

- FOR DISCUSSION ONLY -

North Santa Monica Bay Watershed Area Steering Committee

Date: December 22, 2020

To: Regional Oversight Committee
Safe, Clean Water Program

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Los Angeles County Flood Control District

From: North Santa Monica Bay Watershed Area Steering Committee

Re: Comments on Framework for Potential Fiscal Year 2021-22 Stormwater Investment Plan Programming Guidelines

The North Santa Monica Bay (NSMB) Watershed Area Steering Committee (WASC) reviewed the October 19, 2020 memorandum to the Regional Oversight Committee on the preparation of potential Fiscal Year 2021-22 Stormwater Investment Plan Programming Guidelines (copy attached). Based on the collective input of WASC members and their experiences preparing the NSMB's Fiscal Year 2020-21 Stormwater Investment Plan, we would like to share the following comments related to each of the five elements identified for additional clarification.

1. Programming partial funding

Given the limited funding available to the NSMB, the WASC would benefit from the opportunity to approve partial funding for projects submitted for inclusion in its Stormwater Investment Plan. For the NSMB's Fiscal Year 2020-21 Stormwater Investment Plan, the only qualifying project application was for the Viewridge Stormwater Improvements Project, which requested \$2.9 million in funding. Unfortunately, the project proponent opted to withdraw the application because, if approved, it would have monopolized almost two years of funding for the NSMB.

By approving partial funding for qualifying projects, the WASC would be able to leverage a larger number of projects and distribute the limited funds more equitably. When approving partial funding for a project, the WASC could request assurance from the project proponent of the availability of an alternate source of funding. Alternatively, some projects may be scalable, allowing for a smaller project with proportional benefits.

2. Applying Consistent Disadvantaged Community Benefits Policies

The NSMB has no disadvantaged census block groups shown on the Safe, Clean Water Project GIS map. However, the NSMB is a destination for many disadvantaged community residents who recreate in the region due to its beaches, trails, parks, campgrounds and other visitor facilities. Safe, clean water is essential to support that recreational experience. The NSMB WASC would encourage future consideration of investments in recreational resources that serve and benefit disadvantaged communities.

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3. Strengthening Community Engagement and Support

The NSMB WASC recognizes the importance of strengthening community engagement and ensuring community support for the projects that are included in its Stormwater Investment Plan. Guidance on the expectations for both community engagement and support would be helpful to ensure that project proponents have a consistent understanding. Also, additional support is recommended to encourage public participation and engagement in WASC meetings.

4. Clarifying Prioritization of Nature-Based Solutions

The NSMB WASC supports the proposal to provide additional guidance on project elements that would qualify as nature-based solutions, and the process to be used by WASCs to ensure that nature-based solutions are prioritized in a consistent way.

5. Understanding Water Supply Benefits

Project proponents in the NSMB have experienced difficulties scoring points in the water supply benefit area due to the unique characteristics of the watershed. The volume of water supply generated by projects in the NSMB is significantly limited by scattered development near relatively small tributary waterbodies, the lack of permeable soils due to local geology, and the lack of a usable groundwater basin. Additionally, the scoring for the Water Supply Benefit area is heavily weighted on cost effectiveness. No water supply points are awarded for projects that produce less than 25 acre-feet at a unit cost of more than \$2,500 per acre-foot. In the NSMB, the smaller tributary areas yield projects that produce smaller volumes of water supply for comparable costs to improve water quality.

The NSMB WASC would support consideration of more flexible scoring criteria for the Water Supply Benefit. The criteria could be amended to provide points for projects in the NSMB with a higher per acre-foot cost, recognizing the difficulty of delivering projects with new water supply at \$2,500 or less per acre-foot. In addition, the criteria could also be adapted to provide points for projects in the NSMB that provide less than 25 acre-feet per year of water supply, recognizing the smaller volumes of water that will be captured with sparse, distributed development and relatively smaller tributary waterbodies.