THRIVING IN A HOTTER AND DRIER LA COUNTY THROUGH LOCAL STORMWATER CAPTURE AND POLLUTANT REDUCTION



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# **ACRONYMS**

AF - Acre-Feet

AFY - Acre-Feet per Year

ARLA - Accelerate Resilience LA

BMP - Best Management Practice

**BoS** - Los Angeles County Board of Supervisors

**CBO** - Community Based Organization

CIB - Community Investment Benefit

DAC - Disadvantaged Community

FCD - Flood Control District

K - Thousand

LA - Los Angeles

LID - Low Impact Development

M - Million

MS4 - Municipal Separate Storm Sewer System

NGO - Non-Governmental Organization

NRDC - Natural Resources Defense Council

OWLA - OurWaterLA

**ROC** - Regional Oversight Committee

SCOPE - Strategic Concepts in Organizing and Policy Education

SCWP - The Safe, Clean Water Program

TMDL - Total Maximum Daily Load

**USGS** - United States Geological Survey

WASC - Watershed Area Steering Committee

# **EXECUTIVE SUMMARY**

Los Angeles County residents passed a landmark funding measure in 2018 (Measure W), which imposed a parcel tax on impervious surfaces to fund stormwater projects to increase local water supply, improve water quality, and provide community benefits through the Safe, Clean Water Program (SCWP). With an annual budget of approximately \$280 million, the SCWP has the potential to transform how Los Angeles County manages stormwater, prioritizing climate resilience and community health and well-being. The SCWP is currently undergoing its first official assessment through the County's Biennial Review process, offering an opportunity to assess progress, reflect on the achievement of goals, set targets, and make recommendations.

Despite numerous successes, the SCWP must be bolder in its goals, targets, and timelines in order to accelerate the equitable transformation of LA County to greener, more local water self-sufficient and climate-prepared communities. With numerous water quality deadlines passed, an environment that is becoming hotter and less hospitable, and frontline communities bearing the brunt of the impacts, we must act now by setting ambitious yet realistic goals for the SCWP. Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper developed "Vision 2045" with bolder goals, targets and recommendations for the SCWP on water supply, water quality, equity, science, finance, and policy. Our top level goals, with additional recommendations detailed in the full report, include the following:

#### **VISION 2045 GOAL SUMMARY**

**Water Supply Goal:** 300K acre-feet-per-year (AFY) of new water will be captured and infiltrated from stormwater by 2045. An interim target of 100K AFY of new water will be met by 2030.

**Water Quality Goal:** All water quality standards and Total Maximum Daily Load (TMDL) requirements shall be met by no later than 2038. An interim target of a 50% reduction in water quality standards exceedances will be met by 2030.

Projects funded by the SCWP must include an analysis
 of what portion of the associated waste load allocation
 reduction will be achieved as a result of project
 implementation; ongoing monitoring must be
 conducted; and a robust best management practice
 (BMP) efficacy monitoring program for new projects
 must be developed and implemented in 2024.

 The County must conduct an assessment of the estimated benefits from Low Impact Development (LID) regulatory requirements of SCWP projects.



Uncaptured Stormwater can ferry thousands of pounds of trash through the Los Angeles Watersheds, and ultimately to local beaches and coastal waters. Photo by: Heal the Bay

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**Equity Goal:** To reduce the disproportionate pollution burden suffered in disadvantaged communities, the Safe, Clean Water Program will prioritize equity in all of its projects and programs.

- At a minimum, all SCWP projects must involve local communities and at least 10% of all funded projects in underserved communities must be led by communitybased organizations (CBOs) or non-governmental organizations (NGOs), as primary or secondary applicants. 100% of projects within underserved communities must also include paid CBO engagement
- A SCWP outreach and engagement effort focusing on tribes should be developed and implemented in 2024.
- The SCWP workforce development program should be written and approved by June 2024 and implemented by early 2025. The Countywide community and K-12 education program should be developed and approved by June 2024 and implemented by early 2025 at the latest.

#### Community Investment Benefits & Greening Goal: Replace 12,000 acres of impermeable area with new green space by 2045.

- All schools located in Disadvantaged Community (DAC) boundaries should become green, 'cool schools' by 2030. All LA County Schools should be green schools by 2045.
- The SCWP should develop and implement a K-12 education program in 2024 with a target of 10% of students receiving watershed education annually by 2026.

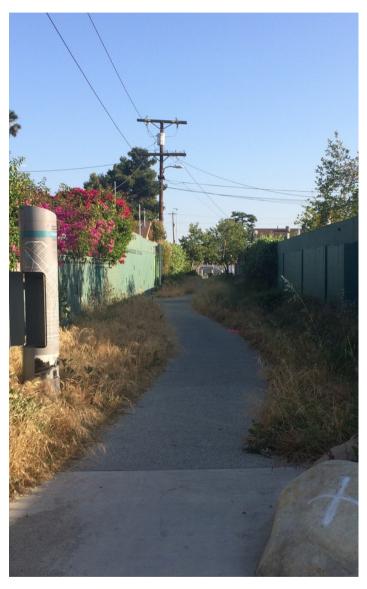
**Science Goal:** Create a Scientific Advisory Committee in 2024 to review research proposals, identify data gaps, and recommend funding to the Board of Supervisors (BoS).

**Finance Goal:** Develop a finance plan by the end of 2024 with strategies on increasing matching funds and approaches to enable larger, more impactful project funding.

**Policy Goal:** Utilize SCWP and County expertise to recommend policies that will accelerate the County's transformation to a mosaic of healthier, more resilient, water-self-sufficient communities.

#### Watershed Specific Prioritization Goal: By 2025,

Watershed Area Steering Committees (WASCs) should develop and recommend for BoS approval comprehensive multi-benefit watershed management plans that go beyond water quality and water supply to include equity, open space, flood control, cooling, climate resilience, and other benefits.



Elmer Avenue Neighborhood Retrofit: green alley with permeable pavement, climate-appropriate vegetation, and infiltration galleries. Photo by: Heal the Bay.

Through the Biennial Review process, we urge community members to call for decision-makers to adopt and implement our Vision 2045, which will equitably transform Los Angeles County into a more climate-resilient region with rivers, streams, lakes, and coastal waters that are safe for people and wildlife.



### INTRODUCTION

#### **VISION STATEMENT**

The Safe, Clean Water Program (SCWP) will improve the quality of life for LA County residents by catalyzing the transformation of LA County and its 88 cities to greener, more climate-prepared communities. A robust SCWP will help to achieve water quality standards that protect public health and aquatic life by capturing and using stormwater runoff, replenishing aquifers through stormwater infiltration, reducing water pollution, and providing community benefits, especially in underserved communities. These benefits include increased shade, flood control, recreational space, access to nature, and job opportunities for underserved community residents in the areas of stormwater education and nature-based solution installation and maintenance.

Vision 2045 provides recommended goals that will achieve our vision for the SCWP by 2045 with numerous milestones along the way. Numeric targets, actions, recommendations, and deadlines are provided for water supply, water quality, equity, science, finance, and policy to be achieved county-wide while taking into consideration watershed-specific priorities. The environmental group authors developed this vision through extensive discussions with SCWP committee members and stakeholders. Also, our targets and recommendations are meant to reflect and build on the extensive work by entities including Accelerate Resilience LA (ARLA) (1), UCLA Luskin Center for Innovation (2), Strategic Concepts in Organizing and Policy Education (SCOPE) (3), LA County Office of Sustainability (4), and Department of Public Works (5), and LA Waterkeeper (6) as well as the comprehensive comments provided by the <a href="OurWaterLA Coalition">OurWaterLA Coalition</a> (OWLA) (7). And finally, NRDC, Heal the Bay, and the LA Waterkeeper acknowledge that all of these targets can not be achieved by the SCWP alone, and have therefore provided recommendations for financing and collaborative partnerships. We view the SCWP as the catalyst that can help transform the County into a greener, cleaner, more climate-resilient mosaic of diverse communities that approach local water self-sufficiency.







East Los Angeles Sustainable Medians Project: multi-benefit stormwater capture project offering flood protection, water quality improvements, recreational opportunities, increased shade, enhanced habitat, and more. Photos by: LA Waterkeeper.



# **VISION 2045 GOALS**

#### **WATER SUPPLY GOAL**

300 thousand (K) acre-feet-per-year (AFY) of new water will be captured and infiltrated from stormwater by 2045. An interim target of 100K AFY of new water will be met by 2030.

LA County's annual supply of water is approximately 1.7 million (M) AFY, of which 55% is currently imported from the Colorado River, the Bay-Delta, and the Eastern Sierra. The largest source of local water supply in the LA County region is groundwater which makes up approximately onethird of County supplies, and recycled water makes up about ten percent of supplies (4). On average, LA County captures and infiltrates 154K AFY of stormwater (5). In the 2022-23 water year, and with the additional rainfall from Hurricane Hilary in August 2023, over 30 inches of rain fell in the Los Angeles area, resulting in significantly higher than average volume captured and infiltrated this year, nearly 500K AF in total (8,9). Yet each year, whether we have above or below-average rainfall, billions of gallons of stormwater flow over paved surfaces, through the storm drain system, and out to the ocean without the opportunity for infiltration because we do not yet have the infrastructure to capture all the rain that falls in a single rain event.

The Our County Sustainability Plan has a target of 80% local water supply by 2045, (4) while the City of LA has a target of 70% local water by 2035 (10). To meet these ambitious goals, LA County will have to increase local supplies by over 580K AFY through a combination of recycled water, stormwater capture, brackish groundwater desalination, pumping and treating contaminated groundwater, and better groundwater management, conservation, and efficiency. A target of an increase in stormwater capture and infiltration of 300K AFY, in addition to the current annual average of 154K AFY, can be achieved by 2045 through a combination of newly constructed regional projects, better use of existing regional infiltration projects, and parcel scale distributed capture and infiltration projects.

The water supply working group of the SCWP Regional Oversight Committee (ROC) recommended the same target of 300K new AFY by 2045 (11).

To determine progress toward the 300K AFY target, we need to come to a consensus on the definition of new water. In LA County's Water Plan, the County makes the assumption that 100% of stormwater infiltrated is available as water supply, when in fact, a significant fraction of infiltrated water doesn't reach producing aguifers. A definition of new stormwater infiltration as water supply could be the incremental volume of water in a producing groundwater basin in comparison to the groundwater volume before infiltration project implementation. Some factor, which needs to be determined as soon as possible by LA County, United States Geological Survey (USGS), local watermasters, academics, and others, should be applied to this volume. This definition makes sure that we don't double-count infiltrated stormwater in various parts of a watershed overlying a producing groundwater basin.

# WATER QUALITY STANDARDS ATTAINMENT GOAL

All water quality standards and Total Maximum Daily Load (TMDL) requirements shall be met by no later than 2038.

The genesis of efforts like the <u>Safe Clean Water Program</u> (12), <u>Proposition O</u> (13), <u>Measure V</u> (14), and <u>Measure CW</u> (15) was to improve receiving water quality to protect public health and aquatic life. Funding from these measures should result in the attainment of receiving water quality standards. The end result should be beaches that are safe for recreation during dry weather and most rainy days; neighborhoods, rivers, lakes, and beaches that don't look like trash dumps before or after a rain; and streams, rivers, lakes, and coastal waters that are not toxic, and that do allow healthy aquatic ecosystems to thrive. To date, more than 30 years after the first LA County stormwater permit and more than 20 years after the effective date of the first TMDLs, far too many LA County waterways still pose health risks to people and aquatic life (Figure 1).



Figure 1: Graphic display of waterbodies assessed by the State Water Resources Control Board, including those placed on the 303(d) list of impaired waters, in the 2020-22 Proposed Final California Integrated Report. Waterways shown in red were assessed and designated as impaired, while those in blue were assessed and designated as unimpaired. Data available at: <a href="https://gispublic.waterboards.ca.gov/portal/home/item.html?">https://gispublic.waterboards.ca.gov/portal/home/item.html?</a> <a href="https://gispublic.waterboards.ca.gov/portal/home/item.html?">https://gispublic.waterboards.ca.gov/portal/home/item.html?</a> <a href="https://gispublic.waterboards.ca.gov/portal/home/item.html?">https://gispublic.waterboards.ca.gov/portal/home/item.html?</a>

There are 210 waterbodies in the Los Angeles Region that the California State Water Resources Control Board (State Board) has listed as impaired by pollutants. In total, over 1,300 impairments are listed in the Los Angeles Region by the State Board because each of these waterbodies are impaired by multiple pollutants such as bacteria, heavy metals, nutrients, pesticides, and trash (16). Unfortunately, little progress has been made to reduce urban runoff, which has long been considered the number one source of pollution in our surface waters (17). While water quality may be improving in some areas, it remains stagnant in many, and there is evidence that water quality may even be declining in some areas including Ballona Creek, the Upper LA River, and the Upper San Gabriel River Watersheds (18). However, the SCWP could lead to meaningful implementation of stormwater projects moving forward, significantly improving water quality throughout Los Angeles County, and protecting both public and environmental health, while also providing multiple additional benefits to Los Angeles communities.

All water quality standards and wet weather TMDL requirements must be met as soon as possible and no later than 2038 (Exhibit A). All TMDL requirements that have already passed or are coming up in the next year (trash, salts, algae, and dry weather fecal indicator bacteria) must be met as soon as possible, and by no later than 2026. As such, all beaches in LA County should receive "A" dry weather grades in Heal the Bay's Beach Report Card by 2026. All metals TMDL requirements must be met by 2028; all nutrients, sediments, and toxics TMDL requirements must be met by 2033; and all wet weather bacteria TMDL requirements must be met by the final 2038 deadline, with all beaches receiving "A" or "B" wet weather grades for Heal the Bay's Beach Report Card.

Water quality standards will be met through compliance with waste load allocations in TMDLs, and compliance with requirements under the Municipal Separate Storm Sewer System (MS4) Permit to capture and clean urban runoff. Given that polluted urban runoff is the number one source of pollution in our surface waters, the water supply goal discussed above to capture, treat, and reuse an additional 300K AFY of stormwater will result in dramatic improvements in water quality, if implemented in accordance with MS4 Permit requirements. As such, planning and implementation for projects to achieve water quality standards should be done in coordination with the Los Angeles Regional Water Quality Control Board and key stakeholders. These planning efforts must include final TMDL compliance by 2038, as well as an interim target of 50% reduction in water quality standards exceedances by 2030, providing an additional target to assess and incentivize progress towards water quality standards attainment.

To attain water quality standards in receiving waters, projects must be designed for pollution reduction and monitored for project efficacy during operations and maintenance. Recently, the ROC committed to creating a water quality working group to develop recommendations for how SCWP projects can better lead to receiving water quality standards attainment in a timely manner.

Existing and proposed projects funded by the SCWP must include an analysis of what portion of the associated waste load allocation reduction will be achieved as a result of project implementation. Then, ongoing monitoring must be conducted to ensure that pollutant removal performance during a storm season is equivalent to what was expected in structural best management practice (BMP) design. That means that a robust BMP efficacy monitoring program for new projects must be developed and implemented in 2024. Also, LA County, working with local cities, needs to assess water quality in each of the impaired water body segments on an annual basis, and that report should be made available to the public. A modification of the current county and municipal monitoring programs may be necessary to provide this important information. Data on the frequency and magnitude of exceedances is critical to assess progress toward water quality standards attainment. A Scientific Advisory Committee must be formed to review monitoring data, assess progress towards compliance, and provide recommendations to improve the monitoring approach, as needed.

An additional critical research need for water supply and water quality is an assessment of the estimated benefits from Low Impact Development (LID) regulatory requirements. To date, thousands of properties have met LID legal requirements, yet the water quality and supply benefits of LID have not been quantified countywide. This should occur every five years at a minimum and should be part of the SCWP biennial review.

#### **EQUITY GOAL**

In order to reduce the disproportionate pollution burden suffered in disadvantaged communities, the Safe, Clean Water Program will prioritize equity in all of its projects and programs.

An equitable SCWP will result in an increase in community-driven projects funded, meaningful community engagement, community-identified benefits being realized in underserved communities, community-based organization and non-governmental organization (CBO/NGO) compensation for participation, tribal representation with compensation for participation, and an expedited rollout of the long-awaited education and workforce development programs.

#### **Community-Driven Process**

To achieve community-driven projects that reflect community priorities, an equitable SCWP includes funding projects designed and constructed by CBOs/NGOs in underserved communities, and in direct coordination/consultation with communities. The SCWP must do substantially better in developing equity metrics for the success of community-driven projects. At a minimum, all SCWP projects must involve local communities and at least 10% of all funded projects in underserved communities must be led by CBOs or NGOs, as primary or secondary applicants. An equitable Program offers opportunities for all members of the public to engage and claim ownership of projects, and ensure substantial community benefits such as increased shade, flood control, recreation and education opportunities, and access to nature, particularly in underserved communities.

The SCWP should ensure that 100% of projects under consideration for funding have already conducted meaningful community engagement, and have a robust plan for community engagement for all stages of the projects. 100% of projects within underserved communities must also include paid CBO engagement. This recommendation is intended to connect qualified community engagement practitioners with project developers looking to truly understand and provide what the community wants and needs. Establishing a bench of CBOs/NGOs that can be contracted to do this engagement in collaboration with applicants would greatly increase the quality of community engagement across projects and result in more valued community benefits.

CBOs, like SCOPE, have advocated for the use of the Spectrum of Community Engagement to Ownership developed by Rosa Gonzalez (Figure 2) (19). The Spectrum outlines stances towards community with a scale of 1-5, spanning ignore = 0, inform = 1, consult = 2, involve = 3, collaborate = 4, and defer to = 5. LA County should assess SCWP project engagement using this spectrum, with a minimum score of 3 to qualify for funding.



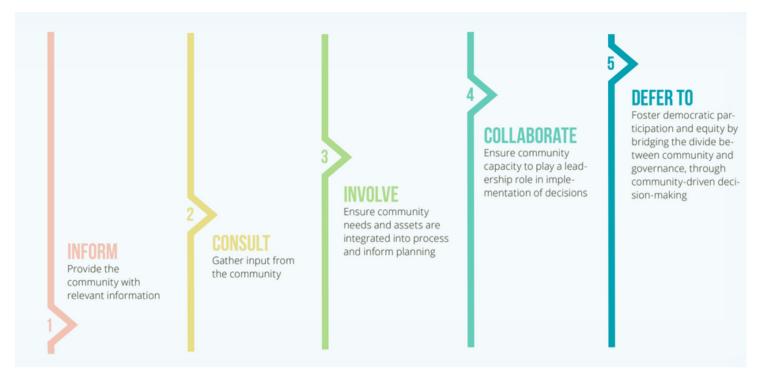


Figure 2: The Spectrum of Community Engagement to Ownership developed by Rosa Gonzalez of Facilitating Power.

At a minimum, all projects should involve the community with a preference for community collaboration or community-led projects and programs, especially in underserved communities. To include self-reported information on communities' stated priorities and needs in the decision-making process, and to identify clear goals and outcomes, the SCWP should develop an interactive vulnerability assessment map, informed by community input via a community survey tool, to be used to document needs and benefits from projects in different areas.

#### **Tribal Representation**

Additional efforts should be made to bolster tribal engagement/consultation, particularly for projects directly affecting tribal populations. To achieve meaningful engagement/consultation, when tribal representation is available and interest is demonstrated, then the opportunity to serve on committees shall be prioritized, and appropriate compensation provided for committee participation. Also, a SCWP outreach and engagement effort focusing on tribes should be developed and implemented in 2024 to ensure consultation on projects and project design, construction, and operation and maintenance.

#### **Education Program and Workforce Development**

To date, the County has reported nearly \$1 billion invested across the Regional, Municipal, and District Programs, including funding for 126 infrastructure projects at various stages from development to construction, and even operations and maintenance (20). Yet, the promised workforce development program that will provide engagement, education, and jobs for residents in lowincome communities has not been implemented. With work opportunities already available for funded projects, the workforce development program should be written and approved by June 2024 and implemented by early 2025. As we enter the fifth year of funding for this program, an established education program, which includes a specific K-12 component, has not yet been implemented. The Countywide education and K-12 education program should be developed and approved by June 2024 and implemented by early 2025, at the latest.



Plymouth School Neighborhood Stormwater Capture Demonstration Project: community drive nature-based project with trees and pervious surfaces for infiltration. Photo by: Amigos De Los Rios.

# COMMUNITY INVESTMENT BENEFITS & GREENING GOAL

Replace 12,000 acres of impermeable area with new green space by 2045.

Most of the community investment benefits (CIBs) outlined in the SCWP are best (and sometimes only) achieved by replacing hardscape with greenspace, as defined as natural areas of vegetation (not alternatives like astroturf or permeable pavement). Greenspaces with a diverse palette of native, climate-appropriate groundcover, shrubs, and trees can provide improved air quality, critical cooling for our hottest communities, flood control, recreational opportunities, carbon sequestration, and wildlife habitat, among other benefits.

The Safe Clean Water Program should support the creation of 12,000 acres of new green space to help get communities recognized with "very high" and "high" park needs (as identified in the LA County Park Needs Assessment (21)) up to the County average of 3.3 acres of parkland per 1,000 people, which is the goal established in the OurCounty Plan (4). Not all watershed areas have the same level of park need, and the County should identify priority greening locations in 2024. Such multi-benefit greening efforts should include parcel-based, neighborhood (new smaller parks, school greening), and larger regional (large parks, new spreading grounds with community/greening elements) scales. While the SCWP should not be the only funding source seeking to green LA's communities, all greening efforts should incorporate stormwater capture, infiltration, and/or pollutant reduction elements. A multi-benefit approach makes this greening goal particularly ripe for cost-share from Measure A (parks) (22), Measure M (transportation) (23), and various state and federal climate-related funding opportunities.





Jackson Elementary School Campus Greening and Stormwater Quality Improvement Project: campus greening project before (left) and after (right) construction. Photo by: Amigos De Los Rios.

All schools located in Disadvantaged Community (DAC) boundaries should become green, cool schools by 2030. Every student has the right to learn in schools that are safe, and green, and provide healthy learning environments. Students should not have to exercise and learn on asphalt schoolyards that heat up to 140 degrees Fahrenheit or more, posing significant public health risks (24). Also, schools provide an extraordinary opportunity to capture and reuse or infiltrate stormwater on site without requiring the purchase of land. This cost-effective multi-benefit, nature-based school transformation results in improved public health; a greener, cooler, and safer school; access to nature on campus; reduction of pollutant loads from asphalt hardscapes; increased outdoor educational opportunities; better learning outcomes; and reduced potable water demand for irrigation.

Because of the myriad benefits, the County's goal should be to green all schools throughout LA County, with greening being defined as 30% of the school having natural permeable cover (e.g., soils), with that 30% being located where students spend their time (such as playgrounds, not in the parking lot or perimeter of the school), and 50% of the school shaded by trees. Some schools and communities need greening more urgently. and by 2030, the SCWP should support the greening of all schools located within DAC boundaries and/or the 70th percentile or above pollution burden boundaries (as determined by the Office of Environmental Health Hazard Assessment's CalEnviroScreen 4.0) (25). All LA County Schools should be green schools by 2045. Funding also should support green schools being accessible to the public during non-school hours. Measure RR (26), a potential 2024 statewide school bond, and federal climate programs all offer opportunities for leveraging SCWP funding to achieve desired results. Over the next six months, the County should assess how many schools need to be greened to meet interim and final goals (and set interim milestones) to more easily assess progress and ensure goals will be met. Also, the County should host a green school summit with Countywide school district leadership to develop a consensus on the quickest, most cost-effective, and public health protective approaches to meet the 2030 and 2045 targets.



The SCWP should develop and implement a K-12 education program in 2024 with a target of 10% of students receiving watershed education annually by 2026. The K-12 aspect of the SCWP has been slow to be developed and implemented. Education of the approximately 1.3 million LA County K-12 students is imperative for efforts to generate watershed management and climate resilience support and future nature-based solution professionals (27).

#### **SCIENCE GOAL**

Create a Scientific Advisory Committee in 2024 to review research proposals, identify data gaps, and recommend funding to the Board of Supervisors (BoS).

LA County and its 88 cities are spending billions of dollars on multi-benefit projects to clean up our polluted waters and increase local water supplies. To spend those dollars strategically and better understand local water quality and supply issues, an independent scientific advisory committee should be formed with the following responsibilities: develop a SCWP research plan; with feedback from the BoS, ROC, and Watershed Area Steering Committees (WASCs), identify and prioritize critical questions that researchers can answer; identify critical data gaps; working with the county, initiate and implement a call for a research projects program to answer critical questions; and review proposals and provide funding recommendations to the WASCs and BoS for larger scale (bigger than a watershed) research as needed.



South Los Angeles Wetlands Park: constructed wetlands stormwater capture project offering water quality improvements, habitat, recreational and educational opportunities, carbon sequestration, and more. Photo by: Heal the Bay.

#### **FINANCE GOAL**

Develop a finance plan by the end of 2024.

Currently, the SCWP has largely been run as a pay-as-yougo program. This approach leads to the funding and construction of many small to medium-sized projects, but larger-scale projects don't have access to the magnitude of funding necessary to design and build. Also, the infrastructure needed to meet SCWP goals for water supply and water quality in a timely manner requires a much faster pace. The pay-as-you-go approach is not the only approach used for transportation, water supply, and wastewater treatment infrastructure projects in the county or state. The County needs to hire financial management experts to develop a finance plan that includes a diversified portfolio of large-scale project financing options such as bonds, loans, assessments, and other strategies. In addition, the finance plan should include estimates of matching funding needed to meet the targets in Vision 2045. The estimates should be updated as part of the biennial review process. The finance plan should be submitted to the ROC and the BoS. Also, by the end of 2024, the County needs to have one or more people assigned to writing grant applications for SCWP projects and programs and for developing collaborative partnerships to leverage and match funding.

Increase collaborative partnerships with Metro, Caltrans, LA Unified School District, and other school districts, businesses, and local, state, and federal agencies and leaders to better leverage SCWP project and program funding.

The SCWP generates over \$280M a year in funds, but the necessary transformation of LA County to healthier communities that protect watersheds, reduce stormwater pollution, and augment water supplies requires greater collaboration and funding from partnering sources. Local, state, and federal agencies have access to billions of dollars of funds that can be used in collaboration and partnership with SCWP funds.



The County should develop a team that has the principal responsibilities to initiate and develop successful collaborative partnerships that can increase matching funds to a level of 1:1 or greater by 2025 with a longer-term goal of 2:1. A clear definition of matching funds should be developed by mid-2024. Also, the proposed collaboration team should work with Watershed Coordinators to connect non-SCWP funding options directly with SCWP project proponents.

# The SCWP should provide transparency on how all \$280 million per year of funds are used.

Currently, the transparency for how projects are funded regionally through watersheds is excellent, but the allocation of 40% of the funds (\$112M/yr.) to municipal programs is a black box except for the recent addition on the SCWP website of municipally funded projects. The public has the right to know how our tax dollars are used and currently, that information is not readily available. For example, how much of the municipal funding goes to programs like street sweeping or catch basin cleaning? Has the SCWP funding been used to backfill funding for programs that existed long before Measure W passed? How have funds been used for community engagement, workforce development, and community benefits? In addition, the allocation of the \$28M (10%) for administration, research, workforce development, and education, also should be more transparent. As part of this, the Flood Control District (FCD) should establish a userfriendly public monitoring dashboard that includes information on each program as well as project-specific information such as what stage the project is (design, construction, completed).

#### **POLICY GOAL**

Utilize SCWP and County expertise to recommend policies that will accelerate the County's transformation to a mosaic of healthier, more resilient, water-self-sufficient communities.

Examples of potential policies that will accelerate progress with reasonable cost to local government include:

- Develop and approve a consistent and effective LID ordinance that is approved by all 88 cities and the County:
- Develop a policy that requires LID BMPs upon the sale of property;
- Modify turf removal/landscape transformation funding programs to require onsite stormwater retention or infiltration:
- Develop and approve an ordinance that requires LID BMPs for all transportation projects that cost more than \$2M:
- Require the most recent, relevant project labor agreements to apply to all projects over a cost of \$5 million:
- Develop and approve a stream and watershed protection ordinance for LA County that is adopted by all cities;
- The ROC should work with the County to assess the consistency of the SCWP with the Our County Sustainability Plan and the County Water Plan;
- And, the ROC should work with the County to develop SCWP goals, targets, and deadlines in 2024.



Mayor Eric Garcetti and the OurWaterLA Coalition take a stand at the YES On Measure W Rally. Photo by: OurWaterLA



#### WATERSHED-SPECIFIC PRIORITIZATION GOAL

While setting clear targets is critical to ensure the SCWP achieves its lofty goals, it is also vital that we prioritize where various investments should be made.

Not all watersheds or communities are alike. Some communities are particularly valuable for water supply enhancements, or have a much higher need for greening, while other areas face particularly daunting water quality needs. The one-size-fits-all scoring criteria have not worked well to recognize the specific needs of each WASC area. By 2025, WASCs should develop and recommend for BoS approval comprehensive multi-benefit watershed management plans that go beyond water quality and water supply to include equity, open space, flood control. cooling, climate resilience, and other benefits. This recommendation is consistent with the draft California Water Plan Update's Watershed Resiliency Vision (28). A robust watershed assessment should be undertaken to identify more precisely what types of investments should be made where. Such an assessment should include existing data (e.g. heat maps, CalEnviroScreen, Park Needs Assessment) as well as relevant community needs assessments and the multi-benefit watershed management plans recommended above.

Site-specific issues that need to be considered for more effective use of SCWP funds include the following:

For water supply, the eastern San Fernando Valley
portion of the upper LA River watershed and the upper
San Gabriel River are excellent locations for
stormwater recharge of groundwater basins. Portions
of the Rio Hondo watershed are good for recharge as
well, while the north Santa Monica Bay watershed is
poor for stormwater infiltration projects.

- For water quality, all watersheds have impaired water body segments, but water quality is particularly poor for toxic pollutants in the lower LA River watershed, the Dominguez Channel portion of the south Santa Monica Bay watershed, the lower San Gabriel River watershed, and the Ballona Creek portion of the central Santa Monica Bay watershed. Constituents like fecal bacteria and trash are prevalent in all county watersheds, with nutrient pollution as a significant problem in the north Santa Monica Bay and Santa Clara River watersheds.
- For equity issues, the lower LA River, Dominguez
  Channel watershed section of the south Santa Monica
  Bay, the eastern and southern sections of the central
  Santa Monica Bay watershed, and significant sections
  of the upper and lower San Gabriel River and upper LA
  River watersheds all have high percentages of lowincome communities and score high on
  CalEnviroScreen 4.0. Community benefits, workforce
  development, projects led or partnered with CBOs, and
  community engagement are especially important in
  these frontline communities.

A vision document with countywide and watershed-specific goals, metrics, milestones and deadlines for the SCWP (based on robust watershed planning principles) is aligned with many of the ROC members' testimony at their October 2023 meeting, and with many outside groups including NGOs, municipalities and business community representatives, as well as the motion put forth by Supervisor Horvath and approved by the full BoS earlier this year (29). The FCD should work with the Chief Sustainability Officer to lead this effort, with engagement by the ROC, each WASC (including their Watershed Coordinators), key stakeholders, and potentially outside experts to develop such a strategic plan by June 30, 2024.





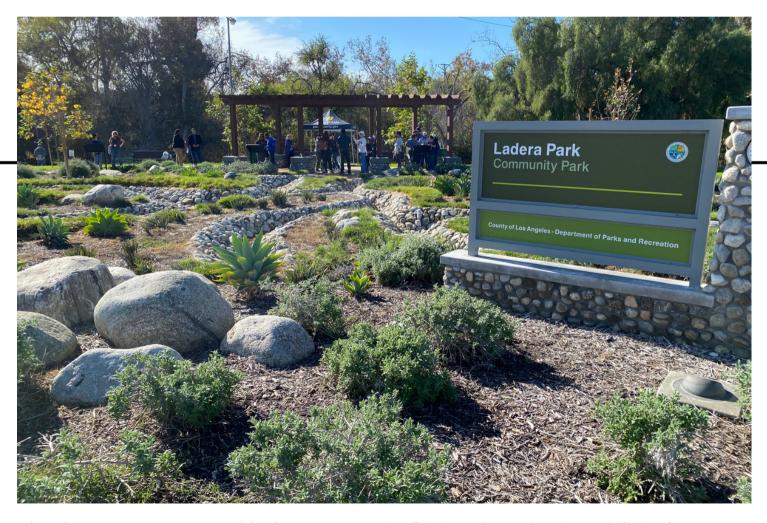


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Adventure Park Multi Benefit Stormwater Capture Project: stormwater capture project with an infiltration gallery, funded by the Safe, Clean Water Program. The project is shown here under construction (far left and far right), and ensuring proper tree protection (center). Photos by: Heal the Bay.

# **CONCLUSION**

Full implementation of the Vision 2045 document will equitably transform Los Angeles County into a more climate-resilient region with rivers, streams, lakes, and coastal waters that are safe for people and marine life. The SCWP is the catalyst to make this transformation happen quickly, effectively, and equitably. Integration of the SCWP, the County Water Plan, the OurCounty Plan, and Vision 2045 will provide the pathway towards water self-sufficiency while providing multiple benefits ranging from recreation, to habitat and flood control, to neighborhood cooling and improved public health. Equity will drive every component of this effort resulting in extensive education and engagement programs, green jobs, and workforce development in communities that have long suffered disproportionate environmental impacts. NRDC, Heal the Bay, and the LA Waterkeeper strongly urge LA County to adopt and implement the Vision 2045 recommendations as soon as possible. We look forward to working closely with decision makers and communities across the County to make this vision a reality.



Ladera Park Stormwater Improvements Project: multi-benefit stormwater capture project offering improved water quality, onsite use and infiltration of stormwater, enhanced recreational and educational opportunities, and more. Photo by: Heal the Bay.



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# **EXHIBIT A: TMDLs Effective in the Los Angeles Region**

Waterbody	Pollutant	Effective Date	Final Deadline
Ventura River Estuary, Reaches 1-4, San Antonio Creek and Canada Larga	Algae	28 Jun 2013	28 Jun 2023
Ballona Creek, Ballona Estuary, and Sepulveda Channel	Bacteria	27 Apr 2007	15 Jul 2021
Los Angeles River	Bacteria	23 Mar 2012	23 Mar 2037
Inner Cabrillo Beach, Los Angeles Harbor Main Ship Channel	Bacteria	10 Mar 2005	10 Mar 2010
Marina del Rey Back Basins and Mothers' Beach	Bacteria	18 Mar 2004	15 Jul 2021
Malibu Lagoon, Malibu Creek and tributaries	Bacteria	24 Jan 2006	15 Jul 2021
Santa Monica Bay Beaches	Bacteria	15 Jul 2003	15 Jul 2021
Santa Monica Bay Beaches	Bacteria	15 Jul 2003	15 Jul 2009
Santa Clara River Estuary, Reaches 3,5,6 and 7	Bacteria	21 Mar 2012	21 Mar 2029
San Gabriel River, Estuary, and Tributaries	Bacteria	14 Jun 2016	14 Jun 2036
Kiddie Beach and Hobie Beach	Bacteria	18 Dec 2008	18 Dec 2018
Long Beach City Beaches, Los Angeles River Estuary	Bacteria	26 Mar 2012	TBD
Santa Clara River Reach 3	Chloride	18 Jun 2003	TBD
Calleguas Creek, Mugu Lagoon, & tributaries	Metals	27 Mar 2007	27 Mar 2022
Los Angeles River & Tributaries	Metals	29 Oct 2008	11 Jan 2028
San Gabriel River & Tributaries	Metals	26 Mar 2007	30 Sep 2026
Ballona Creek	Metals	29 Oct 2008	11 Jan 2021
Los Cerritos Channel	Metals	17 Mar 2010	30 Sep 2026
Santa Clara River	Nutrients	23 Mar 2004	23 Mar 2012



Nutrients	27 Jun 2017	26 Jun 2032
Nutrients	27 Juli 2017	20 Juli 2032
Nutrients	27 Jun 2017	27 Jun 2031
Nutrients	16 Jul 2003	16 Jul 2009
Nutrients	11 Mar 2009	11 Mar 2017
Nutrients	23 Mar 2004	23 Mar 2008
Nutrients	21 Mar 2003	15 Nov 2030
Salts	4 May 2005	4 May 2016
Salts	2 Dec 2008	2 Dec 2023
Sediment and Invasive Exotic Vegetation	26 Mar 2012	TBD
Sedimentation and Nutrients	2 Jul 2013	16 May 2032
Toxicity	24 Mar 2006	24 Mar 2016
Toxics	11 Jan 2006	11 Jan 2025
Toxics	22 Mar 2006	22 Mar 2024
Toxics	20 Mar 2012	30 Sep 2032
Toxics	24 Mar 2006	24 Mar 2026
Toxics	26 Mar 2012	TBD
Toxics	6 Oct 2011	TBD
Trash	7 Jul 2009	7 Jul 2017
Trash	17 Apr 2001	1 Apr 2003
	Nutrients  Nutrients  Nutrients  Nutrients  Salts  Salts  Sediment and Invasive Exotic Vegetation  Sedimentation and Nutrients  Toxicity  Toxics  Toxics  Toxics  Toxics  Toxics  Toxics  Toxics  Toxics	Nutrients         27 Jun 2017           Nutrients         16 Jul 2003           Nutrients         11 Mar 2009           Nutrients         23 Mar 2004           Nutrients         21 Mar 2003           Salts         4 May 2005           Salts         2 Dec 2008           Sediment and Invasive Exotic Vegetation         26 Mar 2012           Sedimentation and Nutrients         2 Jul 2013           Toxicity         24 Mar 2006           Toxics         11 Jan 2006           Toxics         20 Mar 2012           Toxics         20 Mar 2012           Toxics         26 Mar 2012           Toxics         26 Mar 2012           Toxics         26 Mar 2012           Toxics         26 Oct 2011           Trash         7 Jul 2009



Ventura River Estuary	Trash	6 Mar 2008	6 Mar 2016
Ballona Creek	Trash	28 Aug 2002	30 Sep 2015
Legg Lake	Trash	6 Mar 2008	6 Mar 2016
Los Angeles River, Estuary, & Tributaries	Trash	23 Sep 2008	30 Sep 2016
Lake Elizabeth, Munz Lake, & Lake Hughes	Trash	6 Mar 2008	6 Mar 2016
Revolon Slough, Beardsley Wash	Trash	6 Mar 2008	6 Mar 2020