



June 15, 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 and Director Pestrella,

Thank you for the opportunity to submit feedback on the second draft of the Safe, Clean Water Program draft program elements (SCWP or Program). We were glad to see many of the changes in Program released on May 25th. For the strongest possible program, additional important changes are required.

Jobs: Our public dollars should lead to economic as well as environmental resilience. Thank you for increasing the flexibility to use funds for project maintenance, encouraging use of a municipal workforce, and meaningfully increasing funding available for workforce development programs.

- Construction jobs should be family-sustaining and accessible to area disadvantaged residents – this is only achievable if a PLA and local/targeted hire policy apply to all large capital projects receiving SCWP funds, whether funded through the Regional, Municipal, or District programs.
- Projects must be well-maintained to function, so this work should be done by the public sector, either within a city or a County specialized team. The public sector will be able to build this capacity before new projects are constructed, given Regional program funds wouldn't be disbursed until 2020. To develop the pipeline into these jobs, the public sector could partner with approved workforce development programs.
- Workforce development programs must meet high standards, include labor-management partnerships and non-profit collaboration, prepare trainees for career placement, and pay trainees a living wage such as established in the County's living wage ordinance.

Equity: We must invest in the communities that need it most: low-income areas more likely to be polluted and sensitive to extreme weather like flooding and heat. Thank you for addressing what constitutes a "benefit" to a disadvantaged community, instituting Watershed Coordinator positions, and providing robust technical assistance.

- Larger cities' Municipal funds should be held to the same requirement of proportionally dedicating funds to disadvantaged communities. Over 40% of the County is low-income, and the Regional program's commitment is insufficient to address the need in these communities.
- The County's Regional Oversight Committee (ROC) should periodically assess how much total funding is being invested in these communities across all programs and funds.

- Given the escalating housing costs faced by many LA County residents, the County should explore how to mitigate the tax burden for renters and low-income homeowners, such as a “lifeline” style program to reduce the tax paid by low-income homeowners.
- Potential parcel-scale retrofit programs should prioritize low-income homeowners, apartments, and small businesses, and provide services rather than rebates to increase accessibility.
- Education programs on how to increase permeability and reduce water use should be aimed at low-income homeowners, renters, non-profits and small businesses, and incorporate information on which types of costs can be passed through to renters and which costs can't.

Health: Thank you for strengthening the criteria by which water quality is evaluated, and increasing the priority for nature-based solutions, community benefits, and community-based support. To achieve public health and the Supervisors' triune goals of water quality, supply, and community benefits:

- Priority should go to nature-based solutions, such as by requiring Regional projects to receive “Nature-Based” and “Community Investment Benefit” points to meet the threshold score.
- For safe, clean water, projects should meet pollutant load reduction thresholds.
- Projects criteria must evaluate and prioritize projects that can meet goals with minimal greenhouse gas emissions. Evaluations of cost-effectiveness must explore how to incorporate the value of co-benefits and the cost of secondary environmental impacts.

Democratic and Accountable Process: We were glad to see the additional community stakeholder seat and designated environmental and environmental justice seats on the Watershed Area Steering Committees (WASC). Thank you for reconfiguring the Regional Oversight Committee to be more independent and specifying procedures addressing misuse of funds/failure to comply.

- Community leaders should be able to get training on technical information to participate on the WASC, and should be represented on the Regional Oversight and Scoring Committees.
- The ROC should have the authority to review policy goal compliance for the Municipal and Regional program and should ensure peer review of all scientific studies completed.
- Strong community engagement in every step of project development and on the Scoring, WASC, and Regional Oversight Committees can help projects avoid unanticipated impacts.

Credit Program:

- The County should consider ways to ensure the credit program is accessible to multi-family dwellings in order to mitigate the potential tax burden to renters.
- High standards for project performance and construction should apply to any project funded via a credit program. Maintenance of commercial or industrial projects, when funded by an ongoing credit, must be maintained through a “green infrastructure”-certified workforce.

Thank you for your continued work on a secure water future for LA County.

Sincerely,



Lauren Ahkiam
Director, LAANE Water Project