



Public Comment Form

Name*: _____

Organization*: _____

Email*: _____

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Meeting: _____

Date: _____

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

- DRAFT -

*****DRAFT*** Scoring Committee Recommendations**

The members of the Scoring Committee thank you for the opportunity to provide comments on the first round of projects reviewed under the Safe Clean Water Program (SCWP). As a small group that ultimately scored all 58 funding applications - while taking regular feedback from project applicants who attended many of our meetings (in an open-dialogue meeting format) - we believe the Scoring Committee is uniquely situated to provide input in how the SCWP can be improved in the future.

The first round of scoring allowed the Committee to get feedback on which criteria were unclear or regularly misinterpreted. The Committee observed that different entities misunderstood instructions in the online module, requiring resubmission and rescoring. In the next round, we must avoid similar problems to prevent unreasonable demands on Committee members' time.

Some of the recommendations below focus on improvements in the application *process*, while other suggestions are more substantive comments on the scoring criteria itself. Some can be implemented quickly (such as clarifying instructions on the application portal), while others will require additional research or time to vet to fully implement. Some of our recommendations are specific, while at other times we simply identify challenges that need to be resolved. We hope these are useful as the SCWP continues to evolve to meet the region's needs.

A small committee faced with a daunting task of scoring 58 projects in a short timeframe, we are proud of the work we have done, and believe the SCWP is off to an excellent start to be the transformational program we all believe it can be.

We hope you consider the recommendations we are putting forward to ensure the program achieves all SCWP goals as effectively and efficiently as possible. Please do not hesitate to reach out to me or any Committee member should you have any comments or questions.

General Comments

One of the greatest challenges faced by the Scoring Committee resulted from figuring out how to score projects that were at very different stages of development, as well as projects that were phased or where stormwater capture, treatment and reuse were just one part of much larger projects. Should projects be scored only on what is immediately before the committee? Should costs be applied across the entirety of projects, or just stormwater elements? A more detailed assessment and recommendations follow.

O&M and Feasibility Study Projects

In scoring projects, it quickly became clear that the Regional Project feasibility guidelines and scoring criteria were geared for the development of new capital projects. These criteria were extremely difficult (if not impossible) to adequately apply to operation & maintenance (O&M) projects or initial phase/feasibility studies. This resulted in understandable inconsistencies among applicants in how to explain and score O&M projects.

Recommended near-term fixes

At a minimum, applications requesting O&M funds should supply real-world monitoring data on how the BMPs (for which O&M funding is sought) are currently performing.

Recommended longer-term fixes

The County should seriously consider developing a separate scoring rubric for O&M projects and feasibility studies in recognition of the challenges associated with scoring these projects under the current scoring rubric geared towards new project development.

Whether under a separate scoring rubric, or simply developing guidance clarifying the existing criteria, some of the questions that should be addressed are:

- For O&M applications, should applicants be allowed to take credit (i.e., get points) from all water quality, water supply and community benefits of the overall project, or only for those benefits associated with the O&M activities that would be funded;
- Whether feasibility study projects should be scored based on benefits for the entire future project (which are often hard to project as such applications are by definition in the early stage), or is there some better criteria on which to evaluate such studies.

Phased Projects and Projects with Many Non-Storm Water Components

It was equally unclear how to score phased projects—in particular, whether to grade only the proposed phase of the project before the Committee or whether to grade based on what the final project will look like. If the latter, it is unclear how certain future phases must be in order to reward points. Relatedly, for larger projects (where stormwater is a small component), it was unclear whether to score applications based on the entirety of the project, or just the stormwater elements). Applicants often tried to get the best of both worlds by claiming benefits from the entire project, but only counting stormwater elements of the project for any cost-effectiveness criteria. The Scoring Committee generally only looked at the phase of the project being proposed in isolation and, where stormwater was just one component, tried to count the entire project for all benefits and costs (to be internally consistent).

Recommended near-term fixes

None

Recommended longer-term fixes

Clearer guidelines should be developed for applicants as to what part of the project they can get credit for, including direction as to whether:

- (1) Phased projects should only be scored on the phase where funding is being sought or for the entirety of the final project after all phases (and how certain must future phases be to be awarded points).
- (2) Projects where stormwater is only a component whether the portion of the project considered must be consistent across criteria or purposefully inconsistent (e.g., cost effectiveness might count only stormwater features, but community investment benefits and leveraging funding might count the whole project).

Online Form/Portal

Several applicants who attended Scoring Committee meetings mentioned that they were uncertain where to attach certain documents in the first round. As a result, supporting documentation was not included for many claimed project components and benefits. At the same time, long feasibility studies (often hundreds and in some cases more than a thousand pages) were often attached to multiple sections of the online form. Due to online submission challenges, the Scoring Committee provided a five-day resubmission process for applicants and did its best to go through all documents, even when it was not easy to find information in pertinent sections.

Recommended near-term fixes

The online form should be revised to clarify which attachments should be included where, with a goal of making it easy for reviewers to easily see relevant supporting information when reviewing specific scoring sections. Long studies should be included ONCE, while appropriate back up should be readily accessible in each section—community investment benefits, nature-based solutions, etc.—in a concise, clear, easy-to-read format that is responsive to the scoring criteria.

The online form should also generate a table of contents for attachments.

A standardized budget on the website, with O&M information, would also be beneficial, as the way the website currently characterizes project budgets is not well defined.

Finally, the form should require applicants to include a project summary that, where applicable, explains how the proposal fits within a larger project, includes useful project pictures, and clearly identifies which components of the larger project would be funded through the proposal.

Recommended longer-term fixes

Continue to get feedback from project applications and Scoring Committee members to ensure the online application portal is as clear as possible and allows for easy and consistent scoring.

Consider whether to make formulas/modeling used to calculate water quality and water supply benefits on the on-line portal publicly accessible (so applicants could easily review)

Project Flow / Role of the Committee

The flow of projects from the Scoring Committee to WASCs was inefficient for the first round of review. The Scoring Committee rushed to get scores to WASCs in time for WASCs to have them during project presentations. However, this information did not always make it to WASCs prior to applicant presentations, meaning many projects were presented to WASCs without a score or notes from the Scoring Committee. The notes, in particular, were meant to allow WASCs to ask applicants directly to address some of the concerns or uncertainties identified by the Scoring Committee. But this was not possible where WASC's didn't get our scores or notes in advance of their meetings.

Recommended near-term fixes

The Flood Control District should create a better timeline and meeting arc for all committees so that things are not as rushed and information is provided early enough to inform decisions.

Recommended longer-term fixes

Moving forward, the Board of Supervisors may want to revisit the roles & responsibilities of each Committee (e.g., should the WASC take a more active role in reviewing projects prior to sending them to the Scoring Committee?). In addition, as Fund Transfer Agreements are finalized it would be beneficial to have a level of consistency between Scoring Criteria and Performance Standards the project will use for ongoing reporting.

Enhancing Resources for Applicants

In the first round we found that entities provided dramatically different information with different levels of detail when asked to provide a “description.”

Recommended near-term fixes

We support the development of a tutorial, training, and FAQ page to help applicants navigate and input data into the website.

We also urge the Flood Control District to take the opportunity to improve the guidance included in the module so that different entities enter comparable information that can inform WASC and Regional Oversight Committee (ROC) decisions.

Pre-submittal workshops should be held for potential applicants, including both County personnel and non-County speakers (members of the Scoring Committee, WASC or even outside groups that worked on developing the Program) participating so applicants can understand what the intent is for certain sections and what decision-makers are looking for in submittals.

Additional Research Needs

The scoring criteria for this first round of applications was developed using a very small sample-size of projects developed. This resulted in some criteria not accurately reflecting the realities of how much projects cost, potential for water quality improvements or the like.

Recommended longer-term fixes

Armed with feedback from project applicants and a larger set of projects that can be evaluated, there should be additional data mining to further refine and enhance scoring criteria moving forward. A list of potential additional research needs can be found in Appendix A. Depending on how intensive this effort would be, funding could be sought from the Special Studies Fund of the SCWP.

Disadvantaged Community Benefits Information

While not in purview of Scoring Committee, there is no clear definition of what “DAC benefit” means, which allows many applications to claim this benefit with little support. The County should consider developing clearer guidance on DAC benefits.

A. Water Quality

A.1 Wet + Dry Weather Water Quality Benefits

Some parts of the online form related to water quality criteria were confusing, especially for projects with multiple best management practices (BMPs) or linear BMPs. In addition, the scoring criteria was developed based on results gleaned from a very small sample-size of built projects, meaning the criteria might not fully or accurately reflect benefits of projects. In addition, for projects with a large drainage area, it was difficult to build projects with enough capacity to score high as 'wet weather' projects (thus disadvantaging larger projects that might actually reduce pollutant loading more than smaller projects that achieve a higher percentage reduction). Where a project could not score as a wet weather project, the Committee applied the dry weather scoring to try to maximize points for the applicant, though this did not always reflect the intent of the project. Similarly, since scoring criteria is based on the percentage of pollutant reduction between influent with effluent, projects in areas with cleaner runoff (such as mountain runoff) will score higher for removing very small amounts of pollutants compared to more polluted areas where overall pollution reduction is greater but percentage reduction is less. The Committee also observed that it was sometimes hard for projects that were 'over-built' in order to address flooding or other community needs to score many cost-effectiveness points. Finally, some applicants used their own model, making it hard for the Committee to evaluate outputs.

Recommended near-term fixes

Revise the cost-effectiveness (per acre-foot or AF) criteria under A.1.1 to more of a linear or scaled ratio, to help ensure projects don't lose so many points for relatively small changes in cost effectiveness (which is both fairer and will reduce the incentive of manipulating scores to maximize points).

Recommended longer-term fixes

Amend section A.1.2 to include two options: a magnitude route such as pounds of pollutants removed, and a volume treatment route.

In addition to, *or instead of*, the recommendation above, scoring criteria could also be modified to have more of a sliding scale, which would allow for partial credit.

Undertake additional data mining (now that we have significantly more projects to assess than when the Program was first launched) to develop an appropriate threshold to support a "magnitude route for compliance (which would allow applicants to select from two options: a magnitude route such as pounds of pollutants removed, and a volume treatment route).

Guidance should clarify that website values must be supported in the application materials and must be consistent throughout the application. In addition, additional supporting information should be required when applicants use their own model to calculate water quality benefits.

A.2 Dry Weather Only Water Quality Benefits

Applicants of large projects that could not score well under the A.1 criteria opted for dry weather even when the project was clearly intended for wet weather. Even when applicants didn't do this

on their own, the Scoring Committee took it upon itself to recategorize projects that (based on our calculations) wouldn't have scored points under A.1 as dry weather projects.

Recommended near-term fixes

Dry weather points should be modified to 0.1-inch storms as a maximum to prevent wet weather projects from using the category. (Note, making the previous recommended edits to A.1.2 would also help address the underlying issue.)

Recommended longer-term fixes

Consider creating a cost-effectiveness category for the A.2 category (possibly employing a Gallons per Minute (GPM)/\$1M metric). Similar to A.1.1, such an update would require a data mining effort to develop this metric.

B. Water Supply Benefits

While we did not undertake a statistical analysis, it appeared that some watersheds and project types had a significant scoring advantage, which could then create inequities or challenges for other watersheds. Specifically, watersheds and projects that have significant advantages to achieve water supply points include: (1) larger projects (e.g., spreading grounds) in areas with good soils and aquifer recharge (like San Gabriel, Upper LA River, and Rio Hondo watersheds); or (2) larger low-flow diversion projects sending water to water recycling facilities. Having scoring criteria that makes it almost impossible to get 25 water supply related points in areas without easy access to groundwater or water recycling facilities could potentially make it hard for certain WASCs to have any projects get approved.

For the Upper San Gabriel and Rio Hondo watershed areas, there is the added uncertainty of whether projects should get credit for water supply benefits when the majority of stormwater is already captured. The Scoring Committee opted for now to give points in these areas, acknowledging that there could be longer term ecosystem benefits of such an approach.

The Scoring Committee also observed that applicants with a low-flow diversion project often asked for water supply points even when the water recycling projects are planned, but not yet built (e.g., Hyperion or JWPCP in Carson). While we appreciate that providing these low-flow diversions could help create the supply (and influence the market) to help ensure such water reclamation facilities get built, it is also true that these projects are not yet certain and therefore it is possible we might be approving projects that are not truly multi-benefit (as required by the SCWP). In the first round, the Scoring Committee allowed these projects to claim water supply points because we assume a goal of the SCWP would be to encourage projects that will facilitate the development of water recycling plants.

Recommended near-term fixes

The County should provide more definitive direction to the Committee and applicants: (1) whether it will award water supply points for projects diverting water to speculative water reuse projects, and (2) whether, for the Upper San Gabriel and Rio Hondo watershed areas, projects will get credit for water supply benefits when the majority of storm water is already captured.

Recommended longer-term fixes

The Board of Supervisors may decide to change the scoring criteria in the future so that it is curved for each watershed (or for watersheds with similar water supply constraints). It would work well to set an acre-feet capture value as a threshold for applicants to get a minimum level of points, and then to curve the points for each watershed area (or similar watershed areas) to the points of the application with the highest acre-feet captured value. This would help ensure that projects in the majority of watersheds are not unfairly disadvantaged.

In addition, maintenance costs have a major effect on cost effectiveness. It would be beneficial to convert this metric to a scaled value as well as to conduct a data mining effort to update the score ranges.

Further, because the current scoring criteria likely provides an incentive for applicants to underestimate O&M costs, O&M should be looked at separately and judged according to separate scoring criteria.

C. Community Investment Benefits

Lack of measurable outcomes around community benefits made it very difficult for applicants to know what to take credit for when submitting feasibility studies, and equally challenging for the Committee to score projects. Most applicants took credit for at least half of the available community investment benefits points, likely undermining the intent of these criteria. (See Appendix B for breakdown of how many projects were awarded points for various community benefits.)

One somewhat absurd example was ‘improved flood management’, which was claimed by virtually all applicants with the mere rationale that any stormwater project helps with flood management to some extent, which does not seem aligned with the initial intent of the SCWP (which likely was to meaningfully address flood risk in heavily impacted communities). Without clear metrics or guidance, the Scoring Committee’s workaround for ‘improved flood management’ was to award points for all wet weather projects, and deny for dry weather projects (whether projects were submitted as dry weather or the Committee reclassified as dry weather to improve points when projects couldn’t meet wet weather criteria). As you can guess, this was not a satisfying approach, and highlights the challenges (to applicants, scorers and even WASCs) when metrics are not included.

The online application added further confusion by shortening some descriptions from the feasibility guidelines, making things even less clear to applicants. Further complicating matters was that the vast majority of applicants didn’t include ANY attachments for the community benefit section (which may have resulted in lack of clear direction with the online form). To the extent information was included, it was generally within a hundreds-of-pages-long feasibility study in another section, which Committee members then had to sort through.

Due to lack of clarity in definitions (and the fact that many community benefits derive from building nature-based projects), in many instances doing one thing (e.g., enhancing a park or adding a few trees) got applicants points in several categories, such as planting of trees, heat island reduction, and greenhouse gas reduction. Overall, many projects took credit for somewhat dubious benefits—for example, rebuilding (slightly) nicer ball fields after tearing up an old field for underground storage. Others took credit for new park benches or improving an arboretum as ‘enhancing parks’ even though those improvements don’t relate to storm water or nature-based projects. Others took credit for a few native plantings in a bioswale in a parking lot (as enhancing habitat).

Largely because we felt direction to applicants, as well as the scoring criteria itself, was vague, the Scoring Committee took a lenient approach in this first round and generally awarded points to applicants claiming benefits, even when they did not provide sufficient supporting documentation and added benefits were unclear. Where points were awarded for fairly uncertain benefits, the Scoring Committee provided notes to WASCs identifying questions and concerns. This ‘workaround’ was deemed necessary for this first round of funding, but it is unsatisfactory as it does not ensure true community benefits are being achieved.

Recommended near-term fixes

Update the online application portal to require relevant backup materials for the Community Investment Benefits section, and ensure such attachments are responsive to the section (and not just reattaching the entire feasibility study).

As part of the portal update, put the onus on applicants to justify how their projects will actually achieve the benefits they claim with some level of specificity. For example,

The Feasibility Guidelines ask for explanations and analyses beyond what was submitted by most project applicants. The Scoring Committee therefore proposes to add specific prompts to the online form that are in line with the current Guidelines but would elicit more relevant information from applicants:

Improve flood management, flood conveyance, or flood risk mitigation:

- The explanation and analysis should include: (1) details (if any) about any flooding issues in the area of the project that the project will address, and/or (2) if flood risk is reduced in downstream rather than immediately adjacent area, specific information about downstream flooding issues (if any) and the volume of water that will be retained or infiltrated relative to the capacity of the downstream problem area.

Create, enhance, or restore parks, habitat, or wetlands

- The explanation and analysis should include a graphic and/or description of the area of the site that is “created, enhanced, or restored” relative to the total project footprint. These more ecosystem-focused park improvements should be distinguished from the recreational points below by including planting plans with a preference for native habitats, such as:
 1. Native woodland
 2. Native shrubland
 3. Native savanna
 4. Native grassland
 5. Native riparian woodland

6. Native marsh/meadow/vernal pool
7. Open water

Improve public access to waterways

- Access and waterway should be better defined. Does access mean physical access, or is visual access sufficient? Does waterway include constructed wetlands?
- The explanation and analysis should include, where relevant, a picture and/or description of the location of the project relative to the waterway.

Enhance or create new recreational opportunities

- The explanation and analysis should include, where relevant, a graphic and/or description of the area of the site that is “created, enhanced, or restored” relative to the total project footprint. The explanation should also specifically describe enhancements or restorations relative to the original project site, with supporting graphics where possible.

Create or enhance green spaces at schools

- The explanation and analysis should include, where relevant, a picture and/or description of the location of the project relative to the school.
- This Community Investment Benefit can be awarded only if the project is “at” a school, given that several applicants took credit for school adjacent projects or projects likely to attract students from local schools.

Improve public health by reducing local heat island effect and increasing shade

- The explanation and analysis should include a description of the relative increase in shade at the project site. It should also include the number of trees that will be added and the square feet of canopy added (once fully grown in) compared to the pre-project site and compared to the full site footprint.

Improve public health by increasing the number of trees and/or other vegetation at the site location that will increase carbon reduction/sequestration and improve air quality

- The explanation and analysis should include the number and types of trees and plants to be added compared to the number and types at the site before construction begins, as well as an analysis of the amount of CO₂ that will be sequestered annually from that new vegetation (once it is mature).

Recommended longer-term fixes

Establish specific (clear) definitions and metrics for each benefit (e.g., how much carbon needs to be sequestered to receive points?; identifying what type of measurable can be applied to improved flood management).

Revisit whether Community Benefits should be merged with (more measurable) Nature-Based Solutions section (as there is so much overlap between these two). To the extent this is not deemed feasible or desirable, try to eliminate areas of redundancy, where one project design element yields multiple points (such as adding a few trees in an existing public park yields points for: (1) carbon sequestration; (2) heat island effect; (3) park enhancement; and (4) enhanced recreational opportunity, while also getting points under the Nature-Based Solution section).

D. Nature-Based Solutions

Again, due to lack of metrics and clear guidance, it was very hard for applicants to self-score or the Committee to issue a final score on nature-based solutions. Most projects claimed 10 (of 15)

nature-based solutions points, and the Scoring Committee largely awarded these points with notes to WASCs that the claims were not well supported in the application. It is currently unclear how much actual greening will occur in association with proposed projects given the inadequate guidance. Another issue the committee faced is that impermeable area points (similar to previous sections related to water quality) are percentage based, so some of the projects that scored highest actually had very little actual removal of impervious cover, but had a high percentage (for example, one project got maximum points by decreasing impermeable area from .1 to 0 acres). And some projects (which included parking lot enhancements as part of a larger park stormwater project) actually increased impervious cover, but were still awarded points if there were other nature-based (e.g., bioswale) elements to the project.

Recommended near-term fixes

Moving forward, the feasibility guidelines should be more clearly incorporated into the online application so that both applicants and Scoring Committee members can better assess whether projects are eligible for these points. Those guidelines state that “[i]f Nature-Based Solutions are not utilized, an explanation, with supporting analysis and information, of why it is not feasible to do so.” In addition, the Feasibility Study must include “[a]n explanation, with supporting analysis and information, of how the Project” meets the following criteria:

Implements natural processes to slow, detain, capture, and absorb/infiltrate water in a manner that protects, enhances or restores habitat, green space or usable open space.

- Nature mimicking projects include “green streets, spreading grounds and planted areas with water storage capacity.” Ordinance at p. 3. It must be clarified that nature-mimicking projects do not include bioreactors or low flow diversions unless there are associated planted materials.

Utilizes natural materials such as soils and vegetation with a preference for native vegetation.

- The explanation should include the relative increase in soils and vegetation at the project site and/or the relative increase in native vegetation. If a plant palate has been developed, it should be attached (and if no plant palate has been developed, then at least a description of what would go into determining a plant palate).

Recommended longer-term fixes

Consider awarding points for removal of impermeable surface based on overall acreage removed, or at least should impose a minimum acreage removed threshold to score points if percent reduction continues to be the metric. Consider whether projects that actually increase impermeable surface should face some penalty.

Undertake additional research to develop a more metrics-based approach to awarding points for nature-based projects.

E. Leveraging Funds & Community Support

Cost Share

Although the cost share criteria seems clear, applicants interpreted it in different ways: some claimed cost-share points for staff time, some claimed points for speculative funding (e.g., grant applications, or for using unspecified amounts of local return funds), and some left funding gaps (e.g., asked for \$2 million and showed \$2 million in match, but listed the overall project cost as \$5

million). The Scoring Committee gave points where there was a committed funding match (not just staff time), and funding was secure for the entire storm water portion of the project.

Recommended near-term fixes

For the next funding round, the feasibility guidelines should be elevated as part of the online application portal. Those state that, to be awarded cost share points, the Feasibility Study must include: “a discussion of how other funding sources are being leveraged to finance the Project, including documentation of such other funding sources (e.g., existing agreements, MOUs, grant awards). Other funding sources could include funds from the SCW Municipal Program.”

Recommended longer-term fixes

Consider providing more guidance on how cost-share should be calculated to ensure clarity and consistency, including:

- Requiring applicants that are committing to use their SCWP municipal funds as cost share to account for where all such local return funds are being utilized to ensure they are not being double-counted for multiple projects
- Making a determination about whether or not staff time can be counted as match
- Making a determination as to how certain funding must be to be awarded points (because of the timing of funding applications, does an applicant need to show 100% of funding is committed in order to get points, or is some lesser percentage sufficient as long as the applicant has a realistic plan to get the rest?).

Community Support

Many applicants claimed points for community support while either mistaking outreach for community support or providing a letter from an individual or group that is not representative of the broader community. Almost no applicants engaged with non-governmental organizations in a significant way to inform project design or implementation. The Scoring Committee awarded points to projects that had ANY letters of support, even if from a single resident or organization, so long as the letter was not from a municipality or elected official. However, it was unclear whether most projects have true “strong community support” as was intended when the Safe Clean Water Program was developed.

Recommended near-term fixes

For the next round of funding, a clearer definition of “strong support” must be provided and the minimum requirements for demonstrating that support must be defined, and should at a minimum clarify that “strong support” does not mean a plan for *future* outreach, and entails concrete evidence of meaningful support.

Recommended longer-term fixes

In the long run, the Board of Supervisors should consider enhancing the points available for true collaborations between NGOs and project applicants. They might also consider implementing community engagement metrics similar to those used in Prop O and Parks Measure A.

Appendix A: Possible Special Studies

1. Data mining to update scoring criteria given that the criteria was developed with five projects and there are now dozens of projects to improve thresholds.
2. For pollutant removal calculations at A.1.2 – data mining to come up with an appropriate threshold to support a “magnitude route for compliance. This would allow applicants to select from two options: a magnitude route such as pounds of pollutants removed, and a volume treatment route.
3. For the A.2 category - creating a cost effectiveness category to capture the high cost for some dry weather projects. Updates would require a data mining effort to develop this metric.
4. For the A2.2 tributary area limits - re-evaluate through a data mining effort as these came from a limited set of projects.
5. For water supply - maintenance costs have a major effect on cost effectiveness. Converting this metric to a scaled value as well as conducting a data mining effort to update the score ranges would be beneficial.
6. Water supply – Upper LA River, Upper San Gabriel River and Rio Hondo appear to have large advantage. The Scoring Committee could use a further detailed analysis to determine if what was perceived at the Committee was, in fact, what was happening.
7. Additional water supply categories could be developed for various ecological benefits provided to maximize the water supply benefits for the Region.
8. A member of the public noted that a study was done in 2007 that monitored dry weather capture for specific watersheds, and that the website should provide an estimate of dry weather flow for specific projects. TJ Moon noted that data may not be available to consistently provide a dry weather flow estimate for all areas of the County, and that new studies would likely be required. Currently, project applicants can overestimate water supply benefit by entering in their own dry weather flow value.
9. Undertake additional research to develop a more metrics-based approach to awarding points for nature-based projects

Appendix B: Breakdown of Community Investment Benefits

Of the 51 projects that cleared the scoring threshold, the following number of projects were awarded points (or claimed points for DAC benefits)

DAC	
DAC benefit claimed	34
Community Investment Benefit Awarded	
Improved flood management, flood conveyance, or flood risk mitigation	43
Creation, enhancement, or restoration of parks, habitat, or wetlands	39
Improved public access to waterways	7
Enhanced or new recreational opportunities	36
Greening of schools (assuming only at schools counts)	2
Reducing local heat island effect and increasing shade	41
Increasing the number of trees increase and/or other vegetation at the site location that will increase carbon reduction/sequestration and improve air quality	43
Nature-Based Solutions Full Points Awarded	
Implements natural processes or mimics natural processes to slow, detain, capture, and absorb/infiltrate water in a manner that protects, enhances and/or restores habitat, green space and/or usable open space	47
Utilizes natural materials such as soils and vegetation with a preference for native vegetation	43
100% impervious cover removed	7
60% impervious cover removed	2
40% impervious cover removed	6
Leveraging Funds Full Points Awarded	
>25% funding matched	5
>50% funding matched	23
Community Support Full Points Awarded	
Demonstrates strong local, community support	21

To:	Safe, Clean Water Program 900 South Freemont Ave Alhambra, CA 91803	From:	Mike Antos, Tori Klug Stantec Consulting Inc. 300 North Lake Avenue #400 Pasadena, CA 91101
File:	File Name	Date:	April 18, 2022

Reference: Scoring Committee Systemic Comments

PURPOSE AND BACKGROUND

At the October 5, 2021 Scoring Committee meeting, Chair Bruce Reznik requested that note-takers keep a list of the items discussed regarding the Safe Clean Water Program (SCWP) scoring system. The following memorandum includes a list of systemic updates discussed or mentioned during Scoring Committee meetings since August 2021.

At March 14, 2022 Scoring Committee meeting, the committee reviewed the summary materials here, and further refined their feedback about each category of comments.

COMMITTEE'S ABILITY TO SCORE BASED ON SUBMITTALS

The following comments reflect the Committee's understanding of how it seeks additional information when a submittal is insufficient to verify the score, and what can and cannot happen during the back-and-forth with project proponents.

- December 9, 2021 - The Scoring Committee can only ask for clarifying information when planning to rescore projects. They cannot give guidance for improving projects. Applicants cannot make revisions after submitting (District staff).
- December 9, 2021 - For projects that are being rescored, funding requests cannot be changed from the original submittal (Vice Chair Moon).
- December 9, 2021 - Points requested by the applicant cannot be increased due to an update in the project (comment by Vice Chair Moon, concurrence from Chair Reznik and District staff).

Notes from Scoring Committee Review, March 14, 2022
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The Scoring Committee is not meant to be a working group; it is meant to validate the scores of projects. Information clarifications will likely be required, but projects cannot be fundamentally reworked.

The Scoring Committee expressed interest in having both the District's completeness check and the WASCs' reviews filter out projects not ready for scoring. SCWP may consider making pre-submittal workshops mandatory to get projects as final as possible before they reach the Committee. In addition, the Committee would like to treat incomplete submittals with more finality, rather than having back and forth correspondence regarding how to complete projects. District staff may also consider specifying the portions of the projects that are to be re-scored before they get sent to the Committee.

Reference: Scoring Committee Systemic Comments

PROJECTS DESIGNED TO EARN POINTS

The following comments reflect the Scoring Committee's thinking about projects that they deem to be designed or documented in such a way to earn high numbers of points, rather than designed towards the technical merits of the potential project.

- October 19, 2021- Applicants are encouraged to focus on their presentations to the WASC, instead of focusing on raising their scores beyond 60 points, because it is not necessary to exceed the 60-point minimum (Chair Reznik).
- January 10, 2022 - The Scoring Criteria encourages applicants to overbuild/overdesign projects to receive Water Quality and Water Supply Benefits. (Chair Reznik).

Notes from Scoring Committee Review, March 14, 2022

The Scoring Committee wishes to make holistic comments about each project reviewed to benefit the WASCs and have those comments captured by notetakers and shared with the WASCs.

VARIATION IN INFRASTRUCTURE SUBMITTAL TYPES

The following comments reflect the Scoring Committee's thinking about how projects submitted for design funding only or a previously or concurrently implemented project seeking only O&M funding are difficult to evaluate alongside projects seeking design, implementation, and O&M funding.

- October 19, 2021 - Projects submitting for only Operations and maintenance (O&M) funding should be evaluated with a separate criteria (comment by Chair Reznik, concurrence from Vice Chair Moon).
- October 19, 2021 - Scoring should be based on O&M costs, rather than original project costs. Clearer direction needs to be provided (Vice Chair Moon).
- October 19, 2021 - [A] project [that is seeking only O&M funding] does not need to be modeled because it has already been constructed (Vice Chair Moon).
- January 10, 2022 - Evaluation of the Water Quality and Water Supply scores will be / is more relaxed for projects seeking design-only funding (Member Matt Stone and Vice Chair Moon).
- January 10, 2022 - Design-only projects should be assessed under a different Scoring Criteria (Chair Reznik).

Notes from Scoring Committee Review, March 14, 2022

The Scoring Committee feels strongly that the Infrastructure Program application process does not sufficiently manage the three types of project submittals: design, construction, and O&M. The Committee believes a slightly different Scoring Criteria should be used for each IP submittal 'type'.

Reference: Scoring Committee Systemic Comments

EVALUATING WET WEATHER VS. DRY WEATHER FOCUS

The following comments reflect the Scoring Committee considering the issues around assessing a project as providing wet weather Water Quality Benefits as opposed to dry weather Water Quality Benefits.

- October 5, 2021 - The Scoring Criteria does not factor the cost-effectiveness of dry weather projects. Cost needs to be considered, like wet weather projects (comment by Member David Sorem, concurrence by Vice Chair TJ Moon).
- October 19, 2021 - Need clearer criteria to determine whether large drainage projects apply as wet weather or dry weather projects (Chair Reznik).

Notes from Scoring Committee Review, March 14, 2022

The Scoring Committee feels that having a scaled point system might help projects get points for partial pollutant reduction in situations where large drainage areas are being partially managed by a project.

PERMUTATIONS OF WATER SUPPLY BENEFITS

The following comments reflect the Scoring Committee considering how Water Supply Benefits can be assessed and considered for other-than infiltration to groundwater.

- October 5, 2021 - A project's capacity to capture a large amount of water should not be held against applicants when a project is well-sited and has a good permeable surface (Vice Chair Moon).
- October 5, 2021 - Need to determine how to assess the offsetting of existing potable water use while providing water for additional vegetation (although it is a valuable form of community investment) (Chair Reznik).
- October 19, 2021 - Should offsetting new demand count towards a project's Water Supply Benefit? (Chair Reznik)
- October 19, 2021 - Net Water Supply Benefits should be considered. For example, it should be assessed whether the project offsets an existing need or if it simply offsets needs generated by the project itself (i.e., through new plantings).
- November 17, 2021 - In regard to the Water Supply credit for partial infiltration and partial diversion to water recycling – the Committee should consider how diversion to recycling will augment Water Supply if capacity of treatment facilities is (currently) already fully accounted for (Chair Reznik).

Notes from Scoring Committee Review, March 14, 2022

The Scoring Committee will employ the new draft Interim Guidance about groundwater and recycled Water Supply Benefits.

Reference: Scoring Committee Systemic Comments

NATURE-BASED SOLUTIONS

The following comments reflect the Scoring Committee considering the elements of Nature-Based Solutions.

- October 5, 2021 - Applicants should be asked whether trees being removed will be replaced (Member Kristen Schwarz).
- October 5, 2021 - Not enough points are awarded for connectivity between habitat patches or between community areas with open space (Chair Reznik and Member Schwarz).
- October 5, 2021 - Generally disappointed by the amount of hardscape removed in projects across the SCWP (Chair Reznik).
- October 19, 2021 - Points awarded for impervious surface removal should be based on actual square footage, rather than a percentage (Chair Reznik).
- October 19, 2021 - For Nature-Based Solutions, the Scoring Criteria should consider the size of impermeable surface removed, rather than the percentage, because proponents limit project area to receive maximum impermeable surface reduction points (Chair Reznik).
- November 22, 2021 - Why is the boundary for impervious surface counted toward the total benefit?

Notes from Scoring Committee Review, March 14, 2022

The Scoring Committee sees the awarding of points within wants to make sure that significant points are awarded to projects removing a significant amount of hardscape. The impervious surface calculation is a major issue. Additional details regarding addition of trees would be helpful. The Committee would like to be able to assign points for projects that connect habitats and community hubs. The Committee also want to pay more attention to the net benefits of projects.

OTHER ITEMS

The following comments reflect other issues raised by members of the Scoring Committee that were not similar to the categories identified above.

Community Engagement

- October 19, 2021 - The Community Engagement Assessment for developing projects should reflect what applicants have already done in addition to what they should plan to do if/when they receive SCWP funding.

Notes from Scoring Committee Review, March 14, 2022

The Scoring Committee hopes that more information can be requested of the applicants -- number of community members contacts, community demographics, demonstration of representation from the neighborhood, and demonstration by applicants of strong local support.

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Reference: Scoring Committee Systemic Comments

School Greening Projects / Goal

- October 5, 2021 - A project that is adjacent to a school, rather than within a school, should not receive points for achieving school greening (Chair Reznik).

Displacement

- October 5, 2021 - The Scoring Criteria does not address projects' impacts on displaced communities.

Notes from Scoring Committee Review, March 14, 2022

Applicants are required to disclose information about anti-displacement. SCWP needs to determine how this information will be used.

Infrastructure capacity

- January 10, 2022 - Los Angeles Sanitation requests that a sewer capacity study be a required component of the feasibility study (Member Stone).

Leverage Funding

- October 5, 2021 - The Scoring Criteria for Leveraging Funds points is too rigid. A project with 24.5% shouldn't get zero, while a project with 25% gets 3 (Member David Diaz).

Notes from Scoring Committee Review, March 14, 2022

The Scoring Committee shared that job creation does not contribute to application score, and that the program likely should start weighing the climate-related pros and cons of projects. For example, some projects require a significant amount of pumping which uses energy which may be producing GHG.

IDENTIFYING EXEMPLARS:

The following are examples of the Scoring Committee members identifying an element of a project that has one or more elements that were exemplary.

- October 5, 2021 - The project advisory committee that Amigos de los Rios assembled for the Jackson Elementary Project is a great example of community engagement prior to project submittal (Chair Reznik).
- October 5, 2021 - Bilingual materials used for the Whitsett Fields Park North Stormwater Capture Project (Member Schwarz).

Notes from Scoring Committee Review, March 14, 2022

This item was not discussed for lack of time.

To:	Safe, Clean Water Program	From:	Mike Antos, Ryanna Fossum SCWP Regional Coordination Team
	900 South Freemont Ave Alhambra, CA 91803		Stantec Consulting Inc 300 North Lake Avenue, #400 Pasadena, CA 91101
		Date:	May 30, 2023

Reference: Scoring Committee Comments and Recommendations – Round 4 Projects**PURPOSE AND BACKGROUND**

At the November 3, 2022 Scoring Committee meeting, Chair Bruce Reznik requested that note-takers keep a list of the items discussed regarding the Safe Clean Water Program (SCWP) scoring system. The following memorandum includes a list of systemic updates discussed or mentioned during Scoring Committee meetings for Round 4 projects (Fiscal Year 2023-2034).

At the April 6, 2023 meeting, the Scoring Committee reviewed the summary materials here, and shared specific recommendations that align with their previously recorded comments, requesting that the recommendations be provided in this final memo. The Committee also requested that this memo incorporate comments made by the committee during the prior three years of SCWP implementation. Both additions were made to this final memo.

The recommendations made by the Scoring Committee will be reviewed by District Staff and incorporated into the production of the SCWP biennial report, and as appropriate to other adaptive management efforts.

VARIATION IN INFRASTRUCTURE SUBMITTAL TYPES

The following comments reflect the Scoring Committee's thinking about how projects submitted to the infrastructure program for design only funding, or for a previously or concurrently implemented project seeking only O&M funding are difficult to evaluate alongside projects seeking design, implementation, and O&M funding.

- September 1, 2022 – There is not yet guidance to help evaluate design-only projects that propose a variety of alternatives. An audit to compare benefits promised and benefits realized for projects that received SCWP funding may be needed (Member Matt Stone).
- October 6, 2022 – As noted in previous rounds of scoring, it is difficult to score Operations and Maintenance (O&M) projects using the current scoring criteria (comment by Member Diaz and concurrence by Chair Reznik).
- November 3, 2022 – As noted in previous rounds of scoring, projects that apply for both design and construction funding should submit separate applications, especially if there are multiple phases of the project (Committee Members).
- November 3, 2022 – As noted in previous rounds of scoring, evaluation of projects seeking design-only funding is typically more lenient than projects seeking both design and construction funding (Chair Reznik).

Reference: Scoring Committee Comments and Recommendations – Round 4 Projects

- December 1, 2022 –Projects requesting a small amount for design versus a large amount for construction should be intentionally considered during the scoring process as it relates to the cost benefit ratio of a project (Committee Members).

Notes from Scoring Committee Review, April 6, 2023

The Scoring Committee shared that the Infrastructure Program application process does not sufficiently manage the three types of infrastructure program project submittals: design, construction, and O&M. The Committee believes the different project types warrant slightly different scoring approaches or a weighted scoring system. The Scoring Committee also recommends that the SCWP encourage projects that apply for both design and construction funding to submit separate applications, especially if there are multiple phases of the project. The Scoring Committee also requested guidance on how to evaluate design-only projects that propose a variety of alternatives.

Similarly, the Scoring Committee sought more guidance on whether to award points for project benefits based on the entire cost and merits of a project or just components of the project funded by the SCWP.

Other Scoring Committee recommendations:

1. To Modify Feasibility Study Guidelines 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. 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
 - ii. Require on-site geotechnical analysis
 - iii. Require a letter from water purveyor for water supply points
 - iv. Require sanitary sewer capacity analysis
 - c. Operations & Maintenance only projects:
 - i. Require monitoring data to supersede modeling data
2. To Develop clearer guidelines for the Scoring Committee and applicants about which parts of a project can be given credit, including direction for the following:
 - a. 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, how should the Scoring Committee evaluate projects that propose a variety of alternatives?
 - b. Affirm that total project cost is used in the cost/benefit calculations in all project benefit categories where that metric is used to evaluate proposals. Some proposers have elected to include only partial project costs in the cost/benefit calculations.

Reference: Scoring Committee Comments and Recommendations – Round 4 Projects

WATER QUALITY BENEFITS

The following comments reflect the Scoring Committee considering the issues around assessing a project as providing wet weather Water Quality Benefits as opposed to dry weather Water Quality Benefits and practices to standardize project applications for assessment.

- September 1, 2022 – More guidance is needed to assess whether projects are dry weather or wet weather (Vice Chair Moon).
- October 17, 2022 – The maximum calculated 24-hour storm capacity should be capped at the 85th percentile storm capacity. This cap will reduce the points historically awarded to applicants that use a larger capacity in calculations (Vice Chair Moon).
 - Concerns about inaccurate system capacity calculations that go above the 85th percentile storm capacity were raised again at the November 3rd and November 9th Scoring Committee meetings.
- November 3, 2022 – Projects with treat-and-release or proprietary BMPs should be evaluated based on the results of the Metrics and Monitoring Study instead of being treated as an infiltration basin in the SCW module (Vice Chair Moon).
- November 9, 2022 -- The Project Module and Scoring Criteria are not equipped to allow applicants to input multiple treatment techniques (e.g. dry wells and treat-and-release) (Vice Chair Moon).
- December 1, 2022 – Some form of standardization for dry weather should be created for future applications. Field measurements are ideal but using a standard authority's cubic feet per second (cfs) per acre could also be considered. The number of dry days in a year assumed in an application should also be standardized. If an applicant uses a 24-hour duration instead of the standard 72-hour duration used after a wet weather event to mark when dry weather begins, they should provide justification. (Vice Chair Moon).
- December 1, 2022 – Projects should not be designed to treat more water than required, as it increases the cost and use of SCWP funds (Vice Chair Moon).
- December 1, 2022 – For future applications, site-specific geotechnical data should be required for projects requesting construction funding and may be a step in the District's preliminary verification process (Vice Chair Moon).

Notes from Scoring Committee Review, April 6, 2023

The Scoring Committee identified several challenges when it comes to awarding water quality benefit points to projects, including non-standardized calculations used across applications and a lack of flexibility in distinguishing between wet weather and dry weather projects. Scoring Committee recommendations from previous rounds of scoring also included revising the cost-effectiveness (per acre-foot) criteria under A.1.1 and potentially creating a cost-effectiveness category under A.2. Recommended next steps are below.

Other Scoring Committee recommendations:

1. Changes to project module:

Reference: Scoring Committee Comments and Recommendations – Round 4 Projects

- a. Disallow 24-hour BMP capacity above the 85th percentile design storm volume and require applicants to submit calculations.
 - b. Allow dry weather calculations to be superseded by monitoring data, if available
 - c. Investigate standardizing the process for the flow calculation inputted by the applicant
 - d. Allow applicants to select multiple BMP types to be evaluated
2. Changes to Feasibility Study Guidelines:
 - a. Require site specific geotechnical reports for projects applying for construction funding
 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 criteria.
 - b. Create sliding scale for projects that capture quantities between dry weather and wet weather capacities
 - c. Revise the cost-effectiveness (per acre-foot) criteria under A.1.1 to be linear or scaled
 - d. Consider creating a cost-effectiveness category for the A.2 category (possibly employing a gallons per minute (GPM)/\$1M metric).

WATER SUPPLY BENEFITS

The following comments reflect the Scoring Committee considering how Water Supply Benefits can be assessed and considered for other-than infiltration to groundwater.

- November 3, 2022 – Water supply cost effectiveness points are difficult to earn (Chair Reznik)
- November 3, 2022 – The Scoring Committee should consider whether projects located in watershed areas with very deep aquifers should be awarded water supply benefit points for interventions that intend to recharge the aquifer (such as concrete removal), even if no direct path to the aquifer is specified (comment by Member Stone and concurrence by Member Esther Rojas).
 - In the past, no points have been awarded to projects in watershed areas without aquifers, but the Scoring Committee has given partial points to projects that demonstrate the intent for recharge in regions where aquifers are present (Vice Chair Moon).

Notes from Scoring Committee Review, April 6, 2023

The Scoring Committee concluded that the current water supply scoring criteria prevents them from awarding water supply benefit points for projects that demonstrate the intent for groundwater recharge without definitive proof of generating usable recharged water. Committee Members understand that this would limit the ability for many projects to receive points for water supply and recommended either adjusting the scoring criteria or changing the ordinance definition of water supply benefit.

The Scoring Committee also clarified its position on a Round 3 Scoring Memo comment, concerning whether a project's newly created water demand can count towards creating water supply, such as a project creating additional demand for onsite irrigation and meeting that demand with captured runoff. If a project is claiming a water supply benefit by offsetting a new potable demand, the applicant should provide an analysis of supply and demand impacts of the project.

Reference: Scoring Committee Comments and Recommendations – Round 4 Projects

Other Scoring Committee recommendations:

1. To address difficulty in claiming water supply points from infiltration:
 - a. Change the SCWP ordinance definition of “water supply benefit” to include activities that infiltrate water with the intent to replenish groundwater, or
 - b. Adjust the scoring criteria to include different thresholds for different WASCs, create a “base plus bonus” system of scoring, and/or assigning weights to different scoring categories.
2. Adjust scoring criteria with recommendations from the Metrics and Monitoring Study (MMS) investigation on how to lower or recalibrate the B.1 cost effectiveness for water supply points.
3. Modify 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.

COMMUNITY INVESTMENT BENEFITS

The following comments reflect the Scoring Committee considering how school greening and flood protection benefits can be considered for Community Investment Benefits.

- October 17, 2022 – As noted in previous rounds of scoring, school greening points should only be awarded to projects that directly implement green features in school campuses (Chair Reznik).
- November 3, 2022 – The Scoring Committee should consider whether school greening points may be awarded to projects that are not located on school property but located on property which the school uses or intends to use (Chair Reznik).
- November 3, 2022 – Flood protection benefits cannot be awarded to dry weather projects for Community Investment points (comment by Member Diaz and concurrence by Chair Reznik).
- November 9, 2022 – More discussion is needed to decide whether all wet weather projects confer flood protection benefits, or just those which treat the 85th percentile storm (comment by Vice Chair Moon).

Notes from Scoring Committee Review, April 6, 2023

The Scoring Committee concluded that school greening benefits will be evaluated on a per project basis for projects not located on a school campus. The Committee agreed that generally, if a project has a joint use agreement with a school, the project can receive school greening credit.

The committee agreed that only projects that capture the 85th percentile storm can receive flood protection benefits. *[Staff note: this restriction may prevent community investment points from being awarded to projects that seek to address localized flooding concerns that occur in storms less than the 85th percentile.]*

NATURE-BASED SOLUTIONS

Reference: Scoring Committee Comments and Recommendations – Round 4 Projects

The following comments reflect the Scoring Committee considering the elements of Nature-Based Solutions.

- November 3, 2022 – The Committee’s stance on artificial turf as a nature-based solution should be discussed (Chair Reznik).
- November 3, 2022 – Because removal of impermeable surfaces is expressed as a percentage, applicants can game the criteria by reducing the overall project area and inaccurately represent claimed benefits (Chair Reznik).
- December 1, 2022 – There may be a gradient point scale developed for points awarded for percent reduction in impervious area (District Staff).

Notes from Scoring Committee Review, April 6, 2023

The Scoring Committee determined that artificial turf will not be considered a nature-based solution. In previous rounds of scoring, the Committee shared they would like to be able to assign points for projects that connect habitats and community hubs. The Committee also want to pay more attention to the net benefits of 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.

Other Scoring Committee recommendations:

1. For Round 5 Call for Projects:
 - a. Modify project module to require that applicants submit additional information documenting the impermeable surface removed in relation to the total project area.
2. For future Calls for Projects:
 - a. 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.
 - b. Consider adjusting the scoring criteria for impermeable area removed from a percentage to the total impermeable area removed

LEVERAGING FUNDS AND COMMUNITY SUPPORT

The following comments reflect the Scoring Committee considering the elements of leveraged funds and community support.

- October 17, 2022 – The Scoring Committee is only responsible for evaluating leveraged funds that have been secured. The WASC would be responsible for evaluating the likelihood of securing funds not yet committed (District Staff).
- October 17, 2022 – It is acceptable to evaluate letters of support for projects that are addressed to other funding sources, so long as the project has not drastically changed and the length of time since the letter was dated is not too great (comment by Member Diaz and concurrence by Chair Reznik and Vice Chair Moon).

Reference: Scoring Committee Comments and Recommendations – Round 4 Projects

Notes from Scoring Committee Review, April 6, 2023

The Scoring Committee confirmed that only secured leveraged funds can be evaluated and that funds that are merely “likely” to be secured will not be counted by the Scoring Committee. The Scoring Committee clarified that letters of support for a project should be recent (e.g., less than 1-2 years) and addressed to the SCWP instead of reusing letters of support addressed to other organizations.

Scoring Committee recommendations from previous rounds of scoring also included providing a clearer definition of “strong support” and the minimum requirements for demonstrating that support, which should at a minimum clarify that “strong support” does not mean a plan for future outreach, but rather entails concrete evidence of meaningful support. The Scoring Committee hopes that more information can be requested of the applicants, such as number of community members contacted, community demographics, demonstration of representation from the neighborhood, and demonstration by applicants of strong local support.

OTHER ITEMS

The following comments reflect other issues raised by members of the Scoring Committee.

Considerations for North Santa Monica Bay Watershed Area

- October 6, 2022 – It has been difficult to generate qualifying projects in the North Santa Monica Bay Watershed Area and a separate scoring system should be considered (comment made by Chair Reznik).

Estimates of O&M costs vary

- October 17, 2022 - Inconsistent estimates of O&M costs across applications make it difficult to assess projects (Vice Chair TJ Moon).

Notes from Scoring Committee Review, April 6, 2023

The Scoring Committee noted that the Metrics and Monitoring Study (MMS) will evaluate scoring criteria for the North Santa Monica Bay Watershed Area, which has historically struggled to generate projects that pass the scoring threshold due to lack of recharge potential in the Watershed Area.

In addition, the Scoring Committee agreed to recommend adjustments to the scoring system that would establish that certain categories are not optional. For example, the category for Leveraging Funds and Community Support (Part 2) is only worth five points, so project applicants can neglect community engagement and still pass the scoring threshold. The Committee felt that this should not be the case, as intentional community outreach and engagement should be required for projects seeking SCWP funds.

Scoring Committee recommendations from previous rounds of scoring also included considering how job creation might contribute to application score and developing guidance on how to weigh the climate-related

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Reference: Scoring Committee Comments and Recommendations – Round 4 Projects

impacts of projects. For example, some projects require a significant amount of pumping which uses energy, potentially producing GHG emissions.

Other Scoring Committee recommendations:

1. For Round 5 Call for Projects:

- a. Consider changes to scoring criteria for the North Santa Monica Bay Watershed Area based on MMS recommendations.

2. For future Calls for Projects:

- a. Consider altering the scoring criteria to require a minimum point threshold for Leveraging Funds and Community Support
- b. Consider awarding points for job creation in the scoring criteria
- c. Consider including positive impact on climate response in the scoring criteria



Scoring Committee Memo

To: Safe, Clean Water Program Scoring Committee From: Safe, Clean Water Program Regional Coordination Team
Date: April 5, 2024

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 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 Projects 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.
 - v. A SCW funded design-only project would be expected to and have sufficient resources to develop project plans to a level appropriate for submitting a construction funding application.
- b. Construction Projects:
 - i. Require existing feasibility study and require a minimum of 60% design plans (elevation and profile plans, strong cost estimates)
 - ii. Require site-specific geotechnical analysis obtained at the project location or within 500 feet of the project location.
 - iii. Require a letter from Watermaster or Sanitation agency verifying capacity to provide Water Supply Benefits.
- c. Operations & Maintenance Only Projects:

Reference: Scoring Committee Comments and Recommendations – Round 5 Projects

- i. Simplify and streamline the application process.
- ii. Require monitoring data rather than modeled data about project benefits.

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. Allow dry weather pollutant loading calculations to be superseded by monitoring data, if available.
 - c. Revise the Projects Module to include a function to accurately predict and standardize Water Quality Benefits based on 24-hour BMP capacity determined using reservoir routing for the design storm, typically the 85th percentile storm.
 - d. Investigate how to standardize flow calculation outputs and conduct hydrology routing calculations in the Projects Module. Request District staff analyze output differences between Los Angeles County Flood Control District’s modeling system and Los Angeles County’s Watershed Modeling Management System (WMMS).
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 within a 500 foot threshold.

Reference: Scoring Committee Comments and Recommendations – Round 5 Projects

3. Changes to Scoring Criteria:

- a. Allow applicants to categorize the project using a load-based criteria (i.e., pounds of sediment 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 runoff volumes.
- 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

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Reference: Scoring Committee Comments and Recommendations – Round 5 Projects

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 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 Projects 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.

Reference: Scoring Committee Comments and Recommendations – Round 5 Projects

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.

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 dry weather projects that present clear solutions to localized flooding (i.e., addressing recurring flooding at the intersection across from a school) would be eligible to receive CIB points for flood management.

The Committee also expressed interest in exploring how to best quantify community needs and benefits.

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 used 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.
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.

Reference: Scoring Committee Comments and Recommendations – Round 5 Projects

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.

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 has expressed that design-only projects should include a community engagement plan and/or a budget for engagement or partnership with a local Community-Based Organization to demonstrate local support.

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.”

Reference: Scoring Committee Comments and Recommendations – Round 5 Projects

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.