



Date: 3/15/2022

To: South Santa Monica Bay WASC Committee Members  
cc: SCWP Staff, Watershed Coordinator

From: OWLA Core Team (Heal the Bay, LAANE, LA Waterkeeper, Nature for All, NRDC, Pacoima Beautiful, SCOPE, The Nature Conservancy and TreePeople)

RE: Input on Project Prioritization for SCWP SIP

OurWaterLA is a diverse coalition of community leaders and organizations from across Los Angeles County united to create a strong water future for Los Angeles. Our goal is to secure clean, safe, affordable and reliable water for drinking, recreation and commerce now and for the future. We have a deep commitment to uphold the trust that voters had in this program when passing Measure W, and that projects which achieve Safe Clean Water Program objectives of water quality, water supply, nature-based solutions and community investments are prioritized. Your active participation on this body is appreciated and we are excited about the prospects of working together to achieve a better water future for our region.

As we have identified in previous letters to you, this program is dynamic, and based on the first two rounds of project reviews, interested stakeholders such as OWLA, committee members and staff recognize the need for improvements to program metrics. With contributions from various stakeholders we are optimistic that future rounds of program funding will yield projects that not only improve water quality and water supply, but also provide community investments that are developed with community participation from concept to implementation and operations. The priorities for OWLA have always been clear: community-led project designs using nature-based solutions. These types of designs will not only address MS4 permit issues, but will also result in projects that can meet the multiple priorities for our region including addressing climate change, providing healthy recreational opportunities, and developing engagement tools so that water issues are more broadly understood and supported by our communities.

As has been reported by staff to the committee, there is currently an assessment being conducted to determine how investments and benefits are attributed to disadvantaged communities. The position of OWLA on this issue is very clear; projects must be located in disadvantaged communities in order to be counted. We are expecting that the reports in development by the SCWP staff working with subject matter experts for Round 4 projects will provide us all with the metrics necessary to plan for and achieve our disadvantaged community

investment goals. We are urging all WASCs to use only the benchmark of projects located in and providing benefits to a disadvantaged community to count toward the 110% threshold, until new assessment strategies are further refined.

We found most applicants in Round 3 did not provide enough information on both prior and planned engagement to allow a clear assessment on community engagement. For example, in some cases, applicants mentioned community meetings but lacked details on who participated, how many people attended, and whether/how input was solicited and incorporated. We see this as an important area where WASC members can request more information from applicants, especially given they may receive additional feedback from ongoing community engagement while under WASC consideration.

We also found many applicants mainly listed discussions with organizations as part of their outreach/engagement activities. We would like to see more emphasis on direct engagement with community members, especially across a broad cross-section of stakeholders. For example, the City of Lakewood held focus groups with seniors, youth, parents, and center users in addition to two community meetings and a survey with over 1,000 responses to guide Lakewood Equestrian Center renovations. Additionally, Amigos De Los Rios connected with Jackson Elementary students, teachers, admin, parents, and area residents to design its school greening and stormwater project.

For projects claiming to benefit disadvantaged communities, few applicants explicitly outlined targeted and direct engagement with members of these communities which further obscured whose needs are being addressed, who is benefitting, and whether there is local support.

We are encouraged to see more references to project proponents proactively seeking Tribal consultations and cross-agency collaborations as well as reaching out to Watershed Coordinators. We hope to see these efforts lead to more community-driven, multi-benefit projects.

Finally, we want to caution WASC members about efforts to claim prior local support when there have been major changes to project concepts, such as the North Hollywood Park Stormwater Capture Project, or a significant gap in time since the last engagement, such as projects coming from prior Watershed Management Program or Master Plan planning processes.

The task before you is to consider the prioritization of projects for funding in this round for the 2022-23 SIP. After careful review of the project submissions, **OWLA strongly recommends** that you approve only those projects that include strong remarks for water quality and water supply and that:

- clearly demonstrate a strong community engagement plan and process took place,
- include a significant community investment element,
- provide benefits to and, as applicable, are located in a disadvantaged community, and
- utilize vegetated nature-based solutions.

Many of the projects proposed in the South Santa Monica Bay watershed area do offer multiple benefits and represent good projects aspects in many ways; however, given limited funds, we would like to highlight the Hermosa Beach Multi-Benefit Parking Lot Greening Project for funding approval this year.

With respect to the special studies presented to this WASC, our recommendation is as follows:

*Community Garden Stormwater Capture Investigation - Los Angeles Community Garden Council*

OWLA sees the direct connection between this proposed study and the goals of the Safe, Clean Water Program to provide community investment through multi-benefit projects, with a wide range in project sizes. The acquisition of land comes with a high capital cost, so identifying any opportunities for cost sharing partnerships will provide a benefit to the program. We encourage the Los Angeles Community Garden Council to work in close collaboration with the Watershed Coordinators on this study, if funding is approved. Our only concern with this study is with the lack of accessibility of these community garden green spaces. If public funds from the Safe, Clean Water Program are used in any way in coordination with community gardens across Los Angeles County, there must be public access. Therefore, we recommend that the WASC include funding for the Community Garden Stormwater Capture Investigation in their SIP, but require an accessibility assessment to be included as part of the study.

*Rebuilding Soils for Effective Nature-based Solutions - Tree People*

We recommend funding allocation for the Rebuilding Soils for Effective Nature-Based Solutions study considering the benefit to overall ecosystem resilience that healthy soils can provide, not to mention the increased water retention potential. If application of the findings for this study is properly implemented, this study could help to achieve Safe, Clean Water Program goals for prioritizing nature-based solutions as well as providing myriad community benefits associated with a thriving and resilient environment.

*Regional Pathogen Reduction Study – Gateway Water Management Authority*

We recommend that no funding be allocated for the Regional Pathogen Reduction Study. We have serious concerns about the legitimacy of this proposed study as no scientific professionals were involved in the development of the study, which is required under the SCWP Scientific Studies Program when feasible. We do appreciate the external review conducted by the Southern California Coastal Water Research Project, but these external experts seem conflicted about how well this study will achieve its proposed goals. OWLA agrees, as we do not understand what new information will be achieved with this study. Additionally, this proposal targets a specific source of a specific pollutant rather than providing multiple benefits, and will potentially weaken water quality objectives rather than improving our water quality. This proposed study therefore will not support many of the program goals. There are already other potential opportunities to conduct a study like this, including through the Stormwater Monitoring Coalition, which already has a similar study in its 5-year plan. Therefore, funding should instead be spent to invest in our communities with multi-benefit stormwater capture projects.

In addition, we support the South Santa Monica Bay WASC limiting their project approvals this year to ensure that sufficient funds remain for future projects such as those highlighted by the watershed coordinators in their presentations. It is preferable for WASCs to maintain their SIP at 75% or below each year.

Thank you for your consideration of these recommendations. We look forward to continuing our engagement with this committee and the watershed coordinators to ensure a better water future for the region.

Sincerely,

OurWaterLA.