



The RIVER PROJECT

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May 11, 2018

TO: Hon. Sheila Kuehl, Chair, Los Angeles County Board of Supervisors
Hon. Janice Hahn, Chair Pro Tem, Los Angeles County Board of Supervisors
Hon. Hilda L. Solis, Supervisor, First District, Los Angeles County
Hon. Mark Ridley-Thomas, Supervisor, Second District, Los Angeles County
Hon. Kathryn Barger, Supervisor, Fifth District, Los Angeles County
Mark Pestrella, Director of Public Works, Los Angeles County

RE: Safe, Clean Water Program

Dear Los Angeles County Board of Supervisors,

The River Project (TRP) is a 501(c)(3) nonprofit with a mission to encourage responsible planning and management of our lands, working toward living rivers nourished by healthy watersheds for the social, economic, and environmental benefit of our communities. TRP supports the May 30, 2017 motion by Supervisors Sheila Kuehl and Hilda Solis *Regional Water Resilience Planning, Outreach, and Engagement, and Stormwater Capture Expenditure Plan*. We appreciate the intent of the Safe, Clean Water Program and are committed to working with all stakeholders to secure a safe, healthy, and climate-resilient future for all Angelenos.

The motion by the LA County Board of Supervisors calls for a plan that:

- Emphasizes projects providing multiple benefits that increase water supply
- Improves water quality
- Provides community enhancements such as greening of schools, parks, and wetlands
- Increase access to rivers, lakes, and streams

Nature-Based Solutions realize these goals above and beyond alternative approaches, and must be a core part of such a motion.

Nature-Based Solutions rely predominantly on soils and vegetation to restore the natural ecosystem processes required to slow, detain, and absorb water, infiltrate water to aquifers, filter pollutants out of water and air, sequester carbon, support biodiversity, provide shade, and aesthetically enrich environments. Examples include strategically undeveloped mountains and floodplains, wetlands, rain grading, mulched areas, soil conservation and enhancement, tree and vegetation planting, and parkway basins.

TRP supports the Program Outcomes supported by Our Water LA:

- Safeguarding public health and well-being;
- Advancing regional water resilience to mitigate against extreme weather variability, including increased drought, flood risk and urban heat;
- Reducing pollution to, and improving the health of, waterways and habitat throughout the region;
- Increasing local water supply to lessen the region's carbon footprint by reducing reliance on imported water and other energy-intensive water strategies;

- Enabling municipalities to comply with legal and regulatory stormwater cleanup requirements;
- Protecting and revitalizing communities through increased green space for habitat, climate mitigation and recreation, particularly in underserved communities;
- Building environmental awareness that encourages and trains individuals and communities in watershed stewardship;
- Promoting green jobs across the region and solidifying Los Angeles County as the national leader on transitioning to a green economy.
- Prioritizing distributed and neighborhood-scale nature-based solutions that create multiple benefits
- Furthering equity and environmental justice

From this framework we make the following recommendations:

Broaden Program Targets

Page 19 N. Stormwater Management Targets: Add a new item c. Set achievable targets for impervious surface reduction. Each Watershed Group will develop and be responsible for implementing an integrated holistic WMP that has climate adaptation and resilience as it's principle driver. A key principle of watershed management is managing rain where it falls. A key metric of a healthy watershed is the % imperviousness. Add target % imperviousness to wq/ws/cb targets and include them in plan.

Provide sufficient support for Watershed Coordinators

For the \$7.5 allocated for technical assistance, dedicate a minimum of \$3 million to appropriately staff Watershed Coordinator offices in each of the 9 watershed areas.

Page 23 allocates \$20M over 5 years (~\$4M/year) for a wide range of critical programs including Watershed Coordinators, public and academic educational programs, and workforce job training. This stands in contrast to the \$7.5M/year set aside for special studies, monitoring, modeling, project feasibility study development, providing technical resources for community groups, such as DACs, NGOs, and CBOs described on page 10.

Page 13 Regional Program: Initial Year Events Watershed Coordinator Groups established and staffed, Stakeholder Groups formed to support program guidance from the onset.

Watershed Coordinators should convene and facilitate ongoing, inclusive, and diverse participatory Stakeholder engagement—resulting in actual agency for participants—using the CA Department of Conservation Program as a model. The Watershed Stakeholder Groups these Coordinators support should determine what project feasibility studies and technical assistance is required, choose appropriate subcontractors to assist them, and be able to draw from a budget set aside for these needs. This is the ‘ground’ from which things go ‘up.’

Watershed Area Steering Committees should be guided by Watershed Stakeholder Groups. The description on Page 23 appears to describe an outreach coordinator, rather than a mechanism to advance a meaningful, equitable, and participatory stakeholder-driven process.

Ensure appropriate technical assistance is available

Page 4 III. Definitions, define the Technical Committee

Specify which positions within the District will staff the technical committee

Page 6: Stakeholder Advisory Committee as defined should be Stakeholder Technical Advisory Committee, and review process should be collaborative as with the Basin Study process.

Page 10 Scientific Studies and Technical Assistance for the Development of Feasibility Studies (up to 5% of Regional Program Funds): Specify that technical experts may include but are not limited to planners, designers, engineers, biologists, hydrologists, and soil scientists. Maintain flexibility to ensure appropriate technical expertise may be selected on an as-needed basis.

Adjust definitions

Page 5: Delete 'or' and pluralize 'Benefit' in definition of 'Multi-Benefit Project'

Page 5: Remove the words 'any of' in the definition for Nature-Based Solutions

Page 6: Add '...and Nature-Based Solutions will be prioritized.' to Regional Project

Page 6: Add 'set goals for regional flood safety' in Stormwater Management Targets

Add: Definition of Watershed Coordinators

Add: Wetlands, inclusive of riparian areas

Ensure measurable, clear inclusion of multiple benefits

Reference attached Regional Project Criteria TRP Redlines for project selection criteria

Embracing nature's services is becoming increasingly vital to support a better future. Given the mounting threats of climate-change and a growing population, we do not have land, funds, or other resources enough to continue investing in single-purpose projects. Taking into consideration a fuller range of demanding regional challenges, multi-benefit projects are often most cost-effective for regional, cross-agency and cross-jurisdiction benefits.

Important factors necessarily include meaningful provisions to support:

- Water supply
- Water quality
- Flood Management
- Air quality
- Carbon sequestration
- Carbon footprint
- Energy and material efficiency
- Habitat
- Community engagement
- Cost-effectiveness
- Urban cooling
- Aesthetics and quality of life

Ensure clear support for distributed projects

Including supportive language, definitions of different project types, and adjusting scoring criteria for smaller cost-effective projects will be instrumental to accomplish program objectives.

The Basin Study included several top and high-scoring provisions for local stormwater capture, low-impact development, and supportive programs for impact and cost-effectiveness:

- Open Space Stormwater Improvements
- New park space (as green infrastructure)
- Infiltration at parks
- "Urban Acupuncture" (many small projects over the basin)
- Construct distributed BMPs upstream of lower efficiency spreading grounds
- Increase residential land use infiltration
- Rain gardens
- Use parkways and road medians to capture stormwater

Potential returns on investment in distributed projects are established, and municipalities from Seattle, Portland, New York, Philadelphia, and Tucson to small towns across the US have been capitalizing on this. Pilots and programs have demonstrated that these projects are cost-effective, meeting and exceeding targets for water quality and water supply, in addition to the manifold associated benefits they support. Like many other urban areas, the majority of Los Angeles is built out, reducing potential for large regional projects. Not only is there exponentially more space to realize distributed projects, but these projects also have potential to spread and diversify impacts and associated benefits, capitalize on resources already expended in landscape operations, and reduce impacts of individualized project failure.

Ensure development of a Residential Retrofit Program

Residential areas have particularly high potential for distributed, nature-based stormwater projects. Cost-effective retrofit projects have more potential installation locations, compound impacts, and leverage existing ongoing investments:

- Residential areas cover ~ 60% of the urban area, and ~ 70% of residential water use is outdoors. In aggregate, they contain the greatest potential area of beneficial impact.
- There are 1,686,137 single-family parcels in LA County. Several regional water plans recommend retrofitting at least 1% of these properties every year.
- Residential landscapes are concentrations of resources already expended in installations and operations: mowing, clearing, trimming, fertilizing, and managing
- The development of some combination of incentives, rebates, and credits to appropriately encourage residential property owners to participate in stormwater management will accelerate the region's ability to meet program objectives.

Develop a floodplain reclamation program component

Page 13 Regional Program: Initial Events Initiate action items to mobilize a broad range of affected community stakeholders and appropriate experts to develop an effective and equitable long-term floodplain buy-back program. Action must start now to allow the inclusive, deliberate, long-term process that is required. Reactive responses cannot address our challenges, and inaction continues to leave affected communities vulnerable to disaster.

Floodplain reclamation drives 3 of the highest-scoring solutions in Los Angeles Basin Study for comprehensive impacts and cost-effectiveness:

- Floodplain reclamation
- Implement a long-term floodplain buy-back study/program
- Investigate recharge along river embankments

Soft-bottom rivers and wetlands are essential to realize water supply, water quality, and flood management targets in the Los Angeles region. Additionally, wetlands including riparian areas support more species and sequester more carbon than any other habitat classification. As floodplain reclamation and MAR begin to advance as modern practice in the Central Valley and watersheds in Northern California, it's time for Los Angeles to act on the recommendations of the Basin Study and further explore the projected costs and benefits of such a nature-based approach.

Water Supply: According to the Metropolitan Water District of Southern California we have a groundwater deficit of 1.2 million acre feet (MAF) since 1986. Average water levels continue to decline, with the lowest levels ever in 2016 at 5-5.5 million acre feet. At the same time the USGS estimates that nearly 600,000 acre feet of water are directed to the ocean from the LA basin in an average year. Rivers once supplied all of the region's water, with many municipalities still supplying most of their water locally in the San Gabriel River watershed. The LA River has potential to supply a significant part of the region's population again.

Water Quality: According to the US EPA “[r]iparian buffers are a ‘best management practice’ (BMP) that should be used in conjunction with a comprehensive watershed management plan that includes control and reduction of point and non-point sources of nitrogen from atmospheric, terrestrial, and aquatic inputs.” The 2018 UN World Development Report states “wetlands also biodegrade or immobilize a range of emerging pollutants, including certain pharmaceuticals, and often perform better than grey solutions. For certain chemicals, they may offer the only solution.”

Flood Management: There is an imperative to buffer high-risk areas, with the USGS projecting an ARkStorm scenario like that of 1861 could generate losses three times greater than the largest possible earthquake, and has an equal probability of occurring. 432,815 housing units are already at risk in the 100-year flood zone. The National Institute of Building Sciences 2017 study evaluated 23 years of federally funded mitigation grants and found that the nation can save \$6 in future disaster costs for every \$1 spent on hazard mitigation.

Invest in Upper Watershed Management, providing provisions for (1) land conservation acquisitions and (2) conserved lands maintenance

Expanding protected lands and wise management are cost-effective investments central to the intent of the motion. Undeveloped lands—including the San Gabriel Mountains and natural bottoms of rivers and streams—account for a majority of local water supply. Additionally, managing appropriate wild-urban interface buffers is essential for:

- Mitigating fire, flood, and erosion impacts which are driving hazards in our region
- Sequestering carbon
- Cleansing air and water
- Providing critical species habitat in this region internationally recognized as an ecological hotspot
- Providing cultural resources, recreation opportunities, aesthetics, human restoration, and sense of place

California Assembly Bill 2480 Source Watersheds Financing defines watersheds as integral components of California’s water infrastructure, making maintenance and repair eligible for the same financing as other water collection and treatment infrastructure. This includes:

- (1) Upland vegetation management to restore the watershed’s productivity and resiliency.
- (2) Wet and dry meadow restoration.
- (3) Road removal and repair.
- (4) Stream channel restoration.
- (5) Conservation of private forests to preserve watershed integrity through permanent prevention of land use conversion and improved land management, achieved through, and secured with, conservation easements.
- (6) Other projects with a demonstrated likelihood of increasing conditions for water and snow attraction, retention, and release under changing climate conditions.

Ensure communities are empowered through *Regional Governance Structure and Selection Process Flowchart*

Page 15 The sector-specific stakeholder representatives and community stakeholder representatives should be nominated by the Watershed Stakeholder Groups.

Require robust participation of non-government organization (NGO), educational and public health institution, and community members in the governance structure, technical review, and selection process to support meaningful impacts on decision-making.

To date the Integrated Regional Watershed Management Plan (IRWMP) and similar processes such as the City of Los Angeles Proposition O have not resulted in meaningfully integrated projects with available monitoring or tracking on results. As evidenced by the lack of available monitoring data in the Southern California Water Coalition 2018 Whitepaper Update—despite impressive effort on the part of the authors—we are little further along now than we were a decade ago toward comprehensive watershed management and results-based decision making. Entities from the state level to local neighborhood councils have called for different approaches. Engaging more diverse perspectives in these conversations can be challenging. However, empowering these perspectives will result in more community support, stronger decision-making, and projects that better serve our communities.

We appreciate the County of Los Angeles' strong commitment to achieving a safe and clean water future for all residents and thank you for consideration of our comments.

Sincerely –

Melanie Winter
Founder & Director

Johnathan Perisho
Design & Policy Director

CC: Safe, Clean Water Program Stakeholder Advisory Committee
Leslie Friedman Johnson, Conservation and Natural Resources Group
Rachel Roque, Conservation and Natural Resources Group
Kelly Cook, Conservation and Natural Resources Group
Genevieve Osmena, Public Works, Los Angeles County
Los Angeles Regional Water Quality Control Board