



Date: May 9, 2025

To: Regional Oversight Committee

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

RE: Regional Oversight Committee Water Quality Subcommittee Report: Alternative Approach for Developing Water Quality Targets for Safe, Clean Water Program (SCWP) Watershed Planning

To Members of the Regional Oversight Committee:

On behalf of the OurWaterLA (OWLA) Coalition Core Team, we appreciate the opportunity to comment on the proposed “Alternative Approach for Developing Water Quality Targets for Safe, Clean Water Program (SCWP) Watershed Planning.” OWLA is a diverse coalition committed to a strong water future for Los Angeles County—one that delivers clean, safe, affordable, and reliable water while prioritizing nature-based solutions, community health, local jobs, and equity.

We commend the Regional Oversight Committee (ROC) Water Quality Subcommittee for undertaking this important effort to provide direction and interim progress indicators to advance the SCWP water quality goals. The proposed 2038 target for achieving water quality standards in receiving waters, along with interim load reduction targets for key pollutants by 2032, represents a positive step in ensuring program effectiveness and measurable environmental benefit.

OWLA supports the following aspects of the proposed approach:

Commitment to Clean Water: Establishing water quality standards as the guiding principle aligns with OWLA’s fundamental goal of securing clean water for all communities, and with the program goals of the SCWP. Clear, science-based standards provide a consistent benchmark for evaluating progress, prioritizing investments, and ensuring that efforts under the SCWP lead to measurable improvements in water quality and public health, particularly in communities disproportionately burdened by pollution.

Strategic Project Prioritization: The development of tools and criteria to help Watershed Area Steering Committees (WASCs) prioritize impactful projects is essential. Integrating this planning process with existing efforts - such as Municipal Separate Storm Sewer System (MS4) Watershed Management Programs (WMPs) - is a valuable strategy to achieve cumulative water quality improvements while avoiding duplication of efforts.

Adaptive Management Framework: The Countywide Adaptive Management Implementation Plan offers a meaningful mechanism to assess, adjust, and improve SCWP implementation over time. Establishing measurable milestones - particularly through dual-level monitoring that evaluates both project-specific performance and broader in-stream water quality - will help ensure accountability and generate the data needed to inform adaptive management decisions at both the regional and watershed scales.

Mapping and Transparency: Including SCWP-funded projects—as well as related efforts led by community-based organizations (CBOs), NGOs, and other partners—in a comprehensive, publicly accessible mapping system will significantly strengthen program transparency. Such a tool can help visualize where investments are being made, highlight areas of persistent need, and identify opportunities for coordination and cumulative impact. This approach not only supports accountability but also empowers stakeholders, including community members, to track progress, advocate for equitable distribution of resources, and engage more meaningfully in watershed planning.

We also encourage the ROC to make a few critical refinements to ensure this approach fully reflects the intent and vision of the SCWP—especially when it comes to delivering meaningful benefits for communities most impacted by pollution, disinvestment, and climate vulnerability:

Centering Multiple Benefits and Equity Alongside Water Quality: While the approach identifies water quality as the primary driver for project selection, the SCWP was intentionally designed to deliver multiple community benefits—including urban greening, heat mitigation, job creation, and equitable public health improvements. As these guidelines are incorporated into Watershed Plans over the coming year, it is essential that they serve as a decision-making tool that balances water quality objectives with equity and other co-benefits. Treating these elements as integrated priorities—rather than secondary considerations—will better align implementation with the full vision and intent of the SCWP and help ensure that investments meaningfully serve the communities most impacted by pollution and climate stressors.

Prioritizing Underserved Communities and Elevating Community Leadership: The prioritization approach must go beyond broad land-use and geographic criteria to include clear metrics that direct resources to historically underinvested, pollution-burdened, and park-poor communities. Equally important is ensuring that community stakeholders - especially from low-income and frontline areas - have structured opportunities to shape how priority strategies are selected, how success is defined and measured, and which community benefits (such as green jobs, shade, or recreation) are prioritized.

Strengthening Stakeholder Engagement and Transparency: To maximize the value of the progress reports received by the ROC, we recommend formalizing a clear and consistent reporting process that ensures all stakeholders remain informed and aligned throughout implementation. This process should include structured opportunities for public input and regular updates that are accessible and easy to understand. All reported information must also be fully integrated into the SCWP portal to enhance transparency, support accountability, and ensure equitable access to information.

OWLA remains a strong supporter of the Safe, Clean Water Program and the work of the Regional Oversight Committee. We believe the proposed water quality target framework can be a valuable tool for planning and progress - if it is integrated with a robust commitment to equity, community leadership, multiple benefits, and accountability. Thank you for your leadership and for the opportunity to share our input. We look forward to continued collaboration to ensure that every community in Los Angeles County benefits from safe, clean, and resilient water.

Sincerely,

OurWaterLA Coalition
Core Team

OurWaterLA is a diverse coalition of community leaders and organizations from across Los Angeles County united to create a strong water future for Los Angeles. Our goal is to secure clean, safe, affordable and reliable water for drinking, recreation and commerce now and for the future. We have a deep commitment to uphold the trust that voters had in us when passing this measure and that projects which achieve Safe Clean Water Program objectives of water quality, water supply, nature-based solutions and community investments are prioritized.