

November 2, 2020

**TO:** Hon. Kathryn Barger, Chair, Los Angeles County Board of Supervisors  
Hon. Hilda L. Solis, Chair Pro Tem, Los Angeles County Board of Supervisors  
Hon. Mark Ridley-Thomas, Supervisor, Second District, Los Angeles County  
Hon. Sheila Kuehl, Supervisor, Third District, Los Angeles County  
Hon. Janice Hahn, Supervisor, Fourth District, Los Angeles County  
Mark Pestrella, Director of Public Works, Los Angeles County

**Re:** Recommended Updates to the Safe, Clean Water Program

To Los Angeles County Board of Supervisors,

With the passage of Measure W in Los Angeles, local and regional entities throughout the County are investing millions of dollars in stormwater projects to improve water quality and increase local water supplies. These multi-benefit stormwater projects also have the potential to provide community and environmental benefits, including improved habitat, greater public access to greenspace and local waterways, and increased carbon sequestration. **We commend you and Los Angeles County residents for incorporating community investment benefits and nature-based solutions into the Safe, Clean Water Program.**

The Safe, Clean Water Program guidelines and scoring methodology acknowledge community benefits and nature-based solutions. However, there are several opportunities to incorporate these benefits more meaningfully into the project application and decision-making process, thereby maximizing the value of these important investments in stormwater infrastructure.

The Pacific Institute, in collaboration with stakeholders in Los Angeles and throughout the United States, developed a framework for identifying, evaluating, and communicating the multiple benefits of water management decisions.<sup>1</sup> Based on our research and applications of the framework in communities across the United States, we offer the following recommendations for better integrating community investment benefits and nature-based solutions into project design and prioritization for the Safe, Clean Water Program.

Recommendation #1: Combine scoring categories for Community Investment Benefits and Nature-Based Solutions

Feasibility studies are scored for both community investment benefits (CIBs) (up to 10 points) and Nature-Based Solutions (NBS) (up to 15 points). **The categories for CIBs and NBS should be combined into a single, section of up to 25 points, that is focused on NBS and the resulting community benefits.** Merging these two sections will help to avoid redundancies in scoring. For example, inclusion of trees in a project currently provides points for enhancing of habitats or parks, as well as additional points for reducing urban heat island, sequestering

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<sup>1</sup> <https://pacinst.org/multiplebenefits/>

carbon, and utilizing natural material. Instead, the addition of trees to the project design should be considered for its benefits in one scoring category.

In addition, **we recommend incorporation of additional quantitative and qualitative metrics for evaluating the NBS component of projects.** The Pacific Institute is currently researching metrics and evaluation methods for water, carbon, biodiversity, and social benefits of NBS and will share this work with the County when it is available. By merging these two sections, project applicants can focus on quantitative contributions of NBS to community benefits.

Finally, the definition of NBS and its components should be clarified in the Feasibility Study Guidelines. The current Guidelines require an explanation of NBS, including how the “Project will implement or mimic natural processes to slow, detain, capture, and absorb/infiltrate water in a manner that protects, enhances or restores habitat, green space or usable open space.” The addition of the phrase “or mimic” natural processes allows for nearly all projects to claim NBS points. **We recommend redefining NBS with a stronger focus on natural systems and the resulting benefits provided by incorporating nature into project designs.**

#### Recommendation #2: Quantify Community Benefits Using Appropriate Metrics

Community Investment Benefits are essential components of successful SCW Program projects. On average, projects proposed in Round 1 of funding claimed between four and five CIBs, most commonly for flood control, as well as vegetation and carbon benefits. While the applicants are encouraged to describe the benefits provided, quantitative metrics would help WASCs to more systematically compare benefits of project options.

**We recommend that the project feasibility study guidelines provide metrics and methodologies for quantifying CIBs to allow WASCs to better compare project outcomes.**

In addition to metrics, the Feasibility Study Guidelines should include methods for determining the benefits provided by CIBs, whenever possible. For example, carbon sequestration benefits could be based on a method developed by Center for Neighborhood Technologies (CNT)<sup>2</sup>:

- Expected annual carbon sequestration (lbs C) = Total area of green space (SF) \* average annual amt. of carbon sequestered (lbs C /SF)
- Annual value of climate benefit (\$) = Total climate benefit (lbs CO<sub>2</sub>) \* price of CO<sub>2</sub> (\$/lb)

Project applicants should be strongly encouraged to calculate both the potential benefits of the projects, as well as potential negative impacts for each benefit category. For example, project feasibility studies should report the potential greenhouse gas emissions from project construction, as well as potential carbon sequestration from additional green space.

Potential metrics should be developed by stakeholders involved in the SCW Program, including members of the WASCs, County Board of Supervisors, the Regional Oversight Committee and Scoring Committee, and the project applications. Metrics and resources are available from

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<sup>2</sup> [https://www.cnt.org/sites/default/files/publications/CNT\\_Value-of-Green-Infrastructure.pdf](https://www.cnt.org/sites/default/files/publications/CNT_Value-of-Green-Infrastructure.pdf)

existing water accounting and evaluation methods, including from Center for Neighborhood Technology's National Green Values Calculator<sup>3</sup>, Green Infrastructure Leadership Exchange's Co-Benefits Valuation Tool<sup>4</sup>, Autocase Methodologies<sup>5</sup>, World Resources Institute's Volumetric Water Benefit Accounting<sup>6</sup>, and the Landscape Architecture Foundation's Landscape Performance Series<sup>7</sup>. These metrics and associated methodologies should be incorporated into the Project Feasibility Study Guidelines.

Finally, **we recommend that each benefit be evaluated compared to a “no action alternative” as a baseline to provide fair comparisons of benefits among projects.** The selection of the baseline fundamentally determines how project options compare with one another. For example, the feasibility studies should include details about current flooding conditions as to inform the no action alternative and how the project can address current challenges. Explicitly defining the baseline as existing conditions would allow for a more systematic comparison of projects presented to the committees.

By including these quantitative metrics for CIBs, WASCs have an opportunity to compare project options in more detail and prioritize projects that effectively meet multiple objectives.

### Recommendation #3: Require Community Letters of Support and Provide Additional Points for Robust Community Engagement

Project applicants have an opportunity to provide letters of support from community members. Because these letters are not required, the claimed benefits may not reflect the interests of the community they are meant to serve. **We recommend requiring submission of current support letters from local project beneficiaries.** This will ensure that the project applicants have meaningfully engaged the communities that the project is seeking to benefit.

Further, we agree with recommendations provided by the OurWaterLA Coalition<sup>8</sup> to refine the points-based system for community engagement and collaboration:

- Community engagement: Project includes community priorities that were developed as part of a robust outreach process (that is documented) (2 points).
- Collaboration: Project demonstrates collaboration among at least 4 entities, including at least one non-profit or community-based organization (2 point maximum).

Finally, we recommend awarding additional points for robust community engagement. Community engagement is a crucial component of effective and equitable water management.

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<sup>3</sup> [https://www.cnt.org/sites/default/files/publications/CNT\\_Value-of-Green-Infrastructure.pdf](https://www.cnt.org/sites/default/files/publications/CNT_Value-of-Green-Infrastructure.pdf) and <http://greenvalues.cnt.org/national/downloads/methodology.pdf>

<sup>4</sup> [https://giexchange.org/wp-content/uploads/2019/05/Green-Infrastructure-Valuation-Tool-User-Guide-Version\\_1.01.pdf](https://giexchange.org/wp-content/uploads/2019/05/Green-Infrastructure-Valuation-Tool-User-Guide-Version_1.01.pdf)

<sup>5</sup> <https://sites.autocase.com/docs/methodologies.html>

<sup>6</sup> <https://wriorg.s3.amazonaws.com/s3fs-public/volumetric-water-benefit-accounting.pdf>

<sup>7</sup> <https://www.landscapeperformance.org/guide-to-evaluate-performance>

<sup>8</sup> <https://ourwaterla.org/wp-content/uploads/2018/06/OWLA-Safe-Clean-Water-Recommendations-Combined.pdf>

One strategy for improving community engagement is through a comprehensive examination of project co-benefits and trade-offs. Such a process can help to build community support for project implementation and uptake. In our recent reports, *Incorporating Multiple Benefits into Water Projects*<sup>9</sup> and *Ensuring One Water Delivers for Healthy Waterways (Appendix A)*,<sup>10</sup> we provide recommendations for community engagement best practices that could be incorporated into guidance documents for project feasibility studies.

#### Recommendation #4: Communicate Benefits and Trade-offs of Suite of Proposed Projects

WASCs are tasked with recommending a suite of projects over time that provide a mosaic of integrated multi-benefit projects throughout the watershed. The current planning tools are helpful for examining the water quality and water supply benefits of proposed projects, as well as the financial implications of a suite of projects. For example, the SIP planning tool is a useful way to demonstrate the costs and water benefits of individual projects, but it does not demonstrate the community investment benefits provided throughout the watershed.<sup>11</sup>

**We recommend improving the existing tools to demonstrate the quantitative CIBs of projects, as well as demonstrate the benefits of the suite of proposed projects together.** By incorporating the CIBs into existing planning tools, WASCs can more systematically consider the benefits for projects that reach the necessary scoring threshold.

We commend Los Angeles County Board of Supervisors for completing a first round of funding for the Safe, Clean Water Program. And, we look forward to continued investments in multi-benefit solutions in Los Angeles. We would be happy to discuss the SCW Program and these recommendations with you in the upcoming months. Please do not hesitate to reach out with any questions or comments.

Sincerely,



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**CC:** Matthew Frary, Los Angeles County Flood Control District  
Shelley Luce, Heal the Bay, Regional Oversight Committee Co-Chair  
Barbara Romero, City of Los Angeles, Regional Oversight Committee Co-Chair  
Lauren Ahkiam, LAANE, Regional Oversight Committee Vice Chair  
Bruce Reznik, LA Waterkeeper, Scoring Committee Chair  
J.R. De Shazo, UCLA Luskin Center for Innovation, Scoring Committee Vice Chair

<sup>9</sup> <https://pacinst.org/publication/incorporating-multiple-benefits-into-water-projects/>

<sup>10</sup> <http://texaslivingwaters.org/wp-content/uploads/2020/08/Ensuring-One-Water-Delivers-for-Healthy-Waterways.pdf>

<sup>11</sup> <https://safecleanwaterla.org/wp-content/uploads/2020/05/SIP-Programming-Guidelines-Tool-Guide.pdf>



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