

MEMO

TO: Accelerate Resilience L.A. (ARLA)

FROM: Craftwater Engineering, Inc. and Emergent Strategy

SUBJECT: Listening Sessions Takeaways

DATE: July 28, 2021

As part of its Safe Clean Water Program (SCWP) Working Group Project (Project), Accelerate Resilience L.A. (ARLA) wanted to ensure that key stakeholder groups were engaged early in the Working Group process. Craftwater Engineering, Inc. and Emergent Strategy (members of the Technical Team) and ARLA conducted fifteen listening sessions with a subset of key stakeholders, consisting of participants from the L.A. County Board of Supervisors' (Board) offices, the Regional Oversight Committee (ROC), the Scoring Committee, and the Watershed Area Steering Committees (WASCs) as part of the early engagement process. The intended outcomes of the listening sessions were to: 1) inform key stakeholders and decision makers about the Project early in the process to ensure they were aware of the effort; 2) describe the coordinated effort and partnership between ARLA and the L.A. County Flood Control District (District or LACFCD); and 3) gather feedback on perceptions and values about SCWP Goals, definitions of SCWP success, and input on metrics to inform the Working Group and maximize the impact and applicability of the final recommendations.

The following sections summarize the questions asked and feedback received during the process, including the areas of general agreement or disagreement and where participants made noteworthy, unique, or specific comments. This document serves to capture the highlights of the discussion rather than a transcript of each call. Participants were asked questions related to:

- Defining success for the SCWP (Section 1.0) and identifying the SCWP Goals most important to the success of the Program (Section 2.0);
- Evaluating the types of multi-benefit projects that can help the County best achieve the SCWP Goals (Section 3.0);
- Identifying existing challenges to achieving or maximizing success of the SCWP (Section 4.0); and
- Evaluating the largest barriers and greatest opportunities for maximizing Nature-Based Solutions (NBS), Disadvantaged Community (DAC) Benefits, water supply, and community engagement (Section 5.0).

The listening sessions were conducted between February 2021 and April 2021. Deborah Bloome (ARLA) and Bethany Bezak (Emergent Strategy) facilitated the conversations to inform participants of the Working Group process and to gather feedback on the SCWP, and Pauline Nguyen (Craftwater Engineering) took meeting minutes and synthesized key takeaways for the Working Group. **Table 1** displays the list of key stakeholders interviewed during the listening sessions. Additional stakeholder engagement with the entities outlined in Table 1 is anticipated once initial modeling results are completed and following the final Working Group recommendations in early 2022.

Overall, participants applauded the District's work developing the SCWP and commitment to funding and implementing stormwater management in the coming decades. Participants generally agreed that applicants would benefit from additional clarity and guidance to advance the SCWP Goals and highlighted the importance of multi-benefit projects to provide community investment benefits. However, participants also noted the challenge of striking a balance between nongovernmental organizations' (NGOs) desire for multi-benefit projects that meet community needs and cities' needs to prioritize and achieve regulatory compliance. Participants also expressed diverging opinions about definitions, allocation of funds, and how best to maximize SCWP success. The following sections provide a summary of key takeaways from the discussions organized by the topic areas noted above.

Table 1. Key SCWP stakeholders interviewed during listening sessions.

Participant Name	Position/Organization	SCWP Role/Relationship
Anish Saraiya	Planning and Public Works Deputy for	
	Supervisor Kathryn Barger (District 5),	Board of Supervisors
	L.A. County Board of Supervisors	
Daritza Gonzalez	Public Works Deputy for Supervisor	
	Janice Hahn (District 4), L.A. County	Board of Supervisors
	Board of Supervisors	
Katy Young Yaroslavsky	Deputy for the Environment and the	
	Arts for Supervisor Sheila Kuehl (District	Board of Supervisors
	3) L.A. County Board of Supervisors	
	Senior Deputy, Environmental Justice	
Laura Muraida	for Supervisor Holly J. Mitchell (District	Board of Supervisors
	2), L.A. County Board of Supervisors	
Waqas Rehman	Director of Planning and Development	
	for Supervisor Hilda L. Solis (District 1),	Board of Supervisors
	L.A. County Board of Supervisors	
Carl Blum	LA County Flood Control District	Regional Oversight Committee
		(non-voting member)
Elva Yanez	Prevention Institute	Regional Oversight Committee
Kristine Guerrero	League of Cities	Regional Oversight Committee
Lauren Ahkiam	LAANE	Regional Oversight Committee
Shelley Luce	Heal the Bay	Regional Oversight Committee
Jill Sourial ¹	The Nature Conservancy	Scoring Committee
Matt Stone	Santa Clarita Valley Water Agency	Scoring Committee
TJ Moon	LA County Public Works	Scoring Committee
Madelyn Glickfeld	Institute of the Environment and	
	Sustainability at the University of	North Santa Monica Bay (NSMB) WAS
	California, Los Angeles (UCLA)	, , , , , , , , , , , , , , , , , , ,
Melissa Bahmanpour	River in Action	Lower L.A. River (LLAR) WASC

 $^{^{1}}$ Ms. Sourial was a Scoring Committee member at the time of this interview but has since left the position.

1.0 DEFINING SUCCESS FOR THE SCWP

Participants were asked how they envisioned success for the SCWP in the short term (within 1-5 years) and long term (within 10 years).

In the short term, participants, regardless of affiliation, referenced a desire for ensuring Program delivery of the intended Goals. Participants pointed out the need for policies, procedures, practices, and conventions for the pipeline of project applications so that everybody has clear direction and agrees to what a successful application looks like. For example, one participant noted that the current scoring criteria, which came out of a year-long stakeholder process, has a lot of flexibility but also ambiguity due to the disagreement between municipalities and NGOs. The participant noted that the current scoring criteria needed significant political cover for approval; as a result, there is residual disagreement surrounding definitions and the current scoring guidelines. Overall, to improve the near-term success of the SCWP, the vast majority of participants believe that applicants would benefit from additional clarity and guidance to ensure that the SCWP Goals are advanced in the next several SCWP funding cycles of projects.

Many participants, regardless of affiliation, emphasized the importance of multi-benefit projects that are beneficial for communities and that integrate communities into the process. Because traditional stormwater infrastructure is usually hidden underground (sometimes limiting Community Investment Benefits, or CIB), some participants noted the importance for multi-benefit projects to be *tangible* and *visible* to the community, whereas others broadened their definition,

commenting that it does not matter whether these multi-benefit projects are above ground or below ground. Several participants expressed their hope that SCWP projects would be able to spearhead the creation of stormwater-related green jobs as well as develop a skilled workforce that is able to successfully operate and maintain these new types of infrastructure. Both municipal and NGO participants also highlighted the need for more partners to be a part of the Program (e.g., Metro, Caltrans, school districts) and to diversify funding potential through Measures W, H, A, and M (WHAM), especially because Measure W alone does not generate enough money to achieve success in all fourteen SCWP Goals.

In the long term, participants representing municipalities noted that the water quality requirements in the Municipal Separate Storm Sewer System (MS4) permit are a critical issue and that it is important to ensure that the actions taken today through the implementation of the SCWP assist municipalities with meeting the MS4 permit requirements. With the commencement of the SCWP in FY 2019-2020, and with water quality being one of the SCWP's fourteen goals, MS4 permittees are interested in leveraging both regional and municipal funding from the Program to help meet their compliance requirements. Prior to the SCWP, most MS4 permittees did not have a dedicated source of funding solely for stormwater management, unlike drinking water or wastewater utilities that rely on ratepayers; rather, they have had to rely on general funds and outside grants. Others representing municipalities emphasized the importance of projects meeting water quality compliance while having multiple benefits. One participant noted that they feared that the water quality goal is taking a backseat in the Program and emphasized that the other SCWP Goals should be subsidiary to the water quality goal to ensure that this key criterion is met. With many people interested in using the SCWP to further goals related to nature, rehabilitation, water supply benefits, and placing projects where they benefit communities, the participant expressed concern that the water quality goal will get lost and projects will not be placed in locations that capture the most pollutants to maximize water quality improvements.

In the long term, participants representing NGOs generally commented that they would like to see thoughtful design of projects in collaboration with communities. Many of the NGO participants expressed their desire to have upfront, intentional thinking from project applicants to use NBS to help achieve water quality and water supply goals in the long-term; they noted that initial SCWP funding cycles of projects appeared to have nature-based attributes "tacked on" to score higher than they would have otherwise scored without them (i.e. projects may not be maximizing the full NBS benefits compared to projects in which NBS was integrated into the design from the project concept). Others also mentioned that it would be beneficial to strike a balance between guidance/specificity for incorporating green aspects while recognizing there are times and places where there is a reason to have more traditional Gray Infrastructure. In addition, NGO participants noted that they wanted to shift the paradigm of how projects are conceptualized and fed into the "pipeline of projects" within municipalities' Capital Improvements Project (CIPs) programs so there is long term development of NBS/CIB projects.

Other comments include the following:

- One participant hoped to be able to quantify the volume of infiltration expected from Countywide implementation of the Program as well as the increase in perviousness (i.e., how much of the County had pavement removed due to this Program). Another participant made a note that work involving NBS will most likely require a different approach than traditional large scale labor agreements because small, distributed projects have different labor forces and therefore, require different project and labor structures.
- Several participants stressed the need for community engagement, equity, providing DAC Benefits, and understanding community needs when conceptualizing projects and throughout the project lifecycle.
- One participant noted that successful project implementation that achieves project applicants' anticipated benefits will be crucial to ensuring the long-term success of the SCWP. This track record of experience will improve in the way projects are conceived and implemented within the Program over time. The participant made note of the differences in the amount of reported information between project applications in different project phases (planning vs. design vs. construction). The participant questioned whether there should be more focus on frontend work for projects before they can apply for funds (e.g., a study initiative funding pool). Another participant

added that scoring project applications in different phases against each other is a current challenge within the Scoring Committee.

2.0 SCWP GOALS MOST IMPORTANT TO SUCCESS OF PROGRAM

Table 2 displays participants' responses to the question: "What SCWP Goal(s) are most important to the success of the Program?"

Table 2. Participants' responses to "What SCWP Goal(s) are most important to the success of the Program?"

SCWP Goal Letter	SCWP Goal Title	Number of Times Mentioned
Α	Water Quality	6
В	Water Supply/Drought	5
M	Promote Green Jobs/Career Pathways	4
J	DAC Benefits	4
С	Improve Public Health (Community Investment Benefits)	3
Н	Adoption of New Technologies	3
I	Invest in Scientific Research	3
F	Prioritize Nature-Based Solutions	2
N	Ensure Ongoing O&M for Projects	2
E	Invest in Multi-Benefit Infrastructure	1
G	Spectrum of Project Sizes	1
K	Regional Program Funds Benefiting Each Jurisdiction	1
D	Leverage Funding	0
L	Implement an Iterative Planning and Evaluation Process to Ensure Adaptive Management	0

ARLA's SCWP Working Group's prioritized goals generally align with responses from the stakeholder participants. **Overall, participants agreed upon the key goals of greatest importance for SCWP success being Water Quality, Water Supply/Drought, Promote Green Jobs/Career Pathways, and DAC Benefits.** The other goals (less mentioned or not mentioned) were considered relevant but perhaps secondary to the importance of implementing those listed above.

Participants who noted Goal H (*Adoption of New Technologies*) as being important to the success of the Program made the following points:

- The County should bring the best engineer and innovative thinkers to talk about how to encourage innovation/technology and what to do to remove disincentives;
- There is currently no vehicle for adoption of new technologies or incentive for entities to try to install new technologies;
- Guiding technological development would lead to a great return on investment in the long term for the SCWP;
- New technologies require appropriate training and development of new skill sets for operations and maintenance, which can often take several years to build – from a public municipality perspective, the ability to have adequate maintenance for new technologies outside of typical standard practice needs to be considered; and
- It will be important to demonstrate the effectiveness of real-life technologies in field situations and assess what technology proved to be more resilient, how proprietary in-ground projects perform, and whether new technologies delivered the anticipated benefits.

Participants who noted Goal I (Invest in Scientific Research) made the following points:

- No study is being done of what scientific studies are needed;
- There is no discussion of research related to innovation; and
- There would be benefits to involving faculty from academic institutions, such as UCLA.

Regarding Goal A (*Water Quality*), one participant noted that projects that can capture the 85th percentile storm often score the best under the current scoring criteria due to the language in the 2012 L.A. County MS4 Permit, which aligns with one of the key metrics the Working Group is modeling.

3.0 MULTI-BENEFIT PROJECTS TO BEST ACHIEVE SCWP GOALS

Table 3 displays participants' responses to the question: "What types of multi-benefit projects best achieve SCWP Goals?" Overall, participants viewed parks, green streets, wetlands, underground storage facilities, and schools as the most effective multi-benefit projects. Some participants indicated that they desired a range of multi-benefit projects so long as the projects advanced several of the SCWP Goals; those comments are not reflected in Table 3 below.

Table 3. Participants' responses to "What types of multi-benefit projects best achieve SCWP Goals?"

Multi-Benefit Project Type	Number of Times Mentioned
Parks	4
Green Streets	4
Wetlands	2
Underground Storage Facilities	2
Schools	2
Open Spaces	1
Medians	1
Distributed Projects on Private Properties	1
Wastewater Treatment Plants*	1
Ecosystem Restoration	1
"Visible" Projects	1
Bike Lanes	1
Green Alleys	1

^{*}One participant noted that wastewater treatment plants have more capacity to treat stormwater because of conservation, which has resulted in less sewage inflows into wastewater treatment plants. However, the participant noted that it is also important to not eliminate all flows from rivers in order to sustain ecosystem benefits (e.g. not all flows from rivers should be diverted to a wastewater treatment plant even if those plants have more capacity due to conservation). The participant noted that this may be one of the best solutions for those watersheds that have polluted groundwater basins.

Participants noted the following example "inspirational" multi-benefit water capture projects that have been implemented in L.A. County which may serve as examples for future implementation:

- Bassett Park
- Compton Creek Blvd Project
- East LA Stormwater Median
- South LA Wetlands

Participants offered the following commentary around multi-benefit projects to best achieve SCWP Goals (**bold formatting** is added for emphasis):

- Several participants noted that parks are most popular with politicians and WASCs, as well as school projects. With
 regard to park projects, it is great to have infiltration galleries with park space that creates multi-use open space
 on top. Further, two participants noted that school projects were the type of multi-benefit projects that were
 envisioned to come out of the SCWP, as there are only so many parks that entities can improve, and there may not
 always be opportunities at a park;
- Another participant noted that any project that can provide the most benefits related to Water Quality, Water Supply, and Community Investment Benefits, regardless of whether people can see them or whether they are "good looking," is a good multiple benefit project;
- A participant added that locations where affordable/workforce housing are proposed could be opportunities for co-funding to transform vacant/underutilized spaces; and
- 40 percent of participants from the Board of Supervisors' offices independently and voluntarily indicated that **leveraging funding through WHAM** will be crucial to ensuring implementation of multi-benefit projects.

3.1 Nature-Based Solutions

The SCWP Goal related to Nature-Based Solutions was regularly discussed during the listening sessions given its ability to provide triple benefits (Water Quality, Water Supply, and Community Investment Benefits).

Generally, participants representing municipalities commented that flexibility is important for achieving NBS benefits by providing the best value and implementing the right project in the right space. Participants indicated NBS benefits are best achieved when they can incorporate these elements into projects rather than trying to force NBS onto every project. The potential to implement NBS depends on the project and its location, and participants indicated that it is important to consider each project's site characteristics and constraints. The cost effectiveness of projects was discussed, and it was recommended that the definition for NBS be updated to be precise and falsifiable (i.e., designs and benefits must be able to be tracked to real NBS outcomes to ensure that the project is achieving the benefits).

Generally, participants representing NGOs noted that Nature-Based Solutions (vs. Nature-Mimicking Solutions) needed to be better defined so that projects could maximize investments in specific areas. Generally, NGO participants indicated that NBS projects are more desirable than Nature-Mimicking Solutions given its ability to intrinsically provide Water Quality, Water Supply, and Community Investment Benefits rather than only Water Quality and Water Supply Benefits. Several participants noted that Nature-Based Solutions may not always be feasible due to the highly-urbanized conditions in L.A. These participants acknowledged that it is difficult for some places to incorporate NBS due to infiltration challenges, so there should be a way to incorporate flexibility into the guidelines while still prioritizing projects that have Water Quality benefits built into NBS rather than "tacked-on" NBS attributes, such as walkways with a few trees added. The topic of equity and scale was raised related to NBS benefits with participants noting the importance of projects bringing benefits to the community.

One participant noted that infiltration-based projects should be considered NBS, but only if there are also above ground elements, such as bioswales with vegetation and porous pavement. The participant commented that none of the projects that have gone through the scoring process have qualified as "best" under OurWaterLA's NBS ranking in the Municipal Transfer Agreements. It was suggested that the "best" category be revised to consider what is realistic and achievable because if it is difficult for any project to achieve the "best" category, and this unobtainable standard could constrain agencies. Given that L.A. County is very developed, the participant noted this update needs to be considered.

4.0 EXISTING CHALLENGES TO ACHIEVING OR MAXIMIZING SUCCESS OF THE SCWP

The responses surrounding existing challenges to achieving or maximizing the success of the SCWP generally fell into the following categories, with each being elaborated further in their subsequent sub-sections:

Checks and balances within the SCWP;

- Clarity in application process;
- Coming to a consensus on Program Goals;
- Community engagement;
- Financial costs; and
- Land opportunities.

4.1 Checks and Balances Within the SCWP

Many participants emphasized administrative challenges related to the governance of the SCWP as a barrier to achieving success of the SCWP, noting the desire for the Program to be structured to maximize delivery of goals. One participant noted that the ROC currently has a lack of authority in terms of being an arbitrator of scoring and that the ROC's influence on County staff or Board of Supervisors' decisions is unclear. Further, participants commented that having a system of checks and balances is a current challenge and needs to be addressed over time (e.g. what is the right amount of power to give to a certain committee given that the make-up of a committee will change over time?).

Several participants indicated that multiple agencies and approvals for projects is complicating the implementation of the Program. One participant noted that there are many agencies (e.g. cities, partners, community groups) involved with the SCWP and each has a different system in place for approval of projects. With many entities involved, it is difficult to ensure the priorities and needs of the Program are being met (although the inclusivity of the Program promotes diversity of voices). Another participant added that there are certain entities embedded in each stage of the scoring; for example, people who are scoring the projects are critiquing at a later stage during WASC meetings (e.g. representatives on the Scoring Committee are also part of WASCs).

Last, one participant commented that the lack of institutional and historical knowledge regarding the SCWP at the Board of Supervisors level is a challenge. For the Program to be successful, it was noted that these entities need to be familiar with SCWP and be advocates to keep the Program adaptively managed over time.

4.2 Clarity in Project Application Process & Scoring Criteria

Several participants commented on the need for more clarity in the application process, particularly related to CIB, jobs, and operations and maintenance (O&M). It was noted that many "judgment calls" are being made in the Scoring Committee and WASCs around Community Investment Benefits. Project applicants are asked to provide a short narrative describing added CIB, with no specific guidance on what should be included or how the benefits should be quantified. The review committees would benefit from quantification of these benefits, so they can examine the baseline and change in benefits due to project implementation (as well as potential weighting of community benefits). Several participants suggested that different scoring criteria for different Watershed Areas may be needed, as different watersheds vary in their needs and geological constraints.

Additional comments included the following:

- A participant commented that the first two SCWP funding cycles of project applications were rushed, and that
 many applications were incomplete. The participant highlighted the need for more developed projects to apply for
 Infrastructure Program funding;
- One participant noted that scoring weights should be adjusted to emphasize community benefits more;
- One participant added that there is inadequate understanding from project applicants on how to implement a
 project with certain jobs and O&M components; more specific questions and guidance were suggested to be
 incorporated into the application process to clarify who the responsible entity is for maintenance; and
- One participant added that it would be helpful for the Board of Supervisors' offices to understand what projects
 are in the queue (i.e., scheduled through an existing Watershed Management Program (WMP) or Integrated
 Regional Water Management Plan (IRWMP) process) to help them contextualize what has already been decided as
 a higher priority project for other reasons.

4.3 Coming to a Consensus on Program Objectives

Several participants noted tension between competing interests, notably between municipalities and NGOs. Some participants noted that cities need to achieve MS4 compliance, while community-based organizations (CBOs) and NGOs emphasize multi-benefit projects related to community needs. Several participants noted that bringing everybody to the same understanding and coming to a consensus on the SCWP objectives is challenging because there are fourteen SCWP Goals to fulfill.

Additional comments specifically related to administration included the following:

- Program Assessment—One participant emphasized that the Program should be run based on what was agreed to
 and placed in the Ordinance. This participant noted that it may take several years to determine how the Program is
 functioning, after several funding cycles of projects have been implemented.
- Program Goals related to Permit(s)—One participant highlighted that the Regional MS4 Permit adopted by the L.A.
 Regional Water Quality Control Board contains language regarding the multiple benefits of SCWP. Therefore,
 Permittees (i.e. municipalities) are encouraged by regulatory authority to build projects in alignment with SCWP
 Goals.
- Program Administration related to Cost Effectiveness—One participant indicated that cost efficiency needs to be
 considered and suggested that a set percentage of Regional Program funding could be dedicated toward Gray
 Infrastructure that may be able to fulfill Water Quality and/or Water Supply Benefits most cost-effectively. Others
 noted that cost-benefit analysis should be considered for the full range of Program Goals.

4.4 Community Engagement

Participants generally commented that not enough community engagement is being conducted at this time or in a way that meaningfully ensures that community feedback is incorporated. However, several participants recognized that municipalities are reluctant to include residents in project conceptualization or early development if funding has not been committed to the project yet. Participants noted that although the County conducts many public hearings, the feedback from the community is not being considered as quickly as the community would like. In addition, one participant noted that in higher income areas some green street projects are being opposed by residents, which further emphasized the need for education and engagement. Some participants suggested that WASCs organize field visits to communities to be able to hear residents' priorities and preferences directly.

4.5 Financial Costs

Participants noted the extremely high financial costs of implementing Watershed Management Programs (WMPs) or Enhanced Watershed Management Programs (EWMPs), with some programs estimating infrastructure costs to meet Total Maximum Daily Load (TMDL) requirements and deadlines to be in the billions of dollars range. One participant noted a need for equitable funding distribution to all cities to achieve the SCWP Goal K (proportionally benefiting municipalities). Another participant commented on their frustration at the lack of resourcing from other funding measures (i.e., WHAM) or even federal infrastructure dollars to leverage other related infrastructure opportunities.

4.6 Land Opportunities

Many participants noted the lack of undeveloped publicly-owned land for stormwater capture opportunities, as well as the pace of obtaining land, as a challenge. One participant noted that private property offers additional opportunities but that it will be a challenge for cities to integrate stormwater capture solutions into local neighborhoods (given the necessary buy-in and participation from private property owners). The participant stated that although it is challenging for cities to build small-scale projects on a distributed basis, that is what cities should be doing. The participant also noted that it takes many years for cities to complete a project due to the decentralized nature of city agencies (i.e., there is no sole leader in charge).

5.0 GREATEST BARRIERS & OPPORTUNITIES FOR MAXIMIZING NBS, DAC BENEFITS, WATER SUPPLY, & COMMUNITY ENGAGEMENT

Given the unique challenges associated with maximizing opportunities of multi-benefit projects (i.e., implementing projects which maximize water quality **and beyond**, participants were asked to list the greatest barriers and opportunities for maximizing NBS, DAC Benefits, Water Supply, and Community Engagement. The following sections summarize their responses.

5.1 Nature-Based Solutions

5.1.1 Opportunities

Participants noted the following opportunities for Nature-Based Solutions:

- Parkways on streets, basins, bioswales;
- Large, open spaces provide great opportunities; and
- Some recent guidance on NBS could be used to build upon in the future.
- Note: In some instances, applicable feedback from participants related to NBS opportunities is already provided in the above sections.

5.1.2 Challenges

Participants noted the following challenges related to Nature-Based Solutions:

- Lack of clarity on the definition of NBS;
- Lack of cooperation with various agencies to get projects in the ground (no sole agency in charge);
- Projects are expensive and potentially cost-prohibitive;
- Projects already in the pipeline and created for EWMPs/WMPs don't necessarily include multiple benefits; and
- Varying infiltration rates throughout the County.

5.2 Disadvantaged Community Benefits

5.2.1 Opportunities

Participants noted the following opportunities for DAC Benefits:

- Conducting outreach and asking communities what topics are critical to them, as well as raising their awareness and sensitivity to detriments in water quality;
- Onboarding of watershed coordinators and the additional resources this will provide;
- The County Parks measure (Measure A) provides a good framework to build on; and
- Significant opportunities exist to make an impact due to historic underinvestment in specific communities.

5.2.2 Challenges

Participants noted the following challenges related to DAC Benefits:

- Lack of clarity on the definition and scoring of DAC Benefits (plus equity);
- Competing community priorities and interests (including lack of education/engagement around stormwater-related issues including water quality);
- Ensuring that projects within DAC areas are accessible and actually provide community benefits to the DACs;
- Ensuring an equitable and effective method and process to identify needs;
- Lack of adequate anti-displacement strategies (e.g., inclusionary zoning, affordable housing, rent control);

- Lack of good mapping to overlay data on stormwater needs, stormwater opportunities, and socioeconomic data;
- Lack of a program to ensure issuance and enforcement of industrial general permits (IGPs), especially given that many DACs are located near industrial areas or undesirable/toxic land uses;
- Lack of research to understand the health, social, economic, racial, and ethnic indicators pertinent to stormwater;
- Potential displacement when widening the footprint of District facilities; and
- Successfully engaging DAC populations to understand what their needs are.

Last, several commenters noted that WASCs are not applying the definition of DAC Benefits consistently. One participant suggested a tiered scoring for projects inside a DAC vs. outside a DAC (full points for being inside a DAC, partial points for being outside of a DAC if the project applicant demonstrates a nexus is established). Some participants suggested that if a project is located upstream of a DAC and is preventing flooding, then that should count as a DAC Benefit. Others disagreed, indicating that flooding is an issue that should have been solved already and that it seems wrong that DACs should be paying for an upstream project even though it is benefiting them. One participant proposed different scoring thresholds for more "regional" benefits, such as water quality/flooding versus Community Investment Benefits which should be located in a DAC (even though flooding is currently categorized as a Community Investment Benefit).

5.3 Water Supply

5.3.1 Opportunities

Participants noted the following opportunities for Water Supply:

- Opportunities and need for surface/water to groundwater models;
- Recycled water projects; and
- Spreading grounds for groundwater recharge projects.

5.3.2 Challenges

Participants noted the following challenges related to Water Supply:

- Clarity on the definition and scoring related to benefits claimed by diverting water to unbuilt water reclamation facilities (benefits may not be realized for many years) and recycled water usage for vegetation irrigation;
- Ability to capture long-term ecological benefits;
- Variations in geography and topography;
- Inability to quantify whether infiltrated water reaches an aquifer managed for beneficial use or not;
- Lack of NGO acceptance for large-scale spreading ground projects through the SCWP (which are currently not seen as multi-benefit);
- Letters from Water Masters, whom ensure that water is allocated according to established water rights, are ambiguous and non-committal;
- Polluted groundwater basins;
- Scoring criteria that favor Watershed Areas with high infiltration potential or proximity to a planned water reclamation facility; and
- Speculative recycled water facilities (where timing is uncertain).

5.4 Community Engagement

5.4.1 Opportunities

Participants noted the following opportunities for Community Engagement:

 NGOs have social infrastructure/experience in engaging with communities and could play a bigger role in reaching out to communities through the Program;

- Sustained engagement and involvement from people who helped pass Measure W and are currently paying for the measure;
- Virtual meetings to engage communities; and
- Watershed coordinator program.

5.4.2 Challenges

Participants noted the following challenges related to Community Engagement:

- County responsiveness to community concerns/inquiries/requests;
- Educating community members on water quality/water supply issues and potentially how Nature-Based Solutions could address multiple problems, including those identified by the community; and
- Myriad topics that community members care about, other than those related to safe, clean water.

6.0 CONCLUSION

Overall, listening session participants commended the County for laying the foundation for a large, complex Program that has enormous potential for funding and implementing stormwater management in the upcoming decades. To summarize, some of the key areas for consideration as the Program matures and evolves include the following:

- Clarity of definitions (DAC Benefits, NBS, etc.);
- Definition of how goals will be quantified, tracked, and determined to have been achieved;
- Balancing competing interests (stakeholder groups, etc.) or drivers (MS4 permit, etc.), while maximizing benefits and tradeoffs;
- Scale up of Program elements in development (education, green jobs, etc.); and
- Administrative governance and roles of various entities (ROC, WASC, etc.).

Areas noted for advancement and refinement by listening session participants are taken into consideration for the SCWP Working Group's final deliverable planned for submission to the County in 2022.