



May 11, 2018

Mr. Mark Pestrella, Director  
Los Angeles County Department of Public Works  
900 South Fremont Avenue  
Alhambra, California 91803

Dear Mr. Pestrella:

### **COMMENTS ON SAFE, CLEAN WATER PROGRAM**

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LA Sanitation (LASAN) and the Los Department of Water and Power (LADWP) appreciate the efforts and leadership of the Los Angeles County (LA County) Board of Supervisors, and the Los Angeles County Flood Control District (LACFCD) in establishing the Safe, Clean Water (SCW) Program and the opportunity to provide comments on the Draft Program Elements of the SCW Program.

Our agencies strongly believe that by working collaboratively together as a region and within the respective watersheds, we can achieve compliance with the stormwater permit and the water quality mandates while augmenting our local water supply by capturing and infiltrating stormwater, addressing flooding and related public safety risks, and enhancing the quality of life in our communities with focus on our burdened and disadvantaged communities. Through the process of the development of the Enhanced Watershed Management Plans (EWMPs) and the corresponding Coordinated Integrated Monitoring Plans (CIMPs), we have demonstrated that we all can come together, work together and succeed together. We are sure that we can continue the same sense of collaboration as part of the SCW Program.

As we continue to work through the SCW Program stakeholder process and directly with your staff, the following summarizes our general comments on the draft SCW Program:

- The governance structure as currently proposed and constituted in the SCW including the composition of the Watershed Area Steering Committee and the proposed boundaries of the Regional Watershed Areas is appropriate. Maintaining the integrity of the watersheds is extremely important to the City to ensure maximum efficiencies and effectiveness and to ensure compliance with the watershed based and stakeholder developed Enhanced Watershed Management Plans (EWMPs). In addition, we recommend that members of the Watershed Areas Steering Committees (WASC) should not be excluded from discussions or voting on projects within their jurisdictions.

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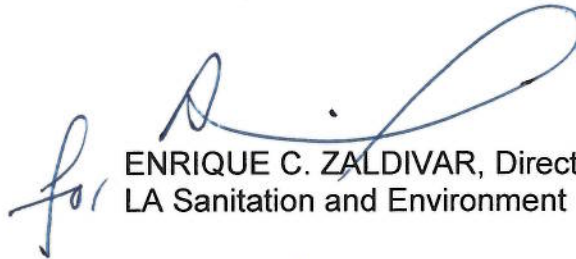


- Funding that benefits burdened and disadvantaged communities should not be less than 110% of the ratio of those populations as compared to the total population in the Watershed Area. In addition, priority should be given to investments in these areas as part of the Local, Regional and District Programs.
- The principle of Equity should be further strengthened in the program overall by including a definition of equity and expanding the policy goal of “Equity for Disadvantaged Communities” by recognizing the nature of localized needs in those areas. The definition of Disadvantaged Community should be modified to ensure inclusion of disproportionately burdened communities and populations, including those identified in the CalEnviro Screen 3.0.
- Flood mitigation projects and other measures to protect the related public safety, improve the quality of life and convey runoff for capture, should be a main element of community investment benefits as part of the Regional Program project scoring criteria and as part of the direct funding in the District Program. Expenditures for flood control conveyance projects that capture and convey stormwater to a local or regional project should be eligible under the SCW Program.
- The Regional Program should give priority to EWMP projects because EWMPs are approved by the Regional Water Quality Control Board, incorporate stakeholder input and emphasize multi-benefit projects. In addition, Cities should be able to designate high priority zones within the watersheds that have the highest urgency and opportunity for project implementation.
- The SCW Program should acknowledge and reward cities that have already invested in the implementation of local and regional water quality projects. This includes allowing for the operation and maintenance costs of these recently completed projects and any repayment of loans on ongoing construction to be eligible under the respective local and regional programs. In addition, a project that is constructed with partial funding from the SCW Program should be eligible for operation and maintenance funding for the entire project from the SCW Program.
- It is recommended that Project Applicants other than cities or LA County within the watershed should obtain sponsorship from a City or the LA County within that watershed. This will help streamline implementation, support acquisition of local permits and authorizations and ensure that long term operation and maintenance is addressed.
- It is recommended that the SCW Program consider options to mitigate the impact of the tax on low income property owners.

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We truly appreciate your consideration of our comments and we look forward to further discussing these comments with you. If you have any questions, please contact LASAN Assistant Director, Mr. Adel Hagekhalil at (213) 485-2210.

Sincerely,

for

ENRIQUE C. ZALDIVAR, Director and General Manager  
LA Sanitation and Environment

for

DAVID H. WRIGHT, General Manager  
Los Angeles Department of Water & Power

ECZ:AHH:SK:HC:vg  
WPDCR9421

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