



# Public Comment Form

Name\*: MIKE LEWIS Organization\*: CICWA BIRFED  
Email\*: MIKE@LEWISANDCO.NET Phone\*: 951-206-4420  
Meeting: \_\_\_\_\_ Date: 8-31-2023

- ☒ LA County Public Works may contact me for clarification about my comments  
\*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

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## Comments

NEED FOR REGIONAL PLAN

Need for PRIORITIES

Dry weather flow

FIRST FLOSH

TRASH- SCREEN ETC

COORDINATE WITH FLOOD CONTROL/CALTRANS

MUCK IN DAMS

RECHARGE FACILITIES

Second Public Comment Period



## Public Comment Form

Name\*: Bruce Reznik Organization\*: LA Water Keepers.org  
Email\*: bruce@la.waterkeepers.org Phone\*: 619-851-9997  
Meeting: SWMP ROC Date: 8/31/23

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### Comments

#6 Public Comment  
FEEDBACK on BIENNIAL REPORT  
OUTLINE

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



Second Public Comment Period



## Public Comment Form

Name\*: Mark Gold Organization\*: NRDC  
Email\*: mgold@nrdc.org Phone\*: 310-386-7516  
Meeting: ROC Date: 8-31-23

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### Comments

- Integration of Water Plan targets and Our County Water Targets
- Need for a Scientific Advisory committee to review & help prioritize research projects.

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



# Public Comment Form

Name\*: Maggie Gardner Organization\*: OurWaterLA Coalition

Email\*: maggie@lawaterkeeper.org Phone\*: (310) 651-3360

Meeting: ROC Meeting Date: 8/31/2023

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## Comments

Please see the attached letter





August 17, 2023

SCWP Regional Oversight Committee  
*Sent via email*

RE: OWLA's SCWP Biennial Review Recommendations

Chair Guerrero, Vice-Chair Faustinos & Committee Members,

**On behalf of the OurWaterLA (OWLA) coalition, the undersigned strongly urge the Regional Oversight Committee (ROC) to consider the following recommendations in their preparation of the biennial SCWP Progress Report.**

Over the course of the first four rounds of the Safe Clean Water Program (SCWP), the biennial progress report has been cited as the point at which any course corrections will be established for the program to ensure it is fully achieving the program's laudable and ambitious goals. The communities that OWLA represents have been waiting for this biennial review as the first opportunity to take a deeper dive into the program's successes and limitations and make adjustments to the program to meet the expectations of LA County voters.

Recognizing that a number of reports with many recommendations have been published around the SCWP, **OWLA made an effort to consolidate and condense the recurring conclusions into the following recommendations** by identifying where reports overlapped. This effort included review of the SCOPE report, the ARLA Working Group report, the UCLA Luskin Center for Innovation and Stantec report under the Metrics and Monitoring Study, the LA Waterkeeper report, and Scoring Committee memos along with OWLA's historic stances and recommendations. Our top priorities are listed first but are also included within their appropriate section.

#### **Top Priorities**

1. Take all steps to **prioritize hardscape removal**, and creation of NEW green space – especially at schools and park-poor communities.
2. Adopt more **metrics and transparent definitions** around Community Investment Benefits, Community Engagement and Support, Nature-Based Solutions, Disadvantaged Community Benefits, and Workforce Impact/PLA Compliance.
3. **Ensure set water quality and supply targets are completed and accounted for** (monitoring; avoiding redundancy).
4. Take steps to move the program from a reactive grants program to a **visionary and proactive investment program**.

#### **Water Quality**

1. **Convene a panel of water quality experts** to assess and make recommendations on how the SCWP can maximize water quality benefits most effectively and efficiently, including whether:
  - a. **Scoring criteria** incentivizes projects that are overbuilt.

- b. **Project categorization** of wet vs dry is sufficient or whether adjustments are needed.
- c. It is appropriate to adopt a **mass pollution reduction** load for larger watersheds and projects.
- d. **Cost-effectiveness criteria** is the best way to measure effectiveness of projects.
- e. The application module can be updated to make it easier to score projects with **treatment trains and other nature-based solutions**.

### **Water Supply**

1. **Use existing ROC Water Supply Working Group** to assess and make recommendations on how the SCWP can maximize water supply benefits most effectively and efficiently, including:
  - a. Whether SCWP's **definition of beneficial use of water** is expansive enough and whether it should be expanded to include shallow groundwater recharge and environmental use of water.
  - b. How to **develop protocols to ensure water is not double counted** between upstream and downstream projects.
  - c. How to **prioritize groundwater recharge projects and on-site use** over wastewater recycling.
    - i. Wastewater recycling plants take in more water than they actually recycle, so sending water to these plants doesn't increase overall water recycling.

### **Nature-Based Solutions (NBS)**

1. **Redefine NBS** in the feasibility study guidelines by incorporating 2022 interim guidance that **differentiates between natural processes and nature-mimicking strategies**.
2. Update scoring criteria to adopt a **sliding scale** (rather than an all-or-nothing score) that incorporates a metrics-based "good, better, best" framework.
  - a. Good = climate-friendly vegetation
  - b. Better = native vegetation
  - c. Best = diverse, native plant communities, including groundcover, shrub, and trees
  - d. See Attachment A for an example of what scoring NBS with a good, better, best framework could look like in a previously submitted letter (page 5-6)
3. Update scoring criteria to incorporate a scale dependent scoring rubric for hardscape removal to better track and **encourage more hardscape removal**.

### **Community Investment Benefits (CIBs)**

1. Require applicants to **demonstrate community need** for project CIB (e.g., reduce flooding, mitigate heat island) through data (e.g., photos, heat index, parks needs assessment) and/or community needs assessment (survey that provides local resident and business input) to achieve points.
2. Replace the current "yes/no" scoring system with **clear metrics** for community benefits to set specific goals and outcomes. Additionally, establish minimum thresholds that must be met to be awarded points.
  - a. An example for the "increasing the number of trees" category is using a metric of change in tree canopy or change in area of native vegetation.
    - i. The ARLA Working Group made suggestions of metrics as a starting point; see [ARLA Working Group Report](#) (pages 27-29) for more details.
3. Embark on ongoing **community needs assessment** (part of outreach program) and build out an easily accessible portal to continuously track.
  - a. The Watershed Coordinators should be integral to this process

### **Benefits to Disadvantaged Communities**

1. Provide a **clearer definition of “DAC benefiting”** that is grounded in strong CIB, community engagement, and displacement avoidance standards.
2. Adopt ARLA Working Group recommendation to **calculate Disadvantaged Community Benefits based on proportionality** (who benefits from a project based on well-established metrics/criteria) for DAC 110% determination and project scoring.
  - a. See [ARLA Working Group Report](#) (pages 48-52) for additional details.
3. Incorporate a **disadvantaged community mapping platform** into the application portal that includes socioeconomic data and environmental challenges to identify priority sites for projects serving disadvantaged communities and severely disadvantaged communities.
  - a. See [SCOPE Report](#) (page 28) for additional details.
4. Require applicants to clearly **demonstrate indirect displacement avoidance strategies**.
  - a. Some examples of displacement avoidance strategies are here:
    - i. [Measure A Grants Administration Manual](#) (pages 195-197)
    - ii. [TCC Program Guidelines](#) (pages 91-94)
    - iii. [Greening in Place Toolkit](#)

### **Community Engagement & Support**

1. **Update and clarify scoring for community engagement** so that expectations and standards are clear. Consider using Rosa Gonzalez of Facilitating Power as a guide.
  - a. See [SCOPE Report](#) (Table 2, page 31) for the Spectrum of Community Engagement to Ownership by Rosa Gonzalez.
2. **Set minimum requirements** (for eligibility) of “Consult” based on Spectrum of Community Engagement to Ownership and allocate increasing points to projects that demonstrate activities that “Involve,” “Collaborate,” and “Defer to” the impacted community.
  - a. See [ARLA Working Group Report](#) (page 41-43) for additional details.
3. Require applicants to **conduct early and meaningful community engagement with federally and non-federally recognized tribes** if it is of interest to the tribes and with appropriate capacity building in place.
4. **Establish a bench of CBOs/NGOs** that can be employed or deployed to conduct community engagement by applicants.
  - a. See [UCLA Luskin Center for Innovation and Stantec’s report](#) (page 10) for additional details.

### **Leveraging Funds**

1. Provide more **clarity as to what constitutes leveraged funding**, specifically addressing:
  - a. internal cost-share;
  - b. phased projects;
  - c. do construction costs count as leveraged funding for operations and maintenance (O&M) projects;
  - d. how certain leveraged funding is; and
  - e. staff time.
2. Establish a **graduated sliding scale** to award points for leveraged funding like the Water Supply pilot.
3. Pilot a track for leveraged funding that allows projects to promise to use SCWP funding to leverage additional funding.
  - a. **Use SCWP funds as a match for federal/state grant programs.**



### **Workforce Development & Good Jobs**

1. Now that the County has a CWA/PLA, have the **\$5M threshold added to the transfer agreement** for applicants who do not have their own CW/PLA.
2. Include a section on application portal to **quantify and make clear the workforce impact of the project**. Specifically, is the project covered under a Community Workforce Agreement (CWA)/Project Labor Agreement (PLA), will the Conservation Corps be part of the workforce, and how many construction and O&M jobs are estimated to be created.
3. **Roll out the workforce development program** as soon as possible. The workforce development program could be structured as a grant program available to external programs with a demonstrated track record of success placing graduates into high road jobs or state-registered apprenticeships, and/or could support the expansion of existing County programs connecting to open County positions (such as WERC).
4. More clarity in the **application module to indicate when a CWA/PLA compliance requirement is triggered**.
  - a. This includes noting when leveraged funding from a source requires a CWA/PLA.

### **Process Improvements**

1. **Separate design, construction, and O&M applications** now to require applicants to submit separate proposals (at the appropriate time) for each project phase. For the longer term, craft relevant scoring rubric for each application type as the criteria and expectations are different depending on the project phase.
2. **Streamline SCWP process** to provide as much deliberation time as possible to WASCs.
  - a. Consider also enabling ROC to send back a single SIP, rather than holding up all SIPs for concerns in one WASC.
3. **Empower ROC** to provide appropriate oversight during SIP reviews.
4. **Assess WASC performance** (e.g., representation and makeup of the WASCs, decision-making practices) through interviews with committee members and other key constituents.
  - a. Is it appropriate to have the WASCs made up of constituents whose organizations apply for the funds from the WASC they sit on?
  - b. Can checks be put in place to prevent WASC members from giving some projects an unfair advantage or disadvantage?
  - c. Are community voices marginalized in WASC discussions and decision-making?
5. **Review the policy of requiring a letter of non-objection** from municipalities in which the Project concept is being proposed.
  - a. Non-municipal applicants have indicated concern that this can be difficult to acquire. Identify if there are ways for the SCWP to smooth the process.

### **Monitoring & Reporting**

1. Establish a **public monitoring dashboard** that is user-friendly and includes which stage the project is in (completed, design, construction, O&M).
2. Develop **specific metrics to quantify, track, and monitor progress** for the SCWP and use monitoring to inform adaptive management.
3. Develop a **monitoring program** that includes compliance monitoring, program monitoring, watershed monitoring, and project monitoring with a strong and transparent review process, ideally conducted by a third party.
4. Offer a County **approved O&M provider or County workforce** as an option to complete O&M if funded by SCWP dollars.

### Other Considerations

1. Explore potential for a **parcel-based program**, such as residential retrofits (with direct install for equity purposes).
  - a. Consider a pilot project with different criteria for regional funds and/or incentives for municipalities to allocate local return funds to such projects.
2. Explore and pursue strategies to **get school districts to more effectively engage** in SCWP (with projects that actually green schools and provide community-wide benefits).
3. Explore any other strategies that will **accelerate replacement of hardscape** with greenspace, especially in park-poor communities.

### Proactive Vision

1. Shift SCWP Regional Program from reactive grants program to **proactive funding program**.
2. Based on existing data and community needs assessment, **identify best project types (and projects)** for various locations to maximize overall program benefits.
3. Use scientific studies money to launch **data assessment**.
4. Use the outreach program to support **community needs assessment**.
5. **Define a proactive vision** that includes specific goals, objectives, targets, metrics, action plan, and timelines for program implementation and evaluation.
  - a. This vision could include crafting a specific SCWP watershed plan led by Watershed Coordinators.

### Additional Research Needs

OWLA found during their analysis and review that there were some significant data gaps, with the vast majority of assessments focused on the infrastructure component of the Regional Program. **We recommend that additional assessments focused on the municipal program, Scientific Studies, Technical Resources Program, and District Programs be pursued.** Specifically, we believe the following questions should be addressed:

1. Are municipal funds augmenting or offsetting past spending on stormwater?
2. Could the RFP for Scientific Studies be adjusted to shift the program towards a more proactive vision by calling for projects to address specific research needs in the region?
  - a. This could include for example calling for projects to identify pollutant reduction of different implemented stormwater infrastructure or calling for data collection, analysis, and modeling towards a watershed planning process.
3. Should applicants be allowed to use funds to conduct their own Feasibility Studies in the TRP program?
4. Once rolled out, how impactful are the outreach, education, and workforce development programs?

Thank you for your consideration of these recommendations. Please let us know if you would like further explanation or context for any recommendation or have any questions. We look forward to continuing our engagement with this committee to ensure a better water future for the region.

Sincerely,  
OurWaterLA

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

*CC: Kristine Guerrero, Belinda Faustinos, Matt Frary, Kirk Allen*

*\*\*\*\*\**

*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 us when passing this measure and that projects which achieve Safe Clean Water Program objectives of water quality, water supply, nature-based solutions and community investments are prioritized.*





# Public Comment Form

Name\*: Peter Tonthat Organization\*: LADWP

Email\*: Peter.Tonthat@ladwp.com Phone\*: (213) 367-1166

Meeting: Regional Oversight Committee Date: 8/31/2023

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## Comments

On behalf of LADWP, I would like to take this opportunity to highlight some recommendations for your consideration.

LADWP encourages the SCWP and individual WASCs to explore strategies for addressing budget shortfalls in previously funded projects due to unforeseen cost escalations resulting from the pandemic, inflation, and supply chain complications. This will help pave the way for the successful implementation of SCWP projects. We also recommend additional guidance and improved efficiency in reporting changes to previously funded projects. Finally, we recommend updates to the Scoring Criteria, including:

1. Expanding incentives for schools to participate in the SCWP
2. Making cost criteria adaptive to changes in the ENR Construction Cost Index
3. Awarding points for projects benefiting disadvantaged communities
4. Awarding water supply points for projects that divert water to reclamation facilities that are being upgraded to recycle 100% of available purified wastewater
5. Further incrementation of scores to improve equity and opportunity in scoring, particularly in the water quality, supply, and community investment categories.

Thank you for considering our recommendations.



# Public Comment Form

Name\*: Annelisa Ehret Moe Organization\*: Heal the Bay / OurWaterLA

Email\*: amoe@healthebay.org Phone\*: 310-451-1500

Meeting: Regional Oversight Committee Meeting Date: 8/31/2023

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## Comments

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### Top Priorities:

1. Take all steps to prioritize hardscape removal, and creation of NEW green space – especially at schools and park-poor communities.
2. Adopt more metrics and transparent definitions around Community Investment Benefits, Community Engagement and Support, Nature-Based Solutions, Disadvantaged Community Benefits, and Workforce Impact/PLA Compliance.
3. Ensure set water quality and supply targets are completed and accounted for (monitoring; avoiding redundancy).
4. Take steps to move the program from a reactive grants program to a visionary and proactive investment program.

August 30, 2023

SCWP Regional Oversight Committee

*Sent via email*

**RE: SCWP Biennial Review**

Chair Guerrero, Vice-Chair Faustinos & Committee Members,

On behalf of the ARLA SCWP Working Group, we strongly urge the Regional Oversight Committee (ROC) to consider the following recommendations in their preparation of the biennial SCWP Progress Report. The Biennial Review is a critical opportunity to ensure the program delivers on the 14 goals promised to the voters when Measure W was approved.

As you know, the Working Group submitted 22 consensus-based recommendations to the District to inform the adaptive management of the SCWP, as documented in the [ARLA Working Group SCWP Report](#). The Working Group believes these recommendations provide valuable insights for the future of the SCWP and strongly encourage the ROC to incorporate these ideas into the 2023 Biennial Review and subsequent guidance.

The Working Group consists of three municipal representatives and three OurWaterLA representatives. The Working Group understands that OWLA made an effort to consolidate and prioritize recommendations by looking for areas of consensus across the following reports:

- ARLA Working Group Report;
- SCOPE Report;
- LA Waterkeeper SCWP Assessment;
- UCLA and Stantec Disadvantaged Community White Paper prepared for the Metrics and Monitoring Study; and
- Scoring Committee Memos.

Some of the Working Group recommendations are reflected in the priorities expressed in the OWLA Comment Letter submitted to the Regional Oversight Committee on August 17, 2023. These include:

- Adopt more metrics and transparent definitions around Community Investment Benefits, Community Engagement, Nature-Based Solutions, and Disadvantaged Community Benefits.
- Ensure water quality and supply targets are completed and accounted for.
- Take steps to move the program from a reactive grants program to a visionary and proactive investment program.
- Consider whether SCWP's definition of beneficial use of water is expansive enough and whether it should be expanded to include shallow groundwater recharge and environmental use of water.
- Redefine Nature Based Solutions to differentiate between natural processes and nature-mimicking strategies.
- Develop community needs assessments as part of the community engagement program.



- Set minimum requirements for community engagement to the level of “Consult” based on Spectrum of Community Engagement to Ownership and allocate additional points to projects that demonstrate activities that “Involve,” “Collaborate,” and “Defer to” the impacted community.
- Calculate Disadvantaged Community Benefits based on proportionality (who benefits from a project based on well-established metrics/criteria) for DAC 110% determination and project scoring.

However, it is important to note that the OWLA letter addresses certain aspects that were not explicitly covered or addressed in the Working Group's deliberations. Notable examples include wastewater recycling, tribal engagement, and displacement avoidance strategies.

In addition to reiterating support for the entirety of the 22 Working Group recommendations, the Working Group would like to draw your attention to two specific Working Group recommendations that merit further prioritization. Both serve to move from a passive to active prioritization of concepts prioritized in the Ordinance.

**Recommendation #9 - Prioritize Nature Based Solutions:** Findings from the Working Group’s year-long watershed modeling effort in the Alhambra Wash watershed show that Nature Based Solutions are the most cost-effective way to achieve *total* benefits across Water Quality, Water Supply, and Community Investment Benefits. In light of this, the Working Group recommends that WASCs should proactively prioritize projects that integrate Nature Based Solutions whenever they are applicable and feasible. This proactive approach is poised to not only surpass Disadvantaged Community Benefit minimum requirements but also optimize benefits while addressing local needs. Therefore, the Working Group recommends the issuance of guidance by the Flood Control District to ensure that WASCs proactively emphasize the strategic deployment of Nature Based Solutions while setting targets for their respective watershed areas.

**Recommendation #14 - Include Disadvantaged Community Benefits in Scoring:** The current process for determining whether projects are providing Disadvantaged Community Benefits is passive, contrary to the Ordinance language which requires that WASCs take an active approach to ensuring that their Stormwater Investment Plans overinvest in Disadvantaged Communities. Under the current approach, WASCs determine on a binary basis whether a project is providing a Disadvantaged Community benefit based on responses received in the application. However, points are not explicitly awarded via the Scoring Criteria to projects that demonstrate they are providing benefits to Disadvantaged Communities. As such, there is essentially no effective mechanism or process for encouraging a robust pipeline of projects that provide meaningful benefits to Disadvantaged Communities. Therefore, the Working Group recommends an additional 10 priority points for projects providing Community Investment Benefits proportional to the DAC population served.

Thank you for your consideration of these high-priority recommendations as you prepare the Biennial Review Report. We would be happy to provide additional information upon request.

Sincerely,

**ARLA’s SCWP Working Group**



# Public Comment Form

Name\*: Michael Scaduto

Organization\*: LA Sanitation & Environment

Email\*: michael.scaduto@lacity.org

Phone\*: (213) 485-3981

Meeting: SCWP ROC Meeting on Aug 31, 2023

Date: 8/30/2023

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## Comments

Please see the attached letter and attachments.

# CITY OF LOS ANGELES

CALIFORNIA



**KAREN BASS**  
MAYOR

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TEL: (213) 485-2210  
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August 30, 2023

## ELECTRONIC MAIL

Ms. Kristine Guerrero, Chair  
Regional Oversight Committee  
Los Angeles County Safe, Clean Water Program  
11th Floor, PO Box 1460  
Alhambra, CA 91802-1460

Dear Chair Guerrero:

### **SUBJECT: CITY OF LOS ANGELES COMMENTS TO REGIONAL OVERSIGHT COMMITTEE SAFE, CLEAN WATER PROGRAM BIENNIAL PROGRESS REPORT**

Los Angeles Sanitation & Environment (LASAN) commends the Los Angeles County Flood Control District (District) for its hard work and dedication to successfully implement and administer the Safe, Clean Water Program (SCWP or Program). It is truly remarkable to see how much has been accomplished during the first four years of the Program and we appreciate the ongoing adaptive management efforts and initiatives to further enhance the Program. We also salute the leadership and guidance the Regional Oversight Committee (ROC) has provided to the Program, and we appreciate the opportunity to provide input and share our insights as part of the first SCWP Biennial Progress Report.

LASAN is designated as the lead agency for implementing the SCWP within the City of Los Angeles (City). Building off the success of Proposition O, the City continues to invest in a hybrid of infrastructure projects and nature-based solutions to improve water quality and water supply. These projects continue to demonstrate LASAN's commitment to improving water quality by enhancing community investments through greening and implementation of nature-based solutions.

LASAN has participated in the first four rounds of the Regional Program and we are thrilled to have been awarded funding in these early rounds for the implementation of a wide variety of unique multi-benefit stormwater projects, special studies, and Operations and Maintenance (O&M) projects across the City. We recognize that the Program is still in its infancy and is

*zero waste • zero wasted water*

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

Recyclable and made from recycled waste





dynamic, presenting a unique opportunity to refine the Program to enable project developers across Los Angeles County to be successful in future rounds.

Adaptive management is an integral part of the Safe, Clean Water Program. The collaborative approach the District has taken with stakeholders via the current refinements underway, such as the Biennial Review and the Metrics and Monitoring Study, will shape the Program to further the region's goals and objectives. The City has been an active stakeholder in this effort and in the Accelerating Resilience Los Angeles (ARLA) Safe, Clean Water Program Working Group, which has provided valuable input regarding disadvantaged community designations and community engagement. The ROC recommendations can additionally inform where future improvements can be made to further achieve the Program's goals and objectives.

With the experience we have gained participating in the Program, and in the spirit of adaptive management, LASAN proposes to the ROC the following recommendations and refinements to the Program as part of the SCWP Biennial Progress Report.

1. When considering approval of the FY 24/25 Stormwater Investment Plans, Watershed Area Steering Committees (WASC) should prioritize supplemental funding requests for projects awarded in Round 1 (FY 20/21) through Round 3 (FY 22/23). In an effort for the Program to realize its investments and commitment towards project implementation, it is important to recognize unique circumstances that have affected projects submitted during these early rounds. For example, in Round 1, applicants had to develop applications within a short two-month Call for Projects period (October 15 - December 15, 2019), which in hindsight affected the level of detail that would otherwise be needed to effectively determine project cost and schedule. Furthermore, Projects submitted in Rounds 2 and 3 were packaged in the midst of a global pandemic, the economic effects of which did not fully materialize until after these projects were approved for funding. The resulting economic factors (inflation and escalation) affecting many of our capital improvement projects today were not anticipated during these early rounds.
2. The County of Los Angeles comprises varying geographic areas, yet the Regional Program's current Scoring Criteria is a "one size fits all" approach. Each watershed has unique opportunities and constraints. An evaluation of watershed specific goals, objectives, metrics and targets would allow project applicants to focus on projects that will meet the goals and objectives of each watershed and yield projects that are more likely to be successful and maximize Program benefits.
3. To ensure project coordination is occurring, an overall watershed approach to planning and implementation should occur within each WASC. It is important for the WASCs to consider upstream and downstream impacts of future projects by recognizing, building upon and maximizing previous and ongoing projects investments. Funding new projects upstream of an existing project will diminish the investment and reduce the overall benefit with the watershed.

Attachments 1 and 2 provide additional programmatic and scoring matrix recommendations for the ROC's consideration and inclusion in the SCWP Biennial Progress Report.

LASAN appreciates the opportunity to provide input and for your consideration of our recommendations. We look forward to continuing our engagement with the SCWP and the ROC to ensure the Program meets all of its objectives and brings the agencies closer to meeting their Total Maximum Daily Load (TMDL) compliance requirements. If you have any questions regarding our letter or wish to discuss further, please contact me at (213) 485-3981 or via email at [michael.scaduto@lacity.org](mailto:michael.scaduto@lacity.org).

Sincerely,

*Michael Scaduto*  
Digitally signed by Michael  
Scaduto  
Date: 2023.08.29  
21:13:29-07'00'  
Michael Scaduto, P.E., ENV SP  
Principal Engineer  
Safe Clean Water Implementation Division  
LA Sanitation and Environment

Attachment 1: Detailed Recommendations and Implementation Suggestions

Attachment 2: Recommended Redlines to Scoring Matrix

Attachment 3: City of Los Angeles, Bureau of Engineering (BOE) Funding for Construction  
Cost Inflation

CC: Barbara Romero, ROC Member / LASAN  
Traci Minamide, LASAN  
Julie Allen, LASAN  
Susie Santilena, LASAN  
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Belinda Faustinos, ROC Vice Chair  
Lauren Akhaim, ROC Member  
Carl Blum, ROC Member  
Norma Camacho, ROC Member  
Liz Crosson, ROC Member  
Maria Mehranian, ROC Member  
Diana Tang, ROC Member  
Charles Trevino, ROC Member  
Elva Yanez, ROC Member  
Carolina Hernandez, LA County  
Matt Frary, LA County

# ATTACHMENT 1: DETAILED RECOMMENDATIONS AND IMPLEMENTATION SUGGESTIONS

Below are Los Angeles Sanitation and Environment's (LASAN) detailed comments and recommendations to the to the Regional Oversight Committee for the Safe Clean Water Program Biennial Progress Report

A. Programmatic and Watershed Area Based Strategic Planning Recommendations		
Issue	Background	Recommendations
The SCWP process and application for the first three rounds was in the midst of the pandemic and a result the economy was project cost have experienced doubled digit escalation.	When considering approval of the FY 24/25 Watershed Investment Plans, Watershed Advisory Committees (WASC) should prioritize additional requests for projects funded from Round 1 (FY 20/21) thru Round 3 (FY 22/23). In an effort for the Program to realize its investments and commitment towards project implementation, infrastructure projects packaged in Round 1 only had two months to prepare and submitted applications and Projects in Round 2 & 3 were packaged in the midst of a global pandemic and did not anticipate for the current economic factors (inflation and escalation) that many of our capital improvement projects are experiencing today.	<ul style="list-style-type: none"> <li>✓ Ensure the Regional Program is committed to funding a portion of the funding shortfalls on previously funded projects.</li> <li>✓ Prioritize additional funding requests for projects approved from Round 1 (FY 20/21) thru Round 3 (FY 22/23).</li> </ul>
The Scoring Criteria presents a "one-size fits all" approach for nine unique watershed areas and does not consider watershed area specific conditions and constraints.	<p>As an agency that spans across multiple watershed areas, LASAN has a clear understanding that there is disparity between the ability of projects to pass the 60-point threshold in some watersheds compared to others. This is due to the fact that the current scoring criteria does not account for watershed-specific conditions and constraints. For instance, in South Santa Monica Bay, infiltration into a drinking water aquifer is not possible, while in the Upper LA River, most projects are able to utilize infiltration as a water capture mechanism.</p> <p>We recommend the Los Angeles County Flood Control District (District) propose watershed area-based studies to assist Watershed Area Steering Committees (WASCs) and project developers in understanding constraints and opportunities, set metrics and targets, and plan strategically to maximize Program benefits and meet watershed compliance obligations. Regional Board representatives have made it clear during public testimony at recent WASC meetings that this Program must continue to prioritize compliance. Defining unique opportunities and constraints of each watershed area would assist with this task and provide each WASC and project developers with the most appropriate types of Projects that would potentially bring cost-effective solutions to WASC in order to maximize cost benefits. WASCs can then take a proactive approach to ensuring they fund the right type of projects in the right locations within the watershed area, considering its unique characteristics and MS4 Permit requirements. This recommendation echoes a similar recommendation suggested in the Accelerating Resilience LA (ARLA) SCWP recommendations detailed in its "Using Watershed Science to Build Consensus and Maximize Benefits of L.A. County's Safe Clean Water Program" published in January 2022.</p> <p>Such analyses would have been appropriate for inclusion in the District's Metrics and Monitoring Study. However, as it may be too late to make that addition, the District should consider working with Watershed Coordinators and local academic institutions to develop an application for each WASC to consider funding a special study to accomplish this goal. This would assist WASC members to be educated on decisions and long-term impacts to regional funding and provide the foundation for developing appropriate unique metrics for each watershed area.</p>	<ul style="list-style-type: none"> <li>✓ Conduct watershed area-based studies to develop specific goals, objectives, metrics and targets.</li> <li>✓ Develop watershed specific scoring based on the goals and opportunities within each watershed area.</li> <li>✓ Incorporate Watershed Management Programs and prioritize water quality compliance into watershed area planning efforts.</li> </ul>
Watershed wide efforts need to be better integrated into the WASCs' deliberation efforts when considering projects for Stormwater Investment Plans (SIPs).	LASAN recommends that the District ensure that each WASC is aware of watershed wide efforts, both planned in approved SIPs, and those not programmed through the SCWP. This would enable WASCs to better coordinate watershed efforts. Large investments in downstream watershed efforts should be strongly considered when funding new proposed projects. For example, the Ballona Creek Total Maximum Daily Load (TMDL)	<ul style="list-style-type: none"> <li>✓ Develop a more robust SCWP Spatial Data Library or use other means, including Watershed Coordinators, to communicate watershed-wide efforts to WASCs.</li> </ul>

	<p>Project, is a \$90M dry weather diversion project funded in Round 2 that will treat 80% of the dry weather flow from the Ballona Creek Watershed. However, subsequently funding dry weather projects upstream of the Ballona Creek TMDL. Project not only diminishes the intent of funding the project, but also reduces dry weather flows that would ultimately go to the Hyperion Water Reclamation Plant (Hyperion) and provide a reliable source of water reclamation. Building out additional information in SCWP Spatial Data Library could assist with this effort to recognize and account for other projects and efforts in each watershed.</p> <p>In an effort to improve watershed coordination and understand projects being proposed within the City of Los Angeles, the City has adopted the “City of Los Angeles Policies and Procedures for Safe Clean Water Program Community-Proposed Projects.” The intent of this policy was to create an intake process for any projects proposed by non-governmental organizations and other third parties. This process enables such organizations to request support from the City, and for the City to review these projects and work out any technical issues before issuing the requested support letter needed for their applications. Prior to implementation of this policy, it was difficult for the City to track projects coming through the SCWP from various sources that have implications for the City of Los Angeles. We kindly request and appreciate the District and Watershed Coordinators assisting in informing the community of this policy and communicating its bearing on their applications.</p>	
Issue	B. Administrative Recommendations	
	Background	Recommendations
<p>The current reporting process presents administrative burdens and should be simplified.</p>	<p>The District should explore ways to lessen the administrative burden of the Program by simplifying and streamlining the reporting processes.</p> <p>We recommend the District work to make reporting in the Program more concise, relevant, and streamlined. For instance, quarterly reports should be simplified to remove ambiguity and repetition in report entries and should focus instead on project-specific information relevant to providing project transparency.</p> <p>In order to streamline reporting, we recommend the District consider changing the reporting to be concise, streamlined, and biannual instead of quarterly in frequency, and that the Program utilize the annual reports for more robust updates. We recognize these reports are required by Chapter 18 of the Los Angeles County Flood Control District (LACFCD) code but believe it is within the District’s purview to change interpretations of the expectations for both. Transitioning to biannual reports is more appropriate, since project developers do not typically have significant project changes to report on a quarterly frequency, nor are modifications considered at WASC meetings on a quarterly basis.</p> <p>The PDF output of the report should also be reduced and reformatted for ease of review. This would also allow WASCs to receive more timely updates and provide better oversight of funded projects. In addition, this would ease the administrative burden for both project developers and District staff, as it would facilitate a more efficient review of the reports. The typical report is usually around 40 pages and is mostly blank space. The City alone must report on 12 different projects. This results in over 500 pages per quarterly report just for our agency. Such reporting requires a tremendous amount of time and resources for all project proponents, large and small, and are cumbersome for WASC members to review, as well.</p>	<ul style="list-style-type: none"> <li>✓ Explore opportunities to simplify and streamline the Regional Program reporting process in order to remove ambiguity and repetition in report entries while providing opportunities to provide more meaningful and relevant project-specific information.</li> <li>✓ Change the frequency of Regional Program reporting to be biannual rather than quarterly.</li> <li>✓ Reduce and reformat the PDF output of the report to eliminate irrelevant/non-applicable questions to facilitate a more effective input process for project developers and to enable the WASCs and District Staff to review reports more efficiently.</li> <li>✓ Provide more guidance and a more efficient process for providing project modification information with precise process.</li> <li>✓ Include further guidance within the SCWP website and the reporting module regarding.</li> </ul>

	<p>Various sections of the current quarterly report are not relevant during certain portions of the project lifecycle. For example, the “Quarterly Metrics and Targets” section is typically left empty for a capital project because benefits cannot be measured until construction is complete. The District should review which sections require little to no modification between quarters in reports submitted to date and consider removing them from such reports. Pertinent sections can be retained in annual reports.</p> <p>More guidance and retooling of the project modifications process is also needed. The current modification process is extremely vague and confusing, requiring many components, including a letter to the District, multiple updates to the quarterly report module at different times, WASC review six months later, without any concrete District approval nor a WASC vote, and an unclear timeline for uploading the updated scope of work in the module.</p> <p>We also recommend the District provide further guidance within the SCWP website and instructions within the reporting module on how to navigate reporting entries, definitions, modifications, etc. For instance, guidance for the fields in the module called “Total SCW Funding Awarded” and “Cumulative Amount Received” should be clarified so that project developers can understand the context in which to provide a response.</p>	<p>including job aids, to navigate reporting entries, definitions, and the project modification process.</p>
The SIP approval timeframe is not aligned with municipal fiscal year schedules.	<p>LASAN requests and recommends that the District work to have SIPs approved by Board of Supervisors by the close of the fiscal year (June 30<sup>th</sup>) to prevent unnecessary delays and cost escalations of projects in the Program. The typical timeframe for an agency to enter into a Transfer Agreement with the District and receive funding is nine months from SIP approval. As a result, and in order to avoid project development delays, the City has been using its Municipal funds to front fund the design work until the first year of Regional Program funding is received.</p>	<p>✓ Revise and align the Regional Program Call for Projects and SIP approval to be completed annually before the close of each fiscal year.</p>
<b>C. Scoring and Application Recommendations</b>		
<b>Issue</b>	<b>Background</b>	<b>Recommendations</b>
<p>The current scoring ranges for Section A.1.1 (Water Quality Cost Effectiveness), Section B1 (Water Supply Cost Effectiveness) and B2 (Water Supply Benefit Magnitude) are not uniform and are not flexible with respect to small changes in project cost or capacity.</p>	<p>LASAN recommends that the scoring ranges and standards for Section A.1.1 (Water Quality Cost Effectiveness), Section B1 (Water Supply Cost Effectiveness) and B2 (Water Supply Benefit Magnitude) be adjusted to include more criteria ranges.</p> <p>The current criteria range for Scoring Standards A.1.1, B1 and B2 have increments that are not uniform and have an increment of up to 7 points between ranges. A small change in the project cost or capacity can significantly affect the score, which could mean the difference between achieving the minimum score of 60 or not. For more complex projects, such as those in areas with insufficient, antiquated, or unmaintained infrastructure (which are often conditions experienced in disadvantaged communities) or in areas with hydrogeological conditions that do not allow infiltration to potable aquifers, every point is significant.</p> <p>Because the increase in points for a project can be significant for a small change in the project cost, the Program may be inadvertently incentivizing project developers to reduce the scope of the project to receive more points. Adding more ranges in the Scoring Standards would make for a fairer comparison of projects, would assist complex projects such as projects in disadvantaged community areas, and would reduce the incidents of proponents removing beneficial project elements to achieve a higher score.</p>	<p>✓ Please refer to Attachment 2 for redline recommendations to the Scoring Criteria ranges and standards.</p>



<p>The current SCWP Projects Module does not provide a consistent way to model and claim the capacity of high efficiency best management practices (BMPs) for Water Quality Cost Effectiveness calculations and scoring.</p>	<p>LASAN recommends improving the SCWP Projects Module to provide a consistent way of modeling and claiming the capacity of high efficiency BMPs. The current Scoring Standards use "24-hour BMP Capacity" to calculate Water Quality Cost Effectiveness (Section A.1.1). 24-hour BMP Capacity is calculated within the SCWP Projects Module as the maximum volume that can be theoretically treated over a 24-hour period. For storage BMPs, this is roughly equivalent to the dry capacity of the project. High treatment rate BMPs such as drywells are designed to exhibit high treatment rates within minimal dry storage volumes.</p> <p>In order to meet both the SCWP and Enhanced Watershed Management Plans/Watershed Management Plans (E/WMPs) goals of capturing the 85th percentile 24-hour storm, the diversion rates of the high efficiency BMPs must match the peak runoff rate from the 85th percentile 24-hour storm. Under the existing calculation framework of 24-hour BMP Capacity within the module, these high treatment rate BMPs are calculated to have exceedingly large 24-hour BMP capacities because the maximum treatment rate, which is designed to occur during short periods at the peak of the design storm hydrograph, is applied uniformly across the entire 24-hour period, often achieving a higher score than storage BMPs. This has created a perception that some projects applying for Regional funding are purposefully "oversized" to receive a Water Quality Cost Effectiveness score higher than what was intended in the Feasibility Study Guidelines. LASAN recommends the District provide for a more flexible scoring criteria for Water Quality Cost Effectiveness (Section A.1.1) that does not penalize drywell and pass through projects for designing to full 85th percentile 24-hour storm capture, a water quality-based target shared by the SCWP and relevant E/WMPs.</p> <p>This can be achieved by changing "24-hour BMP Capacity" to "24-hour Volume Managed" in the Scoring Criteria for Water Quality Cost Effectiveness (A.1.1) and updating the associated footnote to clarify the intent of the criteria.</p>	<ul style="list-style-type: none"> <li>✓ Please refer to Attachment 2 for a redline of the Scoring Criteria reflecting these recommendations.</li> <li>✓ Update the application module to handle more complex projects with a train of BMPs and high treatment rate BMPs.</li> </ul>
<p>The recommendations discussed at the Scoring Committee's April 6, 2023, meeting regarding restricting the scored 24-hour BMP capacity to the 85th percentile storm volume may affect achieving 80% primary and secondary pollutant capture on an average annual basis.</p>	<p>At the April 6, 2023, Scoring Committee Meeting, members recommended restricting the scored 24-hour BMP capacity to the 85th percentile storm volume. LASAN does not recommend implementation of this restriction without additional changes to the mechanism in which 24-hour BMP Capacity is calculated. While all wet-weather projects seek to fully capture the 85th percentile 24-hour design storm and achieve 80% annual average primary and secondary pollutant capture, varying BMP types are limited by each one of these conditions.</p> <p>For high treatment rate BMPs, the 24-hour BMP Capacity must often be larger than the required 85th percentile, 24-hour storm volume to remove 80% of pollutants over a 10-year period as defined in Scoring Criteria Section A.1.2 (Water Quality Benefit), as currently allowed. Conversely, in instances of larger dry BMP capacity, such as for a storage volume used for irrigation, the capacity above the design storm volume should not be allowed in the calculation for Section A.1.1 (Water Quality Cost Effectiveness) but should be allowed, at a minimum, in the calculations for Sections B1 (Water Supply Cost Effectiveness) and B2 (Water Supply Benefit Magnitude) because these projects will provide more water supply benefit. Different design approaches may be needed in different circumstances to meet wet weather water quality targets. LASAN recommends the flexibility to include capacity above the design storm volume for section A.1.1 (Water Quality Cost Effectiveness) when it is needed to meet 80% pollutant removal.</p> <p>We also encourage the District to address escalation on a programmatic scale. Impacts of the current economic conditions have highlighted the fact that the cost estimates for some projects submitted to the Program in earlier rounds did not include adequate, if any, contingency and escalation allowances. To ensure that all cost estimates are as accurate and comparable as possible, LASAN recommends that all cost estimates be required to include</p>	<ul style="list-style-type: none"> <li>✓ Continue to allow for project capacities to capture the entire 85th percentile 24-hour storm.</li> <li>✓ Allow projects to be scored with 24-hour BMP Capacities exceeding the 85th percentile 24-hour storm volume when it is required to achieve 80% primary and secondary pollutant capture on an average annual basis.</li> </ul>
<p>Current scoring standards do not reflect appropriate standards for project cost, including escalation and contingency.</p>		<ul style="list-style-type: none"> <li>✓ Update the Scoring Standards for Sections A.1.1 and B.1 to be based on the ENR Construction Cost Index for the Los Angeles Region on an annual basis.</li> </ul>

	<p>contingency and escalation allowances per industry standards, and that SCWP adopt standards for these allowances. Please see Attachment 3.</p> <p>Current economic conditions have resulted in the Scoring Standards A.1.1 (Water Quality Cost Effectiveness) and B1 (Water Supply Cost Effectiveness) becoming harder to achieve. Both of these standards include construction costs in their calculations. As construction costs escalate, the capacity per million dollars of construction cost is decreasing and the life-cycle cost per acre-foot of water is increasing, both of which lower the scores for the respective Scoring Criteria sections.</p> <p>LASAN recommends that the Scoring Standards for Sections A.1.1 (Water Quality Cost Effectiveness) and B1 (Water Supply Cost Effectiveness) be adjusted annually based on the Engineering News Record (ENR) Construction Cost Index for the Los Angeles Region.</p> <p>Although our projects approved in the Rounds 1 and 2 SIPs did not take credit for this, we are currently using our Municipal Program funds to help fill in the funding shortfalls we are now experiencing due to recent market forces. Our recent Municipal Program Annual Plans submitted to the District reflect how we are strategically leveraging Municipal Program funding for these projects.</p> <p>For previously approved projects from the early rounds of the SCWP that may need to request additional funding, we recommend that Program guidance be updated to exempt such projects from rescoring if they are only asking for amounts to cover escalation.</p> <p>We appreciate the District's effort to encourage competitive bidding on projects through the new "Potential Future Bid Opportunities" section of the SCWP as one way of potentially curtailing high bids for projects, and we appreciate the new process to be implemented in Round 5 through which the Regional Coordination Team will provide project developers with specific potential grant opportunities for leveraged funding. We recommend the District take further action to partner with project developers to lobby for supplemental funding for SCWP projects from the State of California and through funding opportunities available through the Bipartisan Infrastructure Law (BIL).</p>	<ul style="list-style-type: none"> <li>✓ Develop standards for contingency and escalation allowances.</li> <li>✓ Require cost estimates to contingency and escalation allowances.</li> <li>✓ Exempt previously funded projects from rescoring if they are only seeking additional funds to cover escalation.</li> <li>✓ Partner with project developers to lobby for leveraged funds from the State of California and funding opportunities through the BIL and similar programs.</li> </ul>
<p>The definition of Community Investment Benefits does not currently allow for consideration of points for projects in disadvantaged community areas.</p>	<p>One of the goals of the SCWP is to improve disadvantaged community areas. However, there are no points awarded for projects in disadvantaged community areas. Projects in disadvantaged community areas tend to be more difficult and expensive to implement due to several factors including limited open space and narrower public right-of-way. Awarding points for projects in disadvantaged community areas would help to make up for points lost due to the higher costs of projects in disadvantaged community areas where existing infrastructure is inadequate or in disrepair.</p> <p>The District has previously allowed only the total amount of funding awarded by the Regional Program towards a project be used when demonstrating the 110% investment return calculation. LASAN recommends the District explore options for providing partial points and credit for projects benefiting disadvantaged communities (e.g., crediting a proportion of the project cost as benefiting a disadvantaged community), especially for projects located outside of disadvantaged communities.</p>	<ul style="list-style-type: none"> <li>✓ Please refer to Attachment 2 for a redline of the Scoring Criteria for a recommended approach to awarding points for Community Investment Benefits.</li> <li>✓ the SCWP should consider a robust, data-driven process or system to evaluate existing equity issues in project areas to determine what benefits the project should focus on, in alignment with the City's Equity Index</li> </ul>
<p>The current application process does not effectively accommodate Operations and Maintenance (O&amp;M) requests.</p>	<p>LASAN recommends the District develop a specific O&amp;M project request template in the SCWP Projects Module for capital projects that have been built and are now only seeking O&amp;M funding. Rather than have such O&amp;M projects classified as Infrastructure Projects, we recommend such projects have their own category with unique application module inputs.</p>	<ul style="list-style-type: none"> <li>✓ Develop a specific O&amp;M project request template in the SCWP Projects Module for capital projects that have been built and are now only seeking O&amp;M funding.</li> </ul>

	<p>As these projects are already constructed, mostly prior to the passage of Measure W, there is a strong need for a different, simplified O&amp;M project request template that is not dependent on the capital project that implemented the project. Projects seeking to have O&amp;M funded through the Regional Program should not be subject to scoring, as long as the WASC agrees the project meets the goals of the SCWP.</p> <p>A major benefit of the SCWP that sets it apart from other funding sources is the fact it can be used to fund O&amp;M efforts for existing projects. For example, the City of LA has a few dozen projects originally funded by Proposition O, a bond measure passed by City voters that provided \$500 million in capital funds for projects providing water quality benefits, including stormwater capture projects, and have as their primary purpose the reduction of pollutant loads to impaired waters. However, Proposition O did not provide funding for O&amp;M for these projects.</p> <p>In recent Regional Program rounds, the City has leveraged Municipal Program funds as match for Regional applications to assist City O&amp;M projects in being more competitive when seeking Regional funding. Many of the Prop O projects, if provided the resources to ensure for effective O&amp;M, present potentially more cost-effective opportunities to increase stormwater and runoff capture from these existing projects than developing new projects.</p>	<ul style="list-style-type: none"> <li>✓ Rather than have such O&amp;M projects classified as Infrastructure Projects, these projects should have their own category with unique application module inputs.</li> <li>✓ Such O&amp;M projects should not be subject to rescoring.</li> </ul>
<b>D. Additional Recommendations</b>		
<b>Issue</b>	<b>Background</b>	<b>Recommendations</b>
Watershed-specific constraints need to be taken into consideration for determining Water Supply benefits.	<p>As mentioned above in our comments under “A. Programmatic and Watershed Area Based Strategic Planning Recommendations” regarding setting targets and metrics to account for variability between watershed areas, the Scoring Criteria should account for differences between watershed areas and how those constraints affect the type of projects that may be implemented. For example, as recommended by the ARLA Working Group, the Program should expand options for Water Supply points in scores to allow for environmental water to count as a Water Supply benefit, especially for those watershed areas that do not have soils conducive to infiltration.</p> <p>Water Supply Scoring Criteria should also continue to allow for projects that divert water to reclamation plants in the process of being upgraded to 100% water recycling to count as well.</p>	<ul style="list-style-type: none"> <li>✓ Expand options for Water Supply points reflecting unique watershed conditions, including environmental water to count as a Water Supply benefit, especially in areas that are not conducive to infiltration.</li> <li>✓ Provide Water Supply points for projects that divert water to reclamation plants that are being upgraded to recycle 100 percent of available purified wastewater.</li> </ul>
Disadvantaged Community Benefits should be clarified and evaluated to allow for partial points and fractions of funding.	<p>The District has previously allowed only the total amount of funding provided by the Regional Program towards a project to be used to make the 110% Disadvantaged Community investment calculation, per item 7 on page 49 of the 2022 Interim Guidance.</p> <p>However, LASAN urges the District to explore options for allowing WASCs to award fractions of funding provided to make this calculation in its Biennial Review effort, especially for projects located in watersheds that do not contain census tracts that meet the criteria for disadvantaged communities.</p> <p>Various examples and options for providing partial points and credit for projects benefiting disadvantaged communities were thoroughly analyzed by the ARLA SCWP Working Group, such as evaluating benefits based on the population served by a project. Such options are presented in detail in the ARLA SCWP Working</p>	<ul style="list-style-type: none"> <li>✓ Implement options for providing partial points and credit for projects benefiting disadvantaged communities.</li> <li>✓ Consider the options provided by the ARLA SCWP Working Group, including evaluating benefits based on the population served by a project.</li> </ul>

<p>The definition of Community Investment Benefits is vague and does not consider local equity initiatives.</p>	<p>Group's "Using Watershed Science to Build Consensus and Maximize Benefits of L.A. County Safe Clean Water Program" report issued in January 2022, which we encourage the District to use as reference.</p> <p>The City of Los Angeles has made strong commitments to prioritize equity among Angelenos in order to make up for historic inequalities. This is prominent in the City's budgeting process, which requires the City's Chief Administrative Officer to assess the equitable distribution of capital programs in order to evaluate and prioritize capital funding.</p> <p>The location of each project is evaluated using the Equity Index developed by the City Controller's Office. The Equity Index evaluates access to equity and opportunity in each census tract. Through a series of maps, the Equity Index demonstrates how a number of socioeconomic factors, including housing costs, educational achievement, environmental challenges, and access to resources, like health insurance, food and high-speed internet, impact people's lives and livelihoods in each neighborhood, and shows that some neighborhoods are impacted far more severely than others. The Equity Index scores each census tract in the City on a scale of 1 to 10. These scores are reflective of 13 indicators that fall under four major categories. Lower scores indicate that residents experience less access to resources, economic opportunities, and education, and have increased environmental burdens. Higher scores indicate that residents experience high access to resources, economic opportunities, and education, and lower environmental burdens.</p> <p>Despite the clear guidance in the City's Equity Index, we have found it challenging to find projects that meet the City's Equity Index guidance <b>and</b> the SCWP requirements, mostly due to the fact that the definition of Community Investment Benefits in the SCWP Scoring Criteria is vague.</p>	<p>✓ Clarify the definition of Community Investment Benefits to provide project developers with specific criteria to determine a project's potential community benefits.</p> <p>✓ Allow for cities' established equity metrics to demonstrate community investment benefits.</p>
<p>The current Scoring Criteria does not incentivize projects near/at schools.</p>	<p>Projects adjacent to schools (within 0.25 miles) or along a designated Safe Route to School should qualify for School Greening points. If a school project accepts offsite runoff for storage and/or mitigation within a school property, then the project would be awarded 3 additional bonus points.</p> <p>Note, in the past, projects proposed by the Los Angeles Unified School District (LAUSD) have not been favorably awarded funds by WASCs for such reasons as:</p> <ul style="list-style-type: none"> <li>• LAUSD is not subject to the Measure W parcel tax, yet is requesting funding through the Program;</li> <li>• Funding would only assist with meeting minimum current LAUSD MS4 permit requirements, which require new and improved campuses to meet Standard Urban Stormwater Mitigation Plan requirements; and</li> <li>• LAUSD has historically only proposed projects that collect onsite runoff, while not being supportive of capturing offsite water for regional benefits.</li> </ul> <p>As the largest landowner in the County with tremendous potential for offsite capture to assist in regional MS4 compliance, there is a distinct need for this Program to incentivize LAUSD's participation and partnership to manage offsite flow and increase school greening. With proposed changes pending for LAUSD's MS4 Permit, this would be a mutually beneficial endeavor.</p> <p>LASAN has been proactive in engaging LAUSD on potential opportunities to partner by attending numerous meetings with LAUSD staff and by providing a list of the top 20 priority schools for stormwater capture to all the Watershed Coordinators, LAUSD, Los Angeles City Council Energy and Environment Committee members and NGOs.</p>	<p>✓ Provide School Greening points under the Community Investment Benefit criteria for projects adjacent to schools (within 0.25 miles) or along a designated Safe Route to School.</p> <p>✓ Award 3 additional bonus points if a school project accepts offsite runoff for storage and/or mitigation within a school property.</p> <p>✓ Explore opportunities to incentive LAUSD and other school districts to participate and partner on SCWP project.</p>

<p>Post-construction and implementation monitoring requirements for funded projects are poorly defined.</p>	<p>The Safe, Clean Water Program requires that all projects include post-construction/implementation monitoring, as appropriate. Unless this monitoring is coordinated or, at a minimum, guidance is provided, this requirement creates a potential issue in that each project implementer may or may not have the expertise to design a robust monitoring program. Given that so many different applicants will have to do monitoring, it is likely that data will not be collected consistently (e.g., same pollutants, detection levels, collection methods), which could result in poor quality data and the inability to compare data across projects. As a result, resources may be wasted and, more importantly, the opportunity to collect valuable data which could drive future implementation efforts may be lost.</p>	<ul style="list-style-type: none"> <li>✓ The flexibility afforded by the phrase “as appropriate” should be utilized and not all projects should be required to conduct post-construction/implementation monitoring.</li> <li>✓ An agreeable approach to determine which projects should require post-construction/implementation monitoring should be developed.</li> <li>✓ A standardized monitoring approach that, if implemented, will generate high quality, comparable data across projects should be developed.</li> </ul>
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## ATTACHMENT 2: RECOMMENDED REDLINES TO SCORING MATRIX

Below are LA Sanitation and Environment's (LASAN) recommended redline edits to the Safe, Clean Water Program Infrastructure Program Project Scoring Criteria

*(Reference: Page 11 of the Safe, Clean Water Program Feasibility Study Guidelines, dated September 19, 2019)*

Section	Score Range	Scoring Standards
A.1 Wet + Dry Weather Water Quality Benefits	50 points max	The Project provides water quality benefits.
OR	20 points max	<p>A.1.1: For Wet Weather BMPs Only: Water Quality Cost Effectiveness</p> $\text{(Cost Effectiveness)} = \frac{\text{24-hour BMP Capacity}}{\text{(24-hour Volume Managed)}^1 / \text{(Capital Construction Cost in \$Millions)}}^2$ <ul style="list-style-type: none"> <li>• &lt;0.4 (acre feet capacity / \$ Million) = 0 points</li> <li>• 0.4-0.6 (acre feet capacity / \$ Million) = 7 points</li> <li>• 0.6-0.8 (acre feet capacity / \$ Million) = 11 points</li> <li>• 0.8-1.0 (acre feet capacity / \$ Million) = 14 points</li> <li>• &gt;1.0 (acre feet capacity / \$ Million) = 20 points</li> </ul> <ul style="list-style-type: none"> <li>• &lt;0.4 (acre feet capacity / \$ Million) = 0 points</li> <li>• =&gt;0.4 and &lt;0.5 (acre feet capacity / \$ Million) = 2 points</li> <li>• =&gt;0.5 and &lt;0.6 (acre feet capacity / \$ Million) = 4 points</li> <li>• =&gt;0.6 and &lt;0.7 (acre feet capacity / \$ Million) = 6 points</li> <li>• =&gt;0.7 and &lt;0.75 (acre feet capacity / \$ Million) = 8 points</li> <li>• =&gt;0.75 and &lt;0.8 (acre feet capacity / \$ Million) = 10 points</li> <li>• =&gt;0.8 and &lt;.85 (acre feet capacity / \$ Million) = 12 points</li> <li>• =&gt;0.85 and &lt;0.9 (acre feet capacity / \$ Million) = 14 points</li> <li>• =&gt;0.9 and &lt;0.95 (acre feet capacity / \$ Million) = 16 points</li> <li>• =&gt;0.95 and &lt;1.0 (acre feet capacity / \$ Million) = 18 points</li> <li>• &gt;1.0 (acre feet capacity / \$ Million) = 20 points</li> </ul> <ol style="list-style-type: none"> <li>1. Management of the 24-hour event is considered the maximum capacity of a Project for design storm volume managed during a 24-hour period and/or the design storm volume captured during a 24-hour period and managed after the 24-hour period. For water quality focused Projects, this would typically be the 85<sup>th</sup> percentile design storm capacity-volume or volume required to achieve an average 80% pollutant removal over a 10-year period, whichever is higher. Units are in acre-feet (AF). Management is defined as practices or physical devices or systems designed to prevent or reduce pollutant loading from stormwater or non-stormwater discharges to receiving waters.</li> <li>2. Construction Costs are all costs associated with the actual construction of the Project, e.g., fee paid to the contractor, and include contingency and escalation allowances but do not include project delivery costs such as design and construction management. Fees such as sewer connection or discharge fees and building permit fees are not included in construction cost</li> </ol>
	30 points max	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 District's 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.						
		<table><tr><td><u>Primary Class of Pollutants</u></td><td><u>Second or More Classes of Pollutant</u></td></tr><tr><td>• &gt;50% = 15 points</td><td>• &gt;80%= 20 points (20 Points Max)</td></tr><tr><td>• &gt;50% = 5 points</td><td>• &gt;80%= 10 points (10 Points Max)</td></tr></table>	<u>Primary Class of Pollutants</u>	<u>Second or More Classes of Pollutant</u>	• >50% = 15 points	• >80%= 20 points (20 Points Max)	• >50% = 5 points	• >80%= 10 points (10 Points Max)
<u>Primary Class of Pollutants</u>	<u>Second or More Classes of Pollutant</u>							
• >50% = 15 points	• >80%= 20 points (20 Points Max)							
• >50% = 5 points	• >80%= 10 points (10 Points Max)							
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	A.2.2: For Dry Weather BMPs Only. Tributary Size of the Dry Weather BMP <ul style="list-style-type: none"><li>• &lt;200 Acres = 10 points</li><li>• &gt;200 Acres = 20 points</li></ul>						
B. Significant Water Supply Benefits	25 points max	The Project provides water re-use and/or water supply enhancement benefits						
	13 points max	B1. Water Supply Cost Effectiveness. The Total Life-Cycle Cost <sup>2</sup> per unit of acre foot of Stormwater and/or Urban Runoff volume captured for water supply is: <ul style="list-style-type: none"><li>• <del>&gt;\$2500/ac-ft = 0 points</del></li><li>• <del>\$2,000 - 2,500/ac-ft = 3 points</del></li><li>• <del>\$1500 - 2,000/ac-ft = 6 points</del></li><li>• <del>\$1000 - 1500/ac-ft = 10 points</del></li><li>• <del>&lt;\$1000/ac-ft = 13 points</del></li><li>• &gt;\$2500/ac-ft = 0 points</li><li>• &gt;\$2,250 - 2,500/ac-ft = 1 point</li><li>• &gt;\$2,000 - 2,250/ac-ft = 3 points</li><li>• &gt;\$1,750 - 2,000/ac-ft = 5 points</li><li>• &gt;\$1,500 - 1,750/ac-ft = 7 points</li><li>• &gt;\$1,250 - 1,500/ac-ft = 9 points</li><li>• &gt;\$1,000 - 1,250/ac-ft = 11 points</li><li>• &lt;=\$1,000/ac-ft = 13 points</li></ul> <p>2. Total Life-Cycle Cost: The annualized value of all Capital, planning, design, land acquisition, construction, and total life O&amp;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&amp;M). The annualized cost is used over the present value to provide a preference to Projects with longer life spans.</p>						
	12 points max	B2. Water Supply Benefit Magnitude. The yearly additional water supply volume resulting from the Project is: <ul style="list-style-type: none"><li>• <del>&lt;25 ac-ft/year = 0 points</del></li><li>• <del>25 - 100 ac-ft/year = 2 points</del></li><li>• <del>100 - 200 ac-ft/year = 5 points</del></li><li>• <del>200 - 300 ac-ft/year = 9 points</del></li><li>• &gt;300 ac-ft/year = 12 points</li><li>• &lt;1 ac-ft/year = 0 points</li><li>• =&gt;1 and &lt;50 ac-ft/year = 1 point</li><li>• =&gt;50 and &lt;100 ac-ft/year = 2 points</li><li>• =&gt;100 and &lt;150 ac-ft/year = 4 points</li><li>• =&gt;150 and &lt;200 ac-ft/year = 6 points</li><li>• ==&gt;200 and &lt;250 ac-ft/year = 8 points</li><li>• =&gt;250 and &lt;300 ac-ft/year = 10 points</li><li>• =&gt;300 ac-ft/year = 12 points</li></ul>						

<b>C. Community Investments Benefits</b>	10 points max	The Project provides Community Investment Benefits
	10 points	<p>C1. <del>Project includes</del> Community Benefits:</p> <ul style="list-style-type: none"> <li>• One of the Community Investment Benefits identified below = 2 points</li> <li>• <del>Two distinct Community Investment Benefits identified below = 4 points</del></li> <li>• Three distinct Community Investment Benefits identified below = <del>5 points</del> 6 points</li> <li>• Four distinct Community Investment Benefits identified below = 8 points</li> <li>• Five or more distinct Community Investment Benefits identified below = 10 points</li> <li>• <del>Six distinct Community Investment Benefits identified below = 10 points</del></li> </ul> <p>Community <del>Investment</del> Benefits include:</p> <ul style="list-style-type: none"> <li>• Improved flood management, flood conveyance, or flood risk mitigation</li> <li>• Creation, enhancement, or restoration of parks, habitat, or wetlands</li> <li>• Improved public access to waterways</li> <li>• Enhanced or new recreational opportunities</li> <li>• Greening of schools</li> <li>• Reducing local heat island effect and increasing shade</li> <li>• Increasing the number of trees increase and/or other vegetation at the site location that will increase carbon reduction/sequestration and improve air quality.</li> </ul>
<b>D. Nature-Based Solutions</b>	15 points max	The Project implements Nature-Based Solutions
	15 points	<p>D1. Project:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Utilizes natural materials such as soils and vegetation with a preference for native vegetation = 5 points</li> <li>• Removes Impermeable Area from Project (1 point per 20% paved area removed) = 5 points</li> </ul>
<b>E. Leveraging Funds and Community Support</b>	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"> <li>• &gt;25% Funding Matched = 3 points</li> <li>• &gt;50% Funding Matched = 6 points</li> </ul>
	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.
<b>Total</b>	Total Points All Sections 110	

# ATTACHMENT 3: CITY OF LOS ANGELES, BUREAU OF ENGINEERING (BOE) FUNDING FOR CONSTRUCTION COST INFLATION

## CITY OF LOS ANGELES INTER-DEPARTMENTAL CORRESPONDENCE

Date: 7/28/22

To: Municipal Facilities Committee

From: Deborah Weintraub, AIA, LEEDAP  
Chief Deputy City Engineer



Electronically Signed by Deborah Weintraub  
on 07/12/2022 12:53:31 PM

Subject: **FUNDING FOR CONSTRUCTION COST INFLATION**

### Recommendations:

1. That the Bureau of Engineering (BOE) work with the office of the City Administrative Officer to develop a funding strategy for projects that are either in construction and/or starting construction in Fiscal Year 2022-23 due to construction cost inflation, and;
2. Reassess market conditions in January 2023 to adjust this strategy accordingly.

### Introduction:

The BOE is submitting this report in order to alert our City Hall colleagues of significant price increases we are experiencing in construction cost bids. The construction cost increases have a variety of causes and are extraordinary. In order to deliver committed capital projects to the City residents, the funding allocations for construction projects may need to be augmented.

### Background:

Non-residential building inflation between 2011 and 2020 on a national basis was on average 3.7% annually (Zarenski, 2021<sup>1</sup>), and 2.4% in California (California Department of General Services). While the pandemic initially decreased construction activity in 2020, in 2021 there was a large increase in demand for construction materials. Unfortunately, this demand was met with serious supply chain challenges, and this resulted in a reduction in the availability of construction materials and higher construction costs.

Between January 2020 to July 2021, prices of all materials and services for new construction performed by contractors has gone up 26.3% on a national average (AGC, August 2021<sup>2</sup>), and 13% in California (California Department of General Services, 2022). The California Department of General Services also reported that new construction costs in California went up 15.22% from June 2021 to June 2022.

Through 2022, prices for construction materials have continued their ascent and in addition, skilled labor has become even more scarce than previous years. Construction project starts are also being delayed to account for supply chain challenges and labor shortages, and the

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<sup>1</sup> Zarenski is a nationally recognized construction economics analyst, author, educator and presenter. Website: <https://edzarenski.com/>. Article: <https://edzarenski.com/2022/02/11/construction-inflation-2022/>

<sup>2</sup> AGC is an organization of qualified construction contractors and industry related companies dedicated to skill, integrity and responsibility. Website: <https://www.agc.org/>

time delays and the uncertainty in product pricing are also resulting in higher bids (Engineering News Record, 2021). Contractors are transferring these risks to the Owner at the time of bidding.

### **Forecast:**

Market analysis is showing the construction cost escalation rate in Los Angeles is currently 7.99% per year (Rider Levett Bucknall (RLB), 2022<sup>3</sup>), however, RLB is using 8.04% per year in their cost estimate calculations, and HNTB<sup>4</sup> is using 15%.

Below is a summary of some of the other market forces impacting construction costs. As of February 2022, diesel fuel, steel mill products, lumber, plywood, copper, brass, aluminum, plastic, gypsum, concrete, pavement, and roofing have all gone up drastically and forecasts are predicting that prices through 2022 will exceed peak prices of 2021 (Engineering News Record, 2022<sup>5</sup>). Interest rates are set to continue to rise, and the Russia-Ukraine war creates a lot of uncertainty and has market impacts. Supply chain and labor issues continue to cause a backlog of orders and an inventory shortage, indicating a supply-demand imbalance that will result in higher-priced goods and services. The anticipated pace of inflation is not likely to decelerate until 2023, with manufacturers potentially beginning to catch up to demand in late 2022, potentially with supply chains largely unclogged by late-2023 (CBRE, 2022<sup>6</sup>).

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<sup>3</sup> RLB is a global cost consultant partner and a nationally recognized project management and advisory firm. Website: <https://www.rlb.com/americas/>. Article: <https://s31756.pcdn.co/americas/wp-content/uploads/sites/4/2022/03/City-Market-Insight-LOS-ANGELES-Q1-2022.pdf>

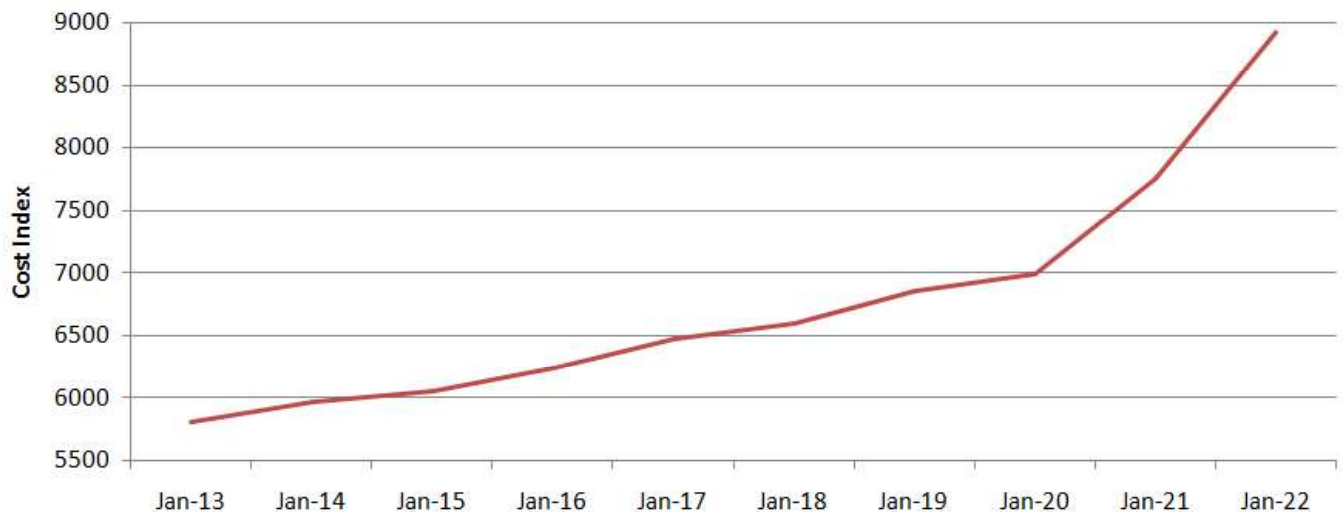
<sup>4</sup> HNTB is a national engineering consulting company, with a strong presence in Southern California. Website: <https://www.hntb.com/>

<sup>5</sup> Engineering News Record is a national magazine that covers the engineering and construction industry. Website: <https://www.enr.com/>

<sup>6</sup> CBRE is the world's largest commercial real estate services & investment company. Website: <https://www.cbre.com/about-us> . Article: <https://www.cbre.com/en/insights/reports/2022-fm-cost-trends-report> .

## Data Analysis:

### 10-Year New Construction Inflation



**\*New Construction Inflation has gone up 54% in the past 10 years**

Source: Department of General Services California Construction Cost Index (CCCI), 2022

Information graphed by the Bureau of Engineering, June 2022

"The California Construction Cost index is developed based upon Building Cost Index (BCI) cost indices average for San Francisco and Los Angeles ONLY as produced by Engineering News Record (ENR) and reported in the second issue each month" (DGS).

## BOE Bid Results:

In the past couple of years, there has been a wide range of cost changes with a general trend of higher than average cost increases. For example, BOE looked at price escalation data from City bids from 2021 to 2022 for two key construction scopes used on our projects that are typically bid on a unit price basis; concrete sidewalk/driveway and concrete pavement. In the past year the average unit cost of concrete sidewalk/driveway and concrete pavement increased by 79% and 21% respectively. We also found that there was a high variation on the cost changes in AC pavement.

In addition, we looked at 20 Municipal Facility project bids between 2017 to the present. These projects are typically bid on a lump sum basis. Our analysis was to look at the variance between the low bid and City Engineer's Estimate on a project-by-project basis. The average in the variance between the low bid price as compared to the City Engineer Estimate from 2017 through 2021 was that the low bid averaged 5.9% higher than the City Engineer's estimate. In 2022 this number increased dramatically to the low bids averaging 40.68% higher than the City Engineer's Estimate.

## BOE Actions:

BOE is in the process of developing a draft cost inflation clause for City construction contracts, which would establish the mechanism for cost adjustments during construction for demonstrated inflationary cost increases and decreases. BOE intends to vet the proposed language with the local construction industry and with our City partners. This will help offset the perceived need by contractors to price risk into their bids.

Additionally, BOE is in the process of revising the suggested inflation rates for project budgeting. Since 2014, BOE suggested using 5% as the inflation rate for all new construction. The below chart is BOE's suggested inflation rates to use for future estimates:

Date	Annual Rate
July 1, 2022 - June 30, 2023	15%
July 1, 2023 - June 30, 2024	12%
July 1, 2024 - June 30, 2025	9%
July 1, 2025 - June 30, 2026	8%
July 1, 2026 - June 30, 2027	8%

The potential recession may cause changes in these inflation rates. Therefore, it is recommended to re-assess these rates in six months.

RL/MA:tt

Box\CMD\Administration\Municipal Facilities Meeting Minutes\MFC Report Construction Inflation

cc: Mary Hodge, Deputy Mayor  
Aura Garcia, Board of Public Works  
Teresa Villegas, Board of Public Works  
Mike Davis, Board of Public Works  
Vahid Khorsand, Board of Public Works  
Susana Reyes, Board of Public Works.  
Gary Lee Moore, Bureau of Engineering  
Ted Allen, Bureau of Engineering  
Alfred Mata, Bureau of Engineering  
Julie Sauter, Bureau of Engineering  
Jose Fuentes, Bureau of Engineering  
Richard Louie, Bureau of Engineering





# Public Comment Form

Name\*: Maggie Gardner

Organization\*: OurWaterLA Coalition

Email\*: maggie@lawaterkeeper.org

Phone\*: (310) 651-3360

Meeting: ROC Meeting

Date: 8/31/2023

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

\*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to [SafeCleanWaterLA@dpw.lacounty.gov](mailto:SafeCleanWaterLA@dpw.lacounty.gov). All public comments will become part of the official record.

Please complete this form and email to [SafeCleanWaterLA@dpw.lacounty.gov](mailto:SafeCleanWaterLA@dpw.lacounty.gov) by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]" (ex. "Public Comment: USGR 4/8/20").

## Comments

Please see the attached letter



# Public Comment Form

Name\*: Ronald Fomalont

Organization\*: Viewridge HOA

Email\*: law@fomalont.com

Phone\*: 310-560-4649

Meeting: SafeCleanWaterLA

Date: 8/31/2023

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

\*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to [SafeCleanWaterLA@dpw.lacounty.gov](mailto:SafeCleanWaterLA@dpw.lacounty.gov). All public comments will become part of the official record.

Please complete this form and email to [SafeCleanWaterLA@dpw.lacounty.gov](mailto:SafeCleanWaterLA@dpw.lacounty.gov) by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]" (ex. "Public Comment: USGR 4/8/20").

## Comments

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



# Public Comment Form

Name\*: Ioanna Kostopoulou Organization\*: Spectrum News 1

Email\*: ioanna.kostopoulou@charter.com Phone\*: 562-852-0901

Meeting: 8/31/23 Date: 8/30/2023

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

\*Per Brown Act, completing this information is optional. At a minimum, please include an identifier so that you may be called upon to speak.

Phone participants and the public are encouraged to submit public comments (or a request to make a public comment) to [SafeCleanWaterLA@dpw.lacounty.gov](mailto:SafeCleanWaterLA@dpw.lacounty.gov). All public comments will become part of the official record.

Please complete this form and email to [SafeCleanWaterLA@dpw.lacounty.gov](mailto:SafeCleanWaterLA@dpw.lacounty.gov) by at least 5:00pm the day prior to the meeting with the following subject line: "Public Comment: [Watershed Area] [Meeting Date]" (ex. "Public Comment: USGR 4/8/20").

## Comments

Hello,

I am with Spectrum News 1 and we are interested to know if you are finding the toxic forever chemical "PFAS" in any of the county's drinking water. If you are, what are you doing to clean it and what communities are impacted? If you are not finding them, are you doing anything with the infrastructure to ensure it doesn't get into the water system?

Thank you so much!

Best,

Ioanna K.  
Spectrum News 1

**From:** Gold, Mark <mgold@nrdc.org>  
**Sent:** Thursday, August 31, 2023 3:51 PM  
**To:** DPW-SafeCleanWaterLA  
**Subject:** SCWP comments - item 6

**CAUTION: External Email. Proceed Responsibly.**

I rushed through my comments verbally - here is a written summary of what I said.

The ROC and SCWP need to have a more big picture view for what we need to achieve in LA County for WQ and supply. Also, the ROC needs to have more authority and influence over the program. They should work with the Board of Supervisors to strengthen the authority to ensure that the program achieves goals.

Use the LACDPW Water Plan and Our County Plan in all SCWP planning and implementation efforts. Integration is essential. It is one county!!

Water quality compliance is so critical. It is so important. We must know how projects are leading to water quality standards attainment.

We need a scientific advisory committee to review and prioritize research efforts. We are missing big picture research efforts. Also, what research has been completed to date and what has it found.

Strategic project development is essential!! Target WQ projects near highly polluted waters. Target supply projects near permeable soils over producing aquifers.

There needs to be a more focused effort to develop and implement collaborative partnership strategies with agencies like Metro, CalTrans, state and federal funding, etc.

The efficacy of municipal investments must be assessed and included in the biennial report and/or MMS. To date, all the focus has been on watershed investments, but \$112M a year is spent in municipalities. We need to know the efficacy of these taxpayers investments.

I strongly support the OWLA recommendations. Also, I support the water supply focus group recommendations. If anything - we should have a bolder SW infiltration Target than 300K AFY. I suggest 400K AFY. This year - the region (mostly the county) infiltrated nearly 500K AFY. that shows you the realm of the possible without new facilities.

Please let me know if you have any questions about my comments.

Thanks.

Mark Gold, D.Env.  
NRDC Director of Water Scarcity Solutions

Sent from my T-Mobile 4G LTE Device  
Get [Outlook for Android](#)