

March 2, 2022

To: Members of the North Santa Monica Bay Watershed Area Steering Committee (WASC)

From: David Pedersen, Chair, North Santa Monica Bay WASC
Madelyn Glickfeld, Vice Chair, North Santa Monica Bay WASC
Russ Bryden, Vice Chair, North Santa Monica Bay WASC

Re: Proposed Scoring Criteria Amendment for North Santa Monica Bay (NSMB) WASC

Beginning in March 2020, the WASC has discussed the difficulty that project proponents have experienced to meet the minimum 60-point threshold score for projects in the NSMB. The difficulty has led to a relatively low number of project eligible for funding as part of the NSMB's Stormwater Investment Plans. This memo describes a rationale and option to amend the project scoring criteria for the NSMB to address the unique characteristics of the watershed.

Unique Watershed Characteristics Create Scoring Challenges:

Project proponents applying for Regional Program funds under the Safe, Clean Water Program for the NSMB have noted difficulties achieving the 60-point threshold score to qualify their projects for funding. Upon discussion of the issue, it has become apparent that the NSMB's unique characteristics make it particularly difficult to score any points in the water supply benefit area. 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 absence of a usable groundwater basin. We understand that Public Works staff has evaluated at least two to three projects in the NSMB that failed to meet the threshold 60-point score.

Following is a summary of the reasons that projects in the NSMB do not score favorably:

- The existing scoring criteria (see Attachment A) assumes that water quality projects can also capture large volumes of water supply via infiltration through permeable soils to underlying groundwater basins. Due to local geology, the soils of the NSMB have very low permeability, and there are only two very small groundwater basins: Malibu Valley and Thousand Oaks Area/Russell Valley.
- The scoring criteria also assumes that projects can be scaled to capture water from a large, urban area, yielding higher volumes of water. However, urbanization and development in the NSMB, particularly the Santa Monica Mountains, is more distributed and along smaller tributary waterbodies throughout the mountains. Projects in the NSMB are smaller and lower volume than others in the greater Los Angeles Basin.

- The scoring for the Water Supply Benefit area is heavily weighted on cost effectiveness with the highest score (13 points) awarded for producing water at less than the current cost of wholesale imported water. 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.
- There are limited options for storage in the NSMB, and construction of underground cisterns or surface water storage is very expensive. Similarly, it is expensive to pipe and pump water captured on-site to nearby areas landscape irrigation. These substantial expenses increase the per acre-foot cost of the water supply.
- The scoring criteria does not recognize the importance and value of water supply to support environmental flows and ecosystem function.

Proposed Option to Amend Scoring Criteria for NSMB:

In early 2020, Committee Members discussed potential options to amend the scoring criteria to reflect the constraints in the NSMB. However, representatives of Public Works and the Third Supervisorial District encouraged the WASC to defer a recommendation on changes to the existing scoring criteria until the second or third year of implementation for the Regional Program. We believe it is now timely to propose an amendment to the scoring criteria for the NSMB, as follows:

- Amend the Scoring Criteria as it relates to the Water Supply Benefit area as shown on the strawman proposal (see Attachment B).
 - a. Provide water supply benefit points to projects with a higher per acre-foot cost, recognizing the difficulty of delivering projects at less than the wholesale cost of imported water. The cost of producing water supply via recycling may provide a more realistic comparison.
 - b. Recognize that the cost per acre-foot of treating polluted runoff and stormwater will be higher for smaller, distributed projects in the Santa Monica Mountains.
 - c. Recognize that smaller volumes of water will be captured in areas with sparse, distributed development and relatively smaller tributary waterbodies.
 - d. Provide water supply benefit points to projects that contribute to environmental flows and support enhanced ecosystem function.

Next Steps:

With support and feedback from the NSMB WASC, we would prepare a revised version of this memo to submit to Mark Pestrella, Director of Los Angeles County Department of Public Works, and Bruce Reznick, Chair of the Scoring Committee for the Safe, Clean Water Program.



Exhibit A – Infrastructure Program Project Scoring Criteria

All Regional Program Projects must meet the Threshold Score of **60 points or more** using the following Project Scoring Criteria to be eligible for consideration.

Section	Score Range	Scoring Standards			
A.1 Wet + Dry Weather Water Quality Benefits	50 points max	The Project provides water quality benefits			
	20 points max	<p>A.1.1: For Wet Weather BMPs Only: Water Quality Cost Effectiveness (Cost Effectiveness) = (24-hour BMP Capacity)¹ / (Capital Cost in \$Millions)</p> <ul style="list-style-type: none"> • <0.4 (acre feet capacity / \$-Million) = 0 points • 0.4-0.6 (acre feet capacity / \$-Million) = 7 points • 0.6-0.8 (acre feet capacity / \$-Million) = 11 points • 0.8-1.0 (acre feet capacity / \$-Million) = 14 points • >1.0 (acre feet capacity / \$-Million) = 20 points <p>¹. Management of the 24-hour event is considered the maximum capacity of a Project for a 24-hour period. For water quality focused Projects, this would typically be the 85th percentile design storm capacity. Units are in acre-feet (AF).</p>			
	30 points max	<p>A.1.2: For Wet Weather BMPs Only: Water Quality Benefit - Quantify the pollutant reduction (i.e. concentration, load, exceedance day, etc.) for a class of pollutants using a similar analysis as the E/WMP which uses the Districts Watershed Management Modeling System (WMMS). The analysis should be an average percent reduction comparing influent and effluent for the class of pollutant over a ten-year period showing the impact of the Project. Modeling should include the latest performance data to reflect the efficiency of the BMP type.</p> <table style="width: 100%; border: none;"> <tr> <td style="text-align: center; border-bottom: 1px solid black;"><u>Primary Class of Pollutants</u></td> <td style="text-align: center; border-bottom: 1px solid black;"><u>Second or More Classes of Pollutant</u></td> </tr> <tr> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • >50% = 15 points • >80%= 20 points <p style="text-align: center;">(20 Points Max)</p> </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • >50% = 5 points • >80%= 10 points <p style="text-align: center;">(10 Points Max)</p> </td> </tr> </table>	<u>Primary Class of Pollutants</u>	<u>Second or More Classes of Pollutant</u>	<ul style="list-style-type: none"> • >50% = 15 points • >80%= 20 points <p style="text-align: center;">(20 Points Max)</p>
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A.2 Dry Weather Only Water Quality Benefits	20 points	A.2.1: For dry weather BMPs only, Projects must be designed to capture, infiltrate, treat and release, or divert 100% (unless infeasible or prohibited for habitat, etc) of all tributary dry weather flows.			
	20 points max	<p>A.2.2: For Dry Weather BMPs Only. Tributary Size of the Dry Weather BMP</p> <ul style="list-style-type: none"> • <200 Acres = 10 points • >200 Acres = 20 points 			
B. Significant Water Supply Benefits	25 points max	The Project provides water re-use and/or water supply enhancement benefits			
	13 points max	<p>B1. Water Supply Cost Effectiveness. The Total Life-Cycle Cost² per unit of acre foot of Stormwater and/or Urban Runoff volume captured for water supply is:</p> <ul style="list-style-type: none"> • >\$2500/ac-ft = 0 points • \$2,000–2,500/ac-ft = 3 points • \$1500–2,000/ac-ft = 6 points • \$1000–1500/ac-ft = 10 points • <\$1000/ac-ft = 13 points <p>². Total Life-Cycle Cost: The annualized value of all Capital, planning, design, land acquisition, construction, and total life O&M costs for the Project for the entire life span of the Project (e.g. 50-year design life span should account for 50-years of O&M). The annualized cost is used over the present value to provide a preference to Projects with longer life spans.</p>			
	12 points max	<p>B2. Water Supply Benefit Magnitude. The yearly additional water supply volume resulting from the Project is:</p> <ul style="list-style-type: none"> • <25 ac-ft/year = 0 points • 25 - 100 ac-ft/year = 2 points • 100 - 200 ac-ft/year = 5 points • 200 - 300 ac-ft/year = 9 points • >300 ac-ft/year = 12 points 			

Section	Score Range	Scoring Standards
C. Community Investment Benefits	10 points max	The Project provides Community Investment Benefits
	10 points	<p>C1. Project includes:</p> <ul style="list-style-type: none"> • One of the Community Investment Benefits identified below = 2 points • Three distinct Community Investment Benefits identified below = 5 points • Six distinct Community Investment Benefits identified below = 10 points <p>Community Investment Benefits include:</p> <ul style="list-style-type: none"> • Improved flood management, flood conveyance, or flood risk mitigation • Creation, enhancement, or restoration of parks, habitat, or wetlands • Improved public access to waterways • Enhanced or new recreational opportunities • Greening of schools • Reducing local heat island effect and increasing shade • Increasing the number of trees increase and/or other vegetation at the site location that will increase carbon reduction/sequestration and improve air quality.
D. Nature-Based Solutions	15 points max	The Project implements Nature-Based Solutions
	15 points	<p>D1. Project:</p> <ul style="list-style-type: none"> • Implements natural processes or mimics natural processes to slow, detain, capture, and absorb/infiltrate water in a manner that protects, enhances and/or restores habitat, green space and/or usable open space = 5 points • Utilizes natural materials such as soils and vegetation with a preference for native vegetation = 5 points • Removes Impermeable Area from Project (1 point per 20% paved area removed) = 5 points
E. Leveraging Funds and Community Support	10 points max	The Project achieves one or more of the following:
	6 points max	<p>E1. Cost-Share. Additional Funding has been awarded for the Project.</p> <ul style="list-style-type: none"> • >25% Funding Matched = 3 points • >50% Funding Matched = 6 points
	4 points	E2. The Project demonstrates strong local, community-based support and/or has been developed as part of a partnership with local NGOs/CBOs.
Total	Total Points All Sections 110	

Attachment B -Strawman Proposal



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