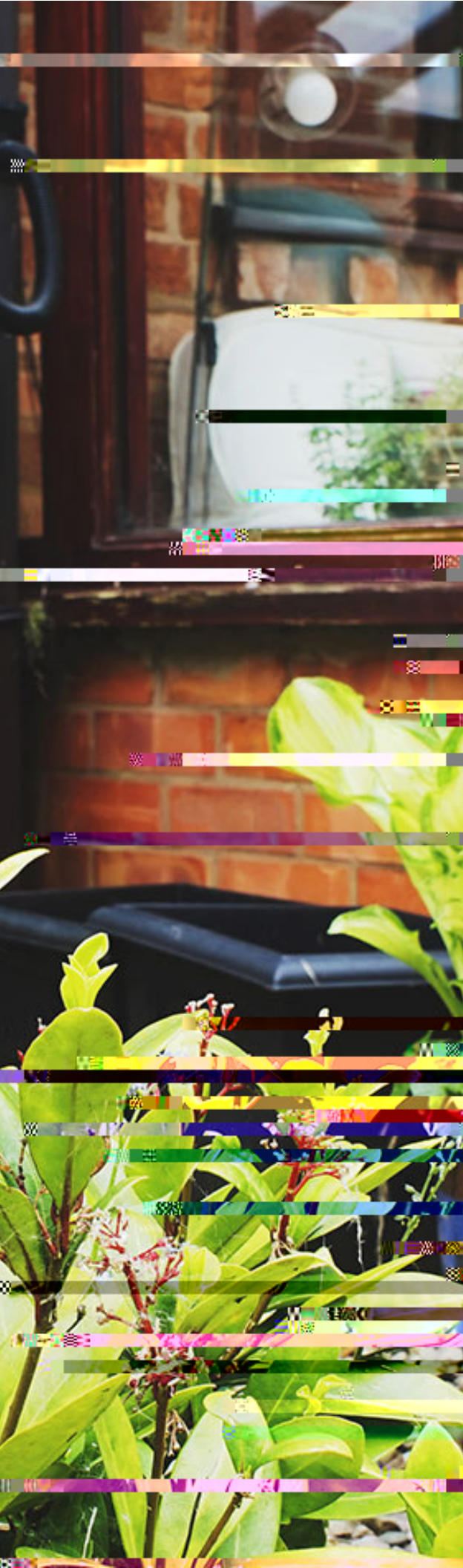


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We acknowledge the Gabrielino/Tongva peoples as the traditional land caretakers of Tovaangar (the Los Angeles basin and Southern Channel Islands). As a land grant institution, we pay our respects to the Honuukvetam (Ancestors), 'Ahihirom (Elders), and 'eyoohiinkem (our relatives/relations) past, present, and emerging.

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Photo sources: SafeCleanWaterLA.org

EXECUTIVE SUMMARY

¹ Chapter 16 of the Flood Control District Code for the Los Angeles Region Safe, Clean Water Program and Special Parcel Tax to Provide for Stormwater and Urban Runoff Capture and Reduced Stormwater and Urban Runoff Pollution: ([Ord. 2018-0044 § 1, 2018](#)).

² [Safe, Clean Water Program Draft Framework Summary](#) 2017.

³ As defined in Chapter 18.02 of the Flood Control District Code for the Safe, Clean Water Program Implementation Ordinance: ([Ord. 2019-0042 § 11, 2019](#))

⁴ Motion by Supervisors Holly J. Mitchell and Janice Hahn, adopted August 10, 2021: [Motion_2004 \(lacounty.gov\)](#)

⁵ LA Sanitation and Environment. (2020). [City of Los Angeles Safe, Clean Water Program Community Outreach and Engagement Strategic Plan](#). Page 5. December 3, 2020.

⁶ Safe Clean Water Program (2022).

processes and that their voices are heard. Finally, distributional justice means that SCWP benefits are equitably distributed so that disadvantaged communities benefit from the program.

The SCWP generally, and Regional Program infrastructure projects specifically, provide three kinds of benefits to our communities: Water Quality, Water Supply, and Community Investment. Each can benefit members of disadvantaged communities, of course, and thus be counted as Disadvantaged Community Benefits that apply to the 110% threshold for proportional investments in disadvantaged communities.


If disadvantaged communities must understand these benefits to recognize them, it logically follows that education about the SCWP is crucial along with community engagement. Good community engagement is a two-way street. It is listening to community members as they educate the SCWP about the benefits they would like to see from projects. And it is educating community members about the capacity the program has to provide benefits to communities.

This is especially true for Community Investment Benefits, which are defined broadly as “a benefit created in conjunction with a Project or Program, such as but not limited to: improved flood management, flood conveyance, or flood risk mitigation; creation, enhancement or restoration of

⁸ As defined in Chapter 6.03 of the Flood Control District Code for the Safe, Clean Water Program Implementation Ordinance: ([Ord. 2019-0042 § 11, 2019](#))

⁹ Within the Regional Program, the [2019 Feasibility Study Guidelines](#) describe the importance of a displacement avoidance plan

ADVICE AND SUGGESTIONS FOR NEXT STEPS

 are not ranked in order of importance, but arranged to follow the flow of the SCWP's implementation process.

¹⁰ At the time of this report, the WaterTalks Strengths & Needs Assessment is not available online. Contact TreePeople for more information.

community engagement for one project can be used for subsequent projects in the same community to alleviate engagement fatigue in communities. This tool could be used in all communities, not just disadvantaged ones, and the data could provide a starting point for engagement between those implementing projects within, or aspects of, the SCWP and members of communities. The WaterTalks tool also offers good lessons on how to assign data into manageable categories and put appropriate boundaries around the needs, risks, and vulnerabilities relevant to the SCWP.

Both of the processes recommended here — the needs assessment map and community survey tool — can and should be used to develop appropriate metrics for guiding project development and evaluating project proposals, making decisions about funding projects, and evaluating project

The LACFCD has published interim guidance that

in disadvantaged communities. Proponents who employ one of these pre-qualified organizations would be strengthened in their claim of authentic community engagement.

The formal role of representing the interests of communities is held by elected government officials in our democracy. But they have not widely been engaged to serve this need in the SCWP to date.

outcomes and impact at the project, watershed area, and program levels, ideally conducted by a third party, of projects and programs funded through the SCWP.

At the project level, metrics for measuring what is recommended here could be as simple as: Are a project's benefits based on data about needs? And are they recognized by the community? At the watershed area and program level, the metric could be as simple as the percentage of projects and investments that provide Disadvantaged Community Benefits. While recognizing that the SCWP measures and reports this metric at the Watershed Area scale, we believe that rolling up this metric to the entire SCWP could also provide a useful metric of programwide Disadvantaged Community Benefits. Though the program does not currently plan for or evaluate a programwide investment threshold for disadvantaged communities, one can easily be calculated from the sums of the nine Watershed Areas.



benefits for disadvantaged communities at some of these wider scales.

Given this spatial distribution of disadvantaged communities in Los Angeles County, and the increased need in severely disadvantaged communities, where the median household income is less than 60% of the statewide median, and where 21% of the county's residents live, we recommend that the LACFCD consider whether it is feasible to modify policies to acknowledge and prioritize severely disadvantaged communities,

RESEARCH THAT LED TO OUR ADVICE

In the next four sections of our report, we provide an overview of the research that led to the advice we have offered. First, we review the SCWP's provisions for community engagement and equitable implementation. Then we provide an analysis of projects approved so far by the SCWP through an equity lens. A review of pertinent literature follows. And then we summarize the stakeholder engagement process that we used as part of the research informing this report. This is followed by a brief conclusion, references, and appendices.

As noted on the SCWP website, the LACFCD Code was originally amended in 2018 to add Chapter 16, which establishes the SCWP, and amended

¹⁴ As authorized by Section 2, subsections 8a-8c of the [Los Angeles County Flood Control Act](#), as amended by Assembly Bill 1180 (2017).

facilitate compliance with this requirement,
the District will work with stakeholders and

transparency on centralized project scoring at the state level and no localized voting at all.

That said, currently, there are no specific ways to evaluate how the SCWP is implementing community engagement. Community engagement is so crucial for the equitable implementation of the SCWP that many of our recommendations focus on how to improve the measurement and implementation of community engagement in the program.



Community Engagement

Most program stakeholders agree that community engagement in project development, selection, and implementation is essential to the success of the SCWP. Research on community engagement, urban greening, water resources, and stormwater projects in Los Angeles County, however, has identified problems with community engagement with these projects, particularly in disadvantaged communities. Moreover, as noted above, while the Scoring Committee and WASCs do assess project proponents' statements about community engagement, the Scoring Committee and WASCs do not assess the quality of the community engagement process. The Scoring Committee and WASCs also do not assess the quality of the community engagement process in disadvantaged communities.

engage communities by building deeper rapport and reliance between those implementing the program or projects and community members (SCOPE 2021). The report also suggests that the SCWP further facilitate community and individual agency and ownership of program outcomes in disadvantaged areas of Los Angeles as well as provide compensation for community expertise. The Accelerate Resilience Los Angeles Working Group report furthers this recommendation by suggesting that the LACFCD should implement a Community Engagement Program that involves grassroots and community narratives. It also suggests that the Board of Supervisors fund CBO and NGO engagement to inform SCWP projects through surveys, needs assessments, and overall consultation (ARLA 2022).

Further, SCOPE's report emphasizes the need

Category	Median Household Income	Percentage of Population
California Statewide	\$75,235	—
Disadvantaged Community	\$60,188	42%
Severely Disadvantaged Community	\$45,141	21%

we used the American Community Survey’s 2015–2019 5-year survey population and median household income data at the block group level for L.A. County. A disadvantaged community is a block group where the median household income is 80% or below the statewide median household income of \$75,235 (2015–2019), as seen in Figure 1.

We found that 42% of the population in L.A. County lives in a disadvantaged community block group and 21% lives in a severely disadvantaged community block group.

The SCWP’s requirement that “[Disadvantaged Community] Benefits shall not be less than one hundred and ten percent (110%) of the ratio of the [Disadvantaged Community] population to the total population in each Watershed Area” is measured at the Watershed Area Scale. The proportion of the Disadvantaged Community population to the total population in each Watershed Area varies, ranging from 0% in the Santa Monica Watershed to 75% in the Lower Los Angeles River Watershed. Each of the Watershed Areas is meeting or exceeding this goal according to the SCWP.

While recognizing that the SCWP measures and reports this metric at the Watershed Area scale, we believe that rolling up this metric to the entire SCWP also provides a useful metric, which would suggest that at least 46% of SCWP funding would need to provide Disadvantaged Community Benefits to meet the program’s goal. Though the program currently does not plan for or evaluate a programwide investment threshold for disadvantaged communities, one can easily be calculated from the sums of the nine Watershed Areas.

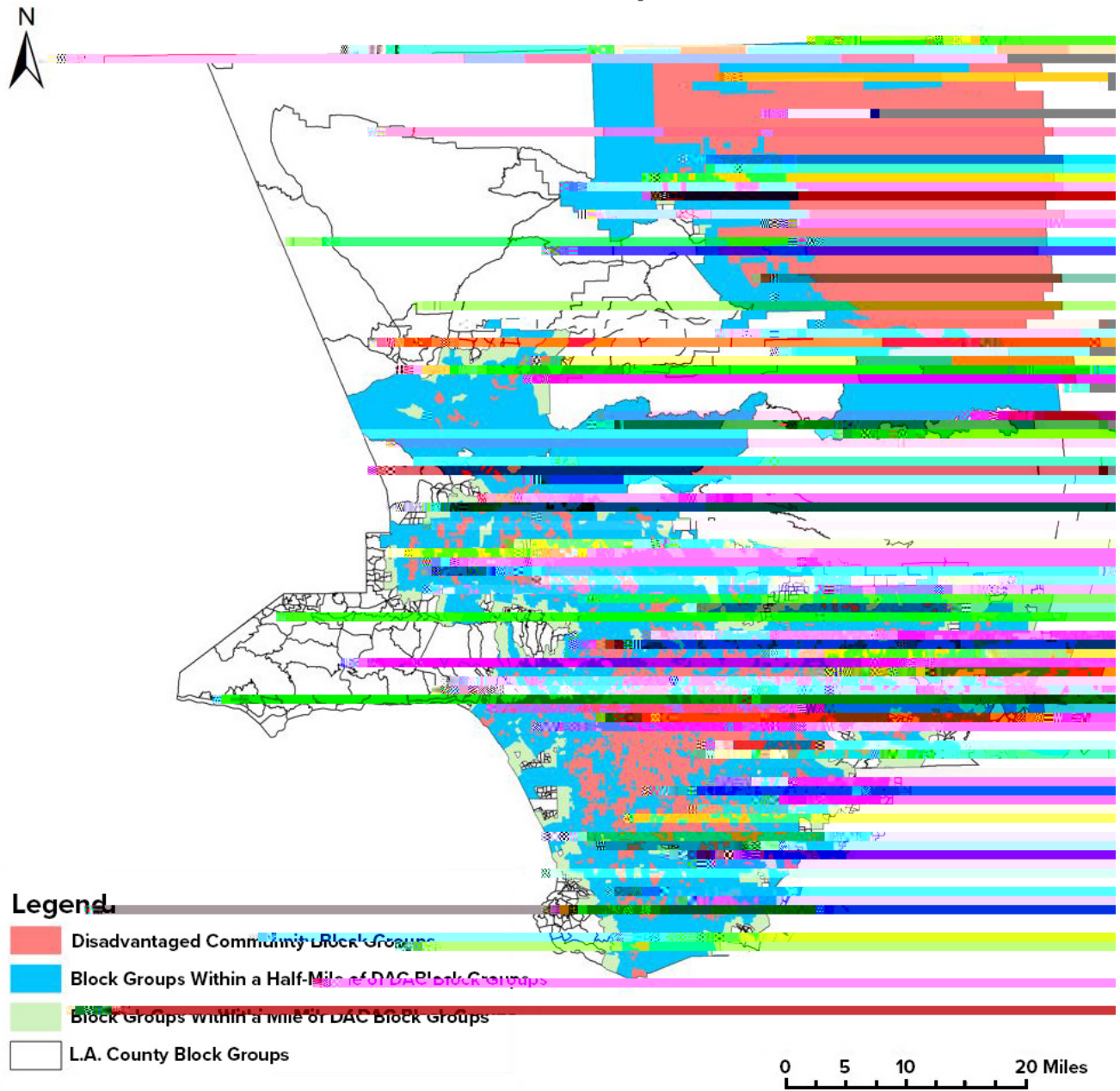
To understand how the SCWP is performing using this metric, we analyzed all 116 funded SCWP Regional Program projects from fiscal years 2019–20 and 2020–21, including 78 “infrastructure” projects and 38 “technical resource program” projects. Using the Safe Clean Water Portal, we identified 78 projects — 59 infrastructure and 19 technical resource projects — that claimed the provision of disadvantaged community benefits. Analysis of these projects suggests that the SCWP is greatly exceeding its equity goal of 46% of funding benefiting disadvantaged communities, with 79% of funding claiming to benefit disadvantaged communities, as seen in Figure 2. However, only 36% of the investments are actually located within disadvantaged communities. The other 43% of investments are in projects that claim to provide benefits directly to a disadvantaged community population while being located outside those communities.

As noted above, there is no precise structure in the SCWP that determines how project proponents can claim a disadvantaged community benefit. Proponents can claim a disadvantaged community benefit if a project is located within the physical boundaries of a disadvantaged community or if the project is “providing benefits directly to” a disadvantaged community population. Evaluating and concurring with a claim by a project proponent is the responsibility of the WASCs, and with the adoption of a Stormwater Investment Plan, those projects and their claims of Disadvantaged Community Benefits are formally accepted.

To understand the spatial relationship between projects and disadvantaged communities, and

to help inform discussions about the potential spatial distribution of benefits, we analyzed the investment totals for projects with respect to their proximity to disadvantaged communities, as shown in [Figure 10](#). We analyzed the proximity of projects to census block groups defined as disadvantaged communities according to the SCWP, severely disadvantaged communities as defined in the California Water Code, and those in the top decile of CalEnviroScreen block groups (CESBG 90%–100%), a commonly used metric to identify the communities with the highest pollution burdens, which align with the most disadvantaged communities in California.

We see that across disadvantaged community definitions — if only investments in projects located within disadvantaged communities were counted as providing Disadvantaged Community Benefits — the SCWP would fall short of the overall equity threshold of 46%. However, as we include projects within a half-mile or mile, investment levels substantially exceed this threshold. We

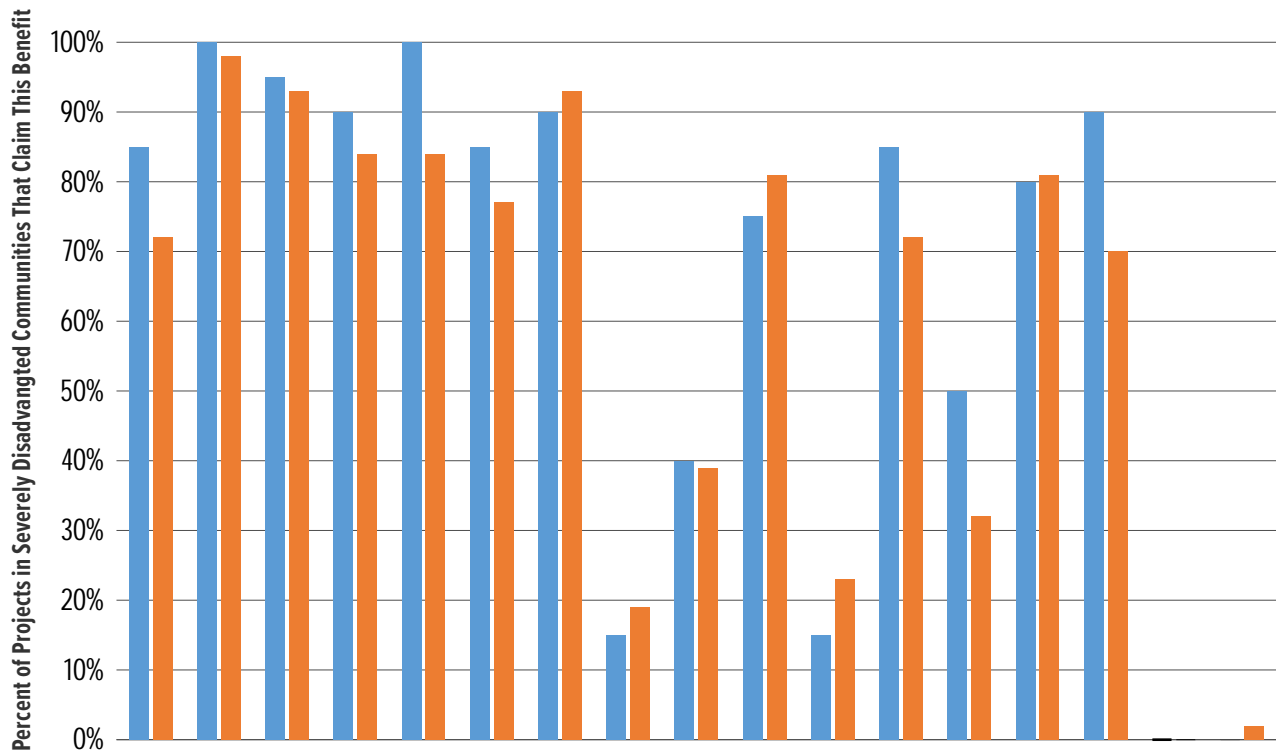


Disadvantaged Community Benefits and Community Investment Benefits

We have found that there is some confusion among stakeholders and others about the relationship between Community Investment Benefits and Disadvantaged Community Benefits in the SCWP. Sometimes, people seem to assume that only Community Investment Benefits can

or should count as Disadvantaged Community Benefits. SCWP policy clearly states, however, that Disadvantaged Community Benefits can be derived from “Water Quality Benefit, Water Supply Benefit, and/or Community Investment Benefit located in a Disadvantaged Community or providing benefits directly to a Disadvantaged Community population.”

While each topic of focus in this study is complex and intertwined, the subject of Community



increasing green space locally (labeled “Green Space for Community” in this chart), implementing a displacement avoidance strategy throughout all phases of project implementation, providing green job opportunities, and prioritizing Indigenous partnerships. This chart displays the benefits claimed by projects that were located directly in a disadvantaged community (blue) or within 0.5 miles or less of a disadvantaged community (orange). We found 30 additional projects within 0.5 miles of disadvantaged communities for a total of 65 projects. We did not include an additional 13

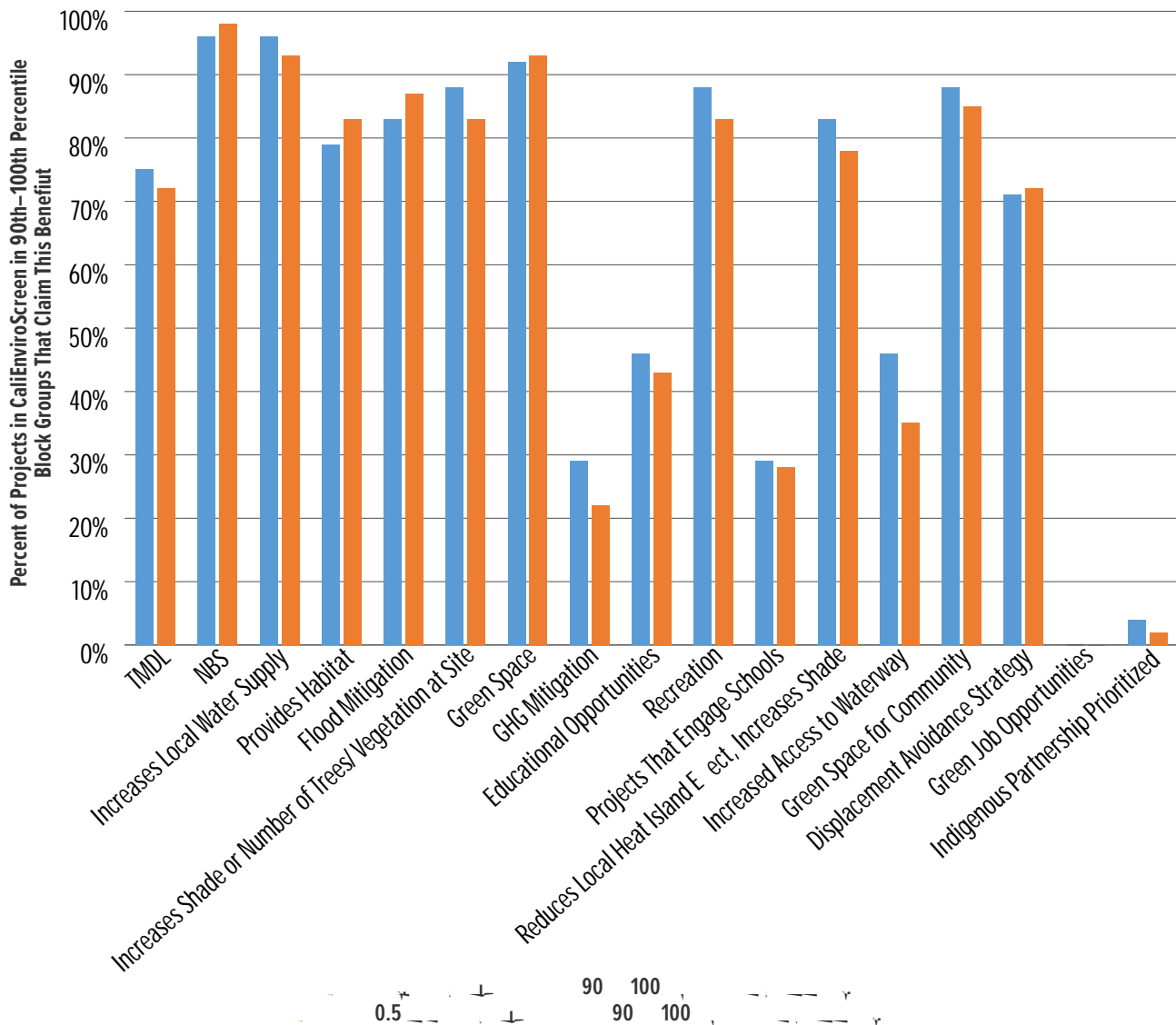
projects that claimed Disadvantaged Community Benefits but were located more than 0.5 miles from a disadvantaged community.

We found 20 projects located directly in severely disadvantaged communities that claimed Disadvantaged Community Benefits at different rates $\frac{5}{10}$. Benefit types (language pulled from SCWP applications, besides Indigenous partnerships) include TMDL implementation, projects that use NBS, an increase in local water supply, new or restored habitat, flood mitigation measures, increasing shade with trees or other

vegetation in situ, increasing or restoring green space in situ (labeled “Green Space” in this chart), mitigating GHG emissions, education opportunities, new or restored recreational spaces, engagement with local schools, reducing heat island effect and increasing shade locally, increasing waterway access, restoring or increasing green space locally (labeled “Green Space for Community” in this chart), implementing a displacement avoidance strategy throughout all phases of project implementation, providing green job opportunities, and prioritizing Indigenous partnerships. This chart

displays the benefits claimed by projects that were located directly in a severely disadvantaged community (blue) or within 0.5 miles of a severely disadvantaged community (orange). An additional 37 projects were found within 0.5 miles of severely disadvantaged communities.

We found 20 projects located directly in the top decile of block groups in CalEnviroScreen that claimed benefits at different rates. Benefit types (language pulled from SCWP applications, besides Indigenous partnerships)



REVIEW OF PERTINENT LITERATURE

Equity and procedural equity is currently incorporated in

at all. For instance, in a study of three cities, including Los Angeles, strategic areas for green infrastructure development were found to change depending on which of six green infrastructure benefits (including stormwater investments) were prioritized (Meerow, 2019), but this study did not deeply explore equity in outcomes.

Heckert & Rosan (2016) developed a green infrastructure equity index to promote equity planning in Philadelphia. Their results highlighted the need for equitable green infrastructure planning to include both socioeconomic and built environment factors through an accessible, visual tool. Mandarano & Meenar (2017) analyzed the distribution of green stormwater infrastructure (GSI), which includes nature-based solutions, also in Philadelphia. They found that census tracts with

is important to consider equity in procedures, particularly community engagement, regardless of the distribution of outcomes. Procedural equity is thus an independent aspect of environmental justice, but achieving it can also lead to fairer distributional outcomes (Bell & Carrick, 2017; Domingue & Emrich, 2019). It can include a spectrum of activities from co-design of projects to

Allocation of regional fund pool for community-driven project planning.

Requirement of proof of compensation for CBOs and community members to claim community engagement in project selection.

Results of the poll favored the first option of incorporating a requirement of proof of community engagement in project applications. Further, a majority of poll participants aligned with including

to identify Tribal interest and how they want to engage.”

The broad scope of this feedback from stakeholders, along with our research, resulted in our recommendation that the LACFCD work with the California Native American Heritage Commission to carry out the formal governance process to consult all recognized tribal groups in the county regarding tribal engagement and benefits in the SCWP, or in a broader county operational effort.²² This advice is informed by the results of our stakeholder consultations on community engagement generally. We do not think the current requirements for tribal consultations on proposed projects under the California Environmental Quality Act fully satisfy the need for community engagement with tribes on the SCWP and its potential benefits for Native people. The effort carried out by the county’s Chief



APPENDICES



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Nicole Steele - Social Justice Learning Institute

Paola Dela Cruz-Pérez - East Yard Communities for Environmental Justice

Rita Kampalath - LA County Chief Sustainability Office

After reading proposals downloaded from the SCWP portal, the parameters of interest to track Disadvantaged Community Benefits were categorized by the following:

- Total Maximum Daily Load (TMDL)
- Nature-Based Solutions (NBS)
- Water Supply/Retention
- Habitat
- Flood Management
- Shade/Reduces Heat Island Effect
- Green Space
- Reduces Greenhouse Gas Emissions (GHG)
- Education
- Recreation
- School
- Shade/Reduces Heat Island Effect
- Waterway Access
- Green Space
- Green Jobs
- Indigenous Partnerships
- Within a Disadvantaged Community or Severely Disadvantaged Community
- Not Within a Disadvantaged Community or Severely Disadvantaged Community but Within 0.5 miles
- Displacement Avoidance Strategy

Once categories were determined, each project plan was read to determine whether projects were providing that benefit to the community they are located in or near. Within project applications, a table in Section 5: *Community Investment and Local Support Benefits*, provides a general overview of project benefits, which informed data collected from those categories. More information could be found in detail throughout the proposals regarding those project benefit elements.

Beyond the table provided in Section 5 of SCWP project plans, Table A (below) lists the terms that were searched within each project plan (along with any supplemental material that was attached to the plans) to identify benefits. The same terms were searched whether the project was a technical resource project or an infrastructure project.

It is important to note that project descriptions in proposals are not uniform in language. For instance, not all projects detail whether they are directly in a disadvantaged community, nor

Central Santa Monica Bay	53%		