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To: Safe, Clean Water Program  
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**Reference: Scoring Committee Comments and Recommendations – Round 4 Projects**

**PURPOSE AND BACKGROUND**

At the November 3, 2022 Scoring Committee meeting, Chair Bruce Reznik requested that note-takers keep a list of the items discussed regarding the Safe, Clean Water Program (SCWP) Scoring Criteria. The following memorandum includes a list of systemic updates discussed or mentioned during Scoring Committee meetings for Round 4 projects (Fiscal Year 2023-2024).

At the April 6, 2023 meeting, the Scoring Committee reviewed the summary materials here, and shared specific recommendations that align with their previously recorded comments, requesting that the recommendations be provided in this final memo. The Committee also requested that this memo incorporate comments made by the Committee during the prior three years of SCWP implementation. Both additions were made to this final memo.

The recommendations made by the Scoring Committee will be reviewed by District Staff and incorporated into the production of the SCWP Biennial Report, and as appropriate to other adaptive management efforts.

**VARIATION IN INFRASTRUCTURE SUBMITTAL TYPES**

The following comments reflect the Scoring Committee's thinking about how projects submitted to the Infrastructure Program for design-only funding, or for a previously or concurrently implemented project seeking only Operations and Maintenance (O&M) funding are difficult to evaluate alongside projects seeking design, implementation, and O&M funding.

- September 1, 2022 – There is not yet guidance to help evaluate design-only projects that propose a variety of alternatives. An audit to compare benefits promised and benefits realized for projects that received SCWP funding may be needed (Member Matt Stone).
- October 6, 2022 – As noted in previous rounds of scoring, it is difficult to score O&M projects using the current Scoring Criteria (comment by Member Diaz and concurrence by Chair Reznik).
- November 3, 2022 – As noted in previous rounds of scoring, projects that apply for both design and construction funding should submit separate applications, especially if there are multiple phases of the project (Committee Members).
- November 3, 2022 – As noted in previous rounds of scoring, evaluation of projects seeking design-only funding is typically more lenient than projects seeking both design and construction funding (Chair Reznik).

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- December 1, 2022 – Projects requesting a small amount for design versus a large amount for construction should be intentionally considered during the scoring process as it relates to the cost benefit ratio of a project (Committee Members).

**Notes from Scoring Committee Review, April 6, 2023**

The Scoring Committee shared that the Infrastructure Program application process does not sufficiently manage the three types of Infrastructure Program project submittals: design, construction, and O&M. The Committee believes the different project types warrant slightly different scoring approaches or a weighted scoring criteria. The Scoring Committee also recommends that the SCWP encourage projects that apply for both design and construction funding to submit separate applications, especially if there are multiple phases of the project. The Scoring Committee also requested guidance on how to evaluate design-only projects that propose a variety of alternatives. Similarly, the Scoring Committee sought more guidance on whether to award points for project benefits based on the entire cost and merits of a project or just components of the project funded by the SCWP.

Other Scoring Committee recommendations:

1. To modify Feasibility Study Guidelines to outline specific requirements for each project submittal type:
  - a. Design-only projects:
    - i. A more flexible application process
    - ii. Require conceptual plan/feasibility study (already required)
    - iii. Preference for on-site geotechnical analysis, but would be satisfactory to use existing or nearby geotechnical information
  - b. Construction projects:
    - i. Require a minimum of 60% design plans
    - ii. Require on-site geotechnical analysis
    - iii. Require a letter from water purveyor for Water Supply Benefit points
    - iv. Require sanitary sewer capacity analysis
  - c. Operations & Maintenance only projects:
    - i. Require monitoring data to supersede modeling data
2. To develop clearer guidelines for the Scoring Committee and applicants about which parts of a project can be given credit, including direction for the following:
  - a. Existing policy says that a project seeking funding for the first phase scope of a multi-phase project cannot claim benefits beyond what the first phase will achieve. In situations where an applicant is seeking funding for a design phase where multiple potential implementation scenarios exist, how should the Scoring Committee evaluate projects that propose a variety of alternatives?
  - b. Affirm that total project cost is used in the cost/benefit calculations in all project benefit categories where that metric is used to evaluate proposals. Some proposers have elected to include only partial project costs in the cost/benefit calculations.

**WATER QUALITY BENEFITS**

The following comments reflect the Scoring Committee consideration of how to assess a project as providing wet weather Water Quality Benefits as opposed to dry weather Water Quality Benefits and practices to standardize project applications for assessment.

**Reference: Scoring Committee Comments and Recommendations – Round 4 Projects**

- September 1, 2022 – More guidance is needed to assess whether projects are dry weather or wet weather (Vice Chair Moon).
- October 17, 2022 – The maximum calculated 24-hour storm capacity should be capped at the 85th percentile storm capacity. This cap will reduce the points historically awarded to applicants that use a larger capacity in calculations (Vice Chair Moon).
  - Concerns about inaccurate system capacity calculations that go above the 85th percentile storm capacity were raised again at the November 3rd and November 9th Scoring Committee meetings.
- November 3, 2022 – Projects with treat-and-release or proprietary BMPs should be evaluated based on the results of the Metrics and Monitoring Study (MMS) instead of being treated as an infiltration basin in the SCW module (Vice Chair Moon).
- November 9, 2022 -- The Project Module and Scoring Criteria are not equipped to allow applicants to input multiple treatment techniques (e.g. dry wells and treat-and-release) (Vice Chair Moon).
- December 1, 2022 – Some form of standardization for dry weather should be created for future applications. Field measurements are ideal but using a standard authority's cubic feet per second (cfs) per acre could also be considered. The number of dry days in a year assumed in an application should also be standardized. If an applicant uses a 24-hour duration instead of the standard 72-hour duration used after a wet weather event to mark when dry weather begins, they should provide justification (Vice Chair Moon).
- December 1, 2022 – Projects should not be designed to treat more water than required, as it increases the cost and use of SCWP funds (Vice Chair Moon).
- December 1, 2022 – For future applications, site-specific geotechnical data should be required for projects requesting construction funding and may be a step in the District's preliminary verification process (Vice Chair Moon).

**Notes from Scoring Committee Review, April 6, 2023**

The Scoring Committee identified several challenges when it comes to awarding Water Quality Benefit points to projects, including non-standardized calculations used across applications and a lack of flexibility in distinguishing between wet weather and dry weather projects. Scoring Committee recommendations from previous rounds of scoring also included revising the cost-effectiveness (per acre-foot) criteria under A.1.1 and potentially creating a cost-effectiveness category under A.2. Recommended next steps are below.

Other Scoring Committee recommendations:

1. Changes to project module:
  - a. Disallow 24-hour BMP capacity above the 85<sup>th</sup> percentile design storm volume and require applicants to submit calculations.
  - b. Allow dry weather calculations to be superseded by monitoring data, if available
  - c. Investigate standardizing the process for the flow calculation inputted by the applicant
  - d. Allow applicants to select multiple BMP types to be evaluated
2. Changes to Feasibility Study Guidelines:

**Reference: Scoring Committee Comments and Recommendations – Round 4 Projects**

- a. Require site specific geotechnical reports for projects applying for construction funding
3. Changes to Scoring Criteria:
  - a. Allow applicants to categorize the project using a load-based criteria (i.e. pounds of pollutants removed), in addition to dry weather or wet weather Water Quality Scoring Criteria.
  - b. Create sliding scale for projects that capture quantities between dry weather and wet weather capacities
  - c. Revise the cost-effectiveness (per acre-foot) criteria under A.1.1 to be linear or scaled
  - d. Consider creating a cost-effectiveness category for the A.2 category (possibly employing a flow rate per dollar metric such as GPM/\$1M).

### **WATER SUPPLY BENEFITS**

The following comments reflect the Scoring Committee considering how Water Supply Benefits can be assessed and considered for other-than infiltration to groundwater.

- November 3, 2022 – Water supply cost effectiveness points are difficult to earn (Chair Reznik).
- November 3, 2022 – The Scoring Committee should consider whether projects located in Watershed Areas with very deep aquifers should be awarded Water Supply Benefit points for interventions that intend to recharge the aquifer (such as concrete removal), even if no direct path to the aquifer is specified (comment by Member Stone and concurrence by Member Esther Rojas).
  - In the past, no points have been awarded to projects in Watershed Areas without aquifers, but the Scoring Committee has given partial points to projects that demonstrate the intent for recharge in regions where aquifers are present (Vice Chair Moon).

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| <b>Notes from Scoring Committee Review, April 6, 2023</b> |
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The Scoring Committee concluded that the current Water Supply Scoring Criteria prevents them from awarding Water Supply Benefit points for projects that demonstrate the intent for groundwater recharge without definitive proof of generating usable recharged water. Committee Members understand that this would limit the ability for many projects to receive points for Water Supply Benefit and recommended either adjusting the Scoring Criteria or changing the ordinance definition of Water Supply Benefit.

The Scoring Committee also clarified its position on a Round 3 Scoring Memo comment, concerning whether a project's newly created water demand can count towards creating water supply, such as a project creating additional demand for onsite irrigation and meeting that demand with captured runoff. If a project is claiming a Water Supply Benefit by offsetting a new potable demand, the applicant should provide an analysis of supply and demand impacts of the project.

Other Scoring Committee recommendations:

1. To address difficulty in claiming Water Supply Benefit points from infiltration:
  - a. Change the SCWP ordinance definition of "Water Supply Benefit" to include activities that infiltrate water with the intent to replenish groundwater, or

**Reference: Scoring Committee Comments and Recommendations – Round 4 Projects**

- b. Adjust the Scoring Criteria to include different thresholds for different Watershed Areas, create a “base plus bonus” system of scoring, and/or assigning weights to different scoring categories.
2. Adjust the Scoring Criteria with recommendations from the MMS investigation on how to lower or recalibrate the B.1 cost effectiveness for Water Supply Benefit points.
3. Modify the Feasibility Study Guidelines to require that projects which claim Water Supply Benefits via offsetting potable water demand provide an analysis of supply and demand impacts of the project.

### **COMMUNITY INVESTMENT BENEFITS**

The following comments reflect the Scoring Committee considering how school greening and flood protection benefits can be considered for Community Investment Benefits.

- October 17, 2022 – As noted in previous rounds of scoring, school greening points should only be awarded to projects that directly implement green features in school campuses (Chair Reznik).
- November 3, 2022 – The Scoring Committee should consider whether school greening points may be awarded to projects that are not located on school property but located on property which the school uses or intends to use (Chair Reznik).
- November 3, 2022 – Flood protection benefits cannot be awarded to dry weather projects for Community Investment Benefit points (comment by Member Diaz and concurrence by Chair Reznik).
- November 9, 2022 – More discussion is needed to decide whether all wet weather projects confer flood protection benefits, or just those which treat the 85<sup>th</sup> percentile storm (comment by Vice Chair Moon).

#### **Notes from Scoring Committee Review, April 6, 2023**

The Scoring Committee concluded that school greening benefits will be evaluated on a per project basis for projects not located on a school campus. The Committee agreed that generally, if a project has a joint use agreement with a school, the project can receive school greening credit.

The committee agreed that only projects that capture the 85<sup>th</sup> percentile storm can receive flood protection benefits. *[Adjustment from June 1, 2023 Scoring Committee Meeting: the Committee discussed how this restriction may prevent Community Investment Benefit points from being awarded to projects that seek to address localized flooding concerns that occur in storms less than the 85<sup>th</sup> percentile. The Committee determined that it would not restrict dry weather projects that do present clear solutions to localized flooding (such as addressing recurring flooding at the intersection across from a school, for example) from receiving the flood protection Community Investment Benefit points.]*

### **NATURE-BASED SOLUTIONS**

The following comments reflect the Scoring Committee considering the elements of Nature-Based Solutions.

**Reference: Scoring Committee Comments and Recommendations – Round 4 Projects**

- November 3, 2022 – The Committee's stance on artificial turf as a Nature-Based Solution should be discussed (Chair Reznik).
- November 3, 2022 – Because removal of impermeable surfaces is expressed as a percentage, applicants can game the criteria by reducing the overall project area and inaccurately represent claimed benefits (Chair Reznik).
- December 1, 2022 – There may be a gradient point scale developed for points awarded for percent reduction in impervious area (District Staff).

**Notes from Scoring Committee Review, April 6, 2023**

The Scoring Committee determined that artificial turf will not be considered a Nature-Based Solution. In previous rounds of scoring, the Committee shared they would like to be able to assign points for projects that connect habitats and community hubs. The Committee also wants to pay more attention to the net benefits of projects. Committee Members also concluded that the best way to improve the impervious surface removal calculation is to require that applicants submit a description of impermeable surface removed relative to the total project area.

Other Scoring Committee recommendations:

1. Modify Project Module to require that applicants submit additional information documenting the impermeable surface removed in relation to the total project area.
2. Consider adjusting the Scoring Criteria for impermeable area removed from a percentage to the total impermeable area removed.
3. Consider adjusting the Scoring Criteria to assign points for projects that connect habitats or community hubs, or otherwise provide net benefits via Nature-Based Solutions.

**LEVERAGING FUNDS AND COMMUNITY SUPPORT**

The following comments reflect the Scoring Committee considering the elements of leveraged funds and community support.

- October 17, 2022 – The Scoring Committee is only responsible for evaluating leveraged funds that have been secured. The WASC would be responsible for evaluating the likelihood of securing funds not yet committed (District Staff).
- October 17, 2022 – It is acceptable to evaluate letters of support for projects that are addressed to other funding sources, so long as the project has not drastically changed and the length of time since the letter was dated is not too great (comment by Member Diaz and concurrence by Chair Reznik and Vice Chair Moon).

**Notes from Scoring Committee Review, April 6, 2023**

The Scoring Committee confirmed that only secured leveraged funds can be evaluated and that funds that are merely “likely” to be secured will not be counted by the Scoring Committee. The Scoring Committee

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clarified that letters of support for a project should be recent (e.g., less than 1-2 years) and addressed to the SCWP instead of reusing letters of support addressed to other organizations.

Scoring Committee recommendations from previous rounds of scoring also included providing a clearer definition of “strong support” and the minimum requirements for demonstrating that support, which should at a minimum clarify that “strong support” does not mean a plan for future outreach, but rather entails concrete evidence of meaningful support. The Committee suggests that along with a community engagement plan, applications should require a budget for community engagement. The Scoring Committee hopes that more information can be requested of the applicants, such as number of community members contacted, community demographics, demonstration of representation from the neighborhood, and demonstration by applicants of strong local support.

**OTHER ITEMS**

The following comments reflect other issues raised by members of the Scoring Committee.

***Considerations for North Santa Monica Bay Watershed Area***

- October 6, 2022 – It has been difficult to generate qualifying projects in the North Santa Monica Bay Watershed Area and a separate Scoring Criteria should be considered (comment made by Chair Reznik).

***Estimates of O&M costs vary***

- October 17, 2022 - Inconsistent estimates of O&M costs across applications make it difficult to assess projects (Vice Chair TJ Moon).

**Notes from Scoring Committee Review, April 6, 2023**

The Scoring Committee noted that the MMS will evaluate Scoring Criteria for the North Santa Monica Bay Watershed Area, which has historically struggled to generate projects that pass the Scoring Threshold due to lack of recharge potential in the Watershed Area.

In addition, the Scoring Committee agreed to recommend adjustments to the Scoring Criteria that would establish that certain categories are not optional. For example, the category for Leveraging Funds and Community Support (Part 2) is only worth five points, so project applicants can neglect community engagement and still pass the Scoring Threshold. The Committee felt that this should not be the case, as intentional community outreach and engagement should be required for projects seeking SCWP funds.

Scoring Committee recommendations from previous rounds of scoring also included considering how job creation might contribute to application score and developing guidance on how to weigh the climate-related impacts of projects. For example, some projects require a significant amount of pumping which uses energy, potentially producing GHG emissions.

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Other Scoring Committee recommendations:

1. Consider changes to Scoring Criteria for the North Santa Monica Bay Watershed Area based on MMS recommendations.
2. Consider altering the Scoring Criteria to require a minimum point threshold for Leveraging Funds and Community Support such that community engagement is a mandatory element of projects.
3. Consider awarding points for job creation in the Scoring Criteria.
4. Consider including positive impact on climate response in the Scoring Criteria.