



February 9, 2026

Upper Los Angeles River Watershed
Watershed Coordinators
1000 S. Fremont Ave.
Suite A-9 East, 4th Floor
Alhambra, CA 91803

Re: Community Feedback on ULAR Watershed Biennial Report (SCWP)

Dear ULAR Steering Committee and Safe, Clean Water Program Staff:

The South LA Tree Coalition (SLATC) is a non-profit urban forestry organization working at the intersection of tree canopy, water, and environmental justice. Our work focuses on communities that are frequently identified as “priority” or “disadvantaged” within watershed planning efforts, yet too often experience gaps between planning goals and on-the-ground implementation.

We offer the following comments to help strengthen the report and future SCWP investments:

1. Trees Should Be Treated as Essential Green Infrastructure, Not Supplemental Amenities

While the report appropriately emphasizes multi-benefit green infrastructure, trees are often framed as secondary landscape elements rather than as functional infrastructure that delivers stormwater capture, heat mitigation, air quality, and public health benefits. SLATC encourages ULAR and SCWP to more explicitly recognize street and parkway trees as critical infrastructure assets whose performance depends on proper siting, long-term care, and protection.

2. Long-Term Maintenance Must Be Central to Project Success

The report highlights project delivery and outcomes, but continued success depends on maintenance beyond initial installation. In South Los Angeles, we routinely see tree planting projects fail not at installation, but quietly in years 3-5, when watering

responsibilities become unclear and funding disappears. This pattern is familiar to residents and erodes trust in public green infrastructure investments.

3. South Los Angeles Requires Both Investment and Protection

South Los Angeles communities continue to face cumulative environmental burdens, including canopy loss from infrastructure projects, utility work, and street and sidewalk repair. Government responses to liability and accessibility lawsuits frequently result in tree removals rather than root-friendly design solutions. SCWP investments should be paired with stronger attention to protecting existing green assets so that stormwater and climate benefits are not undermined by ongoing tree damage or removals.

SLATC supports the goals of the Safe, Clean Water Program and appreciates ULAR's efforts to evaluate progress and refine watershed strategies. We look forward to continued dialogue and collaboration to ensure that future SCWP investments fully realize their equity, climate resilience, and environmental justice objectives particularly in communities that have historically been under-resourced.

Thank you for considering these comments.

Sincerely,

Theresa Maysonet
Co-Founder
South LA Tree Coalition
info@southlatrees.org
SouthLATrees.org



February 12, 2026

To Whom it May Concern:

Please accept this letter on behalf of the seven cities that are part of the Dominguez Channel Watershed Management Group (DCWMG) – Los Angeles, Carson, El Segundo, Hawthorne, Inglewood, Lawndale, and Lomita – excluding the County of Los Angeles and the Los Angeles County Flood Control District (LACFD). This letter constitutes our joint comments to the Safe Clean Water Program’s Regional Oversight Committee (ROC) during the public comment period for the Draft 2026 Biennial Report.

Below please find two comments, both pertaining to the SCWP’s Regional Program Project Scoring Criteria:

Comment 1: Consider Modifying the Scoring Criteria Points Distribution to become Specific to Each Watershed Area to Address the Unique Characteristics of Each Watershed Area

Our first comment pertains to the current uniform distribution of points under the scoring criteria for each Watershed Area. We find that some elements of the current structure put projects within some Watershed Areas at a disadvantage due to the need to achieve a minimum score of 60 points to be considered further by the Watershed Area Scoring Committee.

As representatives of the DCWMG in the South Santa Monica Bay (SSMB) Watershed Area, we face a unique challenge in meeting the minimum scoring requirements. The watermaster has determined that infiltration projects within this watershed cannot receive water supply benefit points. While we respect the technical basis for this decision, it creates a significant disadvantage for our region.

Infiltration projects provide substantial benefits that extend well beyond water supply. They deliver strong water quality improvements, as infiltration is highly effective at removing large volumes of pollutants. These projects also inherently support nature-based solutions and offer meaningful community benefits through their design and integration with natural systems. Despite these advantages, in this Watershed Area the maximum score an infiltration project can achieve is capped at 85 points, rather than the overall 110 points, due to the inability to earn water supply benefit points for infiltration—placing it at a 25-point disadvantage. We recognize that while other options do exist for gaining water supply points, such as diversions to sewers where the diverted flow would later be reused, or stored for onsite use, these options are not always available nor cost efficient.

Given these constraints, we suggest that the unique characteristics of each Watershed Area be reflected in a more flexible distribution of points. For example, in the Upper Los Angeles River Watershed, where conditions are highly favorable for groundwater infiltration, the scoring system could prioritize and more heavily reward water supply projects. Conversely, in a watershed such as SSMB, which includes a significant number of disadvantaged communities, the scoring framework could allow for higher potential points within the Community Investment or Nature-Based Solutions categories. Adjustments such as these would help ensure that the scoring system supports and encourages projects that best advance the SCWP goals within each watershed's distinct context.


We believe there may be multiple ways to achieve a more balanced scoring process that does not preclude meaningful projects from consideration while also promoting the intent of the SCWP's goals that span water quality, water supply, and community benefits. We welcome further discussion regarding this topic.

Comment 2: Reconsider the Cost Effectiveness Values to Reflect Inflation

We acknowledge and respect the recent changes to the cost-effectiveness calculation. While this change does allow for more points to be achieved for projects that are between the original thresholds, we find that it does not reflect industry-wide cost increases. As a result of supply chain challenges, inflation, and other factors, construction costs have significantly increased in recent years and are expected to continue to increase annually. We request that the ROC consider updating both the water quality cost-effectiveness and the water supply cost per acre-foot calculations to reflect up-to-date industry costs. We suggest considering building an escalation factor that applies year over year to keep up with real-world conditions.

We appreciate your consideration of these two comments. We are available to discuss at any time.

Sincerely,



Clifford Shum

Dominguez Channel WMG Lead

C:

Taraneh Nik-Kah, City of Los Angeles Sanitation & Environment (LASAN)

Miller Zou, City of Los Angeles Sanitation & Environment (LASAN)

Cheryl Ebert, City of El Segundo

Manouchehr Esfandi, City of Hawthorne

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February 12, 2026

ELECTRONIC MAIL

Ms. Diana Tang, Chair
Regional Oversight Committee
Los Angeles County Safe, Clean Water Program
11th Floor, PO Box 1460
Alhambra, CA 91802-1460

Dear Chair Tang:

**SUBJECT: CITY OF LOS ANGELES COMMENTS TO REGIONAL OVERSIGHT
COMMITTEE REGARDING THE DRAFT 2026 SAFE, CLEAN WATER PROGRAM
BIENNIAL PROGRESS REPORT**

Los Angeles Sanitation & Environment (LASAN) commends the Los Angeles County Flood Control District (District) for its hard work and dedication to successfully implement and administer the Safe, Clean Water Program (SCWP or Program). It is truly remarkable to see how much has been accomplished during the seven years of the Program and we appreciate the ongoing adaptive management efforts and initiatives to further enhance the Program. We also salute the leadership and guidance the Regional Oversight Committee (ROC) has provided to the Program, and we appreciate the opportunity to provide input and share our insights as part of the first SCWP Biennial Progress Report.

LASAN is designated as the lead agency for implementing the SCWP within the City of Los Angeles (City). Building off the success of Proposition O, the City continues to invest in water quality infrastructure projects to improve water quality and water supply while providing other benefits to Angelenos. These projects continue to demonstrate LASAN's commitment to improving water quality by enhancing community investments through greening and implementation of nature-based solutions. LASAN has participated in the first seven rounds of the Regional Program and we are thrilled to have been awarded funding in these rounds for the implementation of a wide variety of unique multi-benefit stormwater projects, special studies, and operations and maintenance (O&M) of constructed multi-benefit water quality projects across the

zero waste • zero wasted water

City. We recognize that the Program is dynamic, presenting a unique opportunity to refine the Program to enable project developers across Los Angeles County to be successful in future rounds. The ROC recommendations can additionally inform where future improvements can be made to further achieve the Program's goals and objectives.

LASAN is supportive of many of the recommendations presented in the Biennial Report. For instance, the recommendation to expedite district education programs, especially for workforce development and centralized workforce for proponents throughout the County to follow, is an important step forward for the Program. We also support recommendations to create a scientific advisory panel, which could assist with developing meaningful studies with regional collaborations and benefits towards program goals. With the experience we have gained participating in the Program, and in the spirit of adaptive management, LASAN proposes to the ROC the following considerations and refinements to the Program as part of the SCWP Biennial Progress Report.

The Program should maintain flexibility and allow for customization by watershed area.

LASAN supports the Biennial Report recommendation to refine the scoring criteria. The County of Los Angeles is composed of vastly unique and varying geographic areas, yet the Regional Program's current Scoring Criteria is a "one size fits all" approach. Each watershed has unique opportunities and constraints. An evaluation of watershed specific goals, objectives, metrics and targets would allow project applicants to focus on projects that will meet the goals and objectives of each watershed and yield projects that are more likely to be successful and maximize Program benefits. For this reason, LASAN acknowledges and agrees with the comment letter submitted by the Dominguez Channel Watershed Management Group relating to the modification of the Program's current Scoring Criteria.

LASAN recommends that the program remain flexible and customizable to meet WASC-specific needs. For instance, in acknowledgement of the unique needs of each watershed area, LASAN recommends that the Biennial Report's recommendation to require that each SIP does not exceed 80% of the available funding in any future year, and requiring each SIP in aggregate to include not less than 25% in leveraged funds, to be implemented as guidelines, not requirements, to allow WASCs to maintain flexibility and retain discretion to adjust SIPs based on their own watershed area needs and unique characteristics. If included as guidelines, it is recommended to provide each WASC with a template for establishing their own policies and developing their own WASC-specific guidelines. LASAN understands the need to allow capacity for future years. As such, we further recommend the County take this guidance further by encouraging every application to bring 25% leveraged funding to the Program. Due to the uncertain economic forecast, the risk of implementing required standard and minimum contingencies for all project phases may result in the project being put on hold in the future.

The County should provide additional lead time and advance notice when Program changes are implemented and when deliverable deadlines are established.

While LASAN acknowledges and supports many of the proposed Program changes resulting from

the Biennial Report's recommendations and findings, it is critical that these changes be finalized well in advance of application deadlines to allow applicants sufficient time to adjust project planning efforts. The current volume of Program requirements already presents a barrier to participation, and past instances in which changes were introduced as little as one month before key deadlines have created challenges for agencies and other participants that require internal review and approval.

Applicants managing a large number of in-progress projects may face particular difficulty implementing new guidance without adequate notice. LASAN therefore encourages the County to provide increased lead time and advance notification of Program changes—ideally at least three months. We recognize and appreciate the County's efforts in this regard, including the decision to allow an additional funding round before fully integrating the Initial Watershed Plan metrics and targets into Program requirements until May 2027.

LASAN supports the recommendation to implement financial forecasting and establish thresholds for funding reserves and leveraged funding.

LASAN supports the Program's recommendation to utilize bonds and other fiscal instruments as mechanisms for leveraged funding. As an increasing number of projects are completed and transition into the operations and maintenance (O&M) phase, the Program is approaching a point at which O&M obligations may exceed the funding available for new projects. This trend is concerning for agencies that rely on the Program to meet water quality standards but may be unable to deliver the number of projects originally anticipated.

The use of bonds and other fiscal instruments could provide more flexible and innovative financing options, enabling projects to move forward while reducing the risk of schedule impacts and preserving funding capacity for future projects.

LASAN encourages the Regional Program to be adaptive to project developers delivering projects using a design build delivery.

Aligning regional applications and funding disbursements to promote design-build project delivery offers several advantages for public-sector agencies by combining design and construction under a single contract, which creates a clear point of accountability and simplifies contract administration. This approach allows design and construction activities to overlap, accelerating project delivery and helping agencies meet regulatory deadlines and funding requirements. Design-build also provides earlier cost certainty, improving budgeting and appropriation planning, while reducing the likelihood of change orders and claims through early contractor involvement and improved constructability. With fewer contracts to manage, agencies benefit from greater administrative efficiency and reduced staff burden. Additionally, design-build shifts more project risk to the contractor and encourages innovation and best-value solutions, resulting in higher-quality, more efficient project outcomes for the public.

LASAN encourages the program to find ways to decrease its increasing administrative workload.

LASAN appreciates the recommendations to develop post-construction monitoring guidance and integrate it with regional monitoring; however, revisions and streamlining of existing monitoring metrics should occur first. Several current reporting metrics are vague or difficult to quantify, reducing their effectiveness and creating unnecessary administrative burden. As the SCWP continues to grow, simplifying and standardizing monitoring requirements will be increasingly important to improve efficiency and transparency, while accommodating diverse project types.

LASAN also supports efforts to improve transparency in municipal program expenditures and activities but recommends simplifying reporting requirements for municipalities. As implemented in the Reporting Module, many metrics—particularly those related to public health benefits and multi-benefit projects—are challenging to measure and add significant administrative workload. Given that reported information is publicly available, the Program should focus on synthesizing data into clearer, more meaningful performance measures. While LASAN supports incorporating input from the Nature-based Solutions Task Force, this should be done by clarifying and consolidating existing metrics rather than adding new requirements that increase administrative burden.

The Biennial Report’s recommendation to partner with the Regional Board to align SCW program monitoring and reporting with regional water quality monitoring may provide an opportunity to lessen the administrative burden across programs. The alignment would allow for consistency and efficiency as well as reporting water quality priorities driven by regulators. Opportunities to reduce complexities and improve efficiencies in reporting will improve adaptive management and reduce barriers of participation in the program.

The following is a brief list of additional comments on the Biennial Report:

- LASAN is in support of expanding opportunities for access and participation. Smaller applicants often face capacity barriers, so partnerships with larger agencies could be a solution. However, partnerships with schools have a history of being particularly challenging due to the liability and resistance of the schools to accept offsite runoff and the lack of regulatory drivers. It is recommended to incentivize partnership through the program and provide incentives for schools to accept offsite runoff.
- Although the SCW tool can change and still be used, any changes in the SCW Program can impact existing applicants by making it difficult to achieve goals that are pushed further. LASAN recommends the Program to determine how to “grandfather” existing projects that may suffer in rank due to changes in the Program’s priorities.
- The Program provided a recommendation to explore artificial intelligence (AI) to streamline administrative duties. LASAN recommends the Program to provide guidance to applicants to have the AI reviewed by legal and IT security teams, as there may be concerns regarding privileged information and consent of information voluntarily provided by the public.

- On page ii, there is a format issue. Capitalize the “C” in ScW Program Committees and Memos”.

LASAN appreciates the opportunity to provide input and for the County’s consideration of our recommendations. We look forward to continuing our engagement with the SCWP and the ROC to help ensure the Program meets its objectives and supports participating agencies in achieving compliance with their Total Maximum Daily Load (TMDL) requirements. If you have any questions regarding our letter or wish to discuss further, please contact me via email at michael.scaduto@lacity.org or my staff Susie Santilena at susie.santilena@lacity.org.

Sincerely,

Michael Scaduto, P.E., ENV SP
Principal Engineer
Safe Clean Water Implementation Division
LA Sanitation and Environment

CC: Maria Mehranian, ROC Vice Chair
Kristine Guerrero, ROC Member
Carl Blum, ROC Member
Norma Camacho, ROC Member
Belinda Faustinos, ROC Member
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Charles Trevino, ROC Member
Traci Minamide, LASAN
Susie Santilena, LASAN
Sean Phan, LASAN
Matt Frary, LA County



Date: 2/13/2026

To: Regional Oversight Committee

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

RE: 2026 Biennial Report Public Comment

On behalf of the OurWaterLA (OWLA) coalition, the undersigned submit the following public comments on the Safe Clean Water Program (SCWP) Draft 2026 Biennial Progress Report. OWLA recognizes the significant work that has gone into advancing Watershed Planning, refining program tools, and responding to the evolving needs of the Program. As the SCWP continues to grow, this Biennial Report represents an important opportunity to strengthen transparency, governance, and long-term strategic direction. The SCWP has the potential to deliver transformative, watershed-scale benefits for water quality, water security, climate resilience, and community well-being. Achieving that potential will require stronger integration of watershed planning into funding decisions, continued and expanded prioritization of nature-based solutions, clearer performance measures, transparent financial management, and a governance structure that centers community voices. The following comments are offered to highlight major takeaways, community priorities, and specific recommendations to improve the context and impact of the 2026 Biennial Report.

First, OWLA highlights that community engagement appears largely absent from the Biennial Report, and yet it is essential for ensuring that SCWP investments are equitable. Aside from brief references in scoring criteria, there is little discussion of how communities are involved in program design, implementation, or evaluation. This is a significant concern given that the SCWP was approved by voters with clear expectations around equity and community benefits. The Report should explicitly describe how community voices are incorporated into program governance and decision-making, how community-based organizations (CBOs) are supported to participate meaningfully, and how engagement outcomes are tracked and reflected in funding decisions. Critically, the Report should include recommendations on how to improve this aspect of the program moving forward. OWLA recommends that the ROC **establish a minimum level of community engagement as a mandatory eligibility requirement for Regional Program funding**. This requirement must be set as soon as possible, since early and consistent engagement is necessary to build trust, secure long-term support, and deliver projects that genuinely meet community needs.

Across the topics addressed in this letter, several consistent themes emerge. The need for clear definitions, transparent metrics, and consistent data to ensure that watershed targets, financial forecasts, and performance measures are meaningful and comparable. Without clear, consistent, and agreed-upon definitions and data, it is impossible for the ROC and the public to determine whether the SCWP is achieving its goals. The importance of strategic, long-term watershed investment planning, including clearer guidance on interim use of Watershed Plans, independent technical review of complex planning documents, and transparent financial forecasting and leveraged funding policies. A commitment to equity in access and participation, including set-asides or streamlined pathways for smaller jurisdictions, schools, and CBOs; clearer technical assistance structures; and reduced administrative barriers such as the current process for obtaining city letters of support or non-objection. And finally, the need to balance program efficiency with transparency, accountability, and meaningful community engagement, particularly as administrative responsibilities expand and new tools, including AI, are considered.

We also reiterate top priorities from public input, shared in previous comment letters:

1. Adopt clearer, more consistent **metrics and definitions** for community investment benefits, community engagement and community support, nature-based solutions, disadvantaged community benefits, and workforce impact and PLA compliance. These definitions are essential for evaluating progress, comparing watershed plan outputs, and making equitable funding decisions.
2. Maximize hardscape removal and **prioritize new green space**—particularly in schools, park-poor neighborhoods, and communities that have historically lacked access to nature. Current watershed planning targets for new green space amount to only 2% of countywide greening needs, far below levels needed to advance climate, public health, and equity goals.
3. **Advance long-promised but not yet implemented programs**, specifically K–12 school programs, and workforce development programs with transparency and with community input.
4. Investigate and implement methods to **streamline applications for smaller, more community-based projects**, which currently face disproportionate administrative burdens.
5. **Integrate Watershed Plans** into SCWP decision making. The draft watershed plans offer important insights but lack a defined path for integration into SCWP funding and governance. The ROC should clearly articulate how these plans will inform program implementation.

1. INTEGRATE WATERSHED PLANS TO GUIDE STRATEGIC INVESTMENTS (TIER 1)

Finding: The Initial Watershed Plans (IWPs) and Planning Tool provide crucial information to support project development and SCW Program implementation. IWPs are primarily structured as a resource and tool, but offer flexible requirements for alignment. The IWPs are currently in draft form and are anticipated to be finalized in February 2026.

Water Quality and Community Investment Benefit working groups were established by the ROC and included outside participants who contributed to the IWP development process, including by providing insight about existing plans and efforts in the region, and offering recommendations about planning methods and setting measurable targets.

Recommendations:

A. Integrate the Initial Watershed Plans, metrics, targets, and Planning Tool into the overall SCW Program, including Feasibility Study Requirements, by May 2027.

B. An interagency task force (via an existing platform or new) for ongoing coordination on planning and to inform implementation of IWPs, including updating of metrics and targets as appropriate. Report back on interagency task force development by September 2026.

OWLA Comments on Topic 1:

OWLA supports the intent of the Watershed Plans and the Planning Tool to guide more strategic, watershed-scale investments. Watershed Plans have the potential to be a valuable resource for project development and program implementation. Additional clarity and transparency will help ensure effective use of these plans to maintain public trust as the program transitions from draft plans to formal integration.

Watershed plan review: Given the technical complexity of the nine Watershed Plans recently released, OWLA strongly recommends that the County contract with an independent third-party reviewer to validate the underlying calculations, assumptions, and data. An unbiased technical review will help ensure accuracy, strengthen confidence in the plans, and support transparent decision making. The ROC should also review Watershed Plan targets and identify where lack of clear definitions and differing interpretations may render the numbers provided as essentially 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.

Continued dialogue on strategic watershed investments: Ongoing dialogue and watershed planning are essential to a proactive and effective SCWP. OWLA encourages the ROC to facilitate continued discussion on key strategic issues, including how to make thoughtful investment decisions when funding is limited relative to demand, how to better account for cumulative benefits among projects within a single watershed/drainage, and how to balance a

mix of project sizes when the program structure tends to favor mid-sized regional projects. Consider creative funding mechanisms to support both large, capital-intensive projects (e.g., regional spreading grounds and new park space) as well as smaller-scale efforts through project bundling (e.g., residential landscape transformation). OWLA also encourages greater focus on high-opportunity land uses (e.g., rights-of-way, brownfields, schools, and areas with aging infrastructure that need to be addressed and may also be well suited for multi-benefit solutions.)

Clear guidance for use of Watershed Plans during the interim period: Watershed Plans are anticipated to be finalized in February 2026 and integrated into the overall SCWP by May 2027. Clearer guidance is needed regarding when and how applicants should begin incorporating Watershed Plans into project development. The Biennial Report should clarify how projects will be evaluated during this interim period and whether alignment with Watershed Plans will be encouraged, required, or optional.

Transparency around working groups: The Biennial Report notes that Water Quality and Community Investment Benefit working groups were established by the ROC and included outside participants who contributed to development of Watershed Plans. As many interested stakeholders may not have time to track ROC activity closely, OWLA recommends clearly identifying the members of each working group in the Biennial Report, whom they represented, and how their input informed Watershed Plan recommendations, metrics, and targets.

2. IMPLEMENT FINANCIAL FORECASTING AND SET THRESHOLDS FOR FUNDING RESERVES AND LEVERAGED FUNDING (TIER 1, 3)

Finding: Inflation, economic fluctuations, and extended/delayed project planning and environmental permitting timelines are escalating costs. There is concern that change orders and anticipated O&M funding requests may outpace available funds, highlighting the need for set-asides and pursuit of leveraged funding. Preliminary financial forecasting has indicated that more project designs have been funded than can be constructed and maintained with SCW Program funds alone, potentially leaving limited or no funding for long-term O&M or new projects.

Recommendations:

C. Establish policies and/or guidance to address the aforementioned findings by May 2027 and subsequently update the Regional and Municipal Transfer Agreements, as applicable.

a. Set standards and minimum contingencies for projects across planning, design, construction, and O&M phases, and standard and transparent methods for financial forecasting and future SIP Planning Scenarios.

D. Assess the use of bonds and other fiscal instruments.

E. Regional Program:

b. Require that SIPs do not exceed 80% of the available funding in any future year and incorporate financial forecasting it into SIP programming/processes, with the cap potentially adjusted annually based on forecasting

c. Each SIP in aggregate must include not less than 25% in leveraged funds

F. Municipal Program: Evaluate fund accumulation and carryover policies and report back to ROC by December 2026.

OWLA Comments on Topic 2:

OWLA agrees that rising project costs, extended planning and permitting timelines, and increasing O&M obligations are placing significant pressure on long-term SCWP funding and so support the use of financial forecasting and funding thresholds to improve program sustainability.

Long-term watershed investment planning: Each WASC should develop a comprehensive 20-year investment plan. These plans should outline the total funding available over the next two decades, set a cap on annual allocations to promote long-term financial stability (ideally no more than 80 percent), and identify target proportional investments across project sizes, ranging from large regional-scale efforts to small and distributed projects such as landscape transformations and schoolyard greening. Additionally, each plan should include expectations for leveraged funding to ensure that SCWP dollars are maximized through partnerships and co-investment opportunities.

Financial forecasting assumptions and transparency: More clarity is needed about the assumptions underlying the preliminary financial forecasting described in the Biennial Report, including how forecasting will be applied across project phases and how it will be updated over time.

Leveraged funding thresholds: Given the scale of projected funding gaps, the recommended threshold that SIPs include at least 25% leveraged funding may be insufficient. The recommended percentage could be set higher now, or potentially increase over time, provided that adequate technical assistance is available to support applicants in identifying and securing leveraged funding.

Equity and accountability measures: Each WASC should consider setting aside funding for small-scale projects, following the model of the Lower San Gabriel River WASC, to improve equity and expand community access to funding opportunities. OWLA also encourages consideration of sunset dates for funding allocations, with extension granted when justified.

Management of interest earned and unspent funds: The management of interest earned on unspent funds remains unclear. OWLA recommends that the ROC clearly disclose where earned interest is allocated (e.g., returned to the originating WASC, pooled at the Regional Program level and redistributed, or transferred to District Program funds) and establish a consistent policy governing interest allocation moving forward. Ideally, interest earned on unspent funds should remain within the originating WASC to support watershed-based planning and investments. At a minimum, transparent accounting and clear communication are needed so stakeholders understand how these funds are managed.

Discrepancies in Appendix information: There is discrepancy between budgeted SIP funds and actual disbursements in multiple figures in Appendix D and Appendix F (e.g., Figures E.2 and F.2). While carryover due to small municipal allocations or the timing of capital investments may explain part of this difference, the Biennial Report should provide a clear explanation of these discrepancies, including how funds are budgeted versus when they are actually spent.

3. DEVELOP POST-CONSTRUCTION MONITORING & INTEGRATE WITH REGIONAL MONITORING (TIER 1)

Finding: Post-Construction Monitoring guidance is needed to provide clearer definitions of expectations, required activities, and implementation approaches that effectively demonstrate project performance and contribution to overall SCW Program progress. Regional monitoring data is also available from other sources, but is not currently integrated explicitly into the program.

The Water Quality working group recommended developing a monitoring plan to assess project efficacy as well as assess receiving water quality (using MS4 and other available data) to demonstrate progress towards meeting interim load reduction targets.

Recommendations:

G. Release Post-Construction Monitoring Guidance in summer 2026, inclusive of workforce assessment guidance, and integrate into overall SCW Program by May 2027.

H. Partner with Regional Board to align SCW program monitoring and reporting with regional water quality monitoring. Report back to ROC by December 2026.

OWLA Comments on Topic 3:

OWLA is happy to see the ROC recommending post-construction monitoring guidance to be released by summer 2026 and to align SCWP monitoring and reporting with regional water quality monitoring. Post construction monitoring is essential to understanding the true impact of SCWP projects.

4. SUPPORT FOR A GROWING SCW PROGRAM & INCREASING ADMINISTRATIVE WORKLOAD (TIER 1, 2, 3)

Findings: As the SCW Program has continued to evolve and quickly expand, administrative responsibilities have also continued to rapidly increase with new programs, expanded subprograms (e.g., Watershed Planning, Municipal Support team, Grants Program), and as new metrics and requirements are incorporated further into the Regional and Municipal Program planning, implementation, and reporting. Moreover, as additional projects and project phases are funded and implemented, the administrative burden grows significantly.

Recommendation:

I. In recognition of the growth of the SCW Program, provide additional staff and resources commensurate with the Program's expanding responsibilities, and identify opportunities to reduce complexities and gain improved efficiencies to adaptively manage the Program. Explore ways in which artificial intelligence (AI) can be used to streamline administrative duties.

OWLA Comments on Topic 4:

OWLA recognizes that as the SCWP has evolved and expanded, administrative responsibilities have also increased, and support providing additional staff and resources needed for the Program's expanding responsibilities and identifying opportunities to improve efficiencies.

Use of AI: The Recommendation to explore the use of AI would benefit from more concrete guidance. The ROC should develop a clear policy that defines appropriate use of AI to support staff work, when human review for accuracy is necessary, and what the standards are for documentation, transparency, and accountability. Any use of AI should also be evaluated

considering broader environmental and public trust goals. This includes limiting AI applications that require excessive water or energy consumption and establishing safeguards for sensitive data.

Program efficiency and equity: While OWLA supports program efficiency, it cannot come at the expense of program quality or equity. Streamlining administrative processes should not reduce opportunities for meaningful review, community engagement, or thoughtful decision-making. OWLA encourages the ROC to ensure that efforts to reduce administrative burden maintain transparency, accountability, and equitable participation as the SCWP continues to grow.

5. REFINE SCORING CRITERIA (TIER 2)

Finding: Scoring criteria are currently applicable to all IP projects submitted regardless of phase, size, and watershed-specific conditions. These criteria pre-date the updated metrics that are starting to be integrated throughout the SCW Program as well as the new methodologies and assumptions created in the IWPs. There have been many suggestions and requests to reassess scoring for different scenarios, especially since application data is the initial input for estimating anticipated project benefits, which help inform watershed planning and tracking progress toward SCW Program goals.

Recommendation:

J. Once IWPs are finalized, revisit scoring by May 2027 in light of new metrics, targets, and other policy and program changes as part of the adaptive management process.

OWLA Comments on Topic 5:

OWLA has long pushed for updating scoring criteria as we continue to adaptively manage the SCWP. This has consistently been put off, particularly as related to more community-oriented and nature-based benefits and would like to see the recommendation updated to reflect that this is a directive rather than an option. In addition, there are many processes in place right now with various interim guidance documents and designated groups like the LA County Water Plan Nature-Based Solutions Task Force and Blue-Ribbon Panel that offer suggestions for updated scoring criteria. A lot of work has already been completed that now needs to be implemented. Our suggestion would be:

Once IWPs are finalized, **refine** scoring by May 2027 in light of new metrics, targets, and other policy and program changes as part of the adaptive management process.

As part of this process, we would also like ROC to recommend (and review) definitions and processes around Scoring earlier than May 2027. As an example, it is up to the WASCs to determine if a project is actually benefiting a disadvantaged community. However, WASCs are made up of 7 municipal and 5 agency seats whose organizations are applying for funding. It puts them in a difficult position to either go against their own organization or do the same for other municipalities that they work with. An alternative process could be for the Scoring Committee to review the DAC benefiting status and confirm it as part of Scoring. It currently does not impact points, but having the Scoring Committee review adds an additional level of authority to the designation.

6. EXPAND OPPORTUNITIES FOR ACCESS & PARTICIPATION (TIER 1)

Finding: Larger agencies have dominated SCW Program funded activities and project delivery. Smaller cities, schools and educational institutions, community-based organizations (CBOs), and others face persistent capacity barriers. While the Program already allows for bundling of small projects which may help address eligibility there is strong support for set-asides and streamlined processes to enable participation, especially to balance participant reporting and transparency requirements. There is existing SCW Program grant opportunities and ongoing engagement to cities, educational institutions, and CBOs through the Public Education & Community Engagement Grants Program, scheduled to sunset soon, but more can be done.

Recommendation:

K. Assess how a continuum of support can be provided to help all applicants across the SCW Program. Report back to ROC by May 2027

OWLA Comments on Topic 6:

Larger agencies have dominated SCWP funding and smaller and less resourced cities, schools, and NGOs/CBOs face capacity barriers. As the ROC assesses how support can be provided to help all applicants, this assessment should move beyond high-level concepts and identify specific, implementable support mechanisms tailored to applicants with varying levels of capacity.

Address technical assistance gaps: Watershed Coordinators currently provide valuable guidance to applicants, but their ability to support smaller or first-time applicants is limited by staff capacity, and the need to remain neutral. As a result, many applicants (particularly smaller cities, schools, and CBOs) still lack access to meaningful technical assistance during project

development. Additional support roles and resources are needed to fill this gap. This could include additional applicant-focused workshops and training events to walk applicants through eligibility, application requirements, and reporting expectations.

Set-asides and streamlining processes: Given the dominance of larger agencies in current funding allocations, the ROC should evaluate whether a portion of SCWP funds should be set aside for first-time applicants or smaller-scale projects. OWLA also recommends allocating a portion of TRP funds directly to the applicants to support project development and engagement. Paired with streamlined application and reporting requirements, these adjustments could help level the playing field while maintaining accountability and transparency.

Project bundling to achieve scale: Complementary small projects (e.g., residential retrofits, green streets) should be grouped to achieve water quality improvements at scale, following the example of the Beach Cities Green Streets Project in the South Santa Monica Bay WASC. Along these lines, OWLA supports efforts noted in Appendix C to explore opportunities with MET for private property incentive programs, and strongly encourages further pursuit of these initiatives, as they have potential to expand participation and environmental impact beyond publicly owned sites.

Tracking progress: To evaluate whether access is improving, the ROC should track and report metrics on participation by first-time applicants, and the percentage of funds awarded to smaller jurisdictions, schools, and CBOs.

7. ELEVATE SCW PROGRAM GOVERNANCE COMMITTEE APPOINTMENTS & ATTENDANCE (TIER 2, 3)

Finding: Each Watershed Area Steering Committee (WASC) is composed of a diverse group of members from agencies, community stakeholders, and municipalities to ensure a broad representation within the respective Watershed Areas. However, WASCs have faced challenges meeting the attendance requirements outlined in Section 5 of the WASC Operating Guidelines, which mandates a minimum of two members from each member category, in addition to reaching a quorum, to hold a WASC meeting due to vacancies and attendance issues.

Recommendations:

- L. Prioritize expeditious filling of committee vacancies for members/alternates (ongoing).**
- M. Enforce maximum allowable absences. (ongoing).**

OWLA Comments on Topic 7:

OWLA supports efforts to strengthen governance and ensure that WASC membership and participation reflect the diversity and accountability goals of the SCWP.

Fill vacancies and ensure balanced representation: OWLA agrees that filling committee vacancies is needed to ensure representation and effective decision-making. Ensuring that each category of membership is consistently represented (particularly the community stakeholder category) is critical for equity and accountability.

Address attendance challenges proactively: To address ongoing attendance challenges, the SCWP should provide clear guidance on member expectations and commitments and offer additional support during onboarding of new members to facilitate full participation. County staff should also monitor attendance trends to identify potential barriers to participation, such as scheduling conflicts or workload issues, and adjust processes as needed. In addition, avoid canceling WASC meetings that already meet quorum requirements, even if agendas seem light. WASCs should be encouraged to prioritize meetings that are consistently scheduled in order to maintain momentum, engagement, and continuity.

8. SUPPORT FOR MUNICIPAL STAFFING CHALLENGES (TIER 3)

Finding: High staff turnover, differences in municipal capacity, and disparate SCW Program knowledge impact municipalities' ability to deliver plans, projects, and reports.

Recommendation: By March 2027, report back to the ROC on the following:

N. Increase capacity of Public Works to support municipalities with planning, reporting, and Project and Program development both within the Municipal Program and for municipalities as participants in the Regional Program.

OWLA Comments on Topic 8:

OWLA understands that high staff turnover, along with differences in municipal capacity and Program knowledge, can impact the ability of a municipality to complete Program deliverables. While Watershed Coordinators provide valuable support, the SCWP should prioritize helping to build municipal-level capacity to ensure sustainable, locally owned expertise in planning, project implementation, and reporting.

Build sustainable municipal-level capacity: Clearly define the role of Public Works, including what will be supported (e.g., planning, reporting, feasibility assessments, project development). Onboarding, ongoing training, and accessible technical guidance can strengthen municipal staff knowledge, retain expertise, and ensure continuity when there is turnover. Support should be prioritized for municipalities with limited capacity or expertise to promote equity and enable local management of projects over time.

Address administrative burdens related to non-city projects: To address a specific capacity issue that has been identified, the process for obtaining letter of support or non-objection from cities remains administratively burdensome, both for applicants and for city staff responsible for reviewing proposed projects. Inadequate staffing at the municipal level limits cities' ability to review the volume of projects seeking funding, creating delays and uncertainty. As a result, access to the SCWP is heavily dependent on whether an applicant can navigate the process, and the Program is effectively structured to favor larger municipal projects over smaller or community-driven proposals. OWLA recommends that the ROC clarify expectations, timelines, and review criteria for city letters to assess whether additional administrative support, standardized processes, or alternative mechanisms are needed to reduce this barrier to funding.

9. IMPROVE TRANSPARENCY IN MUNICIPAL PROGRAM EXPENDITURES & ACTIVITIES (TIER 1)

Finding: There is a need to evaluate the applicability of metrics from the Metrics and Monitoring Study (MMS) for project and non-project-based activities in the Municipal Program. Public commenters have specifically asked for clearer, more accessible summaries of municipal expenditures and outcomes. This recommendation is aligned with and related to Recommendations described below (Monitoring Improvements & Greater Integration)

Recommendations:

O. Improve Municipal Program reported data dashboards for accessibility and transparency towards progress of achieving SCW Program Goals by March 2027.

OWLA Comments on Topic 9:

OWLA supports the recommendation to improve Municipal Program data dashboards to enhance transparency and accessibility. Improving how information is presented will help the public and stakeholders better understand allocation of municipal funds and how the Municipal Program supports progress towards achieving SCWP goals.

Accessible, transparent, and goal-aligned dashboards: OWLA recommends that dashboards present information in plain language and clearly show how spent funds align with SCWP goals, as well as how unspent municipal funds are currently managed. Municipalities should disclose whether SCWP funds are supplemental, or if they replace any existing stormwater investments to ensure accountability, and demonstrate that SCWP funds are advancing, rather than substituting for, previous local commitments.

10. INTEGRATE NATURE-BASED SOLUTIONS (NBS) (TIER 2)

Finding: The NbS Blue-Ribbon Panel has met and developed definitions and standards for generic as well as water-specific NbS countywide. These definitions have not yet been integrated into the SCW Program and were not included in Initial Watershed Plans since they were being developed in parallel. Recommendations below are contingent on the timing and completion of NbS performance measures.

Recommendation:

P. Continue convening NbS Task Force in 2026.

Q. Incorporate NbS definitions, metrics, and performance measures into the SCW Program, with input from the NbS Task Force, targeting by May 2027, contingent on the availability and readiness of the performance measures.

OWLA Comments on Topic 10:

OWLA supports continued efforts to integrate NBS into the SCWP and recognizes the work of the NBS Blue Ribbon Panel in developing definitions and standards. However, NBS is currently treated as more of an afterthought within the SCWP. Instead, it should be treated as a core strategy, and incorporated more into planning, project development, and performance metrics. Clear definitions and guidance will help ensure that NBS projects are effectively designed, implemented, and evaluated across the County.

NBS Taskforce: Several members of OWLA are participating in the NBS Taskforce. We were surprised to learn that the NBS Taskforce was tasked with recommending performance measures to be incorporated into the watershed plan around NBS, rather than recommending metrics that could be incorporated into the Scoring Rubric/eligibility requirements. Performance measures are important, but if they are not tied to eligibility requirements then projects are not incentivized to attain them. Given recommendation 5, it seems timely for the ROC to recommend the NBS Taskforce specifically consider more appropriate questions/metrics

to measure the benefits provided by NBS projects to incorporate into the Scoring Rubric than does it use a natural process or mimic a natural process (yes/no) and does it use a natural material (yes/no). Similarly, we must revisit the current proportionality approach to replacement of hardscape (which allows maximum points for minimal greening) as well as adding metrics to community benefits (many of which are achieved through NBS) rather than the vague yes/no criteria.

11. EXPEDITE DISTRICT EDUCATION PROGRAMS (TIER 1, 2, 3)

Public Education & Community Engagement (Grants Program)

Finding: The Public Education & Community Engagement Grants Program has been well received and, in fact, over-subscribed. The high level of enthusiasm and participation demonstrates strong interest and is expected to positively inform and improve future SCW Program efforts.

Recommendation:

R. Develop a dedicated grant program(s) as a successor to the current Public Education & Community Engagement Grants Program which is concluding in Summer of 2026. Report back to the ROC by June 2026 on status of any new programs.

S. Develop and deliver training program for elected officials and municipal/agency staff about SCW Program. Report back to the ROC by December 2027.

Workforce Development

Recommendation:

T. Develop a grants program for Workforce Development modeled on the Public Education & Community Engagement Grants Program. Report back to the ROC by June 2026 on status.

U. Evaluate opportunities to invest in in-house and/or other in other Workforce Programs identified in Appendix G: District Program Summary. Report back to ROC by June 2026.

K-12 Schools Education Program(s)

Recommendations:

V. Recommend unique curriculum elements that could be developed and made available to schools, teachers, CBOs, and others involved in educating K-12 students about stormwater and related issues.

W. Develop a grants program for K-12 education and schoolyard transformation. Report back to ROC by June 2026.

X. Report back to ROC by June 2026 on status of schools-related activities to date and those planned.

OWLA Comments on Topic 11:

OWLA strongly supports the expansion of district education efforts. The Public Education & Community Engagement Grants Program has been well received with strong interest and participation. Consider a direct continuation or scaling of the existing program, where appropriate, to build on demonstrated success.

K-12 education programs: OWLA supports developing targeted grants and curriculum resources for K-12 schools and schoolyard transformation. K-12 education efforts should clearly define the scope of work for Watershed Coordinators already engaged in school-based programs to avoid overburdening staff. Reporting back to the ROC should include current program outcomes, planned activities, clear timelines, and defined responsibilities.

Workforce development: OWLA supports developing a grants program for Workforce Development modeled on the Public Education & Community Engagement Grants Program, and evaluating opportunities to invest in in-house and other Workforce Programs identified in Appendix G. Given the growing portfolio of nature-based stormwater projects, workforce training should prioritize skills related to the development, operation, and long-term maintenance of nature-based solutions, which remains a significant gap in current programming. Reporting should clearly describe program status, priority focus areas (including nature-based infrastructure), measurable outcomes, and next steps.

Training for staff and elected officials: OWLA supports developing and delivering training for elected officials and municipal/agency staff about the SCWP. Interim goals in 2026 should be set to ensure timely progress, with a final report back to the ROC in December 2027.

Transparency and Accountability: While OWLA supports expanded investments in education, workforce development, and training opportunities, we are concerned about the lack of clear goals, measurable outcomes, and transparent budget reporting. The Biennial Report does not clearly identify how much funding has been allocated across the three program areas, how

funds are actually being distributed, or whether investments align with SCWP commitments and voter intent. There is a risk that substantial public funds could be expended without significant or equitable impact. OWLA recommends annual reporting to the ROC that includes measurable outcomes and transparent accounting.

12. CREATE A SCIENTIFIC ADVISORY PANEL (TIER 1, 2)

Finding: There is often little to no context to understand how scientific study findings relate to each other, watershed needs, SCW Program Goals, and broader scientific bodies of work. SCW Program Scientific Studies should be proactively directed to answer scientific questions of regional significance and address gaps in understanding and data.

Recommendations:

Y. Create a Scientific Advisory Panel to review and assess scientific study proposals and propose future research topics in alignment with Program priorities. Report back to the ROC by June 2026 on status.

OWLA Comments on Topic 12:

OWLA supports the creation of a Scientific Advisory Panel and appreciates the ROC's efforts to better align scientific studies with both watershed needs and SCWP goals.

Ensure balanced and equitable representation: The ROC should establish clear guidelines to ensure balanced membership of the panel and equitable representation in shaping the SCWP research agenda.

Identify priority research gaps: OWLA recommends that the panel evaluate gaps in existing research to identify priority areas for future studies that will have the greatest impact on watershed planning, project development, and SCWP goals. Input should be actively solicited from WASCs and community stakeholders to ensure that the panel's priorities reflect both local and regional needs.

Other OWLA Comments:

Minor edits: In Appendix E, the Hermosa Beach Parking Lot project is noted, but the City Council has decided not to move forward with this project; it should therefore be removed from the list to ensure the Report reflects current, actionable projects.

Sincerely,
OurWaterLA

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

CC: Matt Frary, Melanie Hu, Diana Tang, Maria Mehranian

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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.



Date: February 14, 2026

To: Safe Clean Water Program Regional Oversight Committee and Public Works

From: Los Angeles Waterkeeper

RE: Biennial Progress Report Public Comment

LA Waterkeeper is grateful for the opportunity to provide comments on the Biennial Progress Report. We are glad that this report is so comprehensive and believe that the Regional Oversight Committee (ROC) has identified important aspects of the program that can be adapted to make it even stronger. The OurWaterLA Coalition (OWLA) submitted detailed comments on the Biennial Progress Report, and we want to echo those comments (which we helped craft as part of that coalition). That said, we wanted to highlight a few suggestions that we believe are most critically important to further strengthen the recommendations and report.

INTEGRATE WATERSHED PLANS TO GUIDE STRATEGIC INVESTMENTS

First, we appreciate the tremendous work that went into watershed planning as part of the Safe Clean Water Program (SCWP), as initially recommended by the ROC, and applaud this committee for further elevating these plans in its very first recommendation to Integrate Watershed Plans to Guide Strategic Investments.

LA Waterkeeper believes that if we are to achieve the myriad goals established in the SCWP as effectively and efficiently as possible, we must ultimately transition the program from a reactive grants program to a more proactive and strategic investment program...a sentiment that was expressed by numerous ROC members at the February 11 meeting of that committee. We also recognize such a dramatic change will take time and must come with significant discussion. We appreciate that steps are being taken in this direction, including the development of watershed plans and tools to identify opportunity zones. However, there are limitations with what has been done to date.

Perhaps most importantly, the watershed plans mostly stop at setting targets for each Watershed Area Steering Committee (WASC). As anyone who has ever undertaken planning (whether strategic, business, or watershed) knows, developing goals, objectives and targets represent only the first steps in planning; meaningful plans must also include action plans that outline the steps to achieve these targets. That is missing from the current watershed plans, though tools have been developed that will allow WASCs to start this process.

Secondly, there is no clear direction on how WASCs should use watershed plans to ensure more strategic investment. That lack of direction, we fear, could lead watershed plans to simply be the proverbial plan that sits on a shelf that doesn't lead to meaningful improvements in the Program.

While we appreciate the new requirement that applicants demonstrate “conformity with the watershed plans,” this requirement is vague and likely easily met without demonstrating that we are actually investing as effectively as possible. With so much having effort having gone into watershed planning, it is critical to keep up the momentum and ensure these plans actually direct more strategic investments. As such, we urge the ROC to amend the biennial report (Recommendations 1) to:

*Direct each Watershed Area Steering Committee (WASC) to **develop a comprehensive 20-year investment plan** by December 2026 (to inform the next RPF cycle). These plans, which should be developed through a series of WASC-led workshops supported by Watershed Coordinators and bringing in outside community voices and experts, will build on existing watershed planning efforts and should identify:*

- *The total funding available through the SCWP regional program for each WASC over the next two decades;*
- *How much of this funding should be capped on annual allocations to account for reserves and contingencies and promote long-term financial stability of the program (we would recommend no more than 80 percent);*
- *Target investments across project sizes, ranging from large regional-scale efforts (e.g. new spreading grounds) to neighborhood-scale distributed projects (e.g. park retrofits, green schools or green streets) and parcel-based distributed projects (such as landscape transformations) as well as priority types of projects, in order to achieve established targets for each WASC. (Note, to the extent they can, the plans should identify specific projects or at least project types and associated locations to provide a much direction as possible);*
- *Estimated costs to build out this range of projects, including ongoing O&M over the 20-year time horizon; and*
- *Requirements for leveraged funding needed to make the investments identified and ensure that SCWP dollars are maximized through partnerships and co-investment opportunities from local, state, and federal sources.*

We recognize that such investment plans, themselves, will not direct WASC funding through Stormwater Investment Plans (SIPs) on their own. But going through this exercise, which is invaluable in its own right to enhance watershed planning countywide, can also play a critical role in improving the types of projects funded by the SCWP. First, they will provide a blueprint for WASC members (many of whom develop projects) to identify which types of projects they should pursue (and where) to be most competitive; similarly, it will allow Watershed Coordinators to better understand priorities and target their outreach to parties that can develop projects aligned with these long-term plans. A more specific and longer-term investment plan can also be used to shape RFPs for each WASC over the coming years that are far more targeted than what happens now or even would happen with just the targets set by current watershed plans. Similarly, such plans would allow each WASC to evaluate proposed projects and recommend funding through the SIP

process in a way that ensures alignment with each WASC's priorities far more effectively than just basing decisions on targets set by current watershed plans.

We also believe it is critical for each WASC to take a 20-year look at investments. Such a longer-term look is aligned with how municipalities and agencies currently plan for infrastructure investments (which is usually based on 20-50 year horizons). It could also allow WASCs to help think through how projects could be phased (for example – and just as an example - perhaps we would want to invest in upstream projects within a particular WASC first, and see how such projects perform before investing in downstream projects). The longer-term look will also allow the WASC to consider the value of larger projects that would take significantly longer to develop than the current 5-year horizon of the SCWP. One complaint that has been leveled against the SCWP is that it is very good at funding certain types and scale (mid-sized park retrofits and green streets), but other projects both small (parcel-based landscape transformations) and large (spreading grounds that could double as community parks) would have a hard – if not impossible – time qualifying for SCWP funding under current rules. Identifying whether such projects are desired within these 20-year investment plan could lead to creative solutions on how the program can be changed to ensure such priority projects can move forward.

Lastly, we have heard that shifting to a more proactive approach could leave out critical voices like smaller/less resourced cities or nonprofit or community-based organizations. However, as we have seen from projects funded to date, these entities already have a very hard time competing for funding with larger municipal entities. In fact, an ongoing watershed planning process to inform these 20-year investment plans should include these parties to ensure their voice is heard, and criteria could be established as part of the process to ensure we are investing appropriately in less resourced communities and more effectively engaging communities.

In conclusion, by directing the WASCs to create these plans, the ROC is ensuring that the program is having an ongoing dialogue with the watershed plans and that the WASCs, in consultation with communities, are thinking strategically now about how to achieve the WASC targets into the future. This approach will also help achieve the ROC's second recommendation around financial forecasting for the program.

REFINE SCORING CRITERIA

While we are advocating for a more proactive process that in the future would render scoring obsolete, in the meantime, we believe updating scoring criteria is critical to ensure that the projects delivered through SCWP funding are providing the benefits anticipated by the voters and communities that supported Measure W.

As part of this process, we would like the ROC to recommend (and review) definitions and processes around Scoring earlier than May 2027. As scoring criteria stand now, more community-based themes tend to have looser definitions and less clear guidelines on how points are scored.

Water quality has specific thresholds of benefits delivered (cost effectiveness, percentage of zinc removed) tied to the points awarded. Community investment benefits do not.

As an example, it is up to the WASCs to determine if a project is actually benefiting a disadvantaged community. However, WASCs are made up of 7 municipal and 5 agency seats whose organizations are applying for funding. It puts them in a difficult position to either go against their own organization or do the same for other municipalities that they work with. In theory, a WASC can change that designation but in our experience, WASC members were hesitant to do so. An alternative process could be for the Scoring Committee to review the DAC benefiting status and confirm it as part of Scoring. It currently does not impact points, but having the Scoring Committee review adds an additional level of authority to the designation.

Similarly, we would like the ROC to review and provide feedback on whether there should be thresholds for projects to meet before they get credit for community investment benefits (i.e., should planting 3 trees on a project ensure they get credit for planting trees, reducing heat island effect, and creating/enhancing/restoring park space/habitat/wetland space?). More numeric criteria – as is the case with water quality and water supply – will provide more certainty for project applicants as well as SCWP committees, and will ensure communities actually see meaningful benefits around reducing impacts of heat island, provide additional recreational benefits, and/or enhance habitat for wildlife.

INTEGRATE NATURE-BASED SOLUTIONS (NBS)

Our concerns on NBS also tie back to those of scoring criteria as NBS tends to be a more community-based theme of the SCWP and thus does not have as well defined a process as water quality or water supply. While we begin to shift the program to become more proactive, in the meantime we do want to ensure we are delivering the most impactful projects we can and be ensuring that we have strong definitions and scoring thresholds, we incentivize and support developers to design impactful projects.

LA Waterkeeper is participating in the NBS Taskforce, which we applaud Public Works for establishing, and is the continuation of work by the Blue Ribbon Panel to develop a definition and metrics for NBS projects in LA County. We were surprised to learn that the NBS Taskforce was tasked with recommending performance measures to be incorporated into the watershed plan around NBS, rather than recommending metrics that could be incorporated into the Scoring Rubric/eligibility requirements. Performance measures are important, but if they are not tied to eligibility requirements, then projects are not incentivized to attain them. Given recommendation 5 (Scoring Criteria), it seems timely for the ROC to recommend the NBS Taskforce specifically consider more appropriate questions/metrics to measure the benefits provided by NBS projects to incorporate into the Scoring Rubric than does it use a natural process or mimic a natural process (yes/no) and does it use a natural material (yes/no). Similarly, we must revisit the current proportionality approach to replacement of hardscape (which allows maximum points for minimal

greening) as well as adding metrics to community benefits (many of which are achieved through NBS) rather than the vague yes/no criteria.

EXPEDITE DISTRICT EDUCATION PROGRAMS

The education programs have been a long-promised aspect of the SCWP and we are excited to see that the programs have begun taking shape (though we would always love to see them rolled out faster).

For the Public Education & Community Engagement Grants Program, we support the development of a successor program as recommended. But we also urge the ROC to emphasize that any successor program should be delivered as quickly as possible to maintain the momentum of work already done in this area. We want to ensure that there is not a significant gap between program delivery as the initial program had significant interest.

Within the Workforce Development program, we support the development of in-house programs and a grants program modeled on that Public Education & Community Engagement Grants Program. There are so many examples locally, regionally, and nationally of organizations delivering high quality workforce development training and even certification and by supporting those willing to work in LA, we can stretch our dollars further on programs that are already in operation rather than developing a program from scratch.

Finally, for K-12 Education, we are strongly in support of the development of curriculum for schools. As a potential model, we want to highlight Project SWELL (Stewardship: Water Education for Lifeline Leadership) in San Diego that used grant funding to hire a curriculum developer to design San Diego specific inquiry-based environmental education that could be slotted into existing state standard curriculum within the school systems. Grant funding was also used to train teachers and added materials to science kits that were circulated at San Diego and Oceanside district schools as part of their science curriculum. By building on lessons that were already being taught, it ensured that widespread adoption would be relatively easy, and at one time tens of thousands of students at various grade levels throughout San Diego and Oceanside Unified School Districts were receiving these critical lessons as part of their regular curriculum; thus ensuring the equitable roll-out of these programs through the districts.

Once again, we want to applaud the tremendous work that has already been done in preparing your Biennial Progress Report and appreciate your time and consideration of our feedback. We are happy to answer any questions.

Los Angeles Waterkeeper

Safe, Clean Water Program 2026 Biennial Progress Report

Public Comment

Name: Carol Bretonne

Are you an active member of SCW Program Governance Committee (ROC, SC, or WASC):
No

Are you an active member of an organization: No

General Comment regarding Water Quality:

Please take out the Fluoride in the water. The President even mandated the elimination of Fluoride. We do not NEED it.

Safe, Clean Water Program 2026 Biennial Progress Report

Public Comment

Name: Anna Groehnert

Are you an active member of SCW Program Governance Committee (ROC, SC, or WASC):
Yes, Central Santa Monica Bay Watershed Area Steering Committee (CSMB WASC)

Are you an active member of an organization: Yes, City of Inglewood

Comment on Findings & Recommendations regarding Water Supply:

Regarding "Section 5. Refine Scoring Criteria":

The City of Inglewood would like to respectfully propose consideration for region-specific weighting of application scoring criteria, specifically the Water Supply benefit in the South Santa Monica Bay. Considering it is infeasible for most project developers within the confined aquifer boundary to be awarded these points, the weighting of this scoring criteria item should be reconsidered for project applicants whose project locations are unable to contribute to local water supply significantly or at all.

It is very unfortunate that project applications within these boundaries are simply unable to receive most of these water supply points, which considerably decreases their competitiveness. Even with strengthening other project benefits, many applications in this situation still fall short of the minimum points required to move forward to the WASC for presentation. While the increasing importance of water supply is obvious, this is a specific circumstance that cannot be addressed by project developers alone and should be reevaluated by SCWP staff.

Thank you for your time and consideration.

Safe, Clean Water Program 2026 Biennial Progress Report

Public Comment

Name: Jenn Swart

Are you an active member of SCW Program Governance Committee (ROC, SC, or WASC):

Yes, Lower Los Angeles River & Lower San Gabriel River Watershed Area Steering Committee (LLAR/LSGR WASC)

Are you an active member of an organization: Yes, Water Replenishment District

General Comment regarding Water Supply:

Hello SCWP Staff,

WRD would like to thank the County for its work on the SCWP and all their efforts in developing the Biennial Progress Report. WRD supports the recommendations outlined in the report and specifically supports Recommendation 5 which seeks to refine the scoring criteria for infrastructure projects. As some watershed areas (ex: SSMB) are no longer eligible for water supply credits, they are at a disadvantage for meeting the scoring minimum. WRD also supports Recommendation 12 which seeks to establish a Scientific Advisory Panel to better contextualize the role of proposed scientific studies within the SCW Program; this will assist the WASCs in their deliberations on Scientific Studies. Lastly, WRD is looking forward to the item outlined in the What's Next section that proposes "Facilitate Additional Sharing of Information Across SCW Program Governance Committees." As new members are continually joining and continuity can be disrupted, it will be beneficial for WASCs to learn from one another and share what creative ways they've operated in the past.

WRD appreciates the opportunity to read and review the Biennial Report and commends the County on its administration of the SCWP.

Jenn Swart
Water Resources Planner
WRD

Safe, Clean Water Program 2026 Biennial Progress Report

Public Comment

Name: CWH

Are you an active member of SCW Program Governance Committee (ROC, SC, or WASC):

Yes, Upper Los Angeles River & Upper San Gabriel Watershed Area Steering Committee (ULAR/USGR WASC),

Are you an active member of an organization: Yes, Council for Watershed Health

General Comment regarding Community Investment:

Questions related to the Discovery Cube

Who will be hosting the field trips, and how are they structured?

Is the program offered county-wide, or limited to certain regions or schools?

How many students or participants does the program reach annually?

What specific stormwater or watershed-related content is included in the field trip curriculum?

Are there opportunities for WCs to support or align with the planned activities at the Cube?

Questions related to Generation Earth

Generation Earth has historically focused on recycling, composting, and waste reduction - Will the curriculum be expanded to include stormwater or watershed topics?

If so, how is stormwater being incorporated into the updated program?

How many students or classrooms does Generation Earth reach each year?

What support or collaboration opportunities exist for WCs to help bring Generation Earth into more classrooms?

Comment on Findings & Recommendations regarding Community Investment:

Page 16: 5. REFINE SCORING CRITERIA (TIER 2): Original language: Scoring criteria are currently applicable to all IP projects submitted regardless of phase, size, and watershed-specific conditions. These criteria pre-date the updated metrics that are starting to be integrated throughout the SCW Program as well as the new methodologies and assumptions created in the IWPs. There have been many suggestions and requests to reassess scoring for different

scenarios, especially since application data is the initial input for estimating anticipated project benefits, which help inform watershed planning and tracking progress toward SCW Program goals.

Comment: Mention NbS Task Force recommended metrics to be added into the considerations for updated PM. Specify/process for updating scoring process where possible. Additional details + transparency on the process here would be great.

Comment on Findings & Recommendations regarding Water Quality, Water Supply, and Community Investment:

There has been consistent call to consider the ways that the Performance Measure (PM) development process is ordered. Establishing PMs prior to the implementation of projects is limiting. However, moving forward it would be beneficial to prioritize lifecycle assessments of projects, and the systemic prioritization of post-construction monitoring and measurement of projects through scoring revisions.

Safe, Clean Water Program 2026 Biennial Progress Report

Public Comment

Name: Timothy F Brick

Are you an active member of SCW Program Governance Committee (ROC, SC, or WASC):
No

Are you an active member of an organization?: Yes, Stewards of the Arroyo Seco

General Comment regarding Water Quality, Water Supply, and Community Investment:

To: Safe, Clean Water Program – Regional Oversight Committee (ROC)

Re: Draft 2026 SCWP Biennial Progress Report (public comment period Jan 15–Feb 14, 2026)

The Safe, Clean Water Program’s multi-benefit intent is important and widely supported. However, the Draft Biennial Progress Report lacks sufficient detail on accomplishments and verified performance, despite over six years of program operation. This absence of outcome-based reporting reduces transparency, erodes public confidence, and hinders adaptive management.

Top 5 recommendations for the final Biennial Report and near-term implementation

1. Publish a standard “Measured vs Modeled vs Planned” performance summary across Regional, Municipal, and District components, with confidence labels and key assumptions.
2. Finalize and implement Nature-based Solutions (NbS) by adopting an NbS typology, minimum standards, and required reporting fields. Integrate these into feasibility assessments, scoring, monitoring, and dashboards.
3. Track and report biodiversity and habitat improvements for projects claiming ecological benefits, using a minimum set of program indicators and baseline plus post-construction reporting where applicable.
4. Rebalance scoring and portfolio evaluation to ensure water conservation, supply, and environmental outcomes—including habitat, biodiversity, and long-term stewardship—are given equal priority alongside water quality.
5. Improve democratic participation and County leadership by expanding meaningful public input beyond two-minute comments at public meetings. Direct LA County Public Works to lead regional performance infrastructure (monitoring integration, standardized reporting, shared services/technical assistance).

Key comments

1) The report does not have sufficient detail on accomplishments and performance

A biennial progress report should clearly document delivered outcomes and effectiveness. At this stage, the Report should present structured, comparable outcome tables that distinguish:

- * Constructed/operational outcomes (measured where possible),
- * Modeled/forecast outcomes (with assumptions and uncertainty), and
- * Pipeline status (planning/design/construction).

Without this information, readers cannot assess progress or identify program elements that require corrective action.

2) NbS and biodiversity remain under-defined and under-reported

The ROC has prioritized defining NbS standards and performance measures. However, NbS remains insufficiently delineated, making it difficult to distinguish nature-based performance from conventional infrastructure with landscaping. Biodiversity benefits are also not consistently identified or quantified.

The final Report should commit to:

- * NbS typology + minimum standards (to prevent “NbS in name only”), and
- * A minimum biodiversity/habitat standard set for projects (e.g., native cover/establishment, habitat extent/quality, invasive control, connectivity indicators).

3) Scoring and program emphasis appear overly skewed toward water quality

The program’s investment incentives and reporting focus primarily on water quality, while water conservation, supply, and ecosystem goals receive less emphasis. As scoring is revised, the Report should require a rebalancing to ensure environmental outcomes and stewardship are measurable and influential in project selection and portfolio performance.

4) Community engagement practices need strengthening

Restricting public input at WASC and ROC meetings to brief remarks limits substantive engagement and meaningful democratic participation. The final Report should recommend enhanced engagement practices, such as periodic long-form public comment opportunities, workshops, written comment periods tied to major decisions, and published response-to-comment summaries.

5) County Public Works must play a stronger leadership role for regional outcomes

County Public Works should take a stronger role in planning and implementing regional programs to maximize res

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Part 2

The current decision structure favors small, site-specific projects and often limits regional cooperation. The final Report should include a clear County action plan to deliver these regional functions and address capacity disparities across jurisdictions.

Closing

We support the program's mission and the ROC's adaptive management role. At this stage, the Biennial Report must provide specific, verifiable evidence of performance—especially for NbS, biodiversity, and genuine community participation—and outline clear, near-term actions to close the gap between program intent and documented outcomes.