



Public Comment Form

Name*: Audrey Siu

Organization*: Infrastructure Justice for LA Coalition

Email*: [REDACTED]

Phone*: [REDACTED]

Meeting: ROC

Date: 10/8/2025

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

*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to SafeCleanWaterLA@dpw.lacounty.gov. All public comments will become part of the official record.

Please complete this form and email to SafeCleanWaterLA@dpw.lacounty.gov by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]" (ex. "Public Comment: USGR 4/8/20").

Comments

Please see attached letter



September 23, 2025

*Regional Oversight Committee
Safe, Clean Water Program
LA County Public Works
900 S. Fremont Ave
Alhambra, CA 91803*

Re: Community Engagement Requirements for the Safe Clean Water Program

Dear Regional Oversight Committee Members,

As community-based and non-profit organizations that prioritize robust, transparent, and equitable public engagement, we are concerned with the level of community engagement required, or lack thereof, for submitted Safe Clean Water Program (SCWP) projects. Community engagement and participation are critical to the successful development of projects that address equity, incorporate community benefits, and create project stewardship.

Community Engagement Eligibility Requirement

We were excited to see the SCWP draft watershed plans target 100% of projects to meet the minimum level of achievement in community engagement by 2045. However, there is no current requirement for community engagement to become eligible for the SCWP Regional Program—unlike many other grant programs. If the expectation is that every future funded SCWP project conducts meaningful community engagement, then an easy strategy to ensure projects are achieving the minimum level of achievement is to require it in order to be eligible for funding.

To address this, we ask that:

- The ROC recommends in their biennial review report that the minimum level achievement of community engagement becomes a mandatory eligibility requirement for the Regional Program.

Measure W Technical Resource Program

While we applaud the County for incorporating metrics and example outreach/engagement activities for the Regional Program Infrastructure design only and O&M Scoring rubrics, appropriate community engagement support is missing in the SCWP Technical Resources Program (TRP). The TRP process is meant to assist community groups, municipalities, and individuals in developing project concepts and applications. However, despite the emphasis on community engagement in the SCWP and the target of all projects achieving a minimum achievement level in community engagement, the TRP does not require quality community engagement or outreach to be conducted as part of the technical assistance for project development. We believe it's a huge missed opportunity and is misaligned with later steps in the SCWP.

Therefore, we recommend the ROC includes the following actions in their biennial review report:

1. Require community engagement as part of the TRP
2. Develop a robust bench of community engagement partners to work on technical resource projects across watershed area steering committees
3. Allow non-municipal project developers to be compensated as part of the technical assistance teams
 - a. For conducting community engagement activities AND
 - b. For covering their time in managing the Technical Assistance Team

Thank you for your time and consideration on this issue,

David Diaz
Executive Director
ActiveSGV

Tori Kjer
Executive Director
LA Neighborhood Land Trust

Dan Knapp
Executive Director/CEO
Long Beach Conservation Corps

Mikaela Randolph
Associate Director, Regional Programs
Green Schoolyards America

Bruce Reznik
Executive Director
LA Waterkeeper

Kelsey Jessup
Project Director,
Climate & Nature-Based Solutions
The Nature Conservancy

Audrey Siu
Facilitator
Infrastructure Justice for LA Coalition

Sara Marti
Board Member
Resilient Palisades

Maggie Gardner
Core Group Coordinator
OurWaterLA Coalition



Public Comment Form

Name*: Barbara Eisenstein

Organization*: Friends of South Pasadena Nature Park

Email*: [REDACTED]

Phone*: [REDACTED]

Meeting: Regional Oversight Committee

Date: 10/7/25

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Comments

My full comments will be sent in an email.

TO: SAFE CLEAN WATER PROGRAM
RE: PUBLIC COMMENT
NAME: Barbara Eisenstein
ORGANIZATION: Friends of South Pasadena Nature Park
MEETING: Regional Oversight Committee Meeting
MEETING DATE: October 8, 2025

My comments address the *Arroyo Seco Water Reuse Project*, currently funded through the Safe Clean Water program, but are relevant to the broader work of this oversight committee. This project suggests that the SCW program is not meeting its stated goals and needs to improve how projects are selected and monitored. After Pasadena (lead agency) and South Pasadena submitted a Mitigated Negative Declaration, they settled a lawsuit by agreeing to prepare a full EIR, which is now underway. This project has received millions of dollars in funding, yet it is unlikely to meet the stated goals of the Safe Clean Water program.

Inadequate Public Engagement

Although SCW purports to require public engagement in its projects, it is clear that the project administrators for the Water Reuse Project have preferred to minimize public involvement. In the Mid-Year Report FY24-25 for the project, it is stated that public engagement consists of "a series of three community outreach meetings" spanning 5/26/22 to 6/1/2026. Pasadena held meetings on 5/26/22, 4/27/2023, and an EIR scoping meeting on 5/28/2025. These three meetings appear to constitute the entirety of Pasadena's public outreach—a fundamental failure, especially given that early public involvement is a primary purpose of the EIR process.

The EIR scoping meeting itself was deeply flawed. After a presentation on the EIR process—with nothing about the project itself—the public was not allowed to comment or address administrators while the full group was convened. Instead, stakeholders were relegated to asking questions at the back of the room, where their concerns were not shared with other participants. This approach undermines meaningful public involvement. The EIR will likely be presented early next year without substantive stakeholder participation.

Even before the cities were required to do this additional environmental review, public involvement was limited. I attended virtual meetings in December 2021 and 2022 and gave written public comment. Few people attended and these meetings were merely an opportunity for the project administrators to convince the public that the project was beneficial. There was little attempt to involve the public in the development of the project or to garner what the public wanted for their communities and parkland.

Failure to Meet SCW Program Objectives

The Safe Clean Water LA website lists three overriding objectives: water purification, nature-based solutions, and community benefits. The Arroyo Seco project falls short on all three.

Community Benefits: As noted above, Pasadena has shown little interest in community input. Los Angeles residents were particularly excluded from the already-inadequate outreach, despite the fact that

City of Los Angeles parkland is in the project footprint and will primarily serve as the site for pumps and other gray infrastructure. Additionally, the Gabrieleño Band of Mission Indians Kizh Nation, for whom this land is sacred, has not been consulted, despite project administrators' claims of outreach attempts.

Water Purification: The volume of water and measured level of pollution to be purified using artificial pumps and filters is minimal. Meanwhile, known pollution sources—runoff from the golf course and horse stables—remain unaddressed. Ironically, a large stand of cattails currently mitigating bacterial contamination will be removed to build an artificial wetland that will assist with irrigation for the very golf course contributing to contamination. The large amount of public funds used for this over-built, backward-thinking project is indefensible.

Nature-Based Solutions: This project contradicts nature-based principles. The wetlands are lined, preventing infiltration. Mature trees will be removed for a landscaped garden with broad paths. While plans call for native plants, ornamental gardening with natives is not a nature-based solution. Burying concrete infrastructure and disrupting the possibility of fish passage runs counter to the project's purported goals—water purification using truly nature-based techniques consistent with ecological restoration of the Arroyo Seco.

Concerns About Program Oversight

I voted for Measure W but am deeply disappointed. While I only know the details of this particular project, I fear the substantial public funding is primarily benefiting consultants and engineers, with inadequate collaboration from environmentalists, scientists, fish specialists, hydrologists, biologists, and the public. I wonder whether the same companies are benefiting across multiple SCW-funded projects.

Pasadena and South Pasadena have additional Arroyo Seco projects planned. For South Pasadena, rather than reusing water, as this project purports to do, the city is interested in being able to continue using even more water from the Arroyo Seco under the guise of water purification and reuse. If approved, these projects may move us further from Measure W's stated goals. Before allocating more funds, the SCW program should require demonstrated evidence that money already received was well spent.



Public Comment Form

Name*: Maggie Gardner

Organization*: OurWaterLA Coalition

Email*: [REDACTED]

Phone*: [REDACTED]

Meeting: ROC

Date: 10/8/2025

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Comments

Please see attached letter + letter attachments



Date: October 8, 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: 2025 Biennial Review Public Input

On behalf of the OurWaterLA (OWLA) coalition, the undersigned strongly urge the Regional Oversight Committee (ROC) to consider the following recommendations for the Safe Clean Water Program (SCWP) as they review the initial draft of the biennial review report.

We want to reiterate our top priorities from our previous letter in March:

Top Priorities from Public Input

1. Adopt more **metrics and transparent definitions** around Community Investment Benefits, Community Engagement and Support, Nature-Based Solutions, Disadvantaged Community Benefits, and Workforce Impact/PLA Compliance.
2. Take all steps to **prioritize hardscape removal**, and the creation of NEW green space that uses native vegetation— especially at schools and park-poor communities. Yet, of all targets created through the watershed planning process, creation of new green space (both generally and at schools) is by far the least aggressive. Targets set would mean the SCWP would only be responsible for making progress on a paltry 2% of countywide greening goals (while most other targets are around a third of countywide goals established in various plans).
3. Roll out the programs that are promised like **K-12 and workforce development**
4. Investigate ways to **streamline applications for smaller, more community-based projects**

We also want to bring up some additional concerns that have arisen since March with the recent release of the draft watershed plans. The watershed plans, which were first recommended in the previous biennial progress report, do not have a formal process for how they get integrated into the SCWP. As such, we strongly encourage the ROC to also review comments provided by OWLA and OWLA member organizations (attachments) on the draft watershed plans and incorporate findings and recommendations into your biennial report as

appropriate. Key points are summarized below.

Additional Concerns:

1. The SCWP draft watershed plans target 100% of projects to meet the minimum level of achievement in community engagement by 2045. The ROC should recommend in their biennial review report that **the minimum level achievement of community engagement becomes a mandatory eligibility requirement** for the Regional Program.
2. To continue moving the SCWP to be more proactive and strategic, the ROC should encourage the District to ask each WASC to **develop a 20-year investment plan** for the WASC built using the watershed plans in mind. This takes the new requirement of conformity with the watershed plan feasibility requirement a step further. Such plans, which could be achieved through a series of workshops supported by Watershed Coordinators and bringing in outside experts, should identify:
 - a. How much money the WASC can allocate over the next 20 years
 - b. How much to cap future fiscal year allocation
 - i. We recommend not allocating more than 80% of future fiscal year funding
 - c. What their ideal funding breakdown should look like across the SCWP and whether they want to specifically call out certain project types
 - i. For example, is there a percentage they would want to allocate to very large sized projects (like spreading grounds), medium sized projects (like park retrofits, green streets, or schoolyard greening), and smaller sized projects (like parcel based programs or residential landscape transformation) or more specifically how much funding they would want to allocate towards specific project types like schoolyard greening projects or industrial brownfield remediation projects
 - d. How much leveraged funding should be secured against overall SCWP investment
3. We believe **continued dialogue and watershed planning are essential to a proactive path forward for the SCWP**. We encourage the ROC to do what they can to encourage discussion of these topics (and more):
 - a. How to navigate thoughtful and **strategic investment** when we have lofty goals and more projects than funding available
 - b. How to better capture **interactions and connectivity between projects** rather than looking at projects in isolation
 - c. How to better balance a **robust mix of project sizes** when SCWP eligibility requirements and funding resources tend to favor mid-sized projects
 - i. This could include identifying **creative funding mechanisms** to fund very large, expensive projects like potential spreading grounds or regional parks as well as ways to support projects on the smaller end of the

project size spectrum such as residential landscape transformation like through project bundling

- d. How to **take advantage of certain land use types** identified as prime opportunity areas such as utility right of ways, brownfields/superfund sites, and places where existing infrastructure is aging and potentially transitioning to alternatives
4. The County should **contract with a third party reviewer to go through the watershed plans to check math and data**. We recognize that the County put in an immense amount of work in a relatively short window of time to roll out 9 watershed plans. We have identified some errors and OWLA believes having a fresh set of eyes to find any of these data errors, would ensure the plans are as strong as possible.
5. The **ROC should review the watershed plan targets and identify where lack of clear definitions and differing interpretations¹ renders numbers provided, almost meaningless**. Without clear, consistent and agreed upon definitions and data, it is impossible for the ROC to fulfill its duty to determine whether the SCWP is achieving its goals.

Thank you for your consideration of our recommendations. We are happy to answer any questions you may have. We look forward to continuing our engagement with the Safe Clean Water Program to ensure a better water future for the region.

Sincerely,

The OurWaterLA Coalition

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.

¹One such example is “habitat created, enhanced, restored, or protected,” where one project (Ballona Creek TMDL) accounts for 577 acres of Central Santa Monica Bay’s 607 acres baseline total (95%). To our understanding, this is indicating that all of the Ballona Wetlands is enhanced because water quality is improved downstream of the project. We do not agree this is what is intended by creating or enhancing habitat.

Similarly, we believe there is some disagreement or confusion over what should be included in the 300,000 AFY of new stormwater capture.



Date: September 28, 2025

To: Watershed Planning Team

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

RE: Watershed Plan Comments

The OurWaterLA Coalition has compiled a series of comments regarding the SCWP Watershed Plans released on August 14, 2025 below. We are happy to answer any questions or provide any clarifications.

Comments	
Topic:	Explanation:
Greening targets	Targets for the creation of new greenspace, both generally and at schools, are disproportionately low, rendering greening as a third -class priority within the SCWP. There are several reasons for this unacceptable outcome: - In its methodology in developing the plans, the District did an excellent job of pulling overarching goals from various county plans (PNA+, County WaterPlan, etc.) and then allocating the percentage that should be accomplished by the SCWP as targets. For most goals that have fairly clear numeric metrics (pollutant load reductions for water quality; water supply; rehabilitation of existing greenspace), around a third of the countywide goal is allocated to the SCWP. When it comes to creation of NEW greenspace (both generally and at school yards), that percentage is a paltry 2% of the countywide goal. This reenforces the perception many NGOs/CBOs and community members have that greening is not a priority of the SCWP. - Even using these paltry targets, creation of new greenspace is generally the worst-performing of all targets. For example, in the ULAR WASC, only 7% of new greening has been accomplished to date, and 0% of the green schools target. While some might argue that this lack of accomplishment suggests that watershed plans should maintain low targets to be more realistic, we believe the opposite - that ambitious goals are essential to drive innovation, mobilize resources, and

	galvanize the partnerships needed to meet the scale of today's challenges. Treating new greening as a third-class goal sends a clear message to project developers that it can be overlooked or deprioritized. - As groups that were integrally involved in the campaign around Measure W (often reviewing polling results, speaking at public forums), we know that the public wanted to see the SCWP achieve multiple goals - improving the health of rivers and coastal waters, creating more water security for the region, and enhancing communities through increased greenspace (whereas municipalities continue to misconstrue the program as exclusively an MS4 compliance measure). - This desire by the public can also be seen in results from the community strengths and needs assessment, which reenforces that the public wants to see all the promised goals of the SCWP (including water quality, water supply <i>and new greening</i>) achieved, and access to parks and green spaces & schools are some of the top community priorities for SCW Program Benefits of respondents. This mirrors almost any time the public is surveyed on similar plans, such as the LA River Master Plan Update. - Even the WASCs, during their strategy-setting exercise as part of watershed planning process, expressed interest specifically in greenspace and greening schoolyards targets.
Greening Schools	The watershed plans' goal of 200 acres of new green space is far less than the 12,000+ acres needed Countywide for equitable park access. But the most dramatic shortfall is in school greening: only 18 acres are proposed, compared to LAUSD's goal of greening 30% of campuses. While we recognize that the SCWP is not the only mechanism available to achieve these greening goals, at a minimum, the SCWP must play a larger role in the 2025 OurCounty Plan sets a goal to replace 1,600 acres of pavement at schools and in public spaces with green infrastructure by 2045.
Nature-Based Solutions	Nature-Based Solutions (NBS) are not clearly framed as a foundation of the watershed planning approach. They appear only later in the plans rather than upfront in the framing. There is also a need for transparency in the datasets used to define "opportunity areas" and establish baselines. For example, the Ecosystem Need dataset from the County's LA River Master Plan is referenced multiple times in terms of defining the opportunity areas related to habitat but there is no clear way to understand what this dataset is based on. The only way to access the data is through GIS which is not feasible for most.
Baseline Calculations	We have found some of the baseline calculations to be misleading. We suspect some of this is due to how information is being pulled.

For example, in the Central Santa Monica Bay watershed, the baseline calculation of net acres of habitat created, enhanced, restored, or protected is 607 acres. For context, no other watershed has above 30 acres. Of the 607 acres, 577 acres appear to be from a single project: the Ballona Creek TMDL Project. According to the beta planning tool, it accounts for 577 acres of enhanced native vegetation. While we recognize that improving water quality can lead to enhanced habitat, we don't believe that is the intention of this metric or target. And if this kind of measurement is allowed, then every single project in the SCWP could claim all habitat downstream as being enhanced.

This reflects a broader trend within the SCWP that we find disturbing - lack of clear/consistent definitions around some goals (particularly those focused on community-based and ecological criteria) means we have inconsistent reporting and we therefore do not fully understand how the program is performing. For this specific example, we ask that the definition of habitat created, enhanced, restored, or protected is made clear (that a habitat action is taken, such as constructing new wetlands, invasive species are removed, new plantings are added, or a conservation easement is put in place to prevent future development; and does not include any incidental benefit to habitat such as water quality improvement which would result in every project qualifying and would render the criteria meaningless) and then eliminate the 577 acre total from the Ballona Creek TMD project. More broadly, we ask that the District work with the ROC to continue refining all definitions so they are clear, concise and consistent.

Another example is the green schools target. In South Santa Monica Bay, there is a baseline of 1 acre of green space at schools created. Based on the tool, that appears to be from the Fulton Playfield Multi-Benefit Infiltration Project which receives 1.3 acres under "net area of green space at public or private schools or co-located with a youth-based education program created." While Fulton claimed greening schools on their application, Scoring Committee did not choose to recognize that. We would guess that the information being pulled from the applications for these calculations is not being cross referenced with how Scoring adjusted credit for benefits claimed.

Generally, we think some of the baseline calculation issues come from how data is stored, managed, and pulled for the website dashboards. There seems to be some inconsistency across the website. For Fulton (referenced above), if you click on the entry on the dashboard (the traditional dashboard, not planning tool dashboard), it does not list school greening as a benefit even though the original application FY22-23 (Round 3) claimed it. This is in line with what the Scoring Committee determined. Only the 5 benefits recognized by the Scoring Committee are listed. A different FY22-23 Project, Salt Lake Park

	Infiltration Cistern claimed 6 community investment benefits, but the Scoring Committee determined it only provided 3 benefits. It asked for \$29M, and it received partial funding of \$4.5M. If the Salt Lake Park entry on the traditional dashboard is clicked on, it includes a \$29M funding ask and 6 community investment benefits rather than what would be expected (ie 3 community investment benefits and \$4.5M funding). On the new beta planning tool however, Fulton seems to have a school greening benefit and Salt Lake Park explicitly does not have a school greening benefit.
Water Supply	The overall stormwater capture goals in the draft watershed plans fall far short of countywide targets. The Watershed Plans currently lists 110,000 AFY as its total capture goal, which represents 60,000 AFY of NEW capture by 2045, with 34,000 AFY specifically attributed to groundwater recharge and storage. In contrast, the LA County Water Plan set a countywide goal of 300,000 AFY of new stormwater capture by 2045. Capturing and cleaning 300,000 AFY of stormwater is critical not only for building local drought resilience and reducing reliance on imported water, but also for advancing water quality goals. In addition, every acre-foot captured and treated represents a measurable reduction in polluted runoff reaching rivers, beaches, and the ocean, supporting water quality progress, as well. As the County's primary driver for stormwater capture and treatment, SCWP's goals must be recalibrated to more accurately reflect and contribute to the countywide target.
Community Integration	The Community and Stakeholder Needs Assessment (CSNA) provides valuable insights into community priorities, but these results are not fully integrated into the watershed plans or the online planning tool. While the data are measured and available, they are presented separately rather than embedded in the framework that decision makers, such as WASC members, rely on to guide funding allocations.

Recommendations:

1. **The County should contract with a third party reviewer to go through the document to check math and data.** We recognize that the County put in an immense amount of work in a relatively short window of time to roll out 9 watershed plans. We have identified some errors as we reviewed and believe having a fresh set of eyes to find any of these data errors would ensure the plan is as strong as possible.
2. **Elevate NBS as a core organizing principle in watershed plans**, framing them clearly at the outset. Provide transparency on data sources, baselines, and opportunity area calculations.

3. **Significantly increase greening goals and more clearly articulate SCWP's role in helping achieve countywide targets from 2% as it stands now up to at least 10% as an absolute minimum.** In particular, SCWP should prioritize greening investments at schools and in disadvantaged communities, where green infrastructure can simultaneously advance water quality, water supply, climate resilience, and community health goals.
4. **Revise program targets to reflect a proportional contribution toward achieving 300,000 AFY of new stormwater capture by 2045.** This alignment will ensure transparency, demonstrate progress, and position SCWP as a credible driver of the County's water supply and water quality objectives.
5. **CSNA results should be fully integrated into the online tool** so that decision makers can directly see and use community priorities when evaluating and funding projects. Embedding this information within the planning framework is essential to ensure that community voices meaningfully shape program outcomes.
6. **The County should strengthen Indigenous engagement and participation in SCWP planning and implementation.** This should start with building understanding of Tribal history, rights, and relationships to land and water in Los Angeles County. From there, the County should identify opportunities and capacity for meaningful engagement, and support mechanisms for Tribal voices to shape project development and long-term watershed goals.

We appreciate the strong technical foundation in the draft watershed plans and the significant work that went into producing them on a short timeline. However, we urge the County to ensure these plans are ambitious, accurate, and community-driven, so that SCWP can fully deliver on the promise voters entrusted to this program. Simply put, we have to do more. While goals should remain realistic, they should not be constrained by what seems achievable based on past performance, especially when improvements are likely to come from new information and emerging technology as the Program progresses.

Thank you for your consideration of our comments and recommendations. We are happy to answer any questions you may have. We look forward to continuing our engagement with the Safe Clean Water Program to ensure a better water future for the region.

Sincerely,

The OurWaterLA Coalition

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Date: September 28, 2025

To: LA County Public Works Watershed Planning Team

From: Los Angeles Waterkeeper

RE: Watershed Plan Public Comments

After reviewing the draft watershed plans, LA Waterkeeper (LAW) has compiled our comments below. These were informed through our experience with the Safe Clean Water Program (SCWP) as well as through 5 watershed planning workshops we held across LA County after the initial release of the draft watershed plans. Our watershed planning workshops were watershed specific events diving into the recently released watershed plan drafts and exploring where we go from here in the Upper LA River, Lower LA River, Central Santa Monica Bay, and South Santa Monica Bay watersheds. More than 150 people from various sectors including NGO/CBOs, Tribes, Academia, Consultants, Municipalities, and Agencies participated. We want to reiterate that we are grateful to the County for initiating the watershed planning process and look forward to seeing the final drafts. We believe, as our workshop participants did too, that there are far more projects and project concepts in each watershed than there is funding available. Having watershed plans that lay out program and watershed priorities can help guide thoughtful determination of what should be funded.

Baseline Data/Plan Organization:

The County should contract with a third-party reviewer to go through the document to check math and data. We recognize that the County put in an immense amount of work in a relatively short window of time to roll out 9 watershed plans. We have identified some errors as we reviewed and believe having a fresh set of eyes to find any data errors that exist would ensure the plan is as strong as possible.

We also want to make sure that there are strong definitions for each of the target metrics. For example, in the Central Santa Monica Bay watershed, the baseline calculation of net acres of habitat created, enhanced, restored, or protected is 607 acres. For context, no other watershed has above 30 acres. Of the 607 acres, 577 acres appear to be from a single project: the Ballona Creek TMDL Project. According to the beta planning tool, it accounts for 577 acres of enhanced native vegetation. While we recognize that improving water quality can lead to enhanced habitat, we don't believe that is the intention of this metric or target. And if this kind of measurement is allowed, then every single project in the SCWP could claim all habitat downstream as being enhanced.

This reflects a broader trend within the SCWP that we find disturbing – a lack of clear/consistent definitions around some targets, particularly those focused on community-based and ecological criteria. Without clear definitions, we have inconsistent reporting and we therefore do not fully understand how

the program is performing. **For this specific example, we ask that the definition of habitat created, enhanced, restored, or protected is made clear** (that a habitat action is taken, such as new wetlands are constructed, invasive species are removed, new plantings are added, or a conservation easement is put in place to prevent future development; and does not include any incidental benefit to habitat such as water quality improvement which would result in every project qualifying and would render the criteria meaningless) and then eliminate the 577 acre total from the Ballona Creek TMDL project. **More broadly, we ask that the District work with the ROC to continue refining all definitions so they are clear, concise, and consistent.**

Greening:

We were disappointed at the share of County greening that the SCWP set as targets. While the SCWP is not a greening measure, this is a distinct community investment benefit that communities want to see come out of the program. **We recommend a more aggressive target percentage of the total LA County greening goal than the current 2% share, specifically, 10% or more.**

Similarly, we found the greening schoolyards target to be too low. At every single watershed planning workshop we hosted, participants identified the greening schoolyards target as too low. With the volume of land owned by school districts and their locations across LA County, schools offer great potential for impervious surface removal, greening, and stormwater capture. The recent 2025 Our County Sustainability Plan includes a goal of removing 1,600 acres of pavement at schools by 2045. Even if the SCWP set its target to 2% of that total (which we believe to be too low a target percentage), it would still be higher than the current targets. **We recommend the target percentage of school greening be raised to match that of the other greening goals.**

Nature-Based Solutions:

Within our workshops, there was a lot of conversation around how ecology, biology, and biodiversity seemed to not be well represented within target metrics or within the plans themselves. The lack of focus on these items directly ties to nature-based solutions and some of the benefits received by utilizing these infrastructure types. Another concept that was brought up within the workshops was trying to consider bundling of projects to create wildlife corridors and otherwise create synergistic effects that will enhance the benefits of individual projects. While ecology, biology, and biodiversity are hard to quantify and may not make good targets, **we recommend incorporating a section in the watershed characteristics devoted specifically to outlining what the ecological significance of the watershed is and what biodiversity is present.**

We and many participants in the workshops were surprised to not see a target for impervious surface removal given it is already being captured by the SCWP application. While it is listed as a performance measure, that does not include a target for removal which we would like to see. Also, participants thought it was worth distinguishing between the types of impervious surface replacement (nature/vegetation as opposed to permeable surfaces that aren't nature based like permeable pavement). **We recommend shifting impervious surface removal from a performance measure to a target.**

Community Engagement:

With the target of 100% of all projects to meet the minimum level of achievement under “prioritize meaningful engagement”, **we would recommend that one of the strategies be to make the minimum level of achievement mandatory to be eligible for funding from the SCWP.** This came up at multiple workshops and several participants were surprised that engagement was not mandatory within the program as other grant programs they subscribed to had minimum engagement requirements.

Participants in our workshops were also interested in the program tracking unique partnerships of applicants to the program. For example, how many projects had a municipality that partnered with a CBO to conduct outreach, how many projects involved a partnership between a school and a developer, or how many projects had multiple partners to develop a project crossing multiple jurisdictions? We believe partnerships and collaborations like these are critical to ensuring good projects enter the SCWP pipeline. Understanding what types of partnerships lead to successful projects can help inspire future collaborations.

Water Supply

There is some confusion over the County’s overarching water supply targets, which manifests in the watershed plans. Specifically, we know there is a countywide goal of increasing stormwater capture by 580,000 AFY to achieve the 80% local water goal. There is a separate goal, as first included in the January 2024 Biennial Progress Report that “Set a region wide water supply target of 300,000 acre-ft of additional storm water capture by 2045. This acre-ft target deadline should be temporarily aligned with the 80% local water by 2045 target in LA County’s OurCounty Sustainability Plan and draft LA County Water Plan.” In other planning documents, there is a further breakdown among centralized stormwater capture, decentralized and groundwater recharge.

It is hard to decipher the actual countywide targets. When the ROC adopted the 300k AFY goal, we believed that it was intended to be capacity for groundwater recharge (to be used onsite or stored for future use). It now appears to us that the County views this 300k AFY goal as also applying to stormwater directed to a wastewater recycling facility for reuse. We have serious concerns with this approach. First, in ensuring we meet overall local supply goals, there is the risk of double-counting (wastewater recycling in this instance). Moreover, it is dubious to claim that stormwater captured and directed to wastewater recycling facilities will yield much “new” water (certainly not on a 1:1 basis), especially as the planned wastewater recycling projects generally have less recycling capacity than their current wastewater flows.

In addition, as has been raised at ROC meetings, even for groundwater recharge, it is unclear whether the amount of water captured for infiltration yields the same amount of new water due to losses. While this issue is broader than the watershed plan, it is impossible to set meaningful water supply targets if there are not clearly agreed on definitions on what the overall 300,000 AFY target applied to, and how much new water will actually be created by various local supply strategies. **We recommend that the District clarify what was intended by the 300,000 AFY target put forth by the ROC.**

Traditional Ecological Knowledge:

Within our workshops, there was an interest in Traditional Ecological Knowledge and engaging with Tribal communities. While it may not make sense to have a target around this topic, we didn't feel like there were any strategies around increasing engagement or any kind of tracking of this in this space either. Our workshop participants discussed what this could look like without creating another box to check or creating a burden on Tribes. Some of the suggestions were tracking, for example, how many projects had existing relationships with Tribes so that the focus was on meaningful relationships being built rather than one-off Tribal consults. **We recommend that the SCWP incorporate strategies to increase engagement with Indigenous communities.**

Eligibility & Accessibility:

One of the most frequent comments at our watershed planning workshops was just how difficult the SCWP can be to access. The process of applying to the SCWP and the timeline can be arduous. **As we work to make the SCWP more proactive through the watershed plans and detail strategies to achieve the targets laid out in the watershed plans, we recommend considering ways to make the SCWP more accessible.** This could include identifying ways to better enable bundling of smaller projects (like school greening projects), finding creative ways to stretch the SCWP impact (such as landscape transformation pilots), and regularly reviewing eligibility requirements.

The Need for Continued Planning to Best Achieve SCWP Goals

A unifying theme across the diverse participants in our workshops was the recognition that there is inherent complexity associated with maximizing multiple benefits through the SCWP. We believe continued dialogue and watershed planning are essential to ensuring a proactive path forward. Some of the issues raised that we think warrant continued and ongoing dialogue include:

- How to navigate thoughtful and strategic investment when we have lofty goals and more projects than funding available
- How to better capture interactions between projects rather than looking at projects in isolation
- How to better balance a robust mix of project sizes when SCWP eligibility requirements and funding resources tend to favor mid-sized projects
 - This could include identifying creative funding mechanisms to fund very large, expensive projects like potential spreading grounds or regional parks as well as ways to support projects on the smaller end of the project size spectrum such as residential landscape transformation like through project bundling
- How to take advantage of certain land use types identified as prime opportunity areas such as utility right of ways, brownfields/superfund sites, and places where existing infrastructure is aging and potentially transitioning to alternatives

We look forward to having further discussions with the District and watershed planning staff about how we can continue the momentum created through watershed planning so we can be as strategic and effective in our SCWP investments as possible.

Direct WASCs to Develop Investment Plans

One of the weaknesses in the watershed plans, in our opinion, is that there is no clear direction on how these plans can and should inform the SCWP.

To continue moving the SCWP to be more proactive and strategic, we encourage the District to ask each WASC to develop a 20-year investment plan for the WASC. Such plans, which could be achieved through a series of workshops supported by Watershed Coordinators and bringing in outside voices/expertise, should identify:

- How much money the WASC can allocate over the next 20 years
- How much to cap future fiscal year allocation
 - We recommend not allocating more than 80% of future fiscal year funding
- What their ideal funding breakdown should look like across the SCWP and whether they want to specifically call out certain project types
 - For example, is there a percentage they would want to allocate to very large sized projects (like spreading grounds), medium sized projects (like park retrofits, green streets, or schoolyard greening), and smaller sized projects (like parcel based programs or residential landscape transformation) or more specifically how much funding they would want to allocate towards specific project types like schoolyard greening projects or industrial brownfield remediation projects
- How much leveraged funding should be secured against overall SCWP investment

We appreciate that “conformity with the watershed plan” will now be a new requirement for applicants. However, we believe having a WASC created investment plan developed using the watershed plans will send a more direct message to project developers about how the WASC intends to apply the watershed plans. This would also serve as a resource for the WASC as they conduct SIP deliberations.

Thank you for your attention to our comments and look forward to working towards a more proactive SCWP.

Sincerely,



Bruce Reznik
Executive Director
Los Angeles Waterkeeper



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September 26, 2025

Los Angeles County Department of Public Works
900 S Fremont Ave
Alhambra, CA 91803

Sent via email to: WPPublicComment@dpw.lacounty.gov

RE: Watershed Plans for the Central Santa Monica Bay (CSMB) Watershed Area and the South Santa Monica Bay (SSMB) Watershed Area.

To the LA County Watershed Planning Team:

Heal the Bay is a non-profit environmental organization based in Santa Monica with 40 years of experience dedicated to making the coastal waters and watersheds of Greater Los Angeles safe, healthy and clean. We would like to recognize that we are on unceded Indigenous land. The scope of our work takes place across the lands of coastal Indigenous Peoples and Native Nations of the Tongva, Chumash, Fernandeño Tataviam Band of Mission Indians, and Kizh Nation tribes. We pay our respects to elders past, present, and emerging, as they continue their stewardship of these lands and waters.

We appreciate the opportunity to review the draft Safe, Clean Water Program (SCWP) Watershed Plans and provide feedback. As an organization dedicated to ensuring healthy and resilient coastal waters and watersheds in Greater Los Angeles, we commend the County for the extensive effort that went into preparing these plans and advancing water quality, equity, and community engagement.

Our review highlights several overarching themes, provided below, where we encourage the County to strengthen the Watershed Plans. Detailed comments supporting these themes and recommendations to strengthen the Watershed Plans are provided in Attachment 1 (CSMB Watershed Plan Comments) and Attachment 2 (SSMB Watershed Plan Comments), both of which have been provided in PDF and Excel formats for the County's ease of use.

Overall program ambition and transparency: While plans should remain realistic, goals should be aspirational enough to drive innovation, mobilize resources, and inspire partnerships. Clear definitions of metrics, baselines, and targets across all program areas—including water quality, water supply, greening, and community benefits—are essential to ensure measurable progress and maintain public trust.

Water supply and stormwater capture alignment: The current SCWP capture targets (110,000 AFY total, 60,000 AFY new) fall short of the County's 300,000 AFY regional goal. SCWP should recalibrate its targets to contribute proportionally to countywide water supply objectives, supporting both drought resilience and water quality improvements.

Ambitious and equitable greening goals: The current watershed plans allocate disproportionately low targets to new greenspace—particularly at schools—relative to countywide needs. We urge the County to increase greening targets to reflect SCWP's potential to advance environmental, community health, and climate resilience goals, prioritizing investments in schools and disadvantaged communities.



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Nature-Based Solutions as a foundational principle: NBS should be elevated in the watershed plans, framed upfront, and supported by transparent, accessible datasets that define opportunity areas, baselines, and expected outcomes.

Technical accuracy and consistency: Several figures, tables, and metrics contain errors, outdated information, or inconsistencies (e.g., project phases, watershed names, water supply calculations, and habitat metrics). Clear, standardized definitions and third-party review of data and calculations will improve reliability, reporting, and program accountability.

Community and Tribal engagement: We strongly support the integration of Community-Stated Needs and Opportunities (CSNA) as a dedicated opportunity layer. CSNA results must be fully embedded in the plans and online tools to guide decision-making, funding, and prioritization. Similarly, Tribal engagement should be strengthened, including building understanding of Tribal history, rights, and relationships to land and water, and providing mechanisms for Tribal voices to shape project development and long-term watershed goals.

.....

Heal the Bay looks forward to collaborating with the County, Watershed Coordinators, and partners to refine these Watershed Plans. We hope these suggestions will help ensure the plans are robust, actionable, and aligned with both community priorities and regional water resource goals. If there are any questions concerning our comments, please reach out to Annelisa Moe via email at amoe@healthebay.org, or by phone at (310) 451-1500 X115.

Sincerely,

Annelisa Ehret Moe
Associate Director, Science & Policy
Heal the Bay

Chapter	Section / Annex	Document Page	Topic	Original Language	Comment / Concern / Question	Recommendation / Note
1	1.2	5	Why Watershed Planning	"by 2030 for more than 200 multi-benefit Regional and Municipal Program Infrastructure Projects, 23 Scientific Studies Program Studies4, 53 Technical Resources Program Project Concepts4, 53 Technical Resources Program Project Concepts4,	The reported numbers for program targets—"more than 200 multi-benefit Regional and Municipal Projects, 23 Scientific Studies, 53 Technical Resources Program Project Concepts"—do not match the SCWP Portal data. The portal lists 284 Regional and Municipal Projects, 63 TRPs, and 34 Scientific Studies.	Updating these figures to ensure consistency across all documents and sources.
1	1.3, Figure 1-6	9	Watershed Planning Elements	"...through usage of PMs (or metrics)..."	The term "PMs" is used before being defined (not defined until Chapter 4).	Clarify the text to read "...through usage of Performance Measures (PMs), as in metrics..." to introduce the abbreviation upfront.
1	1.4.2	13	CSNA		The document does not indicate how many Watershed Coordinators have already completed a survey or whether that data has been integrated into the current CSNA dashboard.	Include this information to provide transparency on data sources and completeness.
1	1.4.3.3	17	SCW Program SS	"To date, the SCW Program has funded 23 Scientific Studies, including seven within"	If FY25–26 projects under consideration are included, the correct figures are 34 Scientific Studies overall, with 9 in the CSMB WA.	Update these numbers for accuracy.
1	1	1	SCWP Goals	"The Initial Watershed Plans should be used to inform stormwater priorities to ensure that Project and Program implementation aligns with both the SCWP 14 established Ordinanced Goals"	This statement should explicitly list the goals. While they are presented in a figure, including them in the text at the beginning of the plan would improve clarity and ensure readers understand the objectives upfront.	List all 14 of the SCWP Goals here.
1	1.4.3.3.	18	SCWP Scientific Studies	"Continued investment in research...and the dissemination of their research"	This phrase could be clarified to show how these scientific studies have contributed to public understanding of the challenges addressed and the benefits achieved.	Explicitly connect research outcomes to public awareness and program impact.
2	2.1.1	25	Physical and Natural Features	In January 2025, ten wildfires, including the Palisades and Sunset Fires, devastated Los Angeles County, resulting in over 13,000 acres of land being burned in the CSMB WA (Figure 2-4). Over recent decades, the size	The section describing the January 2025 wildfires focuses on recent events but does not provide a holistic or historical context of fire risk within the watershed.	Expand the discussion to include wildfire history, potential impacts on water quality, and mechanisms by which fires affect watershed conditions. Additionally, referencing the WC Working Group or Post-Fire Recovery Group could provide guidance on ongoing recovery and community engagement efforts, helping readers better understand both risks and mitigation strategies.
2	2.1.2	26	Land Use Characteristics	Almost half of the total land use is undeveloped...while other areas are densely developed with residential, commercial, and industrial uses.	The description of land use here is too broad. Providing more detailed characterization would better highlight watershed-specific challenges rather than generalizing categories common across all watersheds.	Specify the types of land, particularly industrial land uses, that may pose water quality risks.
2	2.1.2	26	Land Use Characteristics	Historically underserved and DACs within developed areas of the CSMBWA have limited access to open space, parks and recreation facilities, exacerbating community health impacts and urban heat island effects (Figure 2-4)	The text notes that historically underserved communities and DACs in the CSMB WA have limited access to open space, parks, and recreation facilities, but references Figure 2-4, which depicts fires, and Figure 2-5, which shows population density relative to DACs. These figures do not accurately illustrate land use or environmental stressors in these communities.	Include a dedicated map or figure that specifically shows access to open space and other environmental burdens to accurately support this discussion.
2	2.1.3	28	Waterbody Conditions	These pollutants can impair receiving waters, reduce infiltration efficiency, and overload pretreatment systems in capture infrastructure	The discussion of pollutants affecting receiving waters, infiltration, and pretreatment systems currently highlights the January 2025 fires as isolated events.	Frame fires as a broader watershed characteristic that can impact projects receiving water. Reference guidance from the WC Working Group or Post-Fire Recovery Group to provide context on ongoing recovery and risk mitigation for water quality and infrastructure.
5	5.1.1	81	Theme: Prioritize Meaningful Engagement Needs		The section "All Projects to Meet a Minimum Level of Achievement" does not include baselines or targets for Tribal Engagement, although the Planning Tool does reference minimum achievement levels for CSMB.	Explicitly include Tribal Engagement baselines and targets in the plan to reflect its priority for CSMB communities. Guidance from the WC Working Group: Tribal Allyship could inform this inclusion.

Chapter	Section / Annex	Document Page	Topic	Original Language	Comment / Concern / Question	Recommendation/Note
1	Introduction	2		"provide targeted guidance based on what can be achieved"	We appreciate the emphasis on achievable outcomes. At the same time, we encourage the County to ensure the plan is ambitious, setting reach goals that inspire progress beyond what seems realistic based on past performance current resource constraints.	This is a theme found throughout the document.
1	Introduction	14	CNSA, Figure 1-8	"WCs disseminate at SCW Program and other community events..."	Watershed Coordinators play a critical role, but advancing the CSNA should be a shared responsibility across WASC members and partners.	Broadening this will help build stronger participation and more equitable outcomes.
1	Introduction	16	Plans, Table 1-1		The Dominguez Channel WMP appears missing from the highlighted table, even though it represents a large portion of the watershed.	Clarify whether the DC WMP was reviewed and, if so, including it for completeness. It is a majority of the watershed, so we recommend it be included in the highlighted table.
2	Characteristics	23	Physical and Natural Features	Second Bullet - "major watercourse in SSMB WA is Ballona Creek...."	This appears to be an error, likely leftover from Central.	Correct this typo to reflect tributaries such as Torrance Lateral and Wilmington Drain to ensure accuracy.
2	Characteristics	26	DAC, Figure 2-4		The DAC overlay is difficult to interpret, as the current scheme makes comparisons inside and outside the area confusing.	Use an outline in a distinct contrasting color to help with clarity for reader interpretation.
2	Characteristics	29	Existing Projects, Table 2-2	IRWMP - 1 project count	The project count shown seems low compared to the source link, where many more water quality/water supply projects appear.	Clarify the methodology for filtering stormwater capture projects.
2	Characteristics	30		"Prioritizing distributed green infrastructure, in combination with enhanced O&M, was also recommended to maximize local benefits"	We strongly agree with this recommendation.	
2	Characteristics	37	Public Health and Equity	"ensuring equitable distribution of resources and benefits requires careful, data-driven planning and robust engagement..."	We strongly agree, and particularly emphasize the importance of robust engagement to achieve equitable outcomes.	
2	Characteristics	43	Financial Outlook- Figure 2-9		There is a color shown for leveraged funding that does not appear in the chart's legend. Additionally, the meaning of the percentages in the figure would benefit from explanation.	Clarify why any colors may be missing in the figure, and explain the meaning of the percentages shown.

	Baseline of 3 Benefits	45	baseline methodology	"assume a linear trajectory of benefits"	The assumption of a linear trajectory may not reflect reality, as SIP benefits often vary widely and may plateau over time with higher O&M demands. Could the projections also account for rising costs, including inflation? There is an acknowledgement of the limitations of linear forecasts on pg. 56	Make the limitations of this assumption clear along side the statement.
	Baseline of 3 Benefits	48	Figure 3-1	BMP types	BMP types Clarification would be helpful on how BMPs were classified, as the figure suggests one BMP per project. Many large projects have multiple elements such as infiltration and bioretention.	Clarify how BMP types are classified. Perhaps offer a few examples (e.g., How what Alondra Park classified? How are sewer diversion projects classified if they offer multiple benefits?).
	Baseline of 3 Benefits	48	Figure 3-1	Projects Providing WS Benefits	Definitions for "connected to aquifer" and "uses water onsite" would be useful. At present, there is no clear indication of recharge or reuse projects.	We recommend adding these definitions in the figure footnote or glossary.
	Baseline of 3 Benefits	48, 54	Figure 3-1, Figure 3-3	Projects Providing Community Benefits	Projects Providing Community Benefits Clarification would be helpful on which project is listed as increasing green space at a school. Searches of the portal yield no matches, and Wilmington Q Street seems unlikely given the stated acreage.	We recommend an online tool feature allowing users to hover and see which projects populate each category for the benefits provided.
	Baseline of 3 Benefits	50	Table 3-1	Torrance Airport- funded phase and current phase	The funded phase should reflect both design and construction, while the current phase should be updated to "design" to reflect delays. Torrance pushed their timeline (and money's from the program) back in the last SIP	Considering how many projects have been brought back to the WASCS for reconsideration, whether changes were made after the Scoring Committee review, or after funding was allocated, watershed plans must reflect updates to projects and not just project information at the time of application.
	Baseline of 3 Benefits	54	Figure 3-3	"Increase local supply through gw recharge and storage"	Stormwater supply cannot be achieved through groundwater recharge in this watershed, only via injection wells.	Tailor the language by watershed and using "storage" only here.
	Baseline of 3 Benefits	54	Figure 3-3	"30% DAC Bennefit Ratio"	The DAC Benefit Ratio is listed as 30% here, but appears as 31% elsewhere; also found in Figure 5-3. Consistency across figures and tools is important	Correct any typos creating inconsistencies like these within Watershed Plans, and between the Plans and the Online Tools.
	Baseline of 3 Benefits	54	Figure 3-3	78% meaningful engagement	Clarification is needed on how this percentage was calculated. Interim guidance released a "good/better/best" framework, so how was this applied to past projects?	Clarify how percentages were calculated, and how the good/better/best framework is represented in final percentage.

3	Baseline of Benefits	56	linear forecasts	"It is acknowledged that linear forecasts have significant limitations..... O&M monitoring"	This paragraph appears repeated on page 56.	Remove one instance to improve readability.
3	Baseline of Benefits	58	Figure 3-5	Example Benefit forecast for SSMB WA under current SCW Program trajectory for key Planning Themes	The three-year projection appears to show a large increase that is not consistent with current or baseline data. Could this be explained by anticipated project completions?	Provide greater clarity on the assumptions made here.
3	Baseline of Benefits	58	Figure 3-5	Increase drought preparedness	The distinction between "local stormwater supply through stormwater capture" and "local supply through groundwater recharge and storage" is unclear. Does storage include diversion projects?	Clarify the distinction here to make this figure easier to interpret.
4	Quantifying Progress Towards SCW Goals	60	community stated needs and concerns	"Note that while almost all SCW Program Projects funded to date provide at least one CIB, they may not necessarily address a community stated-priority... community-stated priorities and concerns is essential to advancing place-based designs and fostering meaningful engagement"	We strongly support this recognition of the importance of aligning projects with community-stated priorities. This is a key step toward place-based design and meaningful engagement.	
4	Quantifying Progress Towards SCW Goals	63	multi-benefits indicator	"Flooding issue mitigated (yes/no/partial)."	This indicator is important. Many projects claim flooding mitigation, but this clarifies whether an existing issue was actually mitigated.	We suggest refining the language to "existing flooding issue mitigated."
4	Quantifying Progress Towards SCW Goals	64	equitably distribute benefits	"Proportion of muni program funds spent on new Projects or Programs"	We appreciate the specificity of measuring new projects and programs separately from ongoing or replacement funding. This is a strong accountability measure.	
4	Quantifying Progress Towards SCW Goals	69	Figure 4-4 - sw capture target	program wide target to capture 110k af/yr by 2045	The 110k af/yr target appears too low relative to the County's overall goal of 300k af/yr. With 41.5k included as baseline, this leaves only 68.5k in new capture by 2045. On Page 92, the document states, "While SCW Program alone cannot fully achieve regional wq goals, it plays a critical role in supporting progress toward achieving them."	Increase the target to reflect SCW's critical role in achieving the County's regional water supply goals.
4	Quantifying Progress Towards SCW Goals	70	Figure 4-5	Example target setting for an Indicator without a countywide target	The stated target seems low. Since 19 acres have already been enhanced/restored against a target of 31, the target should be higher. A more ambitious target would align with program goals.	Increase the target to reflect SCW's stated goals.

4	Quantifying Progress Towards SCW Goals	72	Figure 4-7	Recognize water supply Indicators to geographically differentiate between infiltration, reuse, and diversion of stormwater.	This priority does not appear adequately addressed.	Differentiate between infiltration, reuse, and diversion indicators to more accurately reflect local water supply outcomes.
4	Quantifying Progress Towards SCW Goals	74	Figure 4-8	Net area of green space at schools created	The current goals are very modest given the opportunities identified in PI and GSA reports. With 1 acre already achieved against a 2-acre target, the bar is set too low.	Increase the green space target at schools
5	Strategies for Addressing Needs and Achieving Goals	79	Figure 5-3	Increase local supply through gw recharge and storage	The metric definition and baseline/target years remain unclear, which risks misinterpretation. The meaningful engagement percentage also appears inconsistent across documents.	Greater clarity and consistency are needed to ensure these figures are reliable and actionable.
5	Strategies for Addressing Needs and Achieving Goals	85	CSNA own separate opportunity layer	CSNA are incorporated as their own dedicated opportunity. This ensures that input from community members is considered on par with technical analyses when identifying where Projects and Programs are most needed.	We strongly support the creation of a dedicated CSNA opportunity layer.	To maximize transparency and usability, clarify how these opportunities are integrated into the watershed plan and reflected in the online tool.
5	Strategies for Addressing Needs and Achieving Goals	92	Need for decentralized projects and small-scale	...near term there is a critical need to strengthen Municipalities' capacity to implement small-scale and distributed stormwater Projects through the Municipal Program. Decentralized Projects are essential for sustaining momentum, delivering localized water quality improvements, and providing immediate community benefits...	We appreciate the recognition of decentralized projects as essential to achieving program goals.	This section could also highlight that the Regional Program is designed to support distributed and small-scale projects, consistent with the Ordinance. Including examples, such as Beach Cities Green Streets, would further strengthen the point.
5	Strategies for Addressing Needs and Achieving Goals	94	Figure 5-10	Opportunity to Improve Water Quality	This tool is valuable for identifying opportunity areas.	To reinforce its impact, consider targets or benchmarks to ensure a meaningful share of approved projects align with the mapped priorities.
5	Strategies for Addressing Needs and Achieving Goals	94	Figure 5-10	Opportunity to Improve Water Quality - legend suggestion	The legend for the opportunity maps currently ranges from general to highest opportunity, but the meaning of the zero/overlay sand color is unclear. It appears these areas may already be addressed by existing SCWP projects, as suggested in the accompanying text, but this is not explicit.	To avoid confusion and ensure consistent interpretation, we recommend updating the legend to clearly indicate what the basemap layer colors represent. For example, the sand color could be labeled as "addressed by existing projects" or "low opportunity." This clarification should be applied to all opportunity maps.

5	Strategies for Addressing Needs and Achieving Goals	94	grammar suggestion-double negative	All areas not currently untreated... still offer beneficial pollutant capture potential	This phrase contains a double negative, which may be confusing.	Revise the wording for clarity, for example: "All areas currently treated by a SCWP project may still offer beneficial pollutant capture potential."
5	Strategies for Addressing Needs and Achieving Goals	97	Fig. 5-11; WQ capture vs WS capture goals?	7,100 af/yr - increase local water supply through stormwater capture	It is not evident whether this represents a 2045 target, and how it relates to other figures in the document—such as the 210 af/yr (by 2045) and the 350 af/yr (by 2038) shown in Figure 5-10 for water quality projects. This requires clarification, as the document identifies water quality as a priority and water supply as a challenge, making the large 7,100 af/yr figure appear inconsistent.	Clearly define what this figure represents and reconcile it with related metrics elsewhere in the document.
5	Strategies for Addressing Needs and Achieving Goals	97	Fig. 5-11; typo	divert to joint water pollution control plant	Facility was renamed to AK Warren Water Resource Facility	The reference to "divert to joint water pollution control plant" should be updated to "AK Warren Water Resource Facility" to reflect the correct facility name.
5	Strategies for Addressing Needs and Achieving Goals	98	typo	NSMB WA	The NSMB WA is incorrectly labeled; it should be SSMB WA. Additionally, all opportunity maps currently include Long Beach as a reference point, which is outside this watershed.	Fix the typo, and remove Long Beach - instead use a location within the watershed, such as Carson, to improve accuracy and relevance.
5	Strategies for Addressing Needs and Achieving Goals	99	Table 5-2; typos	Green New Deal... 100% recycled water use by 2035... & ...SMURFF's location + City of Santa Monica	The references to SMURRF, the City of Santa Monica, and Hyperion are inaccurate for the SSMB watershed and should be removed. Additionally, the Green New Deal goal of 100% recycled water use by 2035, while included in the plan, may no longer reflect current City of LA commitments and should be reviewed for accuracy.	Remove SMURRF and City of Santa Monica, remove Hyperion and possibly adjust Green New Deal goal.
5	Strategies for Addressing Needs and Achieving Goals	102	Fig. 5-13, school greening	Strategy 3.1 - Evaluate open space and large lot potential, particularly on school campuses.	This is identified as both a program-wide and SSMB WASC priority. However, the goal of greening only 1 acre is very low.	Increase the target to better reflect its stated priority and potential impact.
5	Strategies for Addressing Needs and Achieving Goals	105	Opp to green campuses at schools	CalEnviroScreen 2.0	The document uses CalEnviroScreen 2.0; we recommend updating to CalEnviroScreen 4.0 to reflect the most current environmental justice data.	Utilize CalEnviroScreen 4.0

5	Strategies for Addressing Needs and Achieving Goals	116	typo	RH WA	The reference to "RH WA" is incorrect; it should be updated to "SSMB WA" to reflect the correct watershed.	Fix the typo to say "SSMB WA"
5	Strategies for Addressing Needs and Achieving Goals	119	5.2.1.6	Equitably Distribute Benefits: Strategies, Actions, and Opportunities	The DAC Benefit Ratio should, at minimum, reflect the actual percent of the watershed comprised of DAC communities. The current repeated reference to 30% seems inconsistent and may result from rounding in the SIP tool.	Review and clarify this calculation to ensure accurate representation of benefits.
5	Strategies for Addressing Needs and Achieving Goals	123	typo	the Bay Foundation	t should be capitalized	Correct the capitalization typo: "the Bay Foundation" should be "The Bay Foundation."
5	Strategies for Addressing Needs and Achieving Goals	127	leveraged funding - O&M	action 8.2.1 Leverage external funding sources.. to support long-term O&M costs	This is reasonable in principle. However, in practice, it is unclear whether sufficient state, federal, or climate adaptation grants exist to reliably cover O&M costs.	Clarify which specific funding sources are feasible and provide realistic examples to support this action.
5	Strategies	128	Prioritize Meaningful Engagement	while 41% (of funded projects in SSMB) have reported similar levels of engagement with tribes	The statement that "41% of funded projects in SSMB have reported similar levels of engagement with tribes" is unclear and appears inconsistent with other data sources. For example, the online beta tool shows only 13 projects (6%, 9 activities), and other metrics cite 78% for meaningful engagement. The source of the "63% of all funded SSMB projects" figure is also unclear.	Clarify these numbers and increase the emphasis on tribal engagement throughout the plans to better reflect and support meaningful participation.
5	Strategies for Addressing Needs and Achieving Goals	129	Fig 5-26-Strategy 9.2 action 9.2.1 - good/better /best framework	"Enhance existing engagement assessment criteria, such as good/better/best framework,..."	Rosa Gonzalez's <i>Spectrum of Community Engagement to Ownership</i> provides a more comprehensive approach to evaluating and strengthening community engagement.	Utilize Rosa Gonzalez's Spectrum of Community Engagement to Ownership

5	Strategies for Addressing Needs and Achieving Goals	134-139	Figure 5-27 to 5-32	Multiple Benefit Opportunity Across Planning Themes	The maps are a valuable resource for community-based organizations and municipalities to identify areas of highest need across different focus areas. However, we note that a potential issue with the SSMB water supply point being directed to the Carson plant, which is designed for 150 MGD regardless of additional stormwater projects coming online.	Flag this as a technical consideration to ensure realistic planning assumptions.
7	Next Steps and Recommendations	149	spelling	"Launch of an online application ortal"	Missing a "p"	Correct the typo: "Launch of an online application ortal" should read "portal."
7	Definitional Gaps	151	Fig 7-4	Green jobs... Public Works, ROC, ARLA	LAANE should be added to the list of "who should be involved." LAANE to the list of stakeholders. While a LAANE employee currently sits on the ROC, explicitly including LAANE ensures continuity and acknowledges their role in supporting green job initiatives.	Add LAANE to the list of "who should be involved."
7	Definitional Gaps	151	Fig 7-4	Environmental Water Benefits... Public works, WASC, WMGs	This list is missing environemtnal NGOs.	Specifically list environmental NGOs in the "who should be involved" section to ensure their engagement is explicit.
7	Definitional Gaps	154	Fig 7-6	Water Supply fate quantification via simulation	WS points assigned to diversions to sewer plants that will not achieve 100% recycling should be reduced. For example, the Carson plant is designed for 150 MGD based on current baseline data and its capacity is not expected to increase with new stormwater projects.	Refinethe definition of "new water" for water supply and assign fewer points to diversion projects that may not actually contribute additional water due to capacity constraints.
7	Definitional Gaps	154	Fig 7-6	Project monitoing data and post-performance metrics... metrics developed by MMS are not yet confirmed.	This should be treated as a very high priority, as MMS has been completed for some time and several projects have already concluded, making timely metric confirmation critical for evaluating performance.	Prioritze setting performance metrics.
7	Definitional Gaps	157	Fig 7-7	Environmental flows... Public Works, WASC, SWRCB	We recommend adding the LA River CEFF Technical Working Group to the list of stakeholders to ensure relevant expertise is included.	Add the LA River CEFF Technical Working Group to the list of stakeholders.

	Implement 7 Strategies	162	SS	As funded SS reach completion, it is recommended that their findings be tracked and assessed for integration into Initial Watershed Plan...	This process should extend beyond Public Works. Currently, study proponents rarely share findings consistently.	Establish a standard requirement for completed SS projects to share their findings with the WASC and the broader public to ensure transparency and integration into watershed planning.
	Implement 7 Strategies	165	Leveraged funding + WC Module	This page could pull directly from the Watershed Coordinator Module...	The module is currently cumbersome and not particularly useful in its current form. Coordinators use different tracking mechanisms stored in various locations.	This is an observation rather than a required change, but it may be worth noting for future improvements to streamline tracking and accessibility.
App. H	Baselines and Forecasts - Drought Preparedness	H-55	Table H-16 - GW recharge calculations	Target Calculation - $E = F + D \times \Sigma (E - F)$	The formula is unclear—is one of the "E" values supposed to be G? Additionally, the sigma limits are not specified, and the calculation could not be replicated in Excel.	Have Public Works provide a walkthrough of this methodology, as the current chart does not clearly explain the approach.
App. H	Baselines and Forecasts - Drought Preparedness	H-58 and H-59	Table H-18 - Local Supply through SW capture	County Water Plan's target to increase local water supply sources by 580,000 ac-ft/yr. Stormwater capture projections by storage and regional facilities that are produced by the LA County Basin Study are 190,000 ac-ft/yr. The SCW Program alone targets the capture of 110,000 ac-ft/yr	It remains unclear how the 110,000 ac-ft/yr target was determined, given the apparent gap relative to the 300,000 ac-ft/yr stormwater goal. Table H-19 shows the formula used, but the target still seems low.	Clarify the calculation and assumptions behind this figure to improve transparency and alignment with program goals.
App. H	Baselines and Forecasts - Meaningful Engagement	H-107	Table H-54	SSMB - 79% Community Engagement; 42% Tribal Engagement	For SSMB, the reported 79% community engagement and 42% tribal engagement differ from figures in the Watershed Plan (78% and 41%) and it is unclear how these numbers were derived.	Align these metrics across all sources, including the beta tool, and provide clarification on the methodology used to calculate them.