



**The RIVER
PROJECT**

3912 Laurel Canyon Blvd., # 208

Studio City, California 91604

tel: 818-980-9660

www.TheRiverProject.org

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,

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 following are our general comments on the current draft of the Safe, Clean Water Program, in addition to the line-by-line comments attached.

Regional targets for stormwater management and water supply cannot be met without including tools and resources to facilitate better land management. This must include:

1. Residential retrofit program
2. Credits and Incentives program for residential properties
3. Training and Certification program for nature-based projects
4. Watershed Coordinator program

Robust criteria for project selection are key to realize the most cost-effective and impactful outcomes. These must require of installations that they can address regional challenges. Nature-based projects can realize regional challenges through cost-effective investments and small additions to existing projects. Guidelines through criteria are necessary to communicate this potential, as outlined in our previous comments and heard from community groups.

The River Project paper [Measuring Benefits of Distributed, Nature-Based Stormwater Projects](#) profiles the significance of these investments.

(1) RESIDENTIAL RETROFIT PROGRAM

Residential areas occupy approximately 60% of total land area. Distributed-scale residential projects not only capitalize on efficient use of space, but are necessary to realize regional targets set out in the Upper LA River and Ballona EWMPs, as well as the LADWP Stormwater Capture Master Plan and LA County Basin Study. For residential retrofits, an adoption rate of 1% of homes a year is assumed necessary to meet regional targets, or approximately 16,000 homes a year.

Properties cannot be retrofitted at a sufficient rate and a new normal cannot be established without support. The same resources invested into residential properties will result in more benefits that will spread wider with a growing industry than the same investments in large installations and single-purpose facilities. Remote sensing, no or low-fee permits, agreements, and web-supported tools provide means to track extent and impact of installations. Larger projects are only in few instances tracked or monitored, and what limited monitoring has been documented consistently demonstrates underperformance at higher than originally anticipated costs, as evidenced by the [SCWC 2018 whitepaper](#) finding that more data is needed.

The [2018 Water LA Report](#) demonstrates the potential of a successful program and expounds on specific elements necessary for success in Appendices E, F, G, and H.

(2) CREDITS AND INCENTIVES PROGRAM FOR RESIDENTIAL PROPERTIES

The [2015 Coalition for Our Water Future whitepaper](#) highlights key findings in response to the 2013 Clean Water/Clean Beaches Measure and offers several concrete recommendations on necessary elements for a successful program. In addition, [NRDC's Issue Brief on Philadelphia's Green Acres Retrofit Program](#) provides some good insights into a well-structured and inclusive program.

(3) TRAINING AND CERTIFICATION

The [2018 Water LA Report](#) provides detailed recommendations on a productive curricula, program structure, and placement in Appendix G. Essentially, Programs to train municipal employees in green infrastructure, such as the NGICP, are needed here locally and can be easily sponsored, adapted and implemented by the County, individual municipalities, or consortiums. However, Nature-based solutions require a different skill set than municipal green infrastructure. It can also offer a variety of living wage, green jobs. An appropriate training and certification program needs to be affordable and accessible broadly, and The River Project strongly believes that Community Colleges are the best venue for their delivery. Development of a Nature-based solutions program, as described in the above referenced Appendix G, should be a top priority if we intend to have capacity to meet quickly burgeoning demand.

(4) WATERSHED COORDINATOR PROGRAM

The IRWM process highlights the failings of a limited approach designed to *inform* people of decisions made *for* them to build projects that are *single-purpose, not understood, and not tracked*. Meaningfully engaging the public results in projects that people understand, can support, invest into, and steward. We have neither the space nor resources to waste people's tax dollars in unwanted and unproven single-purpose projects. Locally engaged and informed stakeholders often propose the most appropriate solutions and interventions to benefit both their communities and the region at large.

There are substantial resources for guidance to support of a robust Watershed Coordinator Program, including the [federal Interagency Watershed Training Cooperative's Working at a Watershed Level](#) and the [CALFED Bay-Delta Program Watershed Program Plan](#), including a training course and other support materials.

Essentially, Watershed Coordinators should primarily convene and facilitate regular and inclusive Stakeholder Group meetings and processes that result in equitable representation, participation, and collaboration. The Coordinators should be adequately staffed (we recommend an office and a staff total of three for each).

Additional information is provided below for reference.

Watershed Coordinator Grant Program

The Department of Conservation awarded competitive grants to special districts, nonprofit groups, and local governments to promote watershed management and local watershed improvements. The grant program supported watershed coordinator positions that facilitated collaborative efforts to improve and sustain the health of California's watersheds. The Watershed Coordinator Grant Program offered organizations a unique opportunity to improve and sustain the health of California's watersheds through a coordinated and collaborative approach.

As a cohesive approach, the WATERSHED CONCEPT helps us understand what problems residents might share in an area and what solutions might work. Residents within a watershed often share similar challenges. Landscapes in a watershed fit together like puzzle pieces; knowing what is going on upstream may help us understand issues downstream. Understanding a watershed helps us to understand water supply, the fate of nutrients and pollutants, soil erosion and deposition, crop options, wildlife habitat, urban development patterns, air quality, and many other important conservation factors.

A WATERSHED APPROACH relies on the premise that many water quality and ecosystem problems are best solved on a watershed level instead of focusing on an individual water body or the pollutant discharge level in a single location. According to the United States Environmental Protection Agency, "A watershed approach is the most effective framework to address today's water resource challenges. Watersheds supply drinking water, provide recreation and respite, and sustain life. More than \$450 billion in food and fiber, manufactured goods, and tourism depends on clean water and healthy watersheds."

The Watershed Coordinator Grants (WCG) were established to improve watersheds throughout California by providing support for watershed improvement efforts at a local level. The WCG was a part of California's Statewide Watershed Program (SWP). The SWP's purpose was to advance sustainable watershed-based management of California's natural resources through community-based strategies. The SWP was administered through the Department of Conservation (DOC) and provided watershed resource information, grants, and technical support.

The WCG differed from other grant programs in that it did not provide project funding. Instead, it built much needed human resource infrastructure by creating a network of local experts who could implement efficient and effective resource management. This army of experts works to improve and conserve clean water, build local economies, protect the environment, and address critical needs where it is most effective - at the local level.

The purpose of the WCG was to improve watersheds throughout California by improving streams, rivers and the surrounding land through locally-led planning and action.

The CALFED Watershed Program focused on supporting local watershed activities, facilitating coordination and assistance, developing watershed monitoring and assessment protocols, and supporting education and outreach.

WHAT DO WATERSHED COORDINATORS DO?

Watershed Coordinators improve our water, streams, rivers, and surrounding land to create a better environment by working with their communities at the local level.

- Making water cleaner for people, plants and animals
- Addressing water supply issues
- Improving groundwater storage capacity
- Creating homes for fish and wildlife
- Protecting people and their livelihoods
- Thinking bigger - planning for system wide effects
- Teaching people to save water
- Building a system to keep water flowing
- Promoting smarter environmental planning

ECOSYSTEM FUNCTION: A HEALTHIER CALIFORNIA FOR PEOPLE AND NATURE

Coordinators play a significant role in improving ecosystem function in watersheds throughout the state. They are able to integrate local, state, and federal conservation priorities, identify resource conservation needs locally, help stakeholders create solutions and implement on-the-ground projects that meet those conservation needs.

BUILDING PARTNERSHIPS: STRONGER RESULTS BY WORKING TOGETHER

Watershed Coordinators built extensive networks and facilitated collaborative decision-making between private and public entities to develop and implement actions that best address local issues. Coordinators are familiar with issues relevant to their watersheds and have become an important resource to their communities.

TECHNICAL ASSISTANCE: GOOD SCIENCE FOR EVERYDAY DECISIONS

Coordinators developed scientific and technical reports as well as watershed management plans to identify and evaluate opportunities in their watersheds in order to achieve positive natural resource outcomes. Coordinators also worked with landowners to solve specific problems. This type of technical assistance increases the number activities that make water cleaner, build wildlife habitat, and protect farmland.

OUTREACH: HELPING PEOPLE SAVE WATER AND MAKE BETTER CHOICES

Educating local stakeholders creates a more informed citizenry that is better able to protect its resources, prevent future problems and effectively manage future problems as they arise. Watershed Coordinators held public outreach events including land management workshops, watershed celebrations, landscaping demonstrations, community forums and restoration activities. Topics included wildlife enhancement practices for urban and rural landowners, irrigation efficiency for farmers, holistic grazing for ranchers and water conservation for homeowners. The Coordinators also educated kids and young adults by working with teachers and creating school-oriented watershed education programs.

Sample Job Descriptions for Watershed Coordinator from across the country

The watershed coordinator will be responsible for developing a watershed management plan for the XX River in a manner that is inclusive of all stakeholders. The coordinator will work closely with government agencies, non-profits, and individual citizens in the community to develop the plan. The coordinator will organize and facilitate steering committee meetings, arrange logistics for public meetings, prepare draft and final plan documents, coordinate volunteers, and collect water samples as necessary. Specific duties are discussed below.

Major Duties

Watershed Planning. Provide leadership in developing a watershed management plan through the collection and analysis of land use and resource information, identification and clarification of stakeholder concerns, establishment of goals, and supporting locally initiated strategies. The ability to identify pollutant sources, causes, and critical areas within the watershed is crucial. The plan must conform to EPA's nine elements.

Provide leadership in **community outreach** efforts related to watershed planning. This includes developing and disseminating outreach materials to stakeholders at venues such as community events and networking among agencies, organizations and individuals. The coordinator will be responsible for outreach such as preparing press releases, PowerPoint presentations and displays.

Summarize **water quality monitoring efforts** from summer 2012. Summarize **social monitoring** and indicator pilot project to measure current awareness level and citizen behavior. **Coordinate Steering Committee** activities. Provide technical support to the steering committee. Assist in preparing meeting agenda and coordinating activities to implement project. Provide leadership to develop strong working relationships among steering committee members, stakeholders, and other federal, state, local government. The Coordinator will also assist subcommittees as necessary.

The Watershed Coordinator's primary responsibility is to coordinate with partner organizations the implementation, tracking, and progress reporting for the Watershed Management Plan (WMP). This position requires an individual with broad watershed science experience, and the technical skills required for planning, implementing and monitoring program activities throughout the watershed.

The Watershed Coordinator has a firm understanding of watershed ecology, both from the land and bays perspective, and works with the Science Coordinator to ensure that the best available science and policy drives plan implementation. The Watershed Coordinator develops operational plans for WMP objectives, tracks and reports their progress, and coordinates revision as necessary. This Watershed Coordinator has significant grant writing and grant administration responsibilities and may oversee contractors and/or an employee.

Principal Duties and Responsibilities

Coordinate and provide the program lead for a WMP Implementation Committee consisting of high-level staff of partner organizations responsible for the implementation of the WMP. Acts as a liaison between partners in facilitating the tracking of the WMP accomplishments and milestones.

- Develop progress reports as necessary for program funding agencies, and coordinate data and watershed actions being accomplished by partners. This includes development of milestones and tracking water quality, habitat restoration and natural resources leveraging data.
- Provide field assistance to the program science team with research related monitoring and data collection as well as project management assistance for habitat restoration goals.
- Coordinate climate adaptation and resilience activities.
- Coordinate and provide direction to the Citizen Advisory Committee that in turn functions to assist with local citizen input.
- Provide assistance with communications by contributing to newsletters, digital media and public outreach.

Preferred Attributes for Consideration include:

- Master's degree in a natural resource management or environmental planning, science or related field and two years' natural resource management experience is preferred. A Bachelor's degree in any of the above disciplines and five years of relevant experience is the minimum requirement.
- Demonstrated success in coordinating with multiple agencies to accomplish goals within a comprehensive management plan.
- Understanding of coastal natural resource issues and processes, particularly those that impact local habitat and water quality.
- Have in-depth knowledge of their specific area of job responsibility, science subject matter and geographic location as it pertains to the watershed.
- Be knowledgeable and able to interact with other agencies and groups related to their assigned responsibilities.
- Be effective at communicating with groups of scientists, educators, resource managers, and public representatives, and possess the ability to manage data and information collected from all sources.

We appreciate your attention to these comments and those in the table attached below.

Sincerely –

Melanie Winter
Founder & Director

Johnathan Perisho
Design & Policy Director

CC: Russ Bryden, Public Works, Los Angeles County
Genevieve Osmena, Public Works, Los Angeles County
Matt Frary, Public Works, Los Angeles County
Leslie Friedman Johnson, Conservation and Natural Resources Group
Rachel Roque, Conservation and Natural Resources Group
Kelly Cook, Conservation and Natural Resources Group
Deb Smith, Los Angeles Regional Water Quality Control Board

The River Project comments on the public draft Safe, Clean Water Program documents

June 15, 2018

#	Section	Page	Comment
	Global Comment		The terms Community Investment Benefit and Community Enhancement Benefit are used interchangeably throughout the draft documents. We recommend applying a term consistently, and the use of Community Enhancement Benefit as it is more descriptive of the intent, especially for voting stakeholders. Community Investment Benefit may evoke different things for some people, such as Community Redevelopment, which has historically been perceived as non-inclusive and more development-oriented than what is intended here.

Ordinance

1	16.03.A		Change 'impermeable surface' to 'effective impermeable surface'—adding a definition to the definition section—to clearly communicate that installations such as permeable paving, infiltration trenches, drywells, etc. that are realizing the intent of the measure, while they may read as impermeable surfaces from high resolution imagery, are not intended to count against parcel tax. Similarly rain tanks, cisterns, and rain grading that manage runoff from measured impermeable roof areas. While it is understood that the County may not have the tools to measure this distinction up front, it will be important for property owners to understand the difference. They will better appreciate the purpose of the ordinance and can know up front that they will have a mechanism to demonstrate compliance.
2	16.03.C		Capitalize Programs as Projects are capitalized. Utilize throughout document as appropriate.
3	16.03.C Definitions		Add definition of Programs (see above) to distinguish between District Program, Municipal Program, and Programs that are distinct from Projects
4	16.04 Definitions		Add definition for 'effective impermeable surface'. Suggest: "Any surface that effectively facilitates stormwater runoff from a property without appropriate intervention from a BMP."
5	16.04.G		Restoration is an outstanding goal, however, this word has technical definitions that set a high bar. Also include 'ecological enhancements' to afford credit for smaller interventions such as native plants and healthy soil that also provide worthy ecological value.
6	16.04.O "Multi-Benefit Project"		Remove the words 'either or both', and make 'Community Enhancement Benefit' plural 'Benefits'
7	16.04.S "Nature-Based Solution"		Remove word 'component', revise definition to: "Projects that provide Water Quality, Water Supply, and Community Enhancement Benefits by relying predominantly on soils and vegetation to restore natural ecosystem processes. Such projects: slow, detain, and absorb water; infiltrate water to aquifers; filter pollutants out of water and air; sequester carbon; support biodiversity; provide shade and cooling; and aesthetically enrich environments. Project types may include: rain gardens and grading; soil building with mulch and compost; tree and vegetation planting; parkway basins; and strategically undeveloped mountains, floodplains, and wetlands."
8	16.07.A.1.		We appreciate the provision for advance funding, especially for NGOs and CBOs. This can remove at least one barrier to participation for partners and stakeholders that have historically contributed to innovative, equitable, and community-appropriate solutions.
9	16.07.A.2.d.		We are pleased to see inclusion of residential retrofits in the ordinance. With approximately 60% of the developed land in the County, single-family residential properties are key to realizing overall stormwater goals.
10	16.07.A.2.h.		Inclusion of debt financing here begs the question of whether it may be prudent to also include an item allowing for the potential for the County itself to utilize some portion of Regional funds to contribute to and/or establish a funding bank that could be responsive to acquisition of mountain, floodplain, or wetland properties as they become available to market. Such a funding bank might also be set up to be a regional repository for developer credits, mitigation funds, EIFD funds, and/or other resources as appropriate. The County's LA Basin Study concluded that floodplain reclamation projects were among the most effective and cost-effective possible actions, which can be addressed by a floodplain buyback program. This bank could also serve as a placeholder for a more comprehensive program to be developed in future.
11	16.07.B.4,		We find it appropriate for the County to hire the Watershed Coordinators, but feel strongly that watershed stakeholders should have a voice in their selection. Watershed Area stakeholder groups would collectively make recommendations to the Watershed Area Steering Committee, who would then submit those to the County for final approval and hiring. This ensures equitable engagement from affected stakeholders, who through such a process are provided a voice in their representation.
12	16.07.B.5		Suggest being more inclusive here. Revise to: "Regional Watershed planning and coordination, scientific studies, modeling and monitoring of Water Quality, Water Supply and Community Enhancement Benefits."
13	16.07.B.6		We would like to point out that \$25-million over a five year period may be insufficient if it is anticipated that a Residential Retrofit Program is to be funded under this allocation. There are over 1,686,000 single-family properties in the County. Regional planning documents, including some EWMPs, the County's Basin Study, and DWPs Stormwater Capture Master Plan, have all made a point of acknowledging that we cannot reach our CWA goals without significant investment in private properties. Target recommendations range from 1% to 4% of these properties per year. For reference, the City of Philadelphia's Green Acres program is looking at a \$10M annual investment in incentives for private property retrofits. The need in Los Angeles County is even higher.
14	16.07.B.6.a.-c.		We want to be certain that education curricula and workforce training programs funded and developed under this provision can ultimately be delivered independently through Community Colleges. Such an approach would be most cost-effective for the County, and most affordable and equitable for the target audiences. Consider adding language to clarify.
15	16.07.C.		Given the intent of the underlying motion which stresses Nature-Based Solutions, we strongly recommend deleting the "/or" in the fifth sentence of the first paragraph here.

#	Section	Page	Comment
16	16.07.D.1.		Multi-Benefit Projects by definition include more than two benefits. To meet the intent of this ordinance and advance practice in the region, Multi-Benefit should include water quality, water supply and at least three of the articulated community enhancement benefits. Therefore, please revise the first sentence to read: "The Infrastructure Program shall implement Multi-Benefit watershed-based Projects that have Water Quality, Water Supply, and Community Enhancement Benefits."
17	16.07.D.1.a.		Please clarify if the intent here is to require a Feasibility Study performed by the Technical Assistance team prior to a Project being considered as eligible. Alternatively, articulate what other proof of feasibility would qualify. As an example: projects developed under the Tujunga/Pacoima Watershed Plan were subject to intense review and Decision Support System modeling by agencies, engineers, and other subject matter experts prior to being included in the final plan document. Would projects such as these be required to undergo an additional Feasibility Study by the County team? On the other hand, some existing plan documents, such as the City of Los Angeles' One Water Plan, include a list of conceptual green infrastructure projects that have not undergone any real feasibility analysis. It will be important to identify what the bar is here.
18	16.07.D.1.c.		Considered from a watershed perspective, this proportional allocation might be appropriate. For instance, we know that some areas are more pollutant compromised than others, and that regional water supply, quality and safety benefits can accrue to downstream stakeholders by investing more heavily in upstream areas. However, we are concerned that the language here may be interpreted as a strict accounting requirement to distribute funds according to revenues generated. This is understandable for the Municipal Program funds, but NOT for the Regional Program funds.
19	16.07.D.4.		Add language to clarify that the detailed maps that the Chief Engineer maintains on file will be maintained in a publicly accessible digital format.
20	16.07.D.4-5.		<p>Between 16.07.D.4 and 16.07.D.5, please add a section on Watershed Area Stakeholder Committees. Each area assigned a Watershed Coordinator should be required to convene regular stakeholder meetings on weekends and/or evenings so that a variety of affected stakeholders are provided an opportunity to participate meaningfully in the process of study, analysis, education, and project selection. Under the state's Watershed Program, all stakeholders are given an equal voice, and consensus-based practices are strongly encouraged. Watershed Area Steering Committees should represent the collective voice of the Stakeholder Committees, not act as a proxy for them.</p> <p>Suggest reading the following Federal and State resources for appropriate guidance on an optimal approach:</p> <ul style="list-style-type: none"> > CALFED Bay Delta Program - Watershed Program Plan https://digitalcommons.law.ggu.edu/cgi/viewcontent.cgi?referer=https://www.google.com/&httpsredir=1&article=1326&context=caldocs_agencies > Working at a Watershed Level from the federal Interagency Watershed Training Cooperative https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=5781 > and this statement from the EPA: "We make choices which are a reflection of our interests. The diversity of our interests combined with the finite amount of resource and time to use that resource result in conflict, demanding more or different choices. It is important for watershed studies be collaborative efforts so that these potential conflicts are identified and trade-offs are understood. The uses, users, impacts and consequences of choices on watershed resources need to be identified."
21	16.07.D.5		Consider defining 'direct personal financial interest' more clearly. It is feasible that some municipal employees could be considered to directly benefit personally by a project being implemented under their jurisdiction. Similarly, it is likely that agency people would expect NGOs and CBOs promoting a project to recuse themselves, as they perceive a more direct benefit to smaller entities than they would to themselves in a similar situation. We expect the intent is to be more directed at entrepreneurs or investors in certain technologies than it is to municipalities, agencies, NGOs or CBOs. Clarification would avoid future conflicts.
22	16.07.D.6		Suggest revising 1st sentence slightly to read "The Regional Oversight Committee (ROC) is a body independent of other Program Committees that is designed to ensure Regional Program goals are being met."
23	16.12.D.5.		This is somewhat confusing. The provision appears to create a distinction between municipal entities developing a Project and all other Project Developers. It is assumed that municipalities will be developing projects with Regional Program funds. Is it the intent here to create two distinct audit requirements for municipalities - one for the overall Municipal Program funds and one for Projects developed by municipalities with the Regional funds? Or is it to create audit requirements for Project Developers other than municipalities using Regional Program funds? Or is it both? In any case, this is the only instance where "Additional interim audits may be conducted" which seems prejudicial and unnecessarily burdensome for all concerned.

Program Elements

24	II. Definitions	5	Revise definition as specified in comment #6 above.
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25	III.C.i.	8	Bullets 1 and 3 may be in conflict. Small businesses may provide the most equitable capacity and services, and over time may be most flexible in meeting industry, community, and capacity demands. Additionally, municipal staff requires additional capacity to significantly diversify and include technical disciplines such as geology, biology, and environmental design critical for best practices - which are not currently typical staff positions for water management. Small local businesses for distributed, nature-based projects in particular will benefit from flexible measures to deliver diverse implementation and management services.
26	III.D.j.	9	This item is key, we appreciate the language specified. Credit, rebate, and incentive programs with strong targets and inclusive of major land uses will be necessary to realize the core outcomes of the SCW program.
27	IV.A.	11	Projects may receive funding for any post-Feasibility Study phase.' Does this apply to Regional Program projects, or others? Please define.
28	IV.A.	11	Project Applicants must demonstrate technical, financial, and other necessary capabilities to be the Project Developer.' How is this to be determined? Subjective criteria may preclude experts and leaders in the field, and conversely, be inclusive of entities that consistently underperform without independent oversight.
29	IV.A.	11	Projects must be included in an approved water quality plan such as... or other plans as approved by the District.' What would be the approval process for the District to approve a plan? Strongly recommend including the County's LA Basin Study and WMPs such as the Tujunga/Pacoima Watershed Plan in the list of examples. However, plans that specify concept-level projects only, such as the City of LA's recent One Water Plan, should not meet the expected criteria.
30	IV.A. Technical Assistance	12	Nature-based solutions are a subset of green infrastructure driven by sciences and design. Recommend that the list specify: "comprised of experts in the field of stormwater infrastructure, green infrastructure, and nature-based solutions design and implementation, including but not limited to: fluvial geomorphology; geology; soils; ecology; biology; climate; environmental design and planning; stormwater quality; water supply; public health; open space; social science; and other areas"
31	IV.A. Watershed Coordinators	12	Better definitions are needed. The Watershed Coordinators are best modelled after the CALFED Bay-Delta Program, with Watershed Coordinator positions treated as district offices with staff. The potential gains are immeasurable and will return much more for the investments in meaningful engagement with communities, listening, learning, and facilitating dialogs. A well supported and structure program will invite and include continued and meaningful participation from historically marginalized stakeholders. This supports key program goals of equity and inclusion, while ultimately resulting in projects and programs that address both local and regional needs. Please see the attached descriptions and recommended scope of work for Watershed Coordinators.
32	IV.A. Watershed Coordinators & S	13	The District as employer should administer, but not provide performance reviews of the Watershed Coordinators. That should be the purview of the stakeholders that they serve. Watershed Area Steering Committees should be advised by Watershed Stakeholder Groups on the Scientific Studies Program needs in their area, and should be given agency to collectively select the specialists and contractors necessary to undertake necessary initiatives. This process should be facilitated by the Watershed Coordinators.
33	IV.E. Winter 2018	18	While environmental engineering and social sciences are also key, the Scoring Committee, similar to the Technical Assistance Teams, must include a preponderance of members with expertise in the natural sciences, appropriately equipped to assess multi-benefit, nature-based projects.
34	IV.E. Winter 2018	18	Recommend that Watershed Stakeholder Groups be organized as an early first step. The hiring of Watershed Coordinators and their staff should follow. Watershed Coordinators should be at-will employees, so that Watershed Groups can assess their performance at intervals and elect to retain or recommend a new representative every few years.
35	IV.H.	20	Community stakeholder representatives require equal seats with municipalities: 6 instead of 5. This will balance particularly in areas where a single municipality holds a majority of all seats.
36	IV.H.	21	Community stakeholder members must be appointed by stakeholders. Appointments cannot directly represent stakeholders. A voting process may be made through facilitation by Watershed Coordinators.
37	IV.H.	22	Update table to reflect 6 community stakeholder members appointed by community stakeholders
38	IV.K.	23	Consider defining 'direct personal financial interest' more clearly. It is feasible that some municipal employees could be considered to directly benefit personally by a project being implemented under their jurisdiction. Similarly, it is likely that agency people would expect NGOs and CBOs promoting a project to recuse themselves, as they perceive a more direct benefit to smaller entities than they would to themselves in a similar situation. We expect the intent is to be more directed at entrepreneurs or investors in certain technologies than it is to municipalities, agencies, NGOs or CBOs. Clarification would avoid future conflicts.
39	IV.R. Section C	25	'Applies a range of points for Projects that utilize nature-based solutions and three (not one) or more Community Enhancement Benefits'
40	IV.R. Table 7 Project Criteria	27	Maintain specific TRP recommendations for changing the selection criteria detailing metrics for Community Enhancement Benefits. This scoring precludes effective and cost-effective neighborhood and distributed-scale projects and gives away points under a much lower bar for projects defined as 'Dry Weather Water Quality Benefits' when ostensibly Wet Weather Water Quality Benefit projects would also do both. Diversification of potential scoring and specific measures recommended for 'Community Investment Benefits' would give the scoring value.
41	IV.R. Table 7 Project Criteria	27	Recommend clarifying 'Community Enhancement Benefits' as defined in II. Definitions. However, even this clarification as stated could award 25 points for including a single tree and a single bench or even a sign. Without metrics, this measure is either baselessly subjective or just a giveaway. It does nothing to advance practice in the region.

#	Section	Page	Comment
42	IV.R. Table 7 Project Criteria	27	At barest minimum specify 3 community investment benefits for the 5 point threshold, and more than 3 for the 10 point threshold. One benefit is not plural. Even this is a very low bar, we need to expect more for taxpayer dollars. Equity and consideration for community is basic decency. These kinds of benefits are easy to achieve in tandem with almost no additional cost when applying best practices, with little effort or planning.
43	VI.B. Programs	30	Add a point for residential retrofit programs with comprehensive guidance materials and hands-on workshops
44	VI.B.b.	30	We want to be certain that education curricula and workforce training programs funded and developed under this provision can ultimately be delivered independently through Community Colleges. Such an approach would be most cost-effective for the County, and most affordable and equitable for the target audiences. Consider adding language to clarify.
45	VII.E.	31	The rebate program must have a high bar with discrete metrics: targets for 2" storm event, average water use of 55 gallons per capita per day, and inclusive of nature-based solutions
46	VII.E.	31	The rebate program must be clearly inclusive of all major land uses
47	Draft Appendices	36	At large Community Stakeholders descriptions are more representative of engineers and technical consultants than community stakeholders
48	Draft Appendices	37	There is no clear technical experience with nature-based solutions from members described. Environmental design, fluvial geomorphology, ecology, and soil science specific to maximizing natural resources and ecosystem services in practice would be a critical asset to decision-making.

Rebate Program

48			Limiting the credit program to aggregations of 50 or more acres under a single ownership would be inclusive of only the largest property owners in LA County, precluding almost all available opportunities. Aggregation in and of itself can be utilized positively if the requirement of single ownership is removed. See Philadelphia's GARP Program: https://www.nrdc.org/sites/default/files/philadelphia-green-infrastructure-retrofits-IB.pdf
49			Any program that does not provide meaningful incentives and credits for the 60% of all land (not including streets) covered by residential property will fail to meet regional targets. The potential to leverage resources already directed toward turf removal and landscaped areas—and the potential to support, educate, and positively influence resident populations—is too great of an opportunity to waste. The potential metrics are staggering. Philadelphia's own stormwater tax offers subsidies and pathways to achieve up to 80% tax credits for businesses and residents alike.
50			Credits should be based on a high threshold with metrics targeting the on site management of a minimum 2" storm event, and 55 gallons per capita per person per day. Such metrics are more easily understood and applied by residents (and others) than those currently proposed. Given the broader intent of this measure, setting a more robust standard than those for SUSMP and LID for projects funded through this mechanism is reasonable.
51			Existing LID requirements and specifications will not sufficiently address regional challenges for climate resilience, water quality, water supply, flood management, air quality, cooling, health, and quality of life. Currently, the majority of LID installations are filtering and releasing stormwater right back out to gutters and storm drains.
52			Water Supply and Community Enhancement credit percentages should be higher, more representative of their total value in relation to Water Quality: recommend min. 40% 20% and 20%
53			Requiring re-application every three years is unnecessarily burdensome for residential participants. Recommend five years.
54			Requiring certification by a civil engineer is prohibitive for expense and logistic feasibility. The turf rebate programs, including LADWPs which requires rainwater capture, have had no such provisions. Digital tools and accessible measurements will be sufficient for the majority of installations. Bi-annual inspections, or certification of capacity/function by an otherwise qualified professional should suffice. See Credits and Incentives Whitepaper: https://static1.squarespace.com/static/5a21b552bce176df59bb9c8e/t/5b245999575d1f6f791a03bd/1529108893092/Stormwater+Fee+Credits+%26+Incentives+Whitepaper_Final+Draft.pdf
55			See 2018 Water LA Report Appendices F, G, and H: https://www.theiverproject.org/water-la-2018-report