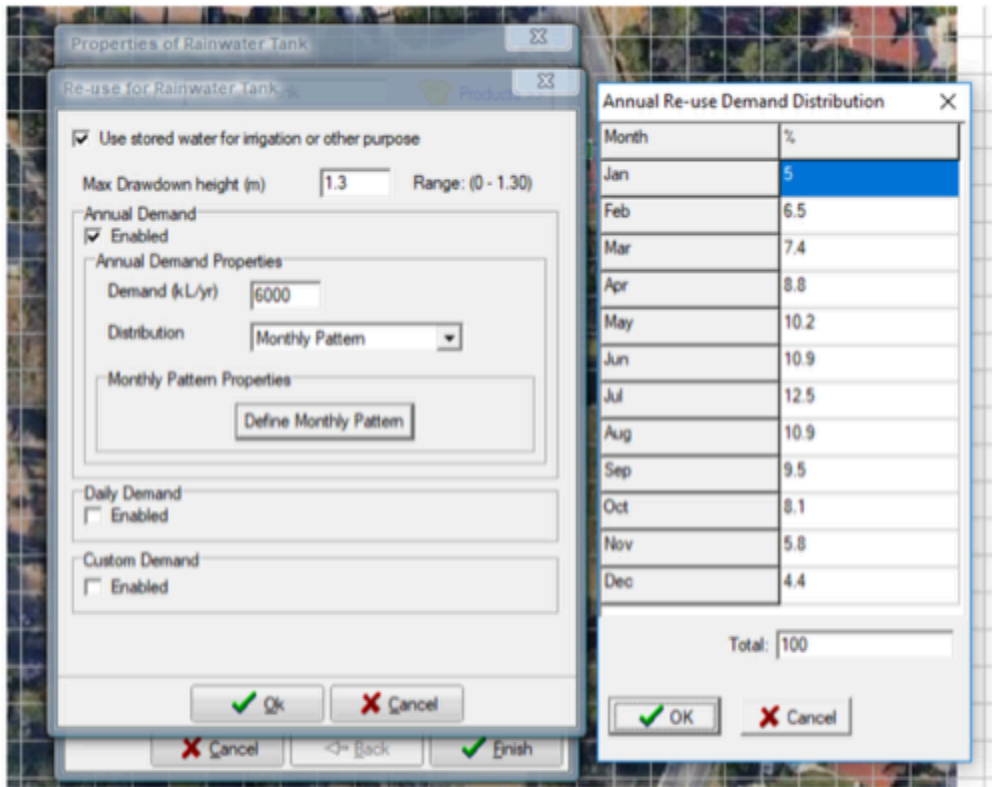


Figure 8: MUSIC Model input node for irrigation

Conclusion

This application needs to be corrected reflecting the true catchment area, with figures revised, and that the storage drawdown will likely occur only a few times reducing the irrigation benefit. After the Application is corrected in needs to be rescored to see if there is a benefit beyond competing projects.

Thank you

Stephen Blagden
 La Habra Heights