



Public Comment Form

Name*: Annelisa Moe Organization*: OurWaterLA

Email*: amoe@healthebay.org Phone*: 310-451-1500 x115

Meeting: Scoring Committee Date: 7/13/2026

☒ 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

See attached letter for comments.



Date: 07/10/2026

To: Scoring Committee

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

RE: Scoring Survey Response

On behalf of the OurWaterLA (OWLA) coalition, the undersigned submit the following public comments on the Safe Clean Water Program (SCWP) Scoring Survey. We appreciate the significant time and effort the SCWP Scoring Committee has dedicated to implementing and refining the current scoring criteria and accompanying guidance documents. As the SCWP continues to evolve, scoring plays a critical role in ensuring that investments reflect the full intent of the program, including water quality improvements, climate resilience, nature-based solutions, community benefits, and environmental justice. These comments reflect our collective experience engaging with the SCWP and offer recommendations to strengthen the scoring criteria, improve transparency and consistency, and better align evaluation methods with the program's long-term goals.

1. How would you describe your role/relationship relative to the SCW Program?
 - a. Other: OurWaterLA Coalition
2. Rate your familiarity with the SCW Program's current FSG. Rate from 1(No Familiarity) - 5(Extremely Familiar)
 - a. 5
3. In your experience, how clear and understandable are the current Scoring Criteria and associated guidance materials? Rate from 1(Not Clear and Understandable) - 5(Extremely Clear and Understandable)
 - a. 3
4. Please Explain.
 - a. The guidance materials have improved over time and generally communicate program expectations well.
 - b. Information is comprehensive but very dense, making it difficult for new applicants to navigate.

- c. Guidance is spread across multiple documents and webpages, making it challenging to find everything needed for a competitive application.
 - i. If the project is in the City of LA, you also need to get letters from them, which adds another step.
 - d. Many helpful guidance documents are not easy to find unless applicants already know they exist.
 - e. Some scoring criteria would benefit from clearer definitions, metrics, and examples (e.g., how much tree planting or other project features are needed to receive full credit).
 - f. Additional clarification is needed for topics such as community engagement, nature-based solutions, community investment benefits, and disadvantaged community benefits to promote consistent scoring and project implementation.
- 5. How would you rate the overall complexity of the current Scoring Criteria? Rate from 1 (Too Simple) – 5 (Too Complex).
 - a. 4
- 6. Please provide a brief explanation for your response, including any aspects of the Scoring Criteria that you believe are unnecessarily complicated or insufficiently detailed.
 - a. The overall scoring system is unbalanced, with some criteria overly complex while others overly simplistic.
 - b. Categories such as nature-based solutions, community engagement, and community investment benefits lack enough nuance to meaningfully distinguish between projects.
 - c. More graduated scoring scales, clearer metrics, and stronger definitions would better differentiate project quality and alignment with program goals.
 - d. The current framework does not adequately distinguish between high-quality and ineffective community engagement, allowing projects to receive points without demonstrating meaningful outcomes. Establishing minimum expectations would better reward strong performance and discourage superficial or ineffective efforts.
 - e. The same is true for nature-based solutions; the current framework does not adequately distinguish between high-quality and ineffective NBS. For example, minimal efforts such as planting “three trees” can receive similar credit for habitat or shade benefits as substantially larger investments, such as projects with 100+ trees. This reduces the ability to distinguish meaningful differences in community benefit delivery.
- 7. To what extent do you believe the current Scoring Criteria are applied consistently and transparently across projects? Rate from 1(Not Consistently and Transparently) - 5(Extremely Consistently and Transparently)
 - a. 2

8. Please Explain.

- a. The scoring process is generally transparent, and the Scoring Committee has done a good job applying the criteria consistently.
- b. Consistency is generally stronger within the same project type, but comparisons across planning, design, construction, and O&M projects can be challenging and we would like to see separate rubrics for separate phases.
- c. The level of evaluation varies across categories, with water quality receiving more rigorous assessment than some co-benefit categories. As such, projects that prioritize different SCWP goals (water quality vs nature-based solutions) are not assessed equitably.
 - i. Some scoring criteria rely on broad definitions or binary thresholds, leaving room for subjective interpretation.
 - ii. Expanding point values and creating more graduated scoring tiers for community engagement, nature-based solutions, and community investment benefits would better recognize projects that excel in these areas and better support these program priorities.
- d. Regional autonomy provides flexibility, which is good, but can also result in differences in how scoring criteria are interpreted and applied once a project moves on to WASC considerations. While project scores were intended to determine which projects advance to the WASC (not to drive funding decisions), in practice, some WASCs rely heavily on scores when selecting projects for funding. Improving the scoring criteria might make it a better decision-making tool. Either way, we recommend also creating clearer expectations for how scores are used by WASCs.

9. To what extent do you believe the current Scoring Criteria effectively evaluates projects that address the most pressing water-related issues in Los Angeles County? Rate from 1(Not effective) – 5(Very effective).

a. 2

10. Please provide brief justification for your answer, including identification of what you believe these issues are.

- a. Water quality priorities are well addressed, particularly stormwater capture and pollutant reduction, which is critical given that stormwater is the largest source of surface water pollution in Los Angeles County.
 - i. The framework could still better evaluate how individual projects contribute to long-term regulatory outcomes, including compliance with MS4 Permit requirements.
 - ii. The Water Quality criteria could also better recognize projects that reduce pollutants beyond those associated with existing TMDLs, including site-specific contaminants.
- b. A one-size-fits-all approach does not fully reflect the distinct water challenges across Los Angeles County's nine watersheds, reinforcing the need for more watershed-specific considerations in scoring.

- c. The scoring criteria effectively support projects that prioritize water quality, and that incorporate elements of other program goals, but under-recognize many well-rounded, multi-benefit projects with a strong focus on other program goals, such as nature-based solutions or climate adaptation benefits.
 - i. Broader climate adaptation goals are not consistently or explicitly captured within the current structure, limiting recognition of benefits such as heat reduction, habitat creation, and community-serving green space.
 - d. The current framework does not recognize environmental water supply benefits, despite their importance to long-term watershed health. Projects that restore natural hydrology, support groundwater-dependent ecosystems, and improve environmental flows provide significant benefits that should be recognized either by expanding the Water Supply category to include environmental water supply, or by increasing the value assigned in the NBS category for the project elements that deliver these environmental water supply benefits.
11. Are there any Feasibility Study Guidelines components (e.g., water quality, water supply, community investment benefits, nature-based solutions) that you feel are overemphasized or underemphasized?
- a. Water Quality (WQ) - slightly overemphasized
 - b. Water Supply (WS) - slightly overemphasized
 - c. Community Investment Benefits (CIB) - slightly underemphasized
 - d. Nature-Based Solutions (NbS) - slightly underemphasized
 - e. Disadvantaged Community (DAC) Benefits - extremely underemphasized
 - f. Community Engagement (CE)- extremely underemphasized
 - g. Leveraged Funds (LF) - well balanced
12. Please provide justification or any comments.
- a. WQ - slightly overemphasized
 - i. Water quality is appropriately central, but its emphasis can overshadow how projects contribute to long-term watershed resilience and integrated planning goals.
 - ii. Water Quality cost-effectiveness is extremely overemphasized and does not fully account for the value of projects that deliver multiple benefits. Projects that provide greater overall public value (habitat, climate adaptation, community investments, etc.) may appear less cost-effective than projects that focus on delivering one or two benefits. This can overshadow broader watershed management goals, regulatory outcomes (including MS4 compliance), and innovative, multi-benefit project design.
 - iii. The current structure allows projects to achieve sufficient points through Water Quality alone, potentially bypassing meaningful contributions to CIB and NBS (central to Measure W voter intent).
 - b. WS - slightly overemphasized
 - i. Water Supply is slightly overemphasized within the scoring criteria, particularly for some watersheds with limited infiltration opportunities.

- ii. Even with a slight overemphasis in scoring, this category is lacking significantly in implementation and might be worth re-evaluation to better recognize beneficial uses of water.
 - 1. This category should better recognize environmental water supply benefits that are currently missing within the program.
 - iii. The current structure allows projects to achieve sufficient points through Water Quality and Water Supply alone, potentially bypassing meaningful contributions to CIB and NBS (central to Measure W voter intent).
 - c. CIB - slightly underemphasized
 - i. As currently structured, projects can advance without meaningfully incorporating CIB, despite strong community interest in these types of benefits and outcomes.
 - ii. Community Investment Benefits lack sufficient thresholds and specificity in current metrics.
 - 1. The current framework would benefit from clearer, more graduated metrics for CIB, such as trees per acre, expected shade canopy at maturity, and species diversity or habitat value.
 - iii. Either increasing the total points allocated to CIB or providing more detailed scoring thresholds would better reflect the scale and quality of community benefits being delivered.
 - iv. Community Benefits should be required components with minimum scoring thresholds rather than optional or easily bypassed categories.
 - d. NbS - slightly underemphasized
 - i. Given their role in providing co-benefits such as habitat creation, heat reduction, and public space improvements, NBS should be more closely weighted to align with water supply benefits.
 - ii. This category also lacks sufficient thresholds and specificity in current metrics. For example, minimal efforts such as planting “three trees” can receive similar credit for habitat or shade benefits as substantially larger investments, such as projects with 100+ trees. This reduces the ability to distinguish meaningful differences in community benefit delivery.
 - iii. Either increasing the total points allocated to NBS or providing more detailed scoring thresholds would better reflect the scale and quality of co-benefits being delivered by NBS.
 - iv. Nature-based Solutions should be required components with minimum scoring thresholds rather than optional or easily bypassed categories.
 - v. Build on the work of the Nature-Based Solutions Task Force ([County Water Plan Nature-Based Solutions Task Force | Watershed Health](#)). While the Task Force was not charged with developing SCWP scoring recommendations, it created practical tools and guidance for evaluating nature-based solutions that could help strengthen scoring criteria and better recognize the benefits that NBS projects provide.

- e. DAC - extremely underemphasized
 - i. No point allocated at all for this category, which demonstrates its lack of meaningful emphasis in the program.
 - 1. Allocating dedicated points to this category would introduce a clear checkpoint to confirm and document these benefits, rather than leaving it solely to individual WASCs to define or raise the question.
 - 2. This would not preclude projects from receiving funding, but would ensure DAC benefits are consistently and explicitly considered in all evaluations.
 - ii. Consider moving away from an all-or-nothing approach and instead increasing a proportional “community benefit ratio” so that projects receive credit scaled to the level of benefit provided, rather than relying on binary or threshold-based determinations.
- f. CE- extremely underemphasized
 - i. There is no meaningful scoring spectrum to distinguish levels of engagement quality or effectiveness.
 - ii. We recommend using the Spectrum of Community Engagement to Ownership: [Spectrum 2-1.pdf](#)
- g. LF - well balanced
 - i. This category would benefit from a more graduated, spectrum-based scoring approach rather than the current step system (e.g., 3 points for 25% and 6 points for 50%).

13. To what extent do you think the current Scoring Criteria effectively evaluates different types of projects (e.g., large vs. small projects, different funding phases, different watershed conditions)? Please rate 1(Low Effectiveness)-5(High Effectiveness)

a. 2

14. Please explain.

- a. The current Scoring Criteria provides a general framework for evaluating projects, but it does not consistently or effectively differentiate between large and small projects, different funding phases, or differences between watersheds, including variability in permeability, pollutant loads, available open space, and buildable land, which limits fair comparison across projects/regions.
- b. Small projects in particular face challenges in achieving sufficient water quality or water supply points to compete effectively, which may unintentionally disadvantage community-scale or innovative projects.
- c. A more watershed-specific approach to scoring could improve alignment with local conditions and project feasibility
- d. Guidance documents have improved clarity around project phases, but the scoring framework itself has not been fully adapted to reflect those differences in evaluation.

15. How could the revised Scoring Criteria more effectively incorporate and reflect community needs and priorities in light of the new Community Strengths and Needs Assessment?
- Require applicants to clearly justify how proposed project benefits are tied to documented community needs (e.g., CSNA, park needs assessments, heat maps, or other engagement data), ensuring that Community Investment Benefits reflect actual community-stated priorities rather than assumed benefits.
 - Strengthen scoring by requiring evidence that projects address identified community needs, with the expectation that full Community Investment Benefits points should not be awarded unless those needs have been identified and documented as discussed above (e.g., CSNA, park needs assessments, heat maps, or other engagement data).
 - Include Tribal engagement as a distinct and explicitly recognized component within both the CSNA and Scoring Criteria, ensuring it is meaningfully considered rather than embedded within general community engagement categories.
16. Are there barriers within the current FSG process that may limit participation from certain groups or communities? Please rate the extent of these barriers on a scale of 1(No Barriers)-5(Significant Barriers).
- 5
17. Please provide brief justification for your answer.
- The application process is resource-intensive and creates a high burden in terms of staff time, funding, and technical expertise, which can limit participation from smaller municipalities, community-based organizations, and tribal entities.
 - The Technical Resources Program (TRP) is helpful, but still requires significant time and capacity, and is not equally accessible to all applicants.
 - Requirements for letters of non-objection and early O&M commitments create significant hurdles, even for projects seeking TRP funding. Requiring agency commitments before feasibility is established can discourage innovation and delay worthwhile projects. The process should distinguish between feasibility-stage funding and implementation-stage approvals so promising projects can move forward before long-term ownership and O&M decisions are required.
 - Cost-effectiveness requirements under the water quality category can disproportionately disadvantage smaller or distributed projects, even when they provide strong local or community benefits.
 - The scoring framework favors larger, more resourced applicants and projects that align more easily with water quality metrics, while creating barriers for nature-based solutions or community-centered projects.

18. What specific changes would you recommend to improve the SCW Program Scoring Criteria?

- a. Align scoring with real-world outcomes and climate adaptation priorities, including explicit connections to community needs assessments, disadvantaged community priorities, MS4 compliance outcomes, and long-term watershed resilience.
- b. Rebalance scoring categories, with metrics-based and graduated scoring across all categories, to better align with multi-benefit program goals, elevating Community Benefits, NBS, and Community Engagement so they are more comparable to Water Quality and Water Supply, rather than being secondary considerations.
- c. Introduce mandatory minimum expectations for categories like Community Benefits and Community Support, to ensure all funded projects meaningfully address community needs.
- d. Improve accessibility for smaller, community-based, and less-resourced applicants to supporting more equitable participation.
- e. Develop watershed-specific scoring to better reflect differing physical and environmental conditions across LA County.
- f. Update criteria to emphasize impervious surface reduction to incentivize hardscape removal and increased infiltration.
- g. Incorporate learning from completed projects and performance data to continuously refine scoring criteria and improve alignment with actual project effectiveness over time.

19. How should the FSG evolve to reflect recent SCW Program developments (e.g., Initial Watershed Plans, updated metrics, policy changes)?

- a. The FSG should function as a living, adaptive management tool that is regularly updated based on program learning, implementation experience, emerging watershed priorities, and feedback from completed projects.
- b. Stronger integration with Watershed Plans should guide scoring updates, with projects receiving recognition across categories when they directly advance watershed-specific goals and priorities.

Sincerely,

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

CC: Matt Frary, Bruce Reznik, TJ Moon

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.