

# Safe, Clean Water Program

## Scoring Committee



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### **Meeting Minutes:**

Tuesday, March 3, 2020

9:00am - 12:00pm

Los Angeles County Public Works, LA County Public Works, Conference Room D  
900 South Fremont Ave, Alhambra, CA 91803

### **Attendees**

#### Committee Members Present:

Bruce Reznik

Dave Sorem

TJ Moon

JR De Shazo

Jill Sourial

#### Committee Members Not Present:

Dean Efstathiou

### **1) Welcome and Introductions**

Bruce Reznik, the Chair of the Scoring Committee, called the meeting to order.

All committee members in attendance made self-introductions, and quorum was established.

### **2) Approval of Meeting Minutes from February 18, 2020**

The District provided a copy of the meeting minutes from the previous meeting. Bruce Reznik asked the committee members for comments or revisions.

Dave Sorem made a motion to approve the meeting minutes. JR De Shazo seconded the motion. The Committee voted to approve the meeting minutes (unanimous).

### **3) Committee Member and District Updates**

Kirk Allen provided the District update, noting: the General Income Based Tax Reduction form is now available; stipends are now available for applicable committee members; and the public review for the Fund Transfer Agreement is being finalized now to be released on March 9.

Bruce Reznik noted that WASCs are now working to prioritize projects, so the Scoring Committees work helped to expedite that process.

### **4) Public Comment Period for Non-Agenized Items**

No public comments

### **5) Discussion Items:**

#### a) Ex Parte Communications Disclosure

Jill Sourial noted that The Nature Conservancy is working on an analysis of Safe Clean Water (SCW) Projects and has presented findings on that study. She has also had meetings with supervisor Barger to discuss the scoring process and SCW Projects.

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TJ Moon has had meetings with consultants Craftwater and Paradigm to provide suggestions for revisions to the scoring criteria.

Bruce Reznik has had meetings with LA City Sanitation and Our Water LA to provide feedback on the scoring process and recommending attendance to today's meeting.

### b) Recommendations for Updates to Feasibility Study Guidelines and Scoring Criteria

Bruce Reznik inquired what the scope of the Scoring Committee (SC) is in suggesting revisions to the scoring criteria. Dave Sorem noted that adjustments to the criteria -- notably for O&M -- is vital to improving the process.

JR De Shazo inquired who would authorize any recommendations that come out of today's meeting. Kirk Allen clarified that the ordinance specifies that the Chief Engineer of the LACFCD is able to modify the scoring criteria, and would happen in an ad hoc process. All comments and recommendations will be taken into consideration. JR De Shazo noted that the operating guidelines specifies a 30 day public period.

Dave Sorem noted that as the program continues over years, more funding will be spent towards O&M. Bruce Reznik noted that in the process of developing the SCW Program, no cap was placed on O&M.

Jill Sourial inquired if these would be voting items to recommend. Bruce Reznik noted that this is currently just a discussion item, and a future meeting may be needed to vote on a draft of the SC recommendations.

Bruce Reznik suggested that recommended updates be made in the order of criteria category.

TJ Moon noted that the website was a critical success to the applications, but that there was some challenge from applicants in navigating the website. It was difficult to build a tool that could automatically accept and model all types of complicated projects. TJ Moon noted that a tutorial or training would be beneficial to help applicants navigate and input data into the website.

JR De Shazo and TJ Moon noted that it would be beneficial to include a FAQ on specific types of projects and questions. Jill Sourial inquired if the website could be used to process more complicated projects. TJ Moon noted that the website was intended for single BMP modeling, and users with more complex projects would need to submit their own modeling.

Bruce Reznik agreed that a tutorial or training would be beneficial, noting that certain categories such as community support were ambiguous on expectations, and that trainings would help explain these sections.

JR De Shazo noted that these recommendations would require changes to the website and guidance documents.

TJ Moon noted that when the scoring criteria was developed, only 5 projects were available to base the metrics on. The SC now has over 50 projects to determine if current thresholds can be updated from a data mining effort. Dave Sorem noted that the latest applications are still just estimates, so updates would require some level of discretion.

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JR De Shazo noted that modifying the thresholds may no longer reward the high achievers. TJ Moon noted that there was not enough information during the initial development of the scoring criteria, and that as the program ages, more data will become available. JR De Shazo noted that updates to scoring criteria could also be used to set a higher bar for performance if desired.

Kirk Allen noted that for the first year, all projects were sent to the SC, but in the future WASCs could decide not to send forward all projects. Each year the SC should see a better set of projects stemming from this pre-filter from the WASCs.

Jill Sourial inquired if there are County completed projects that could be used to update scoring criteria. JR De Shazo inquired if there are significant changes over the development of a project, how that reflects on the scoring process. Kirk Allen noted that major changes in scope would be referred to the WASC which could result in a rescoring of the project by the SC. JR De Shazo noted that there could be external factors that could change a project scope. Kirk Allen again clarified that any changes to scope would have to come back to the WASC for re-consideration and potential rescoring by the SC. JR De Shazo inquired if there was a threshold on the change in scope. TJ Moon noted that the budget alone affects three major scoring criteria.

Bruce Reznik noted that the Regional Oversight Committee (ROC) may also play a role in making updates to scoring criteria. Kirk Allen clarified that the ROC is mainly tasked with making sure the program goals are being met.

Bruce Reznik inquired when the SC would need to reconvene to rescore projects. Kirk Allen noted that changes to scope would prevent the project from receiving funding. A member of the public noted that if funding is pulled due to a project cost overrun, it would be a waste of the SCW Program's initial investment.

A member of the public noted that for applicants that provide their own model, this is a black box problem that could complicate project submission process; suggesting that the website allow for addition of multiple BMPs to be modeled simultaneously.

A member of the public noted that if construction occurs five or more years later, our understanding of water quality and costs per acre foot will change. Bruce Reznik noted that for the cost, there is more information now available, making it worth revisiting adjustments to the scoring criteria; noting that Prop O and other grant programs do revisit updates every year.

Bruce Reznik inquired how the program should handle external modeling. TJ Moon recommended that the website be updated to handle all projects to make sure applicants are using all the same data and modeling techniques.

A member of the public noted that if there is a push to use the website more, it would be beneficial to see the background for how the modeling is performed. The member of the public suggested that there may be other metrics that could be used to help gauge project performance.

A member of the public noted that updates to the website would be beneficial, and inquired what the timeline would be for these updates. Kirk Allen noted that the next call for project will be due July 31<sup>st</sup>, so any updates would have to be done before that date. Bruce Reznik suggested that these updates could potentially be made ahead of the call for project deadline.

A member of the public requested that the SC make a recommendation to update the website and note what changes have been updated or improved.

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TJ Moon noted that for A.1.1 1, the AF/\$1M metric is reasonable, but that the metric should be converted to a linear or scaled ratio. Projects who are just at the edge but below the top score range have a major drop off in score. Updates to the score would use a formula to calculate the score. This would be reasonable and prevent manipulation of the scoring criteria.

TJ Moon noted that for A.1.2, the 80% threshold was set as an incentive to reduce as many pollutants as possible. Very large projects with large tributaries do not score well as there is a large amount of bypass; however, these projects provide significant water quality benefits. TJ Moon noted that the current A.1.2 puts these larger projects at a competitive disadvantage.

A member of the public noted that these larger projects may provide a higher water supply benefit. TJ Moon noted that not all larger projects have a water supply benefit.

TJ Moon recommended a change to A.1.2 to make the scoring process more complex and have two options: a magnitude route such as pounds of pollutants removed, and a volume treatment route. Bruce Reznik noted that additional options would be beneficial for project applicants. TJ Moon noted that a data mining effort would be needed to come up with an appropriate threshold for the magnitude route.

A member of the public inquired what the process is now for A.1.2. TJ Moon noted that it is currently based only on percent of pollutant removal, and that this new method would allow for both a magnitude of pollutants removed, or concentration removed. A member of the public requested that this metric be tied to specific watershed benchmarks for compliance. Bruce Reznik suggested that all watersheds are different, and that watershed specific criteria could help make a more effective program. Dave Sorem noted that each watershed has different pollutants, but that making scoring criteria watershed specific would be a major challenge for validating scores.

TJ Moon noted that for percent reductions, it could also be modified to have a sliding scale, which would allow for partial credit. JR De Shazo noted that the standards could be extended above the current threshold if a sliding scale was introduced.

Jill Sourial noted that a standardized budget on the website would be beneficial, noting that the way the website currently characterizes project budget is not well-defined. Jill Sourial noted that more information on the budget, such as O&M, would be beneficial.

Bruce Reznik suggested clarity be provided on phasing of projects and their budgets. JR De Shazo noted that the project costs should directly lead to the benefits claimed. If a project has multiple phases, benefits would have to be related directly to the phase where funding is being requested by applicants. Bruce Reznik noted that Community Investment (CI) benefits should also be included in the phase being funded, but that it is likely more challenging to achieve.

A member of the public noted that for water quality, pollutant reduction compares influent with effluent, so this would put watersheds with more polluted water at a disadvantage. TJ Moon noted that for nearly clean watershed runoffs, such as mountain runoff, it is easier for projects to receive full points for removing very small amounts of pollutants with compared to more polluted areas of the watershed. The member of the public inquired what could be done to resolve the disadvantage. Bruce Reznik noted that this issue has been identified in other criteria as well, such as percent of impervious area removed, where projects could achieve higher points for minimal effort. Kirk Allen noted that these nuances could also be captured in the WASC discussions to note what projects are doing more. Dave Sorem, JR De Shazo, and Bruce Reznik noted that WASC members may not be able to catch these sorts of nuances in their own watersheds, as WASC members are not taking a deep look at individual projects.

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TJ Moon noted that A2 for dry weather, applicants of large projects that could not score well in A1 opted for dry weather even when the project was clearly intended for wet weather. TJ moon noted that dry weather should be modified to just 0.1-inch storms as a maximum to prevent wet weather projects from using the category. Making the previous recommended edits to A.1.2 would also help address the underlying issue. TJ Moon suggested creating a cost effectiveness category for the A.2 category, noting that cost was very high for some dry weather projects. Similar to A.1.1, updates would require a data mining effort to develop this metric. JR De Shazo inquired how the scaling would work for the new metric. TJ Moon noted that the data mining effort would have to be concluded before a scale could be set.

A member of the public inquired if costs per acre-foot are higher for dry weather projects. TJ Moon noted that for dry weather projects, it is typically much cheaper than wet weather projects, so a new metric would need to be created for dry weather projects. TJ moon suggested using potentially Gallons Per Minute (GPM)/\$1M.

TJ Moon noted that for A2.2, the tributary area limits came from a limited set of projects, and that this should be re-evaluated through a data mining effort.

TJ Moon noted for water supply, maintenance costs have a major effect on cost effectiveness. Converting this metric to a scaled value as well as conducting a data mining effort to update the score ranges would be beneficial. JR De Shazo noted that this scoring criteria has made it an incentive for applicants to underestimate O&M costs. TJ Moon noted that this metric was based on spreading ground type projects where O&M costs are clearer, but that nearly all applications are MS4 water quality projects where O&M is a challenge to estimate. TJ Moon, JR De Shazo, and Dave Sorem noted that O&M could potentially be removed from the metric to make sure that applicants were not incentivized to underestimate O&M costs. Dave Sorem suggested that O&M be looked at separately in the scoring criteria, noting that it would be consistent with A1.1.

TJ Moon suggested that there needs to be WASC specific supply scoring, as groundwater access is not uniform for all WASCs. JR De Shazo noted that for certain WASCs the supply category does not relate to actual supply benefits in those certain WASCs. Multiple members of the public noted that this problem was a major challenge for their WASC, and that WASC specific supply scoring would be a major benefit. JR De Shazo noted that there would need to be a justification provided for a variable scoring criteria process per WASC.

Bruce Reznik noted that water supply is where applicants lost most points, noting that projects that scored higher were either located in areas with infiltration or projects that diverted low flows to the sanitary sewer. If projects were not in these two groups, applicants had to maximize CI categories, providing an unfair advantage for projects that could infiltrate or divert flows for supply.

Bruce Reznik recommended that water claimed reclamation supply should require as much justification as groundwater infiltration.

JR De Shazo noted that additional water supply categories could be developed for various ecological benefits provided to maximize the water supply benefits for the Region. Kirk Allen noted that for WASCs that do not have access to receive water supply points, there is an incentive to incorporate Nature Based Solutions (NBS) and CI benefits, so making water supply points easier to attain may allow applicants to disregard NBS, cost leveraging, and other CI benefits.

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JR De Shazo inquired if there is a database of all the data exists for the data mining effort. TJ Moon and Kirk Allen noted that there is a database and it can be made available.

TJ Moon noted that applicants and the SC used creative interpretations of the scoring categories to maximize water supply scores. TJ moon suggested that if projects are considered wet or dry weather, only the wet weather runoff or dry weather runoff capture should be considered.

A member of the public noted that a study was done in 2007 that monitored dry weather capture for specific watersheds, and that the website should provide an estimate of dry weather flow for specific projects. TJ Moon noted that data may not be available to consistently provide a dry weather flow estimate for all areas of the County, and that new studies would likely be required. Currently, project applicants can overestimate water supply benefit by entering in their own dry weather flow value.

A member of the public requested clarification be provided on the exact definition of water supply, noting that everyone has a different definition of water supply, going as broad as to include perched groundwater that would eventually become supply many years from now.

Bruce Reznik and JR De Shazo noted for NBS and CI benefits, there are no measurable metrics for these categories, and that many criteria are intrinsically linked or are related to several other criteria automatically, such as planting of trees and heat island reduction or greenhouse gas reduction. A member of the public noted that Our Water LA submitted recommendations to apply metrics to the NBS and CI benefits. The member of the public noted that applying metrics can be a challenge as it is a subjective process. Jill Sourial noted that if metrics are developed for these categories, there may be a disconnect between how the community views or interprets the benefit and how the engineers evaluate these benefits. Jill Sourial and JR De Shazo noted that some of the NBS and CI benefits could have very specific metrics, such as native plantings but the metrics would need to be crafted to reach the goal of the category, such as providing habitat.

Bruce Reznik and JR De Shazo suggested that NBS and CI benefits that are similar or related should be combined; noting that applicants that went above and beyond to provide justification received the same scores as projects that provided very little justification. Bruce Reznik suggested that Our Water LA and the public provide recommendations to help provide metrics for these categories. Jill Sourial noted that there would be tradeoffs in making metrics more specific.

Bruce Reznik suggested that a community outreach process could be used to develop measurable metrics for NBS and CI benefits. JR De Shazo noted that the SC may be better positioned to provide updates to the NBS and CI benefits vs. conducting a lengthy stakeholder process. JR De Shazo noted that the metrics under NBS and CI benefits could be combined where the criteria goals are similar.

Bruce Reznik noted that the intent of the CI Benefit category is to make applicants consider and think about what the community needs, and that applying specific metrics may not achieve the specific goals of CI benefits. JR De Shazo noted that more information needs to be provided.

Bruce Reznik noted that during development of the NBS and CI, combining the two categories had been considered but were ultimately left as two separate categories.

Bruce Reznik noted that for specific applications, the justification provided for NBS and CI benefits did not meet the intent of the categories, or that justification provided was very minimal. Jill Sourial noted that in order to make the justification consistent, metrics would still need to be provided for each criterion.

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Jill Sourial suggested that for NBS the impermeable area removal criteria be kept as is, but to shift the other two criteria to metric based criteria. Bruce Reznik and Jill Sourial noted that there needs to be a minimum amount of area included within the criteria, and that the footprint definition should be clarified to make the calculation consistent, and that the criterion should be a scaled equation.

Jill Sourial suggested that native plantings should also be converted to a metric based process to capture the percent of native planting. Bruce Reznik noted that there are additional categories that had been explored originally, such as types of native and larger pallet; further noting that a “good, better, best” approach was developed but was not utilized. JR De Shazo suggested that subcategories and multipliers could be applied for native plantings vs. non-natives and grasses; this would provide a differentiation between the different types of plantings. JR De Shazo noted that wetlands is not addressed in the current scoring criteria. Kirk Allen noted that there is an exhibit on NBS in the draft fund Transfer Agreement, so the discussion on revisions to NBS should be tabled until after that document is ready for public review.

Bruce Reznik suggested that the community support criteria should demonstrate that a project is already engaged and that the project is desired by the community. Bruce Reznik noted that currently, only one letter of support was deemed applicable for this criterion, so a stronger requirement should be developed.

A member of the public noted that many of the letters of support did not come from the project’s community, and that these letters did not meet the intent of strong community support. The member of the public noted that there are existing community engagement criteria for other grant programs that might be beneficial for the SCW scoring criteria; these existing other criteria and also scale depending on the size of the project. The member of the public noted that they have provided a list of community organizations to the District that could be used to gage community support. JR De Shazo noted that letters of support are currently only accepted if they are from NGOs and CBOs but suggested that municipal support should be included as disadvantaged communities (DACs) may have fewer or no local community organizations to provide a letter of support.

Bruce Reznik inquired if the Prop O and Parks Measure A community engagement metrics could be implemented into the SCW. A member of the public suggested that the existing process could be incorporated into SCW. A member of the public noted that the Measure A requirements are very specific and detailed for criteria. Jill Sourial inquired if that same criteria could be provided in a letter of support for SCW projects. The member of the public noted that these criteria could be provided, and that they agreed that CI benefits are a challenge to measure.

A member of the public noted that the SCW Program is tied to reaching legal requirements for water quality, and that the CI benefits are not the primary goal for municipalities. The member of the public requested that the SC consider municipal compliance requirements over increasing requirements for NBS and CI benefits. Bruce Reznik noted that the SCW Program was not framed as a compliance program but noted that the largest weight for scoring is within the water quality category. This suggests that a focus on water quality compliance is already built into the program. The first round of projects was focused heavily at a backlog of existing compliance projects that might not have included the level of community involvement and benefits.

A member of the public noted existing EWMP projects may have a challenge reaching CI benefits as there are compliance deadlines. A member of the public noted that Our Water LA is aware of these challenges and are willing to help provide guidance with these challenges.

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TJ Moon noted that for the leveraging funds category, clarity should be provided on what funding total is used to measure the match. JR De Shazo and Bruce Reznik noted that the fund match should be a comparison of the total project cost and what the applicant has requested for SCW funding. Bruce Reznik and Dave Sorem noted that there should be verification provided for municipal matches. TJ Moon noted that there is a funding plan due in May by all municipalities that would help confirm the claimed municipal matches. Bruce Reznik noted that for staff match, verification should also be provided. Jill Sourial noted that a funding match comparison should include O&M costs.

Bruce Reznik suggested funding source be a requirement on the application to verify applicants can meet the match. It would be beneficial to identify the plan for how funds will be committed; noting that applicants should show the full funding sources and not just for the ask for how applicants will get to 100-percent funding. TJ Moon noted that certain projects may only request funding for design, and may not have the full funding source to reach full project funding beyond the SCW ask. JR De Shazo noted that the SC is not suited to rate applicants credit worthiness or ability to keep promises on funding sourcing.

- c) Potential Separate Scoring Process for O&M Only Projects (*Held for next meeting*)
- d) Scoring Committee Expectations for Credit Program Appeals (*Held for next meeting*)
- e) Selection of a new Scoring Committee Member

Kirk Allen noted that there is still not a process in place to select a new SC member.

### **6) Public Comment Period for Agenda Items**

A member of the public noted that capturing 85<sup>th</sup> percentile runoff at a watershed scale is not appropriate or possible and that the guidelines should be modified to allow load reduction in pounds; allowing these types of projects to compete in the SCW program. The member of the public provided a letter that has been included in the minutes below.

A member of the public suggested that the SC provide additional scoring criteria to differentiate between urban and non-urban watersheds where water quality may differ significantly.

### **7) Voting items:**

None

### **8) Items for next agenda**

Bruce Reznik suggested holding the next meeting on March 17 from 9-12pm. SC members noted they would be able to attend this meeting.

Bruce Reznik suggested the agenda would include the O&M item held today.

Kirk Allen noted that the fund Transfer Agreement could be included in the agenda.

### **9) Adjournment**

Bruce Reznik thanked the committee members and public for their time and participation and adjourned the meeting.

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# Scoring Committee Meeting

## COMMITTEE MEMBER SIGN-IN



| Member Name            | Municipality/<br>Organization         | Email Address                               | Signature            |
|------------------------|---------------------------------------|---|----------------------|
| Dean Efstathiou        | Consulting Engineer                   | defstath1@gmail.com                         |                      |
| Taejin Moon            | LA County Public Works                | TMOON@dpw.lacounty.gov                      | <i>Taejin Moon</i>   |
| Bruce Reznik           | LA Waterkeeper                        | bruce@lawaterkeeper.org                     | <i>Bruce Reznik</i>  |
| Dave Sorem             | Mike Bubalo Construction Co.,<br>Inc. | dave@bubalo.com                             | <i>Dave Sorem</i>    |
| Jill Sourial           | The Nature Conservancy                | jill.sourial@tnc.org                        | <i>Jill Sourial</i>  |
| J.R. De Shazo          | UCLA Luskin Center for Innovation     | deshazo@ucla.edu;<br>cvance@luskin.ucla.edu | <i>J.R. De Shazo</i> |
| <i>Dean Efstathiou</i> |                                       |   |                      |
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# Scoring Committee Meeting

PUBLIC SIGN-IN

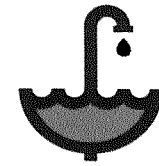


| First Name | Last Name | Municipality/Organization | Email Address                     |
|------------|-----------|---------------------------|-----------------------------------|
| Julie      | Millett   | RWA Planning              | jmillett@rwaplanning.com          |
| Robert     | Berger    | Paradigm Environmental    | robert.berger@paradigmh2o.com     |
| Jon        | Abelson   | Stanrec                   | jonathan.abelson@stanrec.com      |
| Sloane     | Perry     | Cerrell / HDR             | sloane.p@cerrell.com              |
| Jenny      | Newman    | RWA CB                    | jenny.newman@waterboards.ca.gov   |
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| Ali        | Rahmani   | RWA CB                    | Alirez.Rahmani@waterboards.ca.gov |
| Thom       | Epps      | Craftwater                | thom.epps@craftwaterinc.com       |
| Michelle   | Kim       | JLHA                      | mkim@jlha.net                     |
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| Conor      | Mossari   | LADWP                     | conor.mossari@ladwp.com           |
| Susie      | Santilena | LA                        | susie.santilena@lacity.org        |
| DREW       | READY     | CUNYH                     | DREW@WATERSHEDHEALTH              |
| Joyce      | Amaro     | LA                        | joyce.amaro@lacity.org -DR        |
| Samantha   | Matthews  | SBVCOG                    | smatthews@sbvcog.org              |

\*Signing or completing this form is voluntary for members of the public

# Scoring Committee Meeting

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**SAFE  
CLEAN  
WATER**

| First Name | Last Name | Municipality/Organization | Email Address                |
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| Brenda     | Panton    | Woodward + Curran         | bpanton@woodwardcurran.com   |
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| Shelley    | Luce      | Heal the Bay              |                              |
| Vik        | Bapna     | cwf                       | vbapna@cwecorp.com           |
| Gregor     | Patrich   | Torrent Resources         | gpatsch@torrentresources.com |
| Kristine   | Guerrero  | COCC                      | lsguerrero@coactis.org       |
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SAFE  
CLEAN  
WATER  
PROGRAM

# Public Comment Form

Name: Julie Millett Organization: Richard Watson's Assoc  
Email: jmillett@rwaplanning.com Phone: 310.980.1534  
Meeting: 3-3-2020 Scoring Comm. Date: 3/3/2020

LA County Public Works may contact me for clarification about my comments

## Comments

(to accompany letter comments from Rich Watson, distributed to the committee members)

Capturing runoff from an 85<sup>th</sup> percentile storm is not appropriate for watershed scale water capture projects. A good demonstration of the problem is the water capture project at Long Beach Airport, which has a 31 acre-ft capacity. It would need a capacity of 134 acre-ft to capture the 85<sup>th</sup> percentile storm from its 1,925-acre tributary area. The 85<sup>th</sup> percentile storm is appropriate for parcel scale projects and sub-regional projects w/relatively small tributary areas.

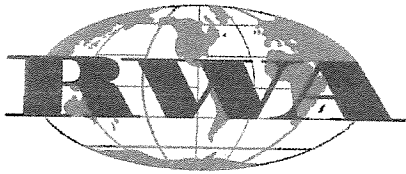
In addition, we request that the Guidelines be modified to allow for load reduction scoring in which the load is measured in pounds. This would be ~~the~~ appropriate ~~scale~~ for watershed-scale projects.

Thank you.

To review the guidance documents and for more information, visit [www.SafeCleanWaterLA.org](http://www.SafeCleanWaterLA.org)

Comments can be mailed to:

ATTN: Safe, Clean Water Program  
LA County Public Works  
P.O. Box 1460  
Alhambra, CA 91802-1460



Richard Watson & Associates, Inc.  
Urban Planning & Stormwater Quality

03 March 2020

HAND DELIVERY

Mr. Bruce Resnik, Chair  
Scoring Committee  
Safe, Clean Water Program  
Los Angeles County Public Works  
900 S. Fremont Ave.  
Alhambra, CA 91803

Dear Mr. Resnik:

My apologies for not attending in person. I need to attend a meeting of the Lower San Gabriel River WASC.

I want to thank the Committee for including "Recommendations for Updates to Feasibility Study Guidelines and Scoring Criteria," as well as "Potential Separate Scoring Process for O&M Only Projects" on the agenda for the March 3, 2020 Scoring Committee Meeting. These are important agenda items. Your experience in interpreting the Guidelines and scoring projects should be reflected in updated Guidelines and scoring criteria that should be updated soon to help both project proponents and your Committee prepare submitting and scoring projects proposed for year two of the Program.

My concerns are primarily related to watershed scale water capture projects. I have long thought that focusing on capturing the runoff from the 85<sup>th</sup> percentile storm is not appropriate for watershed scale water capture projects. That is the primary reason that the Los Cerritos Channel Watershed Group prepared and submitted a Watershed Management Program rather than an Enhanced Watershed Management Program. The difficulty in meeting the 85<sup>th</sup> percentile storm criterion is demonstrated by our water capture project at the Long Beach Airport. It has a 31 acre-foot capacity, but would need a 134 acre-foot capacity to capture the runoff from an 85<sup>th</sup> percentile storm in its 1,925-acre tributary area. The 85<sup>th</sup> percentile storm is appropriate for parcel scale projects and sub-regional projects with relatively small tributary areas.

A second concern that I have with how watershed scale projects are treated relates to the fact that only one Water Quality Benefit track may be used for the purpose of scoring. So far, our regional water capture projects have been designed to capture both dry weather and wet weather runoff. I can understand scoring parcel scale projects for only one track. However, I

DEVELOPMENT SERVICES

STORM WATER QUALITY

STRATEGIC PLANNING

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recommend that a special combined category be developed for large watershed scale projects. Our first four watershed scale regional projects have tributary areas ranging between 1,925 acres and 3,200 acres.

I also recommend that the capture requirement for dry-weather projects be decreased from 100% to 98% or 99% since the drop inlets that we have installed to date do not extend from wall to wall within flood control channels. There are small gaps at each of the drop inlets.

In addition, the third sub-bullet in Section 3.2 of the Guidance should be amended by adding the phrase, "unless part of the planned operation of a pair of water capture facilities" to handle situations such as the planned coordinated use of captured dry-weather flows of the proposed Simms Park project and the existing Mayfair Park project. In the future, sensors and remote management of projects will allow more coordinated use of projects to optimize water capture for compliance and water supply.

Lastly, I recommend that the first bullet in Section 3.5 be revised to clearly recognize existing agreements to fund projects developed in response to the 2012 MS4 Permit, but not directly leveraged by the Safe, Clean Water Program. The three projects in the Los Cerritos Channel approved for O&M funding together represent a Caltrans Cooperative Implementation Agreement investment of \$39 million, similar to the \$15 million Caltrans investment in the Adventure Park Multi-benefit Stormwater Capture Project for which the leveraged funds were recognized.

Thank you for the opportunity to make these comments.

Sincerely,

A handwritten signature in cursive script that reads "Richard A. Watson".

Richard A. Watson



# Public Comment Form

Name: ~~Wendy Gomez~~ Manny Gomez Organization: Tree People  
Email: m.gomez@treepeople.org Phone: ~~918-623-4887~~ 918-623-4887  
Meeting: SCWP Scoring Committee Date: 3/3/20

LA County Public Works may contact me for clarification about my comments

## Comments

Please see email sent on 3/2/20 re: improving SCWP criteria.

Thank You,  
*Manny Gomez*

To review the guidance documents and for more information, visit [www.SafeCleanWaterLA.org](http://www.SafeCleanWaterLA.org)

Comments can be mailed to: ATTN: Safe, Clean Water Program  
LA County Public Works  
P.O. Box 1460  
Alhambra, CA 91802-1460



March 2, 2020

Safe Clean Water Program Scoring Committee  
900 S. Fremont Ave  
Alhambra, CA 91803  
Email: safecleanwaterla@pw.lacounty.gov

SENT VIA EMAIL ONLY

**RE: TreePeople's Recommendations on improving the Safe Clean Water Program project criteria and scoring of projects**

To better align with the original intent of the Safe Clean Water Program to increase water supply, improve water quality, and provide community investments, we strongly urge that the Safe Clean Water Program Scoring Committee consider the following recommendations to be included in the forthcoming program guidance:

**General Comments on Guidance Recommendations**

- Develop a guidance on what it means for a project to benefit Disadvantaged Communities (DACs) by better defining benefits to include:
  - Local hires;
  - Direct benefits to proposed project;
  - Equitable access to the project site;
  - Anti-displacement plans at and/or around the proposed project site;
  - Public health benefits; and
  - Developing partnerships with *local* NGOs/community leaders/key stakeholders.
- Because scientific evidence shows that DACs disproportionately suffer from extreme heat and other public health consequences throughout LA County, we strongly recommend the benefits to DACs category be supported by quantifiable measures to demonstrate the desired benefits.
- Develop better defined guidelines for applicants and Scoring Committee to address the following questions:
  - What part of the project should applicants get credit for (for phased projects, for projects where stormwater component is just one aspect of larger project)? Clearly determine whether this would be consistent across criteria or inconsistent (e.g., cost effectiveness only counts stormwater features, but community investment benefits and leveraging funding count whole project)?



- Whether operation and maintenance projects should take credit from benefits of initial project, or should there be a different scoring criteria (e.g., operation and maintenance has to show separately how it relates to benefits), and whether feasibility study projects should take credit for the entire future project, or just what actual project delivers?
- Online form should be revised to:
  - Clearly state what attachments should be included where, with a goal of making it easier for reviewers to see backup for what applicant is taking credit for, while also including a full feasibility study. To be clear, long studies should be included once, while appropriate back-up should be seamlessly accessible in each section – community benefits, nature-based solutions, etc. – all of this should be in a concise, clear, easy-to-read, and navigable format.
  - Include an online form printout that contains a table of contents for attachments.
  - Include a project summary with useful project pictures.
- Create a better timeline for all committee meetings to facilitate a consistent review of projects.

#### **Comments on Community Investment Benefits Guidance Recommendations**

- Criteria Used: “Reduce local heat island effect and increase shade and increase the number of and/or vegetation at the site location that will increase carbon reduction/sequestration and improve and improve air quality.”
- Proposed Guidance: The requirements of quantifiable application of nature-based solutions such as trees and other vegetation need to be added. At the same time, we highly recommend that the project defines the baseline data/information in a quantitative and/or qualitative way (e.g., tree canopy cover) and monitor the improvements (e.g., the number of trees planted, the increased carbon sequestration, the amount of stormwater captured, the number human lives saved from extreme heat) over time to ensure projects that can increase/enhance or at least do not result in a net loss of tree related ecosystem services (i.e., carbon reduction/sequestration/greenhouse gas reduction, air quality, public health improvements, urban heat island mitigation, stormwater capture, etc.). Use tools (e.g., i-Tree tools) that help quantify the benefits and values of trees. Projects should optimize these benefits by selecting the right tree and/or vegetation and planting it in the right place.

Thank you for your leadership and support. We look forward to working with you on this critical issue to achieve better outcomes for the Safe Clean Water Program.

Best,

Manny Gonez  
 Director of Policy Initiatives, TreePeople