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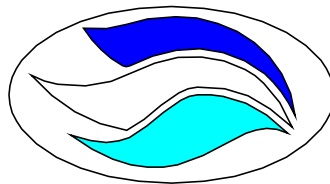
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**From:** Ray Tahir [REDACTED]  
**Sent:** Tuesday, October 24, 2023 3:47 PM  
**To:** DPW-SafeCleanWaterLA  
**Subject:** Public Comment: Regional Oversight Committee Meeting, October 26, 2023  
**Attachments:** SCWPpresentation102623.ppt

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

Please see the attached PP.

Diversion Projects for San Gabriel Valley Permittees  
Are Ineligible for SCWP funding  
and  
No WASC for Dominguez Channel  
Ray Tahir  
TECS Environmental  
October 26, 2023





## Issue #1: Diversion Projects Proposed for San Gabriel Valley Watershed Management Program Groups Are Ineligible for Safe, Clean Water Program Funding

- SCWP requires CEQA compliance as a condition for funding.
- 10 storm water/diversion capture projects proposed by the Rio Hondo/San Gabriel River WMP, the Upper LA River WMP, and the Upper San Gabriel WMP cannot be SCWP funded because they cannot clear CEQA
- The reason: each of the projects call for diverting runoff from the spreading grounds thereby reducing aquifer volume.
- Permittees lost money spent on planning and design of these projects.



CEQA CHECK LIST ITEM IX APPLIES TO  
PROJECTS CALLING FOR DIVERSION  
FROM SPREADING GROUNDS

## IX. HYDROLOGY AND WATER QUALITY.

Potential  
Significant  
Impact

Less than  
Significant  
Impact  
w/Mitigation

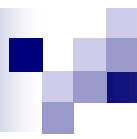
Less than  
Significant  
Impact


No Impact

Would the project:

- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been



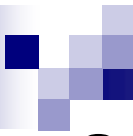
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- **Based on the Initial Checklist Regarding Hydrology the following 10 projects would not clear CEQA**
1. **Arcadia Wash and Groundwater Recharge restoration project.**  
Project calls for diverting runoff from the Rio Hondo spreading grounds.
  2. **Rio Hondo Ecosystem Restoration Project and Arcadia Wash Water Conservation Diversion.** This project diverts runoff from the Rio Hondo spreading grounds
  3. **Encanto Park Stormwater Capture Project.** This project diverts runoff from the Rio Hondo spreading grounds.
  4. **Alhambra Golf Course Capture Project.** Calls for taking runoff from the Alhambra Wash and injecting it into a closed landfill, which would also divert runoff from the Rio Hondo spreading grounds.
  5. **Vincent Lugo Park Capture Project.** Also calls for taking runoff from the Alhambra Wash and injecting it into a closed landfill, which would also divert runoff from the Rio Hondo spreading grounds.
  6. **Kinneola Stormwater Capture Project.** Calls for taking runoff from Eaton Wash and injecting into subsurface, away from Rio Hondo Spreading Grounds.

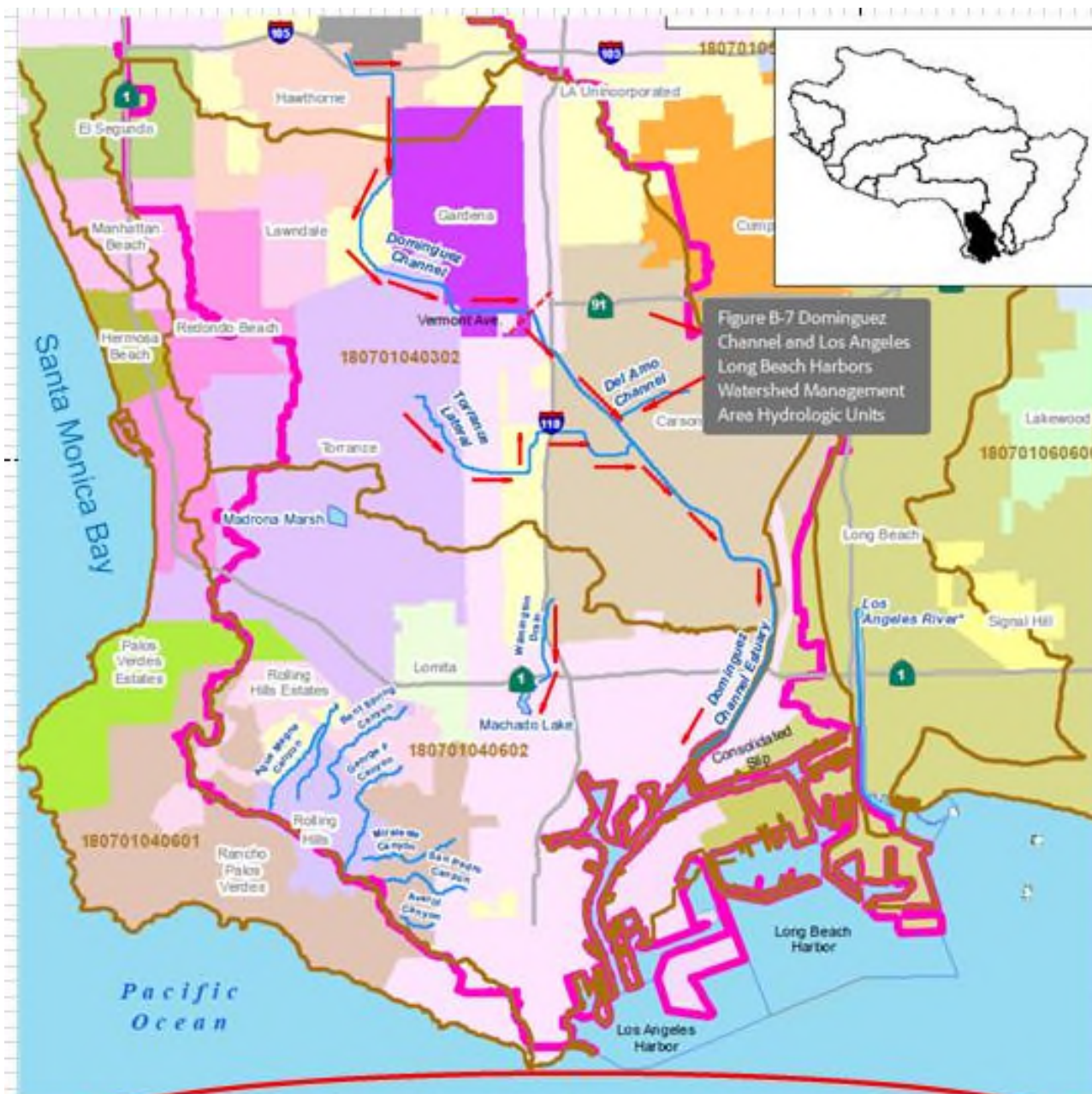
- 
7. **Finkbiner Park Stormwater Capture Project.** Proposes to take runoff away from the Little Dalton Wash and inject it into the park, diverting it away from the Whittier Narrows Spreading Grounds.
  8. **Alhambra Wash Low Flow Project --** diverts runoff from the Rio Hondo Spreading Grounds.
  9. **Eaton Wash Low Flow Project --** diverts runoff from the Rio Hondo Spreading Grounds.
  10. **Rubio Wash Low Flow Project** diverts runoff from the Rio Hondo spreading grounds.

**Issue #2:** The Dominguez Channel Watershed Area has not been assigned a Watershed Area Steering Committee (WASC).


- According to the County's Safe, Clean, Water Program Ordinance, all 9 Watershed Areas must have WASCs. The table below taken from the SCWP website only shows 8 WASCs, along with the amount of SCWP funds each is entitled to annually. There is no mention of the Dominguez Channel Watershed Area

Central Santa Monica Bay	\$18.1M
Lower Los Angeles River	\$13.9M
Lower San Gabriel River	\$17.4M
North Santa Monica Bay	\$2.2M
Rio Hondo	\$12.0M
Santa Clara River	\$7.1M
South Santa Monica Bay	\$19.5M
Upper Los Angeles River	\$39.9M
Upper San Gabriel River	\$20.1M

- 
- SCWP staff explained that the Dominguez Channel Watershed Management Area was placed into the South Santa Monica WASC.
  - ❑ As shown in the map below, that none of the cities in the Dominguez Channel WMA drain to the South Santa Monica Bay. They include, Carson, Gardena, Hawthorne, and Lawndale, Inglewood, and Torrance. Part of Inglewood also drains to the Santa Monica Bay through Ballona Creek. And Torrance drains to Santa Monica Bay through Torrance Beach.



**Figure B-7: Dominguez Channel and Los Angeles/Long Beach Harbors Watershed Management Area Hydrologic Units.**

- 
- Thrown-in with the South Santa Monica Bay has made it more difficult for Dominguez Channel permittees to propose their projects for SCWP funding because they are competing with South Santa Monica Bay permittees.
  - It would be interesting to know what caused this problem.



Date: \_\_\_\_\_

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

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

This image shows a full page of blank, lined paper. It features approximately 20 evenly spaced horizontal grey lines across its entire width, providing a template for writing or drawing. The margins are consistent on all sides.

To: Maria Mehranian Chair, Safe and Clean Water Program Regional Oversight Committee  
Belinda Faustinos, Vice Chair, Safe and Clean Water Program Regional Oversight Committee

From: Madelyn Glickfeld, Chair North Santa Monica Bay WASC  
Jessica Forte, Vice Chair, North Santa Monica Bay WASC

Date: October 25, 2023

Re: NSMB Input to the ROC on the Biennial Report of the Safe Clean Water Program:  
Ideas for Enhancing Entry and Participation in the SCWP Grant Application Process

Dear Chair Mehranian and Vice Chair Belinda Faustinos.

This Memorandum is our testimony and recommendations to the ROC on the Biennial Report to the Board, on your agenda for October 26. We saw a Board Motion passed last month, focusing on broadening access to the SCWP grant process through streamlining grant application processes and enhancing efforts to plan for projects through additional watershed planning. The DPW SCWP staff informed us that the issues raised by the Board would be addressed by the ROC through the Biennial Report.

It is important to make sure that the WASCs all receive notice of documents and proposals that are going to go before the ROC as the same time that the members of the public receive such notice. WASCs are the first connection for SCWP for the public in our areas. We are also the first connection between grant applicants and the program. In short, WASCs should be given an opportunity to participate in matters that are key to the viability of the program in our areas.

Our WASC is providing this letter to relate our experiences and offer constructive feedback regarding the issues that make participation in the grant program too time consuming, uncertain and costly for small cities and nonprofit organizations.

Our North Santa Monica Bay Watershed has had challenges in putting forward grant applications to apply for SCWP funds for a number of reasons. Earlier this year, the DPW SCWP staff recommended an interim change to the grant criteria, which will allow more projects in our WASC to meet minimum scoring thresholds for successful participation in the program. A project pending this year has scored well over 60 points under the new interim criteria. We thank the staff and the ROC for that action.

We also thank the Board staff for the Project Modification Guidelines. This would allow more room for applicants to modify grants in a timely manner on issues that arise in the process of detailed design, bidding and construction of projects. Having no ability to make these changes in the project description and design has been another constraint on applicant interest.

The five recommendations below came from a discussion at our October 12 WASC meeting on ideas to broaden access to and reduce the cost of the SCWP grant process.

**THE PROBLEM: THE APPLICATION PROCESS IS VERY LONG, TIME CONSUMING AND EXPENSIVE FOR SMALL CITIES AND NON PROFIT AGENCIES WHO HAVE LIMITED STAFF AND MUST CONTRACT FOR GRANT CONSULTANTS.**

Costs to prepare and submit project applications for the SCWP in our WASC have been in the \$25,000 range to complete an application and take it through the application process. The success of any given grant is uncertain because scoring can be uncertain. Approval is also very long process, with many requirements to meet during the review process. Therefore, both the length of the process and the uncertainty of success deter potential applicants from applying for grant funds.

Our WASC makes five suggestions to include in your Biennial Report for future action to improve the process.

1. **CREATE A SIMPLE PRE-APPLICATION FOR GRANTS.** The purpose of the pre-application is to allow applicants to submit a short form project concept and key essential details so that grant reviewers can assess: (1) the likely scoring results for the project; and (2) identify what would have to be included in a regular application for a successful grant. If the pre-application succeeds in giving adequate guidance about the proposal, the applicant would have a better idea about what their chances of success are and what should be included in the full proposal. This would happen at a lower cost and in a shorter timeframe and reduce the uncertainty of making a full application. It would encourage more applicants to participate. This pre-application does not address whether a grant application will succeed when in competition with other applications competing with for limited funds. It would only help the applicant and the grant reviewers to know whether a proposal is competitive and can meet the grant requirements.

- In order to work, the pre-application, the submittal process would need to open earlier. The pre-application would have to be simpler and shorter. Feedback from the grant reviewers needs to be on an accelerated schedule, leaving enough time for the applicant to prepare a full proposal in the regular schedule.
- The pre-application would not be a new requirement by the SCWP Program, but done at the option of the grant applicant.

After thinking about this pre-application proposal, we recognize that it will only work if the County SCWP Program staff want it to work and can assess the potential success with less information. The Pre-Application is not helpful if it requires most of what would be required in a regular grant application.

The Pre-Application would not work unless the SCWP staff wanted to commit to a rapid response to a pre-application. Otherwise, the applicant would not have enough time after review to do a full application. Even with a positive response from the SCWP Program, full applications could not be submitted in the same Fiscal Year unless there was timely response.

With this in mind, we ask that the ROC encourage the SCWP Staff to examine how an abbreviated Pre-Application could be used for gauging the potential success of an application. They would

also need to be willing to meet their deadlines for responses to the Pre-Application. It would also require the staff to engage with stakeholders, potential applicants and grant writers to test out how a Pre-Application could be a successful tool. Our WASC stands ready to contribute to this process.

## **2. DEVELOP A SHORT FORM APPLICATION FOR PROPOSALS IMPLEMENTING BMPS THAT HAVE A LONG TRACK RECORD OF SUCCESS**

- Create “short form applications” for projects that use well-known, well-established water quality and water supply BMPS that have been demonstrated to work. Focus the proposal requirements on the ability to successfully locate and operate these BMPS in the project setting. If a shorter application were allowed for well-known BMPS, the application would still need to go through the permitting process, obtain agreements, document community input sought and other project benefits. Examples of such BMPS Include:
  - drywells
  - infiltration basins, where suitable conditions exist for infiltration basins
  - infiltration trenches, where suitable conditions exist for infiltration basins
  - modular wetlands
  - bioswales
  - trash interceptors, etc.
  - low flow and first flush storm drain diversion to sanitary sewer

The short form application could be much simpler, focused on the ability to install the bmp successfully on the site, and include submittals for CEQA, permits, inter-agency agreements, ROW, etc.

Example of a State -run program that has a short form grant application is well known to municipalities: Caltrans Highway Safety Improvement Program (HSIP), Funding Set-asides (SA). As part of the HSIP SA application process Caltrans recognizes specific improvements, namely (1) guardrail upgrades, (2) pedestrian crossing enhancements, (3) installation of edgelines, (4) bike safety improvements, and (5) tribal projects. The SA is a much shorter application than is required of projects under their Benefit Cost Ratio (BCR) project applications. General information, schedules, and project construction costs are submitted, and maximum award levels are established per application category.

A link to the most recent HSIP cycle may be found here: <https://dot.ca.gov/-/media/dot-media/programs/local-assistance/documents/hsip/current/hsip-form-instructions.pdf>

## **3. DEVELOP A COUNTYWIDE SCIENTIFIC STUDIES GRANT PROGRAM**

The Scientific Studies Grant Program now requires grant applicants to apply to all of the WASCs separately for Countywide Studies. This has resulted in years of effort by the

consultant to have each WASC opt in to countywide studies, with each WASC that opts in needing to wait long periods and hold those funds in reserve until the applicant determines that they have enough WASCS committed to be able to begin the project.

- The ROC and Department should recommend a change to the Board of Supervisors that allows qualified applicants to apply to the Countywide SCWP for Countywide Scientific Studies. There should be an allocation in Countywide Funds to fund this part of the program. There should be a new scientific expert panel to fully review each study based on the project team qualifications, the study's scientific merit and methodology, and recommend funding (or not) for each scientific study. WASCS could then focus on approving smaller scientific studies of new BMPS or other issues particular to one WASC seeking scientific studies unique to that WASC. WASCS could still make recommendations on countywide studies to the Science Panel, who would make their recommendations to the ROC and the Board of Supervisors.

#### **4. BALANCE DETAIL WITH FLEXIBILITY IN TECHNICAL FEASIBILITY GRANTS APPLICATIONS**

Technical Feasibility Study Applications under the Technical Resources Program need to be flexible enough so that changes to the project can be made when discovered in the design stage. If feasibility studies are flexible, then the new Project Modification Guidelines might allow a project to be amended in the same year, saving time and money in getting projects "in the ground". Without the ability to make some changes, the projects falls out of line for at least a year and would have to be resubmitted in the following year. However, the grant guidance needed for scoring impels specificity. How can the ROC and DPW SCWP staff balance these two requirements for specificity and flexibility?

The ROC should ask the SCWP staff to give them recommendations for a balance of flexibility to make modifications as analysis makes it clear that they are needed, and specificity to allow adequate evaluation of the Technical Feasibility studies

#### **5. Include Land Acquisition Projects as qualified for SCWP Funding and Develop a Set of Program Guidelines Applicable to these Projects.**

The Measure W Ordinance identifies funding for land acquisition as a qualified project for Measure W purposes. However, the grant program applications and guidelines are designed around capital infrastructure project, not land acquisition. A new grant program criteria need to be developed to ensure that there are water supply, water quality and other community benefits to a proposed land acquisition and criteria to evaluate them.

The current SCWP application deadlines and long times for the current grant application review and approval will not work for acquisition projects. The many public and nonprofit agencies that purchase land need to have funds ready to purchase when a willing seller is ready to sell. That said, prior to formal application, applicants could

provide detailed advance information about the water quality and supply benefits of open space preservation project and the regional and community benefits.

This recommendation is particularly relevant to the NSMB WASC, which covers the Santa Monica Mountains National Recreation Area, with millions using open space areas and millions more using the beaches and ocean for recreation. Several public and nonprofit organizations acquire open space lands that include tributaries to the main creeks and rivers in the Santa Monica Mountains and its watersheds. This is an activity supported by a majority of residents in the WASC and in the County. Open space benefits, clean rivers, and coastal water is a high value in the communities within the Santa Monica Mountains and the communities in Los Angeles County who use these spaces intensively. It maybe also be a good approach in the Santa Clarita WASC with major open space acquisition and in the Upper Los Angeles River Watershed and the foothills of the San Gabriel Mountains. These are all near headwaters of the watersheds of Los Angeles County where maintaining natural water tributaries would enhance water quality and community open space benefits.

- To get a faster application turnaround, applicants should be prequalified (acceptable to DPW SCWP as a trustworthy agency with the capacity to negotiate a fair market sale, execute an acquisition and manage the lands).

Thank you for the opportunity for our WASC to submit comments for the Biennial Report on ways to make the SCWP grant process less expensive and time consuming, while providing the information needed to allocate funds. We hope we will have more notice and opportunity in the future to provide input on ROC decisions to our mutual goal of the ROC the best possible projects while attracting small cities and a wider range of applicants to the Program.

cc: All Regional Oversight Committee Members  
NSMB WASC  
Kirk Allen  
Austine Racelis  
Mike Antos



# Public Comment Form

Name\*: Liz Herron

Organization\*: HOA member/resident of Viewridge Est

Email\*: herronsintopanga@yahoo.com

Phone\*: 818-887-2456

Meeting: ROCI Oct 26, 23 at 1-5pm

Date: 10/25/2023

☒ 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

I am Liz Herron, requesting an opportunity to speak at the earliest opportunity during the Public comments section at the ROCI meeting, Oct 26, 2023. I am a retired Dentist and a 35 year resident of the Viewridge Estates in Topanga Canyon. I am speaking on behalf of our HOA committee of Viewridge Estates addressing the proposed Green Streets Project. While the concept is well intentioned and we support the idea of filtering and cleaning the water, we feel the project's location and proposed end result is ill conceived, a misappropriation of funds and will not accomplish what it sets out to. We have researched this project, sent signed petitions, met and communicated with Public Works for the past 5 years to no avail. On 9/29/23 we walked the site with Sophia Soudani from Supervisor Horvath's office. Three separate communities of Topanga: the neighborhoods of 1) Viewridge Estates, 2) the gated community of Summit Pointe and The Topanga Town Council attended and expressed their opposition. This \$7.5 million project proposes to place BMP's and a filtration system in the surrounding neighborhood and median strip of Viewridge Boulevard to filter and clean the storm drain water. With climate change and the drought, our annual rainfall is limited. A study conducted by Rosie Dagit, a member of the Resources Conservation District of the Santa Monica Mountains revealed that the dirtiest water found in the creek is at the Topanga Town Center and then "natural filtration" cleanses the water BEFORE it enters the Topanga Lagoon at PCH. It is AT the Lagoon that it is re-contaminated by seagull, dog and human urine and feces before it enters the Santa Monica Bay. If the water is clean as it enters the Lagoon there is no need to clean the water nine and a half miles up at Viewridge only to get dirty 5 miles down in the town. No other filtration projects are scheduled in Topanga. We, respectfully, implore that you re-examine and re-evaluate this project and utilize the funds to place a filtration system at the bottom of Topanga adjacent to PCH and the Lagoon immediately prior to it entering the Santa Monica Bay.

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

My name is Liz Herron. I am a retired Dentist and have been a resident of the Viewridge Estates neighborhood in Topanga Canyon for 35 years. I am speaking on behalf of our HOA Committee of Viewridge Estates and would like to address the proposed GreenStreets Storm Drain Project.

While the concept is well intentioned and we support the idea of filtering and cleaning water, we feel that this project along with its location and the end result that it proposes to accomplish is ill conceived, a misappropriation of funds and will not accomplish what it sets out to. We have researched this project and have met on site with Bruce Hamamoto and Melina Watts in 2021 and, most recently, with Sophia Soudani from Supervisor Horvath's office on 9/29/23, sent petitions with signatures to Grace-Komjakraphan-Tek at Public Works in 12/2021 and have communicated with Public Works for the past 5 years to no avail.

Three separate communities of Topanga have weighed in on this project. The majority of residents in the Viewridge Estates and select HOA Board members of the adjacent gated community of Summit Pointe are in opposition to this project. The Topanga Town Council are in agreement and have given us their support.

With climate change and the apparent drought in California, our annual rainfall is limited. This is an estimated \$7.5 million project proposing to place BMP's and a filtration system in the surrounding neighborhood and median strip of Viewridge Boulevard to filter and clean storm drain water. The project's intention is to filter and clean the water from this ONE single neighborhood with the hope that by the time it travels nine miles down the Topanga Creek and reaches the Topanga Lagoon and deposits into the Santa Monica Bay - the water will be clean. BUT, it already IS CLEAN as proven by a study on the Topanga Creek that was conducted by Rosie Dagit, a Topanga resident and member of the Resources Conservation District of the Santa Monica Mountains. Her findings demonstrated that the dirtiest water was in the Topanga Town Center. However, by the time that water travels to just before the Lagoon, near PCH, "natural filtration" has cleansed the water. It is AT the Lagoon where the water is re-contaminated by seagull, dog and human urine and feces before it enters the ocean. This makes us question the necessity of filtering and cleaning the water nine and a half

miles up at Viewridge? This suggests that a filtration system should be placed at the beach in order to filter and clean the water before it enters the Santa Monica Bay.

No other filtration projects are scheduled to occur in Topanga Canyon due to the difficulty of the terrain, septic tanks and complexity of the geography and historical Native American preservation in the town of Topanga.

The “Green Streets” concept is really intended for suburban and urban in-fill areas where sufficient natural groundwater is not present. The VAST majority of Viewridge is open space- where hillsides, slopes and other natural “ green infrastructure” already facilitates natural stormwater infiltration.

In an era of massive climate change characterized by insufficient resources to combat them, why are we squandering our limited resources to implement a project that is totally useless?

We, respectfully, implore that you re-examine and re-evaluate this project and utilize the funds for placing a filtration system at the bottom of Topanga adjacent to PCH and the Lagoon. In addition, we would welcome meeting and walking the site with you at your convenience.

Liz Herron D.D.S, HOA member of Viewridge Estates

3123 Voltaire Drive, Topanga, Ca. 90290

[REDACTED]

[REDACTED]



Date: \_\_\_\_\_

- \*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

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



Date: \_\_\_\_\_

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## Comments

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October 25, 2023

SCWP Regional Oversight Committee

*Sent via email*

RE: SCWP Biennial Review Draft Report

Chair Guerrero, Vice-Chair Faustinos, and Committee Members-

OurWaterLA (OWLA) Coalition has reviewed the [DRAFT Biennial Report](#) in preparation for the Regional Oversight Committee (ROC) discussion. As we feared with the limited number of meetings set for this critical process, we do not believe the report as drafted is where it needs to be, and - while there is a lot of good work included in the report - we strongly urge this Committee to continue working with the Flood Control District staff and key stakeholders like OWLA to refine this inaugural assessment of the Safe Clean Water Program (SCWP). Some of our specific concerns follow:

1. The **timeline for the public to review materials and provide meaningful insight for the ROC to consider during discussion was inadequate**, especially considering that public comment cards must be submitted by 5:00 pm prior to the meeting (giving scant time for our review and drafting robust comments). As a result, our feedback is general and intended to provide the ROC with some questions to discuss. While we recognize there will be a subsequent public comment period, we believe the lack of adequate time to review this report robs the ROC of critical input that groups who have been involved in the SCWP literally since its inception could have provided to this body.
2. **Format matters** in a report like this. There was a lot of good information sprinkled throughout the report, but we found much of it to be buried in the report.
  - a. The executive summary provides an overview of what the Biennial Review Report is. We think it is more important for the **Executive Summary to include summaries of the accomplishments and findings across the different programs (many of which are included in the report, but scattered in various sections), the recommendations, what is anticipated to be initiated prior to the next Biennial Report, and what may be undertaken in the future.** This aligns with the recommendation from the ROC for the report to be 3-4 pages and to keep the report simple at their [August 31 meeting](#) (page 6), as well as the initial [draft outline](#) that was approved that included in the Executive Summary section "Key Findings and Summary Statistics". While the ROC seemed unified in their goal of a short report (or executive summary) to make it as easy as possible for any audience to understand the report, it is imperative that accomplishments (i.e., "evidence") and findings are presented up front to set the stage for the recommendations; otherwise the recommendations have no context. It would be

understandable to have shorter summaries of accomplishments, findings, recommendations and next steps, but the Executive Summary should follow the basic tenet that “the reader should be able to make a decision based only on reading the executive summary”, written for individuals who may not have time to review the entire report.

3. The draft report states that within 6 months the District will establish a timeline/pathway to implementing the recommendations. Having waited so long for this inaugural biennial report (already in the process of the 5th round of funding), **not including such a timeline/pathway in the report is not acceptable. The analysis produced by the District should be included in the biennial review so it is available to the public and decision-makers** so that they are aware of how long these recommendations will take to be implemented and the resources necessary for implementation.
4. While we appreciate that many recommendations put forward by OWLA, the ARLA Working Group and other stakeholders have been incorporated into this report, they have been included in the most general of terms to be truly meaningful, often pushing this process until after the biennial report. The report even acknowledges this when it indicates that *“The generality of the recommendations is intentional to allow for flexibility during the assessment and implementation of the ROC’s recommendations.”* With almost 4 rounds of funding having allocated more than \$1B in investments already behind us, and extensive assessments with very specific recommendations having been issued, this report could and should be much more specific in recommendations it is making. If the ROC has not had time to develop such specific recommendations, more deliberation is needed.
5. We would like to see a **breakdown of the funds spent and funds remaining in the District Program**. Right now, it is unclear how the ~\$24M has been spent. Additionally, understanding how much of the education programs funding (at minimum 20% of the District Program) is still on the table, what has been accomplished with these funds, and what steps are being taken to roll out these programs is a priority of OWLA, especially given the first five-year funding cycle ends next year.
6. We have been impressed with the incorporation of many of our previous recommendations. However, we think there are **two major gaps** where there are no recommendations nor are they included in what is anticipated to be initiated prior to the next Biennial Report or what may be undertaken in the future sections. Those gaps are:
  - a. **Workforce**
    - i. While Transfer Agreements will be updated (and we anticipate that will include the language for the \$5M threshold in the County’s Community Workforce Agreement/Project Labor Agreement), we still would like to see language around quantifying workforce impacts added to the Application. This could be specifically called out in Recommendation 5.

**b. Community Engagement**

- i. With the work conducted around community engagement, we think that at least Recommendation 5 should specifically call out updating community engagement within scoring criteria but ideally establish a new recommendation that fits in with Recommendations 6-10 specifically focusing on Community Engagement.

We want to stress that OWLA does appreciate the work that has been undertaken by the ROC, and the tremendous efforts to get this report together and that there are a lot of positive elements of the report that should be applauded and can be built upon. But as crafted, the report is not yet where it needs to be in terms of specificity and clarity, and the ROC should take the time needed to ensure this report is as meaningful as possible.

We appreciate your time and consideration. Please let us know if you have any questions or wish to discuss any of our concerns in more depth.

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.*

Dear Kristine,

I hope this finds you well. Below please find my feedback on the select sections of the report which address some of the equity issues I have been vocal about in the past. My comments do not focus on the entire document. Please share my feedback with the full ROC and feel free to reach out to me if you or any of those who have drafted the report have questions.

Thank you!  
Elva Yanez

### **Feedback on the Draft Biennial Progress Report**

The Executive Summary of the report states:

“The Safe, Clean Water Program (“SCWP” or “Program”) is a landmark program that funds Los Angeles County (LA County) stormwater initiatives that improve water quality, increase local water supply, and provide community benefits, such as green spaces and parks. The Program cultivates regional and community partnerships while *prioritizing investments in historically underserved communities.*” (italics are mine)

Then again on page 10, the overview section of the report states:

“The SCWP is a pioneering regional initiative that provides dedicated local funding to increase water supply, safeguard and improve water quality, and deliver community benefits, with *particular focus on historically underserved communities.*” (italics are mine)

I am very pleased that the report emphasizes investments in underserved communities and elevates this as a priority of the ROC. However, the remainder of the document does little to clarify the actual extent of the work that still needs to be done to make it a reality in terms of the SCWP. I would like to see modifications of the narrative to right-size these statements, clarifying that the work is in progress, not completed.

To that end, I recommend that the language in the following paragraph, also on page 10, should be modified to state that it is the *goal or aspiration* of the ROC to elevate benefits to historically underserved communities, thereby clarifying that work remains to be done. This is especially true for the items I have bolded below:

“What distinguishes the SCWP is its regional and collaborative approach to addressing the stormwater management needs of LA County. It **engages communities in the design and implementation of local infrastructure improvements and prioritizes nature-based solutions** that can enhance communities with amenities such as green spaces and recreation areas. These efforts help mitigate the urban heat island effect and make neighborhoods and communities more climate resilient. The **Program also places significant emphasis on education, outreach, and engagement**, including the development of sub-programs to provide environmental education to K-12 students, and support for growing a workforce with expertise in green infrastructure and stormwater management.”

The need for modified language is especially clear when considering that the ROC opted for adopting the draft guidance as Interim (see report language below from page 15). Members of the ROC were not satisfied with the draft guidance language developed and as a result was not approved as final language, in particular for nature-based solutions, DAC policies, and strengthening community engagement. Again, I recommend that the report narrative should be modified to clarify that the Guidance language that will prioritize and ultimately benefit historically marginalized communities needs to be improved and remains to be completed or is in progress.

**“2022 Interim Guidance on the specific issues identified below:**

- o Programming of Nature-Based Solutions
- o Implementing Disadvantaged Community Policies in the Regional Program
- o Strengthening Community Engagement and Support
- o Water Supply”

An item included in the section on “What has been accomplished to date” is the Equity in Stormwater Investments. I would like to see some additional details or bullet points from this report included in the Biennial Report. This might require some analysis and synthesis of the recommendations language as they are written in narrative form.

In the section on “What is in progress” it was nice to see that the SCWP Public Education and Community Engagement Grants Program has moved forward. If this grant program supersedes the idea of a bench of CBOs and NGOs to support engagement mentioned in the section, “What may be undertaken in the future,” it would be helpful to provide that information.

In the District Program Findings, the need for an increase in District staffing is mentioned. It would be helpful to include mention of the need for staff with education and experience related to developing infrastructure programming for underserved communities as well as community engagement. Given my earlier comments, the need for staff with this background would hopefully assist with developing guidance, metrics and other tools to operationalize equity in infrastructure investments.

Thank you; feel free to reach out if more information is required.

## MEMORANDUM

Date: October 25, 2023

From: Maria Mehranian

To: Kristine Guerrero, Chair, Regional Oversight Committee (ROC)

Subj: Comments and Considerations for our October 26, 2023, ROC Meeting

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Please accept my regrets for not being able to attend the Regional Oversight Committee (ROC) meeting on October 26, 2023. This rescheduled meeting conflicts with my previously scheduled monthly Delta Stewardship Council Meeting in Sacramento.

Given the importance of the Biennial Report and the ongoing adaptive management of the Safe Clean Water Program, I would appreciate it if you could share this memo with our fellow committee members and the attendees participating in the ROC meeting.

### **Delivering on Measure W's Water Supply Promises**

I participated in the ROC Water Supply Working Group convened by Liz Crosson and fully support the recommendations in the group's Recommendations for Achieving Water Supply Objectives of the Safe Clean Water Program Memo. As discussed in the memo, the ROC Water Supply Working Group reviewed program activities to date and engaged with several interested parties and non-governmental partners. I concur with our working group's recommendations for setting measurable targets for stormwater capture and refining elements related to water supply. These recommendations are key to delivering on the promises made when the voters overwhelmingly passed Measure W.

In addition to lending my support to our Water Supply Working Group's recommendations, I would like to share some additional recommendations for my fellow ROC members' consideration.

### **Watershed Specific Project Evaluation Criteria is Critical to the Safe Clean Water Program's Success**

As the program has matured beyond the basic implementation phase, it is clear to many stakeholders involved that a "one size fits all approach" is no longer working. It is critical that we refine the program to ensure that the unique characteristics, communities, and needs of each watershed are evaluated and that specific metrics, data, goals, and project evaluation criteria are developed for each watershed.

In addition, when evaluating projects within a specific watershed, the applicable WASC must consider the upstream and downstream impact of potential future projects. We need to ensure that project benefits of previously funded projects in the watershed are not diminished or wasted. It is critical that WASCs evaluate previous investments from a watershed wide planning perspective and we need to ensure that the WASCs are provided the tools to do so through a comprehensive and focused watershed specific approach to the Safe Clean Water Program.

### **WASC Training and Onboarding is Crucial for Understanding Program Requirements and Watershed Needs**

In order to adaptively manage the program to be a more proactive, holistic watershed specific focused program, a more formalized onboarding process and training for WASC members should be implemented. This would ensure that members are educated on the Safe Clean Water Program as a whole but are also provided the tools and resources to effectively evaluate projects with a watershed specific lens. WASC alternate members should receive the same training and formal onboarding, and when new members come onboard, it is critical that they receive training and onboarding before they join their first meeting.

### **Reduce the Bureaucracy in Project Reporting**

While I fully support transparency and ensuring projects meet the goals and objectives of the Safe Clean Water Program, I am concerned that the existing quarterly reporting process for Regional Program is burdensome and very administrative in nature. There are several recommendations from stakeholders and project developers for a more meaningful but less frequent reporting process that we should consider in order to streamline the program and reduce the administrative burden on project developers.

Thank you for providing me with this opportunity to share some initial recommendations and thoughts as we review and refine the Biennial Report. I look forward to seeing you and our fellow ROC members at our next meeting.