



June 14, 2018

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 Board of Supervisors
Hon. Mark Ridley-Thomas, Supervisor, Second District, Los Angeles County Board of Supervisors
Hon. Kathryn Barger, Supervisor, Fifth District, Los Angeles County Board of Supervisors
Mark Pestrella, Director of Public Works, Los Angeles County

Re: SUPPORT: Draft Safe, Clean Water Program Elements

Dear Honorable Chairwoman Kuehl, Supervisors, and Director Pestrella:

TreePeople thanks you and your staff for continuing to pursue a critical missing element moving the County towards water-resilience: a stable funding source to design and build multiple benefit stormwater projects. TreePeople has worked with the County for decades to address the problems and opportunities stormwater brings. We have successfully worked together on the Sun Valley Watershed Management Plan, Sun Valley Park, the Greater LA Water Collaborative and several other research and pilot projects with the County. These efforts have shown that properly designed stormwater projects yield multiple benefits — including water quality improvement, water supply augmentation, and other community investments — often in a more efficient manner than traditional, grey, infrastructure.

The Safe, Clean Water Program (Program) creates an opportunity to take these projects to scale throughout the County, and we strongly support the Program. Distributed, nature-based projects can and should be built at homes, schools, parks, streets and other appropriate sites to capture, treat, and/or reuse urban runoff while also providing flood control, water supply, air quality, community beautification, and other benefits. One benefit that is often overlooked is that nature-based projects can help address health issues stemming from extreme heat (given sufficient tree canopy) as well as safety issues from flooding. Additionally, if structured properly, the Safe, Clean Water Program can ensure these projects are built in communities that are the most in need of such projects, and also provide local jobs to build and maintain them.

As key issues in the Program continue to be refined, TreePeople would like to submit the following comments to ensure the Program will be as successful as possible:

1. Equity – Increase Funding in Disadvantaged Communities

Under the current Program as proposed, disadvantaged communities (DACs) will only receive \$69 million in annual funding, assuming the Program raises \$300 million annually. The OurWaterLA proposal, which we agree with, calls for 41% of the funding to go towards DAC communities. The

current Program proposal falls well short of this. The Board should increase funding for projects in DACs; not only in the Regional Program, but the Municipal Program as well. Equity measures in the local return dollars are critical as these are the funds going directly back to the communities which are paying the tax — and these historically underserved communities should benefit from projects with multiple benefits in their region. It is also important that the governance process ensures that this investment in DACs is monitored to guarantee implementation of projects in these communities comes to fruition.

2. Program Criteria – Increase the Number of Multiple Benefits & Ensure Nature-Based Projects

The basis of the Safe, Clean Water Program is the Motion written by Supervisor’s Kuehl and Solis. We believe the use of the term “multiple benefits” was used in this Motion multiple times for a reason – to ensure projects stemming from this Program would meet that vision. Unfortunately, the word “multiple” seems to have lost some of its meaning in the Program’s current form. We would like multiple benefits to mean more than two benefits in the Regional program. Multiple benefits should also be included in the Municipal program.

Additionally, “nature-based” solutions should be a threshold criteria to ensure that any project moving through the process includes nature-based design. “Nature-mimicking” solutions, such as cisterns, should also be included and prioritized in this Program.

3. Education and Engagement – Critical for Success

TreePeople is pleased to see the inclusion of Watershed Coordinators in this Program as well as funding for education and outreach. These elements are critical to creating a water-literate society which will then support and understand the need and function of these multi-benefit stormwater projects installed throughout the County. Funding to create community stewards of our precious water supplies is critical for achieving local water resilience.

4. Studies – Require Peer Review

TreePeople supports inclusion of funding for scientific studies, modeling and monitoring. However, this cannot be a blank check. The Board must ensure that funds used for scientific studies go towards robust, peer-reviewed studies, and not politically-motivated or otherwise potentially biased research.

5. Residential Retrofits – Engaging Angelenos

As TreePeople has noted in our prior comment letters, we believe the Safe, Clean Water Program should include a specific rebate program for residential retrofits. Capturing water at single-family homes throughout the County will not only help meet the MS4 permit, but it will engage Angelenos in a unique way since they will be able to learn first-hand how to become watershed managers of their own properties. We are glad to see language added making this program permissible in the current Program, and we encourage the County to take the lead in creating this rebate program.

6. Credit Program – Metrics are Key

We are glad to see that the framework for a credit program has been put forth, as we believe good actors should be rewarded for their efforts. Additionally, we agree that 15% should be included for community investments. This is critical as community investments should be designed as part of any past or future project submitted for a credit. **Creating metrics to ensure the credit for a community investment is proportionate is vital.** For instance, in these larger properties, strategic tree planting as a Best Management Practice could meet different community investments based on where and how they are planted. We would not want to see credit provided for a few trees on a 50 acre property when strategic tree planting could:

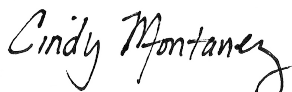
- Yield verifiable greenhouse gas reductions. State quantification methods exist to measure this.
- Reduce water pollution and flooding if planted for those purposes, ensuring the water source is directed to the trees and that there are enough trees (and the right type) to address the flow.
- Provide shade, evaporative cooling, air filtration and reduction of the urban heat island effect (and energy reduction) based on the specific location with respect to the built environment surrounding the trees.

We recommend the County clarify if additional points can be given for the same BMP if it meets two or three of the benefits as this is unclear in the current draft.

Additionally, we look forward to working with the County in developing the incentive and stormwater credit program. We hope these will also cover smaller projects, under 50 acres as noted for the credit program. As noted above, we encourage the County to take the lead on creating a Residential Rebate program as part of the incentive program.

Thank you for this opportunity to comment on the proposed Safe, Clean Water Program Elements. We look forward to working with the County to ensure the creation of a robust Program.

Sincerely,



Cindy Montanez, CEO
TreePeople

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